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To: [Development Management](#)
Subject: 25/00312/FUL
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Good afternoon,

Thank you for consulting GMEU on the application at Land at Junction of Water Street and Molesworth Street, Rochdale (25/00312/FUL).

The application is accompanied by an Ecological Appraisal report and Biodiversity Net Gain (BNG) Small Sites Metric (SSM), authored by Encon Associates (Feb 2025).

Based on the submitted information, GMEU have the following comments:

Ecological Assessment

The ecology report contains robust ecological assessments, and I have no reason to doubt the findings. The site is of relatively low ecological value, with the exception of the existing scrub and small section of woodland. No further surveys are required however the mitigation and enhancement measures detailed in the report must be followed, with recommended conditions below:

Invasive Non-Native Species (INNS) – both Himalayan balsam and Japanese knotweed was recorded onsite, and it is an offence under the terms of Schedule 9 of the Wildlife and Countryside Act 1981 to allow the plant to grow/spread in the wild. We would therefore recommend that a condition be attached to any permission that prior to the commencement of any works on site (including vegetation clearance) a methodology for the control of invasive species be submitted to and agreed by the council. Once agreed the method statement must be implemented in full.

Nesting Birds - As all wild birds, their nest and eggs are protected under the Wildlife and Countryside Act 1981 (as amended), we would recommend that the following condition be attached to any permission, should it be granted:

No removal of or works to any trees, vegetation or buildings shall take place during the main bird breeding season 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before clearance and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site.

Biodiversity Net Gain (BNG)

- The BNG baseline data is considered valid until 10/12/2024 according to the small sites metric, however given the habitats onsite and it is unlikely that any changes have taken place, this is not considered to be an issue.
- In Section 7.2 of the report, the incorrect BNG scores are stated (not consistent with the metric), this should be updated for accuracy.
- Although the proposal is achieving a 12.41% net gain, there is no mention of how applicant intends to resolve the trading rules error. It is likely that offsite units will be required as broadleaved woodland is unlikely to be replaced onsite, however the report should state how the applicant plans to achieve 10% with all trading rules satisfied so that GMEU can be confident that the gains can be secured.

In summary, small amendments to the BNG assessment are required prior to determination including how the applicant plans to achieve 10% net gain with trading rules satisfied.

Should you have any queries relating to this advice, please do not hesitate to contact me again.

Kind regards,

Melissa Sullivan

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