Katie Raw

From: [redacted]
Sent: 24 June 2026 13:53
To: Planning
Cc: Katie Raw
Subject: 2026_06_24 Ecology comments 144830/FO/2025

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For the attention of Katie Raw

Application: 144830/FO/2025

Dear Katie,

Summary
The main consideration for this application are bats, nesting bird, lighting, a method statement, invasive species and biodiversity net gain. All can be covered by either informative or condition text.

Bats
A Preliminary Roost Assessment and Ground Level Trees assessment (e3p – December 2024 82-211-R1) has been submitted. A full internal and external inspection of the structures found negligible potential for the building to support roosting bats. In terms of the trees, the applicant's ecologist has stated "*One tree (T1) was assessed as having 'PRF-I' bat roosting potential due to the presence of ivy cover which may conceal potential roost features"*.

GMEU have no reason to question the finding of the report. The Local Records Centre holds few records of foraging or roosting bats in the area. Having assessed the work planned for the building, there is negligible potential for the works to disturb roosting bats and no further surveys are required.

T1 should be retained where possible. If this is not feasible, then T1 should be soft-felled under the supervision of an ecologist. The tree should be cut below the ivy cover and slowly lowered to the ground. The ivy will then need to be removed from the tree to inspect for any potential roost features. If the tree can be inspected and deemed free of bats once on the ground, then the trees can be removed from the site immediately. If the trees cannot be fully inspected once on the ground, then the trees are to be left overnight to allow any bats to escape before being chipped the next day.

Whilst the works to the property have been assessed as having negligible risk for bats, the applicant is reminded that under the Habitat Regulation it is an offence to disturb, harm or kill bats. If a bat and the signs of bats is found all work should cease immediately and a suitably licensed bat worker employed to assess how best to safeguard the bat(s). Natural England should also be informed. We would suggest an informative to this effect be placed on any permission.

Nesting Birds
All British birds nests and eggs (with certain limited exceptions) are protected by Section 1 of the Wildlife & Countryside Act 1981, as amended. Should the tree and shrub removal be delayed until after the 1st of March, I would recommend the following condition be added.

No tree or shrub clearance shall occur or removal of structures occur between the 1st March and 31st August in any year unless a detailed bird nest survey by a suitably experienced ecologist has been carried out immediately prior to works and written confirmation provided that no active bird nests are present, which has been agreed in writing by the LPA.

Bats and lighting

Bats will potentially forage and commute along the tree lines on the edge of the site. I would recommend the following;

Prior to the commencement of the development a lighting plan should be submitted to and agreed by the council, once agreed the plan should be implemented in full. A condition to this effect should be placed on any permission.

Precautionary Working Methods

The applicant's ecologist (e3p - December 2024) felt that the development had the potential to harm reptiles, amphibians and mammals if reasonable avoidance measures were not put in place.

I recommend a condition along the following lines is applied to any approval.

- Prior to development a reasonable avoidance measures method statement of for reptiles, amphibians and mammals will be provided to and agreed in writing by the LPA.

Invasive Species

Japanese knotweed and variegated yellow archangel are recorded and included within schedule 9 part 2 of the Wildlife & Countryside Act 1981, as amended. It is an offence to introduce or cause to grow wild any plant listed under this schedule. I recommend as a precaution a condition along the following lines is applied to any permission.

Prior to any earthworks, vegetation clearance or demolition a method statement detailing eradication or avoidance measures for Japanese knotweed and variegated yellow archangel *should be supplied to and agreed in writing to the LPA. The agreed method statement shall be adhered to and implemented in full unless otherwise agreed in writing by the LPA.*

Biodiversity Net Gain

The information submitted with the application includes a Biodiversity Net Gain (BNG) report and statutory Biodiversity Metric from E3P (Feb – 2026 82-211-R2-4)

The appraisal found the site had some ecological value, consisting of other neutral grassland, scrub and individual trees.

I have examined the Biodiversity Net Gain (BNG) metric spreadsheet and I am happy with the calculations provided.

After construction of the development, onsite biodiversity remediation and the 10% net gain requirement there is due to be a deficit of 10.29 Area Habitat units and 0.9 hedgerow units.

With the availability of offsite units this appears to be a realistic achievement for the site and therefore the LPA can be reasonably confident that the statutory biodiversity requirements could be discharged.

(Link to various wording for signposting applicant to statutory framework for Biodiversity Net Gain https://assets.publishing.service.gov.uk/media/663251d969098ded31fca800/BNG_Decision_Notice_Text.odt)

I would consider the onsite biodiversity mitigation/enhancement to be significant due to the number of trees being retained.

PAS has provided guidance for various ways of securing the gain PAS Biodiversity Net Gain Legal Agreement & Planning Condition Templates | Local Government Association

If approved, the Biodiversity Gain Plan (BGP), updated metric and Habitat Management and Monitoring Plan (HMMP) should be completed to show how the biodiversity gain will be achieved on and offsite and approved by the LPA, before any condition can be discharged.

For guidance the HMMP should include;

- Description and evaluation of features to be managed.
- Aims and objectives of management.
- Appropriate management options for achieving aims and objectives.
- Prescriptions for management actions.
- Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period and for a minimum total period of 30 years).
- Details of the body or organization responsible for implementation of the plan.
- Ongoing monitoring and remedial measures.

Biodiversity Enhancement
We would expect any such scheme to include measures to enhance biodiversity at the site and to provide a net gain for biodiversity, in line with the requirements of the National Planning Policy Framework. We would recommend that opportunities for biodiversity enhancement be incorporated into the new development. These should include a suitable number of the following:

- Bat bricks and/or tubes within the new developments
- Bird box/swift nesting bricks
- Hedgehog friendly fencing

I hope these comments are useful.

Yours sincerely,

[redacted]

Ecologist - Greater Manchester Ecology Unit
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