

Briefing

138808/FO/2023: Proposed PBSA Scheme, Charles Street, Manchester

Response to matters raised in objection relating to Paintpots Day Nursery

February 2024

Introduction

1. This statement has been prepared by Turley to provide an overview and response to the concerns raised regarding the potential impacts of the above proposal (“the proposed development”) on Paintpots Day Nursery. Turley are the planning consultants acting for the applicant of the proposed development and owner of the application site, Jadebricks.
2. Paintpots Day Nursery is located within ‘Bracken House’ on Charles Street and directly bounds the eastern boundary of the proposed development. Paintpots Day Nursery is an established nursery for early-year pupils with a capacity of 81 places. The Nursery is open Monday – Friday all year round between the hours of 07:30 – 18:00.
3. On the adjoining boundary between the Nursery and the proposed development is the Nursery’s outdoor play space for the pupils. This outdoor play space is used by the pupils regularly throughout the day.
4. The Nursery is currently accessed from Charles Street via a ramp and stairs through the site of the proposed development, as is further detailed below.
5. This note responds to a wide range of matters raised in objection which contend that the proposed development would have an unacceptable impact on the Nursery, such that planning permission should be refused. The application strongly refutes this position and whilst the vast majority of the matters raised have already been comprehensively addressed in the application, this statement provides a consolidated response.

Concerns Raised

6. Through pre-application consultation feedback and feedback during the formal consultation on the planning application for the proposed development, concerns have been raised regarding the impacts the proposed development could have on Paintpots Day Nursery. These concerns principally include:

- General disruption and harm caused by construction related activities including noise, vibration and dust including to the outdoor play area and internal teaching and early years care areas.
 - Reduction of daylight and sunlight on both internal and external areas of the Nursery once the proposed development is operational.
 - Impacts on wind levels as a result of the proposed development.
 - Nuisances caused by student occupiers of the proposed development, including littering, and anti-social behaviour.
 - Provision of an independent, safe, secure and level access/egress to the Nursery.
 - Threat to the economic viability of the business through loss of existing customers and reduction in new business as a result of parents moving their children out of the Nursery due to concerns about the quality of teaching provisions and the safety of pupils during construction.
 - Resultant loss of employment if the Nursery closes.
 - Resultant loss of childcare provision in Manchester city centre if the Nursery closes.
7. This statement addresses each in turn, first considering the 'environmental effects' of the proposed development, then matters of access, then the contended economic impacts. Finally it addresses the extensive attempts that the applicant has made to engage with and respond to the concerns raised by the Nursery.

Environmental Effects and Mitigation Measures

8. The applicant has taken the concerns on Paintpots Day Nursery very seriously and wants to ensure a safe, secure, accessible, and pleasant environment is maintained for the children, staff and parents attending the Nursery both during the construction and operation of the proposed development. To achieve this, a series of mitigation measures, management techniques and monitoring methods will be implemented at the site. These measures are identified in the assessments and reports that support the planning application for the proposed development completed by professional independent qualified consultants and following accepted guidance, including:
- (a) Construction Noise and Vibration Assessment, by Hann Tucker Associates
 - (b) Wind microclimate assessment report, by GIA
 - (c) Environmental Statement including assessments on air quality by Miller Goodall (Chapter 5); and daylight, sunlight, and overshadowing by GIA (Chapter 6).
 - (d) Environmental Management Plan within the Environmental Statement, by Turley EIA
 - (e) Construction Environmental Management Plan, by Domis
 - (f) Dust Management Plan, by Domis

9. The mitigation measures proposed are tried and tested measures which follow applicable guidance and best practice, and are commonly implemented on other schemes of a similar scale and in a similar environment, including across Manchester city centre. In combination they will ensure that an acceptable operating environment is maintained for the Nursery during the construction and operational phases of development.

Construction Phase

10. The following measures will be implemented during the construction of the proposed development to reduce any adverse effects on Paintpots Day Nursery to an acceptable level, such that the Nursery can continue to operate safely and securely during the construction period, respecting the sensitivity of the use.

Construction Noise and Vibration

11. Baseline noise monitoring was undertaken to establish baseline daytime and night-time noise levels surrounding the site, including Bracken House.
12. Without mitigation measures in place, the assessment identifies that at Bracken House there would be an exceedance of the suggested noise criterion (75 LAeq,10hr dB) by c.17dB resulting in a major adverse significant effect, and that that some localised and temporary adverse vibration effects could occur.
13. To reduce such impacts to acceptable levels, the following mitigation measures will be implemented on site:
- All vehicles and mechanical plant used for the purpose of the work shall be fitted with effective exhaust silencers and shall be maintained in good and efficient working order.
 - All machines in intermittent use shall be shut down in the intervening periods between works or throttled down to a minimum.
 - Items of plant shall be maintained in good workmanlike condition so that extraneous noises from mechanical vibration, creaking and squeaking are reduced to a minimum.
 - Barriers will be located as close to the plant as possible to provide adequate attenuation.
 - Lorry engines will be switched off when not in use.
 - Equipment and materials will be delivered, and waste will be removed during the day/evening time, where practical (shoulder hours of 07.00 to 08.00 and/or 18.00 to 19.00).
 - Temporary noise barriers (i.e. acoustic blankets) will be used to reduce noise levels where appropriate and practicable. Such measures can be particularly appropriate for stationary or near-stationary plant such as pneumatic breakers and compressors.
 - Care will be taken when loading or unloading vehicles, dismantling scaffolding or moving materials etc. to reduce impact noise.
 - Prefabricated components will be used, where practicable, to avoid on-site fabrication of components.

- Occupiers who may be affected by noise or vibration for a specific phase of works shall be notified of the nature of the works, a contact telephone number and address to which any enquiries should be directed.
 - Materials will be handled in a manner which minimises noise.
14. The measures to be implemented shall be in accordance with British Standard BS 7445 “Description and measurement of environmental noise”.
 15. With the above mitigation measures in place, the assessment concludes that at Bracken House an exceedance of around 4dB above the suggested noise criterion (75 LAeq,10hr dB) (appropriate for both the residential and nursery uses) will be experienced. This exceedance is minor in significance and considered to be perfectly acceptable in a city centre context.
 16. To support the application, a Construction Environmental Management Plan (“CEMP”) has been prepared by contractors Domis. The CEMP includes the measures identified above from the noise assessment and includes additional measures to be implemented during construction to reduce the impacts from construction related activities even further to achieve the following noise limits (from Bracken House):
 - 75 dB(A) Leq (10 h) Monday to Friday working day (08:00-18:00)
 - 75 dB(A) Leq (5 h) Saturday working day (08:00 – 13:00)
 17. There will be no work on Sundays or Bank holidays.
 18. Additionally, through direct discussions with the Nursery the following measures have been offered:
 - noisy and disturbing survey/work practices and drilling works would cease during children’s sleep time at the nursery (between 12 and 2.30pm).
 - temporarily move the outdoor play area if this is a viable solution for the Nursery (this offer has currently been declined by the Nursery).
 19. The above measures are not required to make the development “acceptable” in planning terms – this is achieved through the mitigation noted above within the CEMP. But these additional measures have been offered by the applicant to help further reduce concerns raised and can be included in agreement with the Nursery.
 20. Nighttime noise levels are not required to be assessed as there will be no construction before 08:00 or after 18:00. If any works are required outside of these hours these will be agreed in advance with MCC pursuant to a suitably worded condition.
 21. Existing internal noise levels from within the Nursery are not known, and therefore an assessment of construction impacts on internal noise levels cannot be confirmed at this stage. This is not something that is normally required for the determination of a planning application, however, if it is deemed to be required to make the proposal acceptable, a suitably worded planning condition can be included which requires internal noise monitoring to be completed and agree internal noise levels during construction prior to construction commencing.

22. In summary, the mitigation measures and monitoring measures proposed to be implemented will reduce noise levels arising from construction activities to acceptable levels in accordance with applicable guidance, such that Paintpots Day Nursery can continue to undertake their daily operations. Additionally, discussions are continuing with the Nursery to offer additional mitigation measures (going beyond those required to make the development acceptable).

Construction Dust

23. Without mitigation measures, construction activities have the potential to result in nuisance and/or adverse health effects due to dust.
24. Given these potential effects, a range of mitigation measures to reduce dust deposition arising from on-site construction activities is provided within the Dust Management Plan (which sits alongside the CEMP). Mitigation measures are set out in the DMP which seek to prevent, suppress and contain dust. The list of measures is quite extensive and are therefore not repeated here, but can be found within the DMP.
25. The DMP specifically recognises the Paintpots Day Nursery as a sensitive receptor to construction dust, in particular the outdoor play space. The relationship of the construction site and this receptor has been at the forefront in developing the DMP. Domis (as contractors) will implement the measures set out in this DMP to ensure this area is protected from construction related activities creating dust, consistent with measures applied in other comparable situations where construction lies close to sensitive uses and users, including (but not limited to):
- The area will be fully screened off during construction, involving a full scaffold enclosure with both debris netting and monaflex sheeting, protecting the area from dust migration from the construction site.
 - The area will be monitored throughout construction to ensure any issues arising are identified quickly, and any further necessary mitigation put in place.
 - Dust monitoring equipment, (equipped with warning sirens), will be in place at the corner of the hoarding at the junction of Charles Street and York Street and also at Paintpots Day Nursery.
 - The full and final details of all dust management measures to be implemented, will be agreed with MCC once initial background readings are taken at the monitoring locations. This baseline measurement will then be used as the level at which the dust monitors will be set within the Nursery's outdoor play area which will be continually monitored.
 - Any excess of the agreed limit will mean any activities leading to the breach of the limit ceasing until a revised methodology has been produced which demonstrates mitigation of dust levels can be achieved and only then activities will recommence.
26. The Environmental Statement (Chapter 5) includes an assessment on the impact of construction activities on air quality. With the measures within the DMP implemented, nuisance and disturbance as a result of dust from construction activities will be reduced to an acceptable level and will not impact the daily operations of the Nursery including its outdoor play space.

Implementation of Mitigation Measures

27. The final details and the implementation of the CEMP and DMP will be secured via a suitably worded planning condition(s).
28. The implementation of these measures will ensure that any potential disruptions caused by construction phase activities are mitigated, managed and monitored to ensure they are within acceptable guidance levels such that the operation of Paintpots Day Nursery is not impacted.
29. With such measures in place, the Paintpots Day Nursery can continue to operate its business without the threat or concerns regarding the quality of teaching provisions and the safety of pupils during construction.

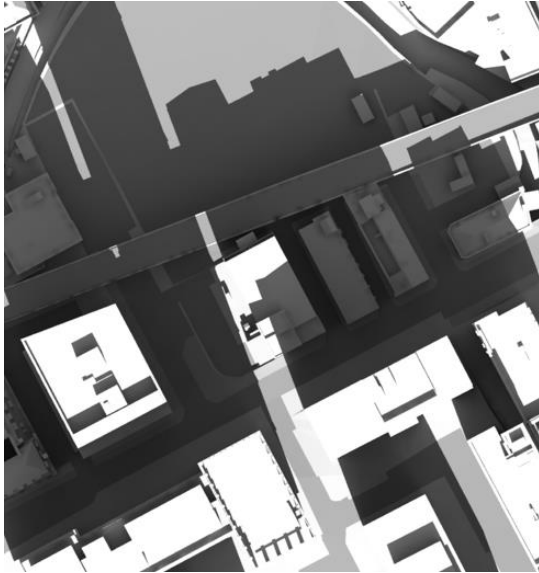
Operational Phase

Overshadowing

30. Bracken House and the Nursery are set within a built-up, dense, urban area of Manchester city centre. This locational context results in the existing levels of overshadowing on the Nursery's outdoor play area are high. The proposed development will result in slightly increased levels of overshadowing during the following periods of the year compared to the existing levels:
 - A very small increase in overshadowing levels during between 10am-11am in the spring and autumn;
 - Increased overshadowing between 1pm & 2pm in the summer; and
 - Increased overshadowing between 5pm & 6pm in the summer.
31. There will be no change to overshadowing levels during the winter (when the Nursery's outdoor play area receives no sunlight), or during the summer between 11am & 12pm.
32. The images below show the existing levels of overshadowing, and the impact of the proposed development on these levels (as described above).
33. These impacts are negligible and at an acceptable level, noting the locational context of the site.
34. Further details on the effects on overshadowing levels on Bracken House are reported within the Environmental Statement (Chapter 6).

Existing

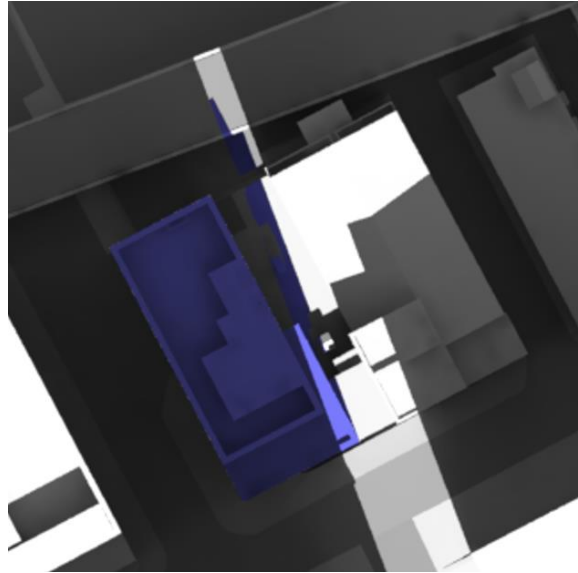
1. Spring & Autumn



One hour between 10am & 11am in when the sun passes through the gap between the 2 Circle Square Blocks on the opposite side of Charles Street.

Proposed

1. Spring & Autumn

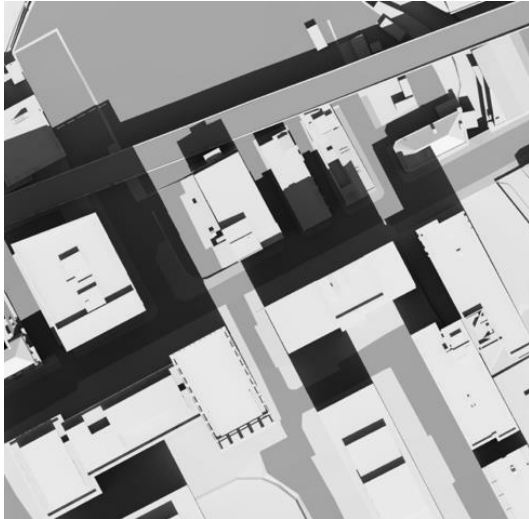


Largely remains the same, with a small additional amount of shadow during this one hour of sunlight amenity.

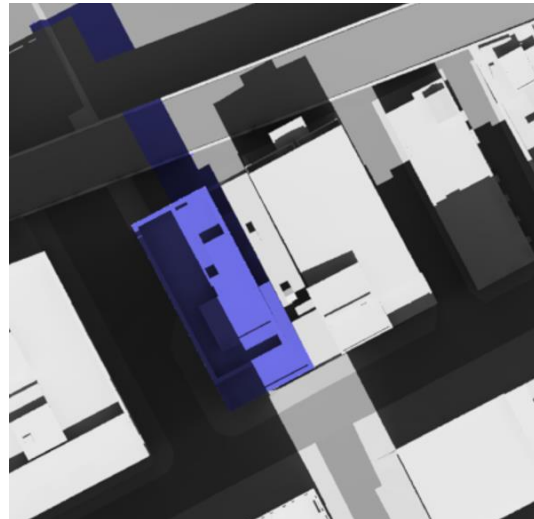
Existing

Proposed

2. Summer



One hour between 11am & 12pm when the sun passes through the gap between the 2 Circle Square Blocks on the opposite side of Charles Street

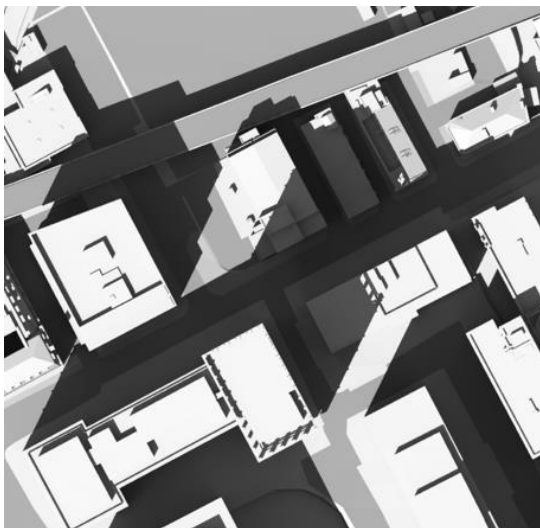


No change - One hour between 11am & 12pm when the sun passes through the gap between the 2 Circle Square Blocks on the opposite side of Charles Street

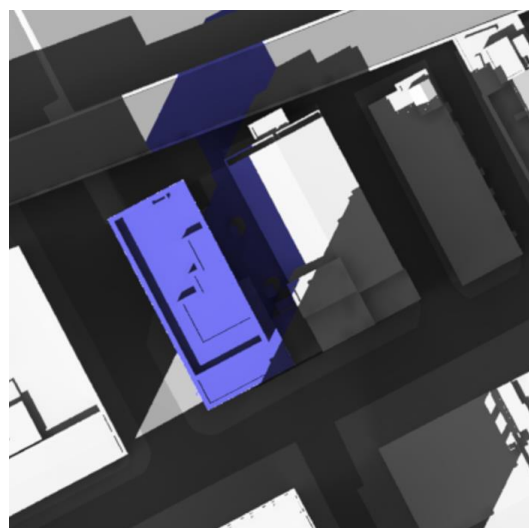
Existing

Proposed

3. Summer



One hour between 1pm & 2pm when the sun rises above the Circle Square blocks

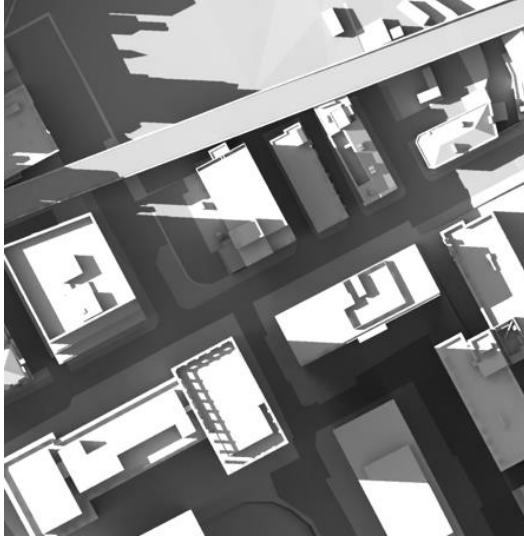


The Proposed Development will cast a shadow over the nursery playground for this one hour as any sunlight is derived directly over the Site at this time.

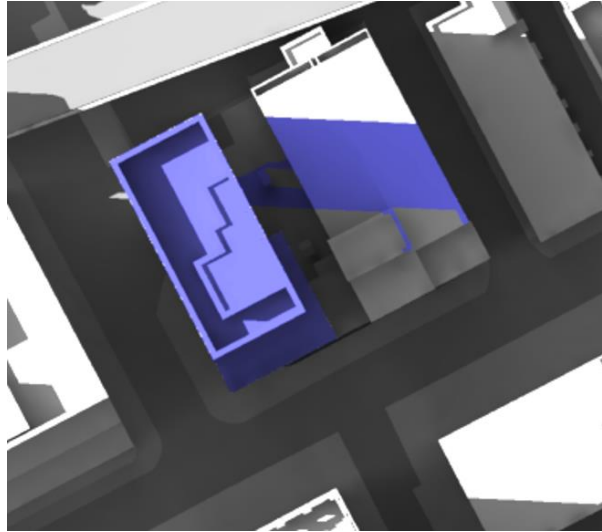
Existing

Proposed

4. Summer



Small shafts of sunlight between 5pm & 6pm across the Site



The nursery playground will no longer receive the small shafts of sunlight as it is derived directly over the Site at this time.

5. Winter

No sunlight exposure as the sun is too low in the sky. This will remain the same with the proposed development.

Sunlight and Daylight

35. Only properties which have windows facing towards a site and are residential in use are required to be assessed for impacts as a result of developments on the levels of sunlight and daylight. There is no requirement to assess the impact on levels of sunlight and daylight on educational facilities.
36. Bracken House is a residential building and has been assessed which inadvertently provides an assessment on the impact of the proposed development on the Nursery.
37. As noted above, Bracken House and the Nursery are set within a built-up, dense, urban area of Manchester city centre. This locational context results in the low existing levels of sunlight and daylight on Bracken House.
38. A total of 46 windows serving 44 rooms were assessed for daylight and sunlight within Bracken House. The assessment does not distinguish whether the rooms are for residential use or associated to the Nursery. Notwithstanding this, the majority of these rooms will experience a significant change in the levels of daylight and sunlight as a result of the proposed development.

39. Whilst the change is considered to be significant, the change needs to be considered in the locational context of Bracken House being in a built-up city centre. It is in this context that the impacts are considered to be acceptable.
40. Further details on the effects on sunlight and daylight levels on Bracken House are reported within the Environmental Statement (Chapter 6).

Wind Microclimate

41. The impacts of the proposed development on wind levels in the area have been assessed and are presented in the Wind Microclimate Report submitted to support the planning application. The assessment presents the baseline wind levels in winter and summer (i.e. without the proposed development) and the change to the wind levels in winter and summer as a result of the proposed development (i.e. with the proposed development).
42. The proposed development will slightly reduce wind levels for the Nursery's outdoor play space during the winter, and wind levels will remain the same during the summer. The proposed development will create slightly windier conditions along Charles Street both during the winter and summer. The change in wind conditions do not impact the uses of the surrounds which will remain entirely safe and useable – the Nursery's outdoor play space will remain entirely suitable for this use, and Charles Street remains entirely suitable for walking and standing. The surrounds

Disturbance caused by occupiers of the proposed development

43. True Student has been appointed to be the operator for the proposed development, who are a well-established student accommodation provider. True Students have produced an Outline Student Management Plan and Move In/Move Out Strategy which focuses on ensuring that the operation of the scheme does not have adverse impacts on the local community in terms of day-to-day comings and goings and particularly move in / move out days. Measures within the Plan that specifically address concerns raised by neighbours will include:
 - The tenants and neighbours will be consulted with regularly and encourage to maintain dialogue with the landlord to maintain satisfaction with the tenancy.
 - The tenants and neighbours will have full contact details of the landlord who will aim to respond to any communication within 24 hours.
 - Every effort will be made to mediate between the tenants and neighbours to resolve any issues and to ensure that repeat disturbances are kept to a minimum.
 - Strong relationships between local businesses will be formed and these businesses will be positively promoted to our guests via onsite events and information provided via our true student app.
44. The final Student Management Plan will be required to be agreed with MCC and implemented via a planning condition.
45. The implementation of these measures will ensure that if disruptions are caused by occupiers of the proposed development, these can be resolved with the management company such that the operation of Paintpots Day Nursery is not impacted. This will be a well managed, self contained, purpose built student accommodation development, and the proposed operators are highly

experienced in managing the behaviours of students occupying their developments mindful of sensitive surroundings uses.

Access

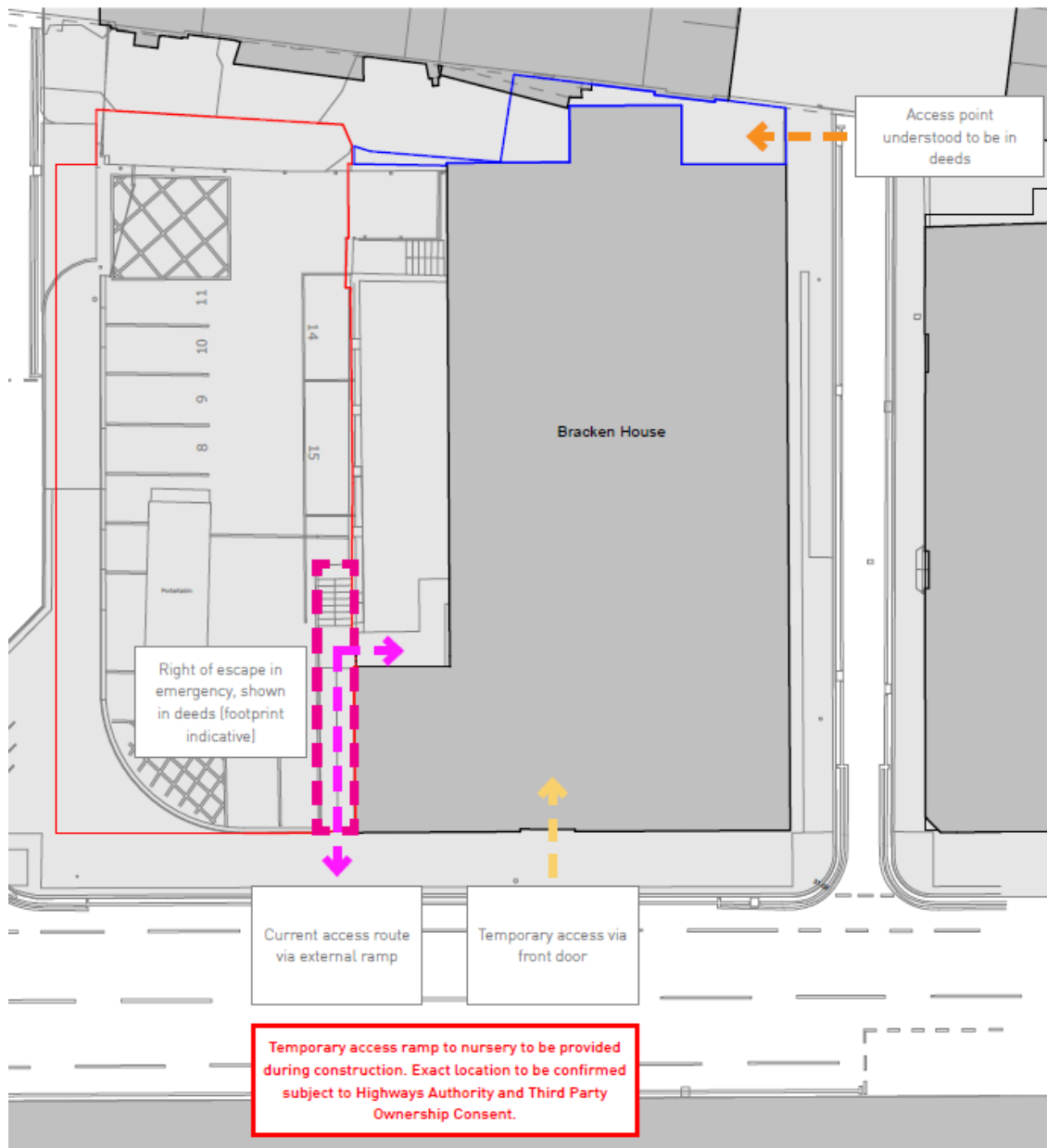
Existing Access

46. The Nursery is currently accessed from Charles Street via an external ramp through the site of the proposed development. The ramp was installed primarily for the provision of prams (it is not DDA compliant) to replace the previous arrangements which required accessing the Nursery via stairs through Bracken House.
47. The current access arrangement is operating on the basis of an informal agreement between Jadebricks (the applicant and titleholder) and Paintpots Day Nursery (leaseholder). The situation is not complying with the access rights established in the legal deeds (which is to the rear of Bracken House via Makin Street), but is being tolerated by Jadebricks who have allowed the informal access arrangements to continue in good faith.

Access During Construction

48. Temporary access during construction can be achieved via the previous access arrangements i.e. via/through Bracken House itself. This would only be a temporary provision during the construction period.
49. Alternatively, access to the Nursery can also be provided via a temporary ramp, which the applicants would deliver at their expense. The ramp will be designed to allow access for prams (as per the current ramp, not DDA compliant). The provision of the ramp will be provided subject to the constraints of the site and agreement with the owners of the ground floor of Bracken House, the Nursery, and Highways.
50. The temporary access arrangements will be in place for the duration of the construction period until the permanent access arrangements are able to be used.

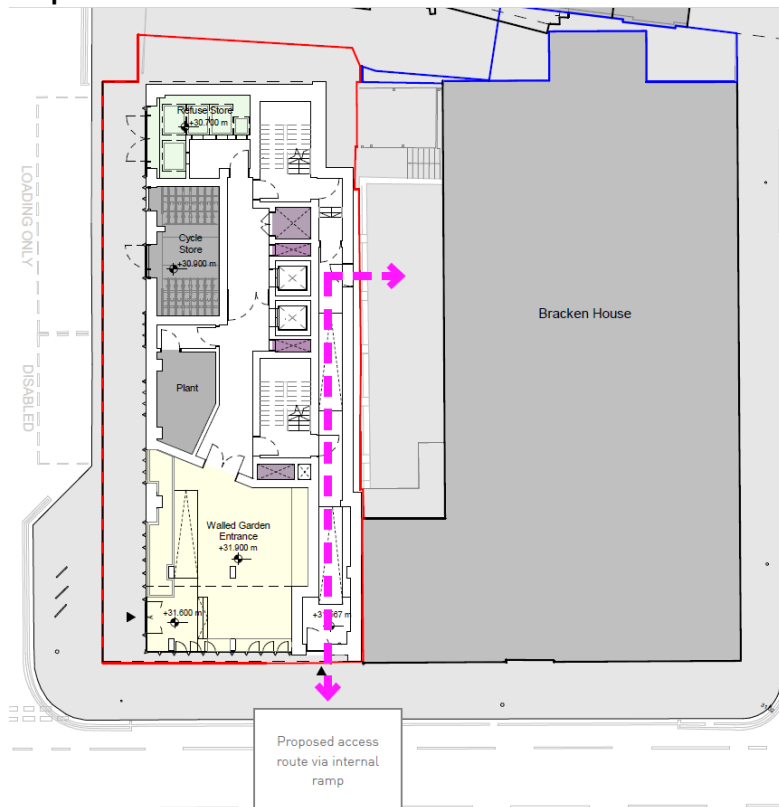
Existing and during construction access arrangements



Proposed Permanent Access

51. The proposed development includes a permanent access arrangement to the Nursery via an internal ramp through the proposed development. This will secure the Nursery a prime, secure access point with compliant ramp and signage zone (such that they can advertise to the street frontage), and to have this arrangement on a formal, legal basis, unlike the current situation.

Proposed Access



52. The existing (informal) and proposed access arrangements are shown below. This comparison of images clearly shows the improved environment and access arrangements which will be provided to the Nursery.

Existing Access Arrangements (shown in red)



Proposed Access Arrangements



53. Accordingly:

- The applicant is currently offering the opportunity to use the Charles Street access to the Nursery on a day-to-day basis at its discretion.
- Access can be readily maintained via the main entrance to Bracken House during the construction period. Temporary access via a ramp access will also be provided subject to

the constraints of the site and agreement with the owners of the ground floor of Bracken House, the Nursery, and Highways. The temporary access provisions will be provided for the duration of the construction period until the permanent access arrangements are able to be used.

- On completion the Nursery will be provided with a much improved access arrangement, which can be formalised by the applicant.

Economic Impact / Risk of Closure

54. It is clear the applicant has taken great steps and measures to protect the Nursery from adverse impacts arising during construction, and through the design of the proposal. As we have evidenced, adverse impacts will not arise on the operation of the Nursery (as a result of the proposed development), there is no reason why the development will cause a reduction in attendance, income or closure. No evidence has been presented to the contrary. Therefore, we refute that an adverse economic impact will arise.
55. Notwithstanding the applicant's position on this matter, objections have been raised regarding the closure of the Nursery and the impact on the provision of sufficient childcare places within the city centre. The recently released '*Manchester Childcare Sufficiency Report 2022*' shows that there is currently sufficient early education and childcare provision for pre-school aged children in Manchester, which evidentially refutes this comment.

Engagement with Paintpots nursery

56. The applicant has invited dialogue and proactively communicated with the Nursery manager and owner in advance of public consultation, during the pre-application consultation period, and beyond into determination. The applicant is committed to act as a good neighbour throughout and delivered on this commitment through the site investigation works and remains committed to this position ahead.
57. The record of engagement below, demonstrates regular, continuous and proactive communication, above and beyond the procedural expectations of pre-application consultation. The applicant has met or corresponded with the Nursery over a 5-month period, starting back in October 2023 before public consultation launch, and beyond to submission, and has clearly taken the time to develop an open and transparent dialogue and listen to their concerns, offering potential solutions to concerns where possible, on a without prejudice basis.
58. Alongside this engagement, regular briefings with Deansgate ward Councillor Anthony McCaul have also taken place. The applicant has met with the Councillor to provide updates on the scheme and local issues raised on the 31st October 2023, 8th January 2024 and 16th February 2024 and the Councillor remains updated on application submission.
59. In addition to the technical mitigation and monitoring measures that are detailed above the applicant has offered the following opportunities for genuine engagement and improvement:

Date	Interaction type	Discussion points and mitigation offered
26 th Oct 2023	In person meeting with the Applicant, Owner and Owner/Manager.	The in-person meeting provided a briefing on the proposals and discussion was around the following points: - Jadebricks' long-term interest – the applicant confirmed intention for long-term stewardship of the site and the offer develop a good neighbour relationship with the business. - Daylight/sunlight impact – The applicant explained how the building design has been developed to step back from Bracken House to minimise loss of daylight. The orientation of the windows to the path of the sun and the presence of existing tall buildings was also discussed and explained. As explained above, some loss of daylight is inevitable if the site is to be developed in a manner reflective of its city centre location. - The current issues with Bracken House – Jadebricks have been developing relations with Railpen, building owner and landlord to Paintpots Day Nursery, and proactively working with them to ensure that the remaining facade works to Bracken House result in minimum disruption to all parties including the nursery . The applicant has worked hard to create positive partnership working with Railpen to minimise the disruption associated with ongoing works. - Nursery access – The applicant discussed the provision of an attractive, access-controlled feature entrance to Charles Street to improve security and visibility and address the current title issues which does not allow use of the ramp as an access (escape only). Jadebricks would look to amend this position and allow permanent general access via this route. This is aligned with the principles of active frontage promoted by MCC. - Potential noise issues during construction – The applicant offered to share the acoustic report on the potential noise impact for further discussion with the nursery.
8 th Nov 2023	Email from Applicant to owner and owner/manager.	An invitation to a follow up meeting was made to Paintpots. The request for meeting was not taken up by the nursery.
27 th Nov 2023	Email from Applicant to owner and owner/manager.	The email contained an update regarding ground investigation works taking place on site and included further information on the following points: - Confirmation that noisy and disturbing survey/work practices and drilling works would cease during children's sleep time at the nursery (between 12 and 2.30pm) to the applicant's own cost and delay to construction programme. - External play area – Offer to meet with the nursery and contractor to discuss in more detail the mitigation proposed as well as to discuss the opportunity to temporarily move the play area if this is a viable solution for the nursery. This solution was offered to attempt to satisfy the nursery owner/manager's concerns, but was declined by the Nursery. - An update on the noise survey, explaining the findings and providing reassurance that noise can be attenuated to a level which is considered to accord with

Date	Interaction type	Discussion points and mitigation offered
		appropriate guidance. It was also confirmed that a bespoke Dust Management Plan has also been prepared with the application. - Further discussion around the building access and making this compliant for the nursery's long-term future. - The correspondence included offer to improve the quality of the nursery experience, including a 'mural wall' with opportunity for the children and nursery to influence the design which is a feature of the scheme and therefore committed by the applicant. - Further offer to meet and continue correspondence and update.
5 th Dec 2023	Email from Applicant to Owner and owner/manager.	The applicant provided an update on investigative works being carried out. This included confirmation that the percussive drilling works were complete and provided communication of a slight delay to finalising the last few rotary drill holes, due to a problem with a skip delivery in the wrong location. The applicant confirmed that the remaining work would be considerably less noisy, and drilling work limited to outside the hours of 1200 and 1430, as agreed as well as finish date for the nursery's information.
8 th Dec 2023	Email from Applicant to owner and owner/manager.	The applicant shared documents with the nursery owner and owner/manager including, logistics plan, daylight reports, CEMP for the nursery's information.
13 th Dec 2023	Face to face meeting	The applicant met with the nursery owner and owner/manager to discuss further the potential impact of construction and mitigation where necessary.
10 th January, 2024	Email	Follow up email from the applicant to set a date for a further meeting.
16 th January, 2024	Face to face meeting with nursery owner and owner/manager.	A meeting was held with the applicant, nursery owner and manager to run through the whole context of the proposed development and the steps the applicant was seeking to put in place to mitigate disruption and offer long-term improvements to the business where possible without prejudice. Discussion around the proposed improvements to the entrance and further listening on the potential issues faced by the nursery was explored. The next steps towards submission of a planning application were provided, and a further meeting offered by the applicant.
22 nd January – 30 th January 2024	Various emails	Follow up emails from the applicant to the nursery in attempt to set a date for a further meeting.

Date	Interaction type	Discussion points and mitigation offered
1 st February, 2024	Face to face meeting (at the Maldron Hotel) with owner/manager only.	Meeting with the nursery manager and applicant at the Maldron Hotel covering a discussion about the nursery business and general context. The meeting discussed the scheme in detail and the proposals relating to the alternative play space offered. This was offered on a without prejudice and not because the applicant considers it to be necessary, but in order to try and satisfy the Nursery's concerns. The discussion covered the potential specification of the relocated play space, including the astro turf floor, new toys, improved security, the potential to include toilets. The applicant communicated a clear understanding of the cost impact on the business and measures required to ensure its viability. This included the potential requirement of additional staff, and a means of communication back to the nursery via mobile phone or alternative. The discussion invited the nursery manager to provide itemised costs that would be covered by applicant. The meeting also considered plans which set out a potential layout of the relocated play space. The meeting concluded with an action on the nursery manager to provide the schedule of costs to the applicant.

60. As shown in the summary table above, extensive communication has been undertaken with the Nursery and additional proposals which go above and beyond the expected / "normal" and necessary mitigation measures have been offered in an attempt to satisfy the Nursery . Such offers remain open to the Nursery to accept and can be incorporated into the necessary mitigation and management documents (such as the CEMP and DMP) upon agreement, should it so wish.

Contact

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27 February 2024

JADM3002