



The Wildlife Trust for Lancashire Manchester & North Merseyside



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Planning and Development
Number One Riverside
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14th March 2025

FAO Claire Ringwood

**RE: PLANNING APPLICATION 25/00116/FUL | ERECTION OF 6 NO. DETACHED DWELLINGS
MARLAND HILL WOOD.**

Dear Ms Ringwood

I have had the opportunity to view the above application on behalf of the Lancashire Wildlife Trust and would like to provide the Trust's comments and concerns regarding the proposed development, as detailed below.

I note that the phase one-habitat survey was undertaken in November. This is a sub-optimal time of the year to undertake ecological surveys. Paragraph 2.2.2 acknowledges that plants may be in a state of senescence or dormant during this period, but argues that the surveyor was experienced in identifying plants from their vegetative features. However, regardless of experience, winter surveys are not as reliable as summer surveys and some species may still have been missed. This can be important in UK Habs assessments due to criteria scores being based on the number of species identified within 1m quadrats. Winter surveys can therefore underestimate the quality of habitats and should therefore be avoided wherever possible. Whilst not suggesting further surveys are required in this instance due to the nature of the grassland habitat recorded, I would point out that every effort should be made to undertake surveys at an appropriate time of year or justification provided as to why this has not been possible. CIEEM guidance also outlines that limitations in ecological surveys for ecological impact assessments should be avoided where possible.

I note that the preliminary ecological assessment report (PEAR) recommends that in accordance with the principles of the mitigation hierarchy that the proposals are redesigned to accommodate the woodland to the north. Paragraph 4.1.1 of the BNG assessment also indicates that the mitigation hierarchy has been applied where feasible. However, from the plans supplied it is difficult to assess if the design of the proposed development has been amended to maximise the retention of the woodland or not. The plans still indicate the loss of woodland along the northern boundary. I therefore recommend that the boundary of the development should be amended so that the entire woodland habitat to the north is retained.

With regard to the BNG metric, the metric itself is not in a form that is easily viewed and as the actual metric itself has not been provided, it cannot be interrogated. The BNG assessment report does however show that there will be a loss of biodiversity units (BU) if the proposed development is granted. The BNG assessment shows BU's being reduced by 50% post intervention, with a loss of - 1.27 biodiversity units. The report also indicates that the trading rules have not been satisfied. A

number of options are suggested as to how the mandatory 10% BNG might be delivered. However, no clear indication of how the 10% uplift is to be achieved has been provided. The BNG assessment acknowledges this lack of detail, as it recommends *that 'any such approach can only be finalised following the completion of the site design and a landscape planting plan (and a revised BNG Assessment) to ensure that the final calculation represents an accurate assessment of the habitat unit change at the site.'*

At the current time, I feel that only the legal minimum BNG requirement has been met. It is important that enough information is provided to reassure the LPA that the mandatory 10% BNG uplift is deliverable. If the information supplied is insufficient to provide this reassurance, then further detail is required. I feel that in this case, a more detailed biodiversity strategy should be provided that identifies a definite pathway for BNG delivery, rather than just a list of possible alternatives. The strategy should include how the red flags identified within the metric are to be resolved and how the development complies with all the metric rules and principles. Details of how the BNG mitigation hierarchy have influenced the layout and design of the development should be highlighted. If off-site provision is required, the applicant needs to provide evidence of liaison with a third party, including written documentation and an agreement in principle that the necessary biodiversity units are available to purchase. If the developer plans to use statutory biodiversity credits, then this should also be stated clearly and the pathway identified.

I feel that there is some uncertainty in delivering the BNG uplift and that further information as outlined above is required to determine the application. However, I would recommend that the Greater Manchester Ecology Unit's advice and guidance also be sought in this matter.

I would also point out the site has been identified within the Greater Manchester Local Nature Recovery Strategy (LNRS) as an opportunity area for the expansion and creation of woodland and scrub habitat. Markland Hill Wood and the connecting woodlands have been identified as an important woodland network and whilst the inclusion of the land as an opportunity area does not preclude development, the importance in enhancing the ecological network in the area has been recognised within the LNRS. Clearly, the site would be better suited for the delivery of BNG and for offsetting the requirements of development elsewhere rather than the reduction of the biodiversity interest of the site, which would result from the proposed development proposal. If Rochdale were minded to grant planning permission, I would recommend that any off-site provision should be identified as close to the LNRs opportunity area as possible to strengthen the ecological network locally.

I hope these comments prove useful. If you have any further queries or require clarification, please do not hesitate to contact me.

Yours Sincerely

M C Walker (signed electronically)

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