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To: [Development Management](#)
Cc: [Ryan Killeen \(He/Him\)](#)
Subject: PA 25/00405/FUL - Ecology Response
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Dear Ryan

Thank you for notifying me about the submission of the required bat survey.

Biodiversity Net Gain

The submitted metric indicates that the proposals will result in a net loss for biodiversity, for area based habitat, with off-site units being sort for the deceit. The scheme does include some on site gains such as tree planting and grassland recreation. However the seed mixes for the grassland areas include several species for that are not locally native to Greater Manchester and are highly unlikely to survive in the long term. This means that required condition of the grassland and suds habitats are unlikely to be met. In additions, the so called “native species tree” include *Pinus sylvestris*, which is not native to England and *Acre campestre* , which is not locally native to Rochdale. The landscaping plans or the metric therefore need to be amended.

In addition the trees have been given a Strategic significance of medium. However, since the 15th February 2025, this category should not be used (<https://greatermanchester-ca.gov.uk/media/kohkgiuc/guidance-note-greater-manchester-approach-to-biodiversity-net-gain-strategic-significance-and-the-gm-local-nature-recovery-strategy.pdf>) The metric therefore needs to be amended.

For hedgerows a gain is shown of some 51%. However from the landscape plan, the hedgerows to be created all appear to be within the curtilage/gardens of the new properties and therefore cannot be included in the gain calculations. The applicant either needs to remove these hedgerows from the BNG calculations or demonstrate that all the hedges will be retained and managed by themselves or a management company for 30 years.

Should these issue be resolved, the on-site gains would be considered significant. We would therefore recommend that a Section 106 agreement be used to secure the long term management and monitoring of these rather than a condition.

Impact on Species

The Preliminary Ecological Appraisal identifies potential impact on nesting birds, bats, hedgehogs and other mammals. Mitigation measures have been proposed to prevent harm to these during construction works. We would therefore advise that all of these measure, including those in the Bat Aerial Inspection Survey Report and the need for pre-commencement surveys, be included with a Construction Environmental Management Plan for Biodiversity. We would therefore recommend that the following condition be attached to any permission should it be granted:

No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following.

- a) Risk assessment of potentially damaging construction activities.*
- b) Identification of "biodiversity protection zones".*
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).*
- d) The location and timing of sensitive works to avoid harm to biodiversity features.*
- e) The times during construction when specialist ecologists need to be present on site to oversee works.*
- f) Responsible persons and lines of communication.*
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
- h) Use of protective fences, exclusion barriers and warning signs.*

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

The Bat Aerial Inspection Survey Report also makes a recommendation for bat boxes to be provided as compensation for the loss of roosting opportunities on site. We would also expect to see enhancement measures for species, such as bird and insect boxes. We would therefore advise that the following condition be attached to any permission:

A scheme for the Biodiversity Compensation and Enhancement Measures shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented prior to first occupation of the development (or in accordance with a phasing plan which shall first be agreed in writing with the local planning authority) and shall be retained thereafter.

In conclusion the application should not be determined until the correct BNG information has been provided.

Yours sincerely

Suzanne

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