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Sent: 20 May 2025 19:50:53
To: Development Management
Cc: Ryan Killeen (He/Him)
Subject: Planning application 25/00381/OUT Stakehill South extension

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Hi Ryan

Thank you for consulting the GMEU.

Summary

Further bat surveys, are recommend as well as information on biodiversity net gain. Information on transport movements along the M62 past Holcroft Moss should also be provided.

Validity of Ecological Report

The ecological appraisal is up to date but brief and relies on previous no longer valid surveys to assess out certain species groups. (Dealt with below as required.). Given the scale of the development site and the potential for slippage between the current survey and development on the site, I recommend an updated ecological appraisal is provided (excluding BNG and UK Hab surveys which need to be fixed at outline stage) at reserved matters. The details can be conditioned along the following lines.

As part of reserved matters an updated ecological appraisal for wildlife and invasive species will be provided to and agreed in writing by the LPA.

European Protected Sites

A shadow HRA has been provided that has assessed the potential for likely significant effects to the Rochdale Canal SAC and Manchester Mosses SAC. No likely significant effects were identified with regards to the Rochdale Canal SAC. Whilst I have some issues with the reasoning, I agree overall that given the Rochdale Canal is protected for water floating-plantain and there will be no direct effects to the canal, any increased recreational usage will have negligible effect and watercourses on/under the site such as the Whit Brook pass under the canal ie are not hydrologically linked. I am satisfied that there will be no likely significant effects.

With regards the Manchester Mosses SAC, I agree that the only potential likely significant effects relates to traffic movements along the M62. The recently adopted pFe SPD for the Manchester Mosses SAC (and specifically Holcroft Moss) is that any development that generates an additional 100 vehicles per day or 20 HGV's per day must devise a scheme to reduce trips by vehicles and provide a contribution towards management and restoration of Holcroft Moss. The transport assessment provided has not however considered the traffic generation beyond the immediate locality ie impact on local network. Whilst this assessment would indicate the residential element is very unlikely to generate an additional 100 vehicle movement per day based on the model of where new residents are likely to work, I am less clear on the number of HGV movements which are likely to travel further.

I therefore recommend that prior to determination the transport assessment is updated to include reference to the Holcroft Moss SPD and an estimate of the number of likely vehicle movements per day past the SAC.

The South Pennines SPA/SAC is not referenced in the Shadow HRA. I accept however that whilst Rochdale has signed up to the South Pennines SPD, that Stakehill South is beyond the 2.5km buffer where measures may be required. I am also aware that Natural England policy for the South Pennines is that recreational pressure and air quality issues associated with the M62 are not regarded at present to be an issue. No further information or measures re. the South Pennines is therefore required.

I note that Natural England have recommended further information and recommended that an appropriate assessment be provided owing to the trigger created by the shadow HRA recommending measures in the CEMP to prevent pollutants, sediment etc from the site reaching the canal. I am however as noted above of the opinion that it is very unlikely that there is any hydrological connectivity from the site to the canal, watercourses on the site passing under the canal. I recommend therefore that the developer looks to demonstrate the lack of any hydrological connectivity from the site to the canal (unless I am wrong and there is). If this can be demonstrated then no measures within the CEMP will be required.

Tandle Hill Site of Biological Importance and proposed new SBI along Whit Brook

There is direct linkage to this site of biological importance and Country Park via the local public right of way network. Approximately half a mile at its closest point, though I note the transport assessment does not appear to recognise this in its walking assessment. In my opinion the development will generate an increase in recreational pressure to the SBI. The site is however also designed as a recreational asset, with well surface paths. I am therefore satisfied that the overall impact on the ecological value of the site will be negligible. There may however be minor impacts on the recreational infrastructure generated by the increase pedestrian and cycle usage of the site.

I recommend that the transport assessment is amended to take in to account the direct bridle connectivity between the development site and Tandle Hill Country Park.

The GMEU has also recently assessed a candidate SBI along the Whit Brook approximately 100m SW of the allocation. This is a small area of woodland adjacent to the public right of way that runs parallel to the Whit Brook. Whilst close to the development and down stream, the woodland is not particularly accessible from the public right of way and is unlikely to be as popular as the proposed open spaces, development to the north and Tandle Hill. I am therefore satisfied that the impact on the ecology will be negligible.

Bats

The ecological appraisal states there are no buildings on the site. This appears to be inaccurate with one barn associated with Lower Stake Hill Farm appearing to be lost, the buildings associated with the garden centre lost and a building between 56 and 64 Stakehill Lane being lost. *I recommend that prior to determination these buildings are assessed for bat roosting potential.*

The consultant does acknowledge that there are some mature trees on the site that may have potential bat roosting features. Given an indicative tree removal plan has been provided, I see no reason why these cannot be fully assessed at the outline stage. *I therefore recommend that any mature trees proposed for removal are assessed for bat roosting potential prior to determination.*

With regards bat activity, the consultant notes that previous surveys are no longer valid (7 years old) but given the habitats on the site, updates are not necessary as it is unlikely that there will have been any significant changes on the site. I would tend to agree that the site itself is unlikely to be of importance for foraging bats, with the main habitat feature of potential value the boundary woodland along the motorways and mill ponds retained. These can be protected through a sensitive lighting scheme. I am therefore satisfied that no further activity surveys are required. *Provision of a sensitive lighting scheme at reserved matters should be conditioned.*

Great Crested Newts

I agree with the consultant's assessment. Whilst previous eDNA surveys are out of date, there is negligible likelihood of the site being colonised, given the barriers to amphibian migration in to the site and because the mill ponds are stocked with fish. No further information or measures are required.

Badger

No evidence of badger was recorded on the site. I have no reason to doubt the findings of the report. They are however present in the wider locality. As this is an outline application, I recommend an updated survey as part of reserved matters. I therefore recommend a condition along the following lines is applied to any permission.

As part of reserved matters an updated survey for badger and their setts will be provided to and agreed in writing by the LPA

Barn Owl and Nesting Birds

The buildings on the site may provide nesting habitat for barn owl (one barn owl box was also recorded) and species such as swallow and house sparrow. *Prior to determination and associated with the bat assessment a barn owl and bird assessment of buildings to be demolished should be provided*

Trees and hedgerow will also be lost potential bird nesting habitat. No farmland birds were recorded, which I accept is likely the case having visited the site. All British birds nests and eggs (with certain limited exceptions) are protected by Section 1 of the Wildlife & Countryside Act 1981, as amended. I recommend a condition along the following lines be applied to any permission.

No works to trees or shrubs shall occur or demolition commence between the 1st March and 31st August in any year unless a precautionary working method statement for nesting birds by a suitably experienced ecologist has been supplied to and agreed in writing by the LPA.

Other Wildlife

No evidence of brown hare was recorded, but the site is suitable for species such as hedgehog and common toad and brown hare are recorded from the wider areas. Areas of scrub and overgrown hedge are present that could provide cover for these species. I therefore recommend precautionary working measures during site clearance and construction. These should be provided prior to development. I therefore recommend a condition along the following lines is applied to any permission.

Prior to any earthworks or vegetation clearance for any phase a precautionary working measures method statement for mammals and amphibians will be provided to and agreed in writing by the LPA

Invasive Species

Himalayan balsam and variegated yellow-archangel were recorded on the site. During my own visit to the site I also recorded Japanese knotweed on the SE boundary. Himalayan balsam is locally abundant and variegated yellow-archangel rare. Measures should be required to control these species, whilst accepting that as they extend off-site, recolonisation post construction is likely. I therefore recommend a condition along the following lines is applied to any permission.

As part of reserved matters a site wide management plan for invasive species will be provided to and agreed in writing by the LPA. All phases of the development will be in accordance with the agreed site wide management plan.

Watercourses

Several watercourses including the Whit Brook are located on/culverted under the site. The masterplan indicates negative impacts on the minor watercourse, whilst indicating that there may be potential to deculvert the Whit Brook. Given the river metric will likely be triggered, I recommend that deculverting the Whit Brook should be required, in order to mitigate for river unit losses and

because unlike the other watercourses that are presumably culverted under the existing Stakehill Industrial estate, the Whit brook is largely in open channel up and downstream of the development site. I therefore recommend that as part of reserved matters for the relevant phase ie phase adjacent to the culvert, restoration proposal for the Whit Brook is provided. This can be conditioned along the following lines.

As part of reserved matters for the proposed commercial development a deculverting proposal (unless clearly demonstrated that day lighting is not feasible) for the Whit Brook will be provided to and agreed in writing by the LPA

In addition as watercourse run through the site measures will be required to prevent pollution and sediment entering the watercourses during and post construction. These can be dealt with through a construction and environmental management plan and drainage strategy condition respectively.

Contributing to and Enhancing the Natural Environment & Biodiversity Net Gain (BNG)

Section 187 of the NPPF 2024 states that the planning policies and decisions should contribute to and enhance the natural and local environment. 10% BNG is mandatory under Schedule 7A of the Town & Country Planning Act 1990 (as inserted by schedule 14 of the Environment Act 2021).

The development will result in the loss of improved and semi-improved grassland, trees, hedge, minor watercourses/ditches and scrub habitat. Wildlife issues include nesting birds, small mammals, amphibians and potentially bats and badger. The indicative masterplans shows the inclusion of green corridors around the boundary of the site and retention of the existing mill ponds through the site, separating the residential and commercial elements. The ecological appraisal recommends bird and bat opportunities on the new build and the maintenance of connectivity across the site for small mammals and amphibians. No detailed landscaping or biodiversity enhancement proposals have however been provided, which is acceptable given this is an outline application.

The development is subject to mandatory BNG. A statutory metric has been provided that indicates a shortfall of both area based and hedge units. No river unit calculation has been provided. Whilst the baseline habitats appear reasonable, I was unable to find a detailed BNG assessment to accompany the metric, though the ecological appraisal provides some information. Without a UK HAB plan and detailed BNG assessment it is not possible to assess the accuracy of the statutory metric, which for an outline application of this scale is in my opinion necessary.

I recommend that prior to determination a UK HAB plan and BNG assessment cross referenced with the baseline metric is provided.

Whilst more information is required, the following potential issues were identified:

- The existing river units have not been calculated. Based on OS maps, watercourses/ditches are present on the site (as well as culverted);
- Some habitats are formally identified in local strategies others are not, I am unclear why;
- All grassland has been assessed as modified grassland in conditions varying from poor to good, some areas may be other neutral grassland in poor condition and;
- Currently the hedge units are shown at a 100% loss. Given some of the hedges are along the boundary of the site, I would have thought that some could be retained.

We also need to know at outline, with regards BNG,

- how the developer intends to meet the likely shortfall. ie will they simply purchase off-site credits or do they have their own potential habitat bank. If the latter a legal agreement may be required with the LPA, the habitat bank is in Rochdale.
- We also need to know whether the development is going to be phased as this will influence the statutory biodiversity condition, any legal agreements and standard conditions. Phased developments have a slightly different mechanism (An overall biodiversity gain plan), that all phases buy in to, but can deviate from, as long as other later phases are amended to pick up any shortfalls, or more units, I assume, purchased off-site.

With regards wildlife measures, I recommend that the standards proposed by Homes for Nature is adhered to. (which dependent on the housebuilder may occur anyway if already a signatory). This includes measures such as one bird box per residential unit and maintenance of connectivity through the site. Whilst out on the site I noted that house sparrow was present around the existing buildings and would therefore recommend targeting of this species in any bird nesting strategy. I noted no starling, swift or house martin, though they may be present. With regards bat bricks I would recommend on average one for every five units, though clustering of several bat boxes is recommended rather than individual boxes dotted around. For the commercial development measures around habitat are more appropriate than bird and bat boxes on buildings, though bird boxes on retained trees could occur.

I therefore recommend that as part of each reserved matters phase, a biodiversity mitigation and enhancement plan is provided for wildlife. *The details can be conditioned.*

David Dutton

Ecologist

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Place

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