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To: [Development Management](#)
Subject: 25/00195/FUL
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Good morning,

Thank you for your consultation on the application at Land at Schofield Street Heywood (25/00195/FUL), for the proposed residential development.

The application is accompanied by a Preliminary Ecological Appraisal (PEA) and Biodiversity Net Gain (BNG) statutory metric and report (Arbtech, Jan/March 2025).

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

Ecological Assessment

The PEA report contains robust ecological assessments, and I have no reason to doubt the findings. The site contains very limited ecological value given that it was recently cleared and no further surveys are required. The mitigation and enhancement measures detailed in the PEA report should be followed, which includes Precautionary Methods of Work (PMW) for amphibians, badger and hedgehog during construction and incorporating bat and bird boxes post development.

Biodiversity Net Gain (BNG)

I can see that a BNG exemption statement has been submitted (dated 17/02/2025) and subsequently a BNG metric and report (dated 31/03/2025). The exemption statement is not accepted by GMEU given that habitat degradation has taken place since 30th January 2020 and therefore the baseline prior to this date must be adopted instead. This has been considered within the BNG report, however I have the below comments on the BNG assessment:

- Appendix 1 of the BNG report shows a Proposed Site Plan (24.3378.SC1.1F), which shows 9 proposed trees and this is incorporated into the BNG metric/report. However, the most recent plan on the planning portal appears to be version K (24.3378.SC1.1K), which shows only 6 trees to be proposed. The BNG must reflect the finalised proposed site/landscaping plans and therefore it appears that 6 trees are proposed instead of 9. Clarification/update of the BNG is required.
- The created Modified Grassland area is proposed to achieve 'good' condition, however given that the area is only 0.0179ha (e.g. very small) and that it is noted to be a 'Communal area of grassland' – it is likely to be subject to regular disturbance and management/mowing which will make it very difficult to achieve 'good' condition. It is recommended that 'moderate' condition is proposed so that GMEU can be confident that this condition can be achieved and maintained for 30 years.
- With both points above incorporated into the BNG metric, the proposal is achieving a loss of biodiversity and the trading rules are not satisfied. The BNG must be updated and 10% net gain must be demonstrated either onsite or offsite (likely from purchasing units from an offsite provider).

In summary, insufficient information has been provided regarding the BNG assessment and it is advised that the BNG is updated based on my comments above. This is required prior to determination of the application.

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

Kind regards,

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