

From: [Melissa Sullivan](#)
To: [Development Management](#)
Subject: 25/00078/FUL
Date: 10 March 2025 12:00:51
Attachments: [image008.jpg](#)
[image001.jpg](#)
[image003.jpg](#)

:CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good morning,

Thank you for consulting GMEU on the application at Long Clough Farm Clough Road Littleborough for the construction of an agricultural building (25/00078/FUL).

The application is accompanied by an Ecological Enhancement document; however, no ecological assessments appear to have been undertaken. Based on the submitted information, GMEU have the following comments:

It is unclear who the author of the ecological document is but it is considered unlikely that it was an ecologist as no ecological surveys have been carried out. Under normal circumstances we wouldn't accept documents/assessments not carried out by an ecologist, however, given that the site currently appears to hold limited ecological value (predominantly bare ground), this is not considered to be a significant limitation.

The ecological enhancement document states that '*There is no vegetation on the site and the proposal will not impact any habitats (including priority habitats), hedgerows or watercourses*' and therefore implied that it is exempt from a Biodiversity Net Gain (BNG) assessment. However, from a review of both recent and historic satellite imagery, it shows that the site was previously vegetated in April 2021 (and prior to this) and therefore did have baseline ecological value and has since been degraded. The most recent satellite imagery from June 2023 shows that the site appears to have been cleared of vegetation and therefore leaving the site as bare ground. Therefore, habitat degradation has taken place sometime between April 2021 and June 2023 (see screengrabs of satellite imagery below).

DEFRA BNG guidance states:

'Where unauthorised degradation of the onsite habitat has taken place on the land between 30 January 2020 and the date of relevant date, the biodiversity pre-development value of the onsite habitat should be calculated as the biodiversity value of the habitat on the date immediately before the carrying out of these degradation activities. The relevant date should therefore be set as a date immediately before these activities. Unauthorised degradation of onsite habitat is any degradation which is not in accordance with a previous planning permission.'

If a habitat has been cleared, destroyed or degraded previously, and you should use an earlier baseline, you must:

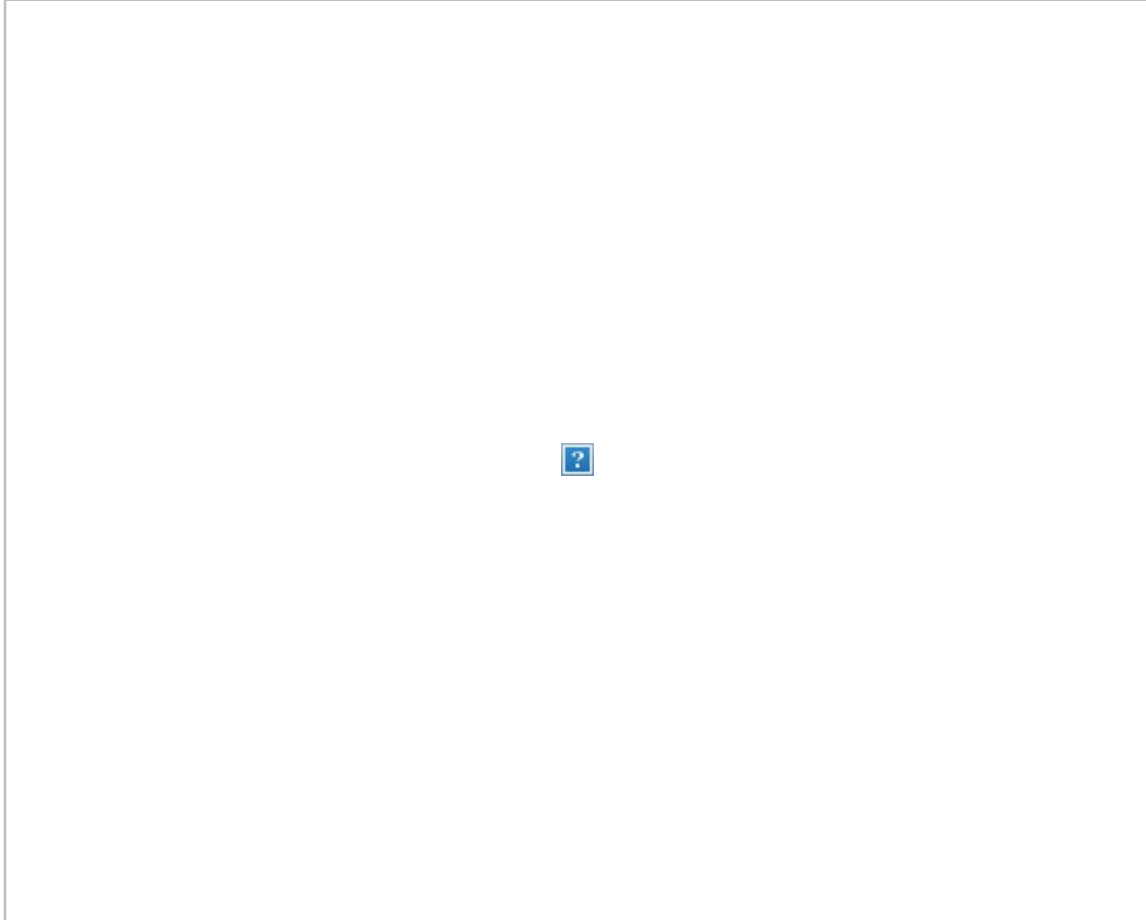
- use the pre-degradation habitat type as the site's baseline*
- evidence how this habitat type and condition has been determined in the user comments*
- record the habitat as lost within the biodiversity metric tool*
- account for the time between the habitat loss and compensation using the 'delay in starting habitat creation or enhancement' function*

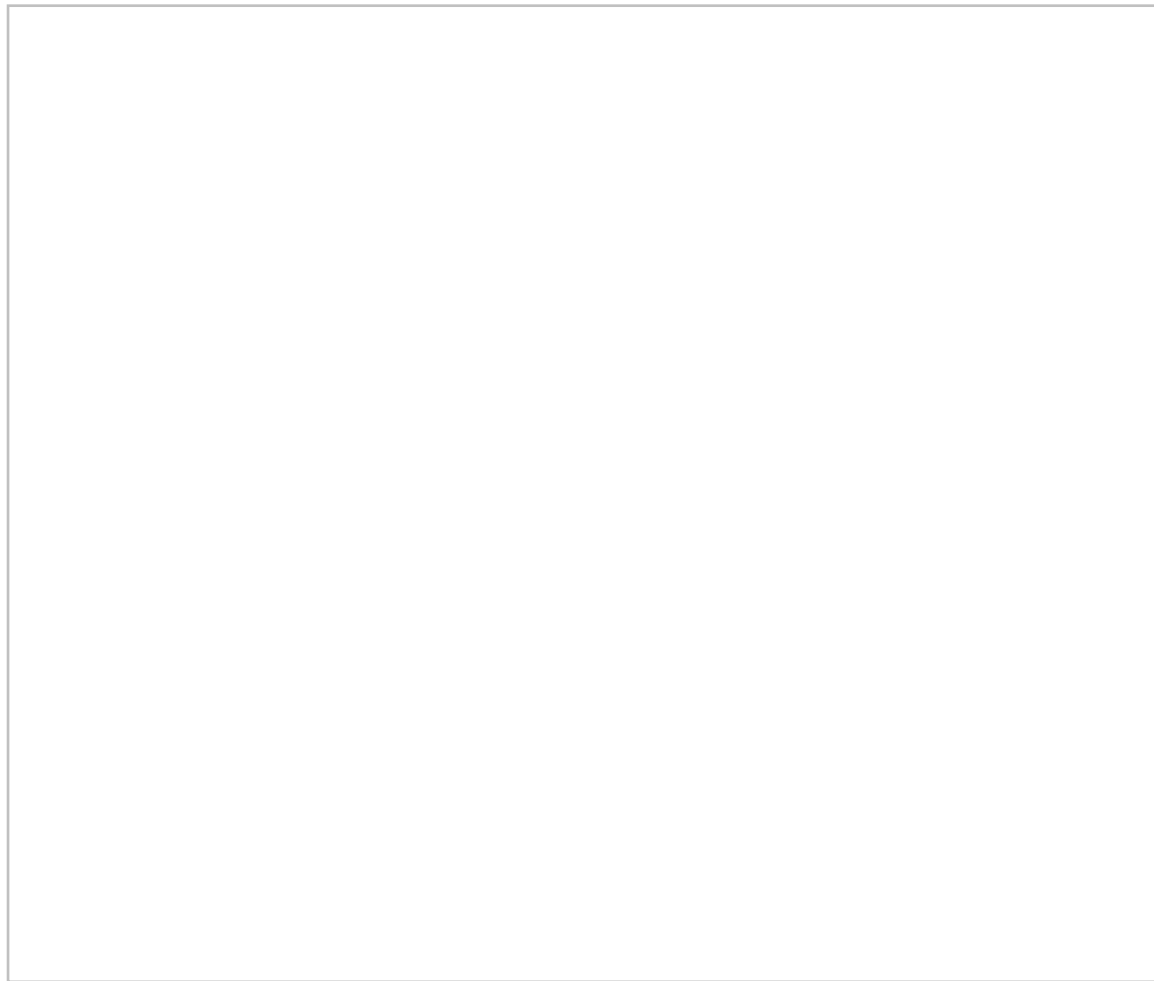
Given the above information, a BNG assessment should be undertaken and the pre-degradation baseline of the site (from satellite imagery) must be used and not the current degraded condition of the site. A minimum 10% BNG will be required.

Compensatory measures such as habitat creation and bat and bird boxes should be incorporated into the proposal for any displaced protected/priority species that the site clearance may have caused.

The footprint of the proposed building is larger than 25m² and therefore would not be exempt from BNG under the de minimis rule, given that habitat degradation has taken place and this must be captured.

The satellite imagery I have referred to is shown below:





In summary, there is currently insufficient information provided for this application regarding Biodiversity Net Gain (BNG) as the degraded habitats have not been considered and a BNG assessment has not been undertaken. The application should not be determined until the relevant BNG assessment has been undertaken and provided.

If you have queries relating to this advice, please do not hesitate to contact me.

Kind regards,

Melissa Sullivan

Ecologist

Greater Manchester Ecology Unit

Tameside MBC, Dukinfield Town Hall

King Street, Dukinfield,

Tameside, SK16 4LA

Tel: 0161 342 2842

image002



This e-mail is intended only for the addressees named above. As this e-mail may contain confidential or legally privileged information, if you are not, or suspect you are not, the named addressees or the person responsible for delivering the message to the named addresses, please telephone the sender on the above telephone number immediately. The contents of this e-mail may not be disclosed to nor used by anyone other than the named addresses. Please note that we cannot guarantee that this message or any attachments are virus free or have been intercepted and

amended.