

From: [REDACTED]
Subject: RE: 25/00116/FUL - Rear of 83 Marland Fold
Date: 02 April 2025 10:23:19
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image005.png](#)
[image006.jpg](#)

Hi [REDACTED],

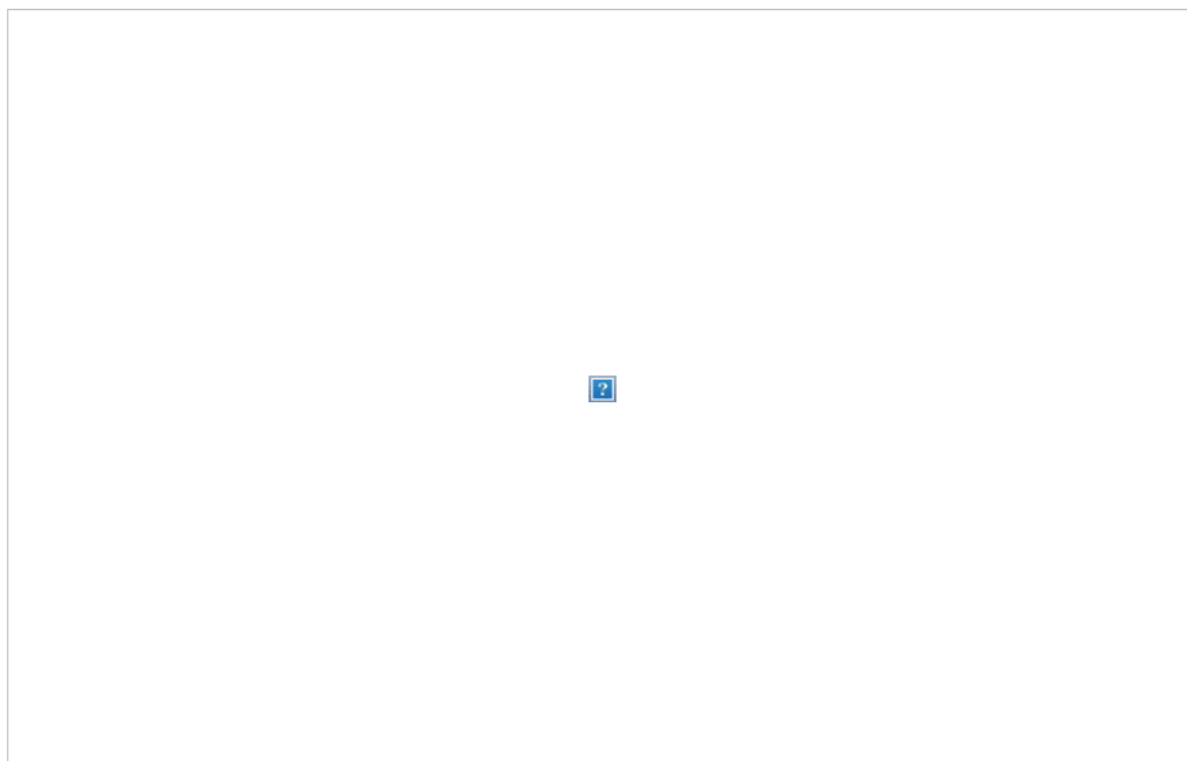
Thank you for consulting GMEU on this application, apologies for the delay in responding to you.

Please can you send me a copy of the excel version of the BNG metric (I can only see the pdf version on line) and also an un-redacted copy of the Preliminary Ecological Appraisal.

I have reviewed the PEA apart from the redacted comments (relating to badgers) and made a partial review of the BNG information based on the submitted BNG report. I will finalise these comments once the additional information has been received and my comments below addressed.

The surveys for the site were undertaken on 1st November 2024. This is outside the optimal survey season for botanical surveys including for woodland and grassland habitats. While this has been acknowledged within the ecology report, I would advise that a precautionary approach is applied for interpretation of the results, especially the grassland habitats in the BNG interpretation. From the description of some areas of 'modified grassland' which are not highly maintained, sound like they could potentially be classed as 'other neutral grassland' as described in UKhab rather than modified grassland, and it may be that surveys at an appropriate time of year would detect more species (photo 5 in the PEA for example, although the species lists/DAFOR and habitat maps have not been split out between different modified grassland area which makes it more difficult to interpret).

GMEU provided comments on a pre-app for this site last year ([REDACTED]). Since we provided these comments, we have completed another piece of work for Natural England which has been reviewing the Ancient Woodland Database. This has identified two woodland parcels to be included on the Ancient Woodland Inventory layer within Marland Woods which will be relevant for this planning application. Please see below a screen shot of the parcels of woodland.



This will have potential implications for the site given the protections provided to Ancient Woodland which is considered an irreplaceable habitat (See NPPF December 2024 Paragraph 193c, and also Natural England's Standing Advice for decision making and protection of ancient woodland <https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and->

[veteran-trees-advice-for-making-planning-decisions](#)), as well as potentially impacting the BNG calculations for the site. Within the ecology report an area of Lowland Mixed Deciduous woodland has been recorded in the north-eastern corner of the site (presumably including the area of Marland Wood that has been identified as AWI). The ecology report has recommended that the mitigation hierarchy is followed and that the site is re-designed to retain this priority habitat. It is not apparent that this advice has been followed. In addition to advising that all areas of priority habitat are retained on the site, we would advise that a minimum of 15m undeveloped buffer is provided around the areas of Marland Wood that have been identified as Ancient Woodland, in line with government guidance to protect this irreplaceable habitats. The status of the woodland in the north-west corner in relation to priority habitat is not mentioned within the PEA report. The habitat distinctiveness in the BNG metric must reflect the woodland habitat type on the site (there doesn't seem to be any lowland mixed deciduous woodland within the BNG metric, but it is identified in the PEA).

I would also seek clarification as to whether there has been any clearance of woodland on the site prior to survey, or if there has been an error mapping the baseline habitats. The aerial photographs appear to show a continuous woodland belt between the river and the field, however the ecology report has recorded this section as other-neutral grassland. In addition the tree removal/retention plans appear to show removal of trees in this area (A1 in the arb report). Based on the submitted information it is very difficult to clarify if the baseline maps in the PEA and BNG report are correct and have accounted for the woodland/woody vegetation in this area and assessed the impacts. Please can this be clarified and the reports updated accordingly.

Further detail of the impacts of increased disturbance to the retained woodland during operation of the scheme also needs to be provided, and appropriately mitigated for as required.

The site is also included in the draft Local Nature Recovery Strategy for Greater Manchester, which has implications for the Biodiversity Net Gain part of the submission. The BNG report doesn't seem to mention this and I haven't been able to assess the application further without the excel metric for the site.

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No trees on the site were identified as having potential roost features for bats, however the site was identified as having moderate suitability for use by foraging and commuting bats. No survey work has been carried out to quantify this and the impact assessment is reliant on retention of the offsite woodland and use of a sensitive lighting scheme to mitigate for any impacts. Further details of this mitigation should be provided to identify how potential flight lines will be maintained and protected across the site. In the absence of this detail, or if it cannot be demonstrated that flightiness can be maintained and protected, activity surveys to establish the use of the site by bats may be required.

Whilst it hasn't been possible to fully analyse the BNG aspect of the application, and my above comments will need to be addressed and incorporated into the ecology/BNG submission, it is clear from the information that I have seen that there will be a net loss of biodiversity units on the site and it is not clear how this will be achieved and the number of units that will be required. In addition it is not clear the Biodiversity Gain Hierarchy has been adhered to. This is distinct from the mitigation hierarchy and is especially relevant with the presence of High Distinctness Habitats on the site.

Please let me know if you have any queries about these comments.

Kind regards,

[Redacted]

[Redacted]

Ecology Planning Manager
Greater Manchester Ecology Unit (GMEU)

Please note that my working days are Tuesday to Friday

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