

Greater Manchester Ecology Unit
Dukinfield Town Hall
King Street
Dukinfield
Tameside
SK16 4LA

Email: gmeu@tameside.gov.uk

Principal Ecologist:
Derek Richardson

Planning Services
Rochdale Borough Council

VIA EMAIL

Dear Claire

PLANNING APPLICATION NO: 25/00116/FUL

Hi Claire,

Further to GMEUs original response to this application, we have now reviewed the following updated documents:

Preliminary Ecological Appraisal, ERAP August 2025

Assessment of Biodiversity Net Gain, ERAP August 2025 and associated BNG Metric

Arboricultural Impact Assessment, Iain Tavendale, Survey 4th November 2024

Proposed Site Plan, November 2024 Rev K

Foul and surface water drainage strategy, August 2025 -Rev A

Having reviewed these reports I have the following comments to make

Habitats/BNG

The redline boundary of the site has been amended and the layout of the scheme revised so there is no development proposed within 15m from the woodland which has been identified as likely AWI in my previous comments. This is a welcome inclusion and has satisfied the point raised in my previous comments with regards to compliance with the irreplaceable habitats policies of the NPPF.

The PEA report states that there is only one small area of Priority Woodland located in the site in the north east corner and that this woodland continues to the northeast of the site. Now the boundary of the site has been reduced, I do not think there is any priority woodland within the red edge of the site. The Magic Map Priority Woodland also continues to the northwest of the site, which does not seem to have been mentioned in the ecology report.



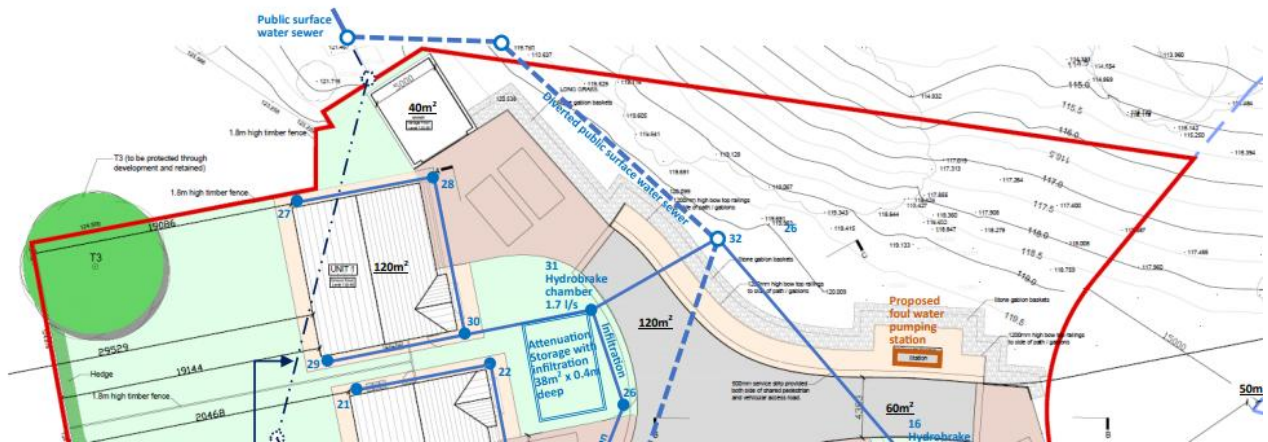
Darker green shows Magic Map Layer Priority Habitat Inventory - Deciduous Woodland (England)

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Whilst the red line boundary of the site does not appear to overlap with the priority habitat boundary, work detailed in the drainage plan for the site does appear to show a diverted public surface water sewer outside of the red line boundary and within the surrounding woodland. The impacts of this need to be accounted for within the PEA.



Extract from Drainage Plan showing diverted surface water sewer in woodland

There are also two areas (circled in red below) shown on the BNG proposed post development that I would like clarification on. These are outside the boundary, and I am not clear if this is proposed to be a built structure of some sort?

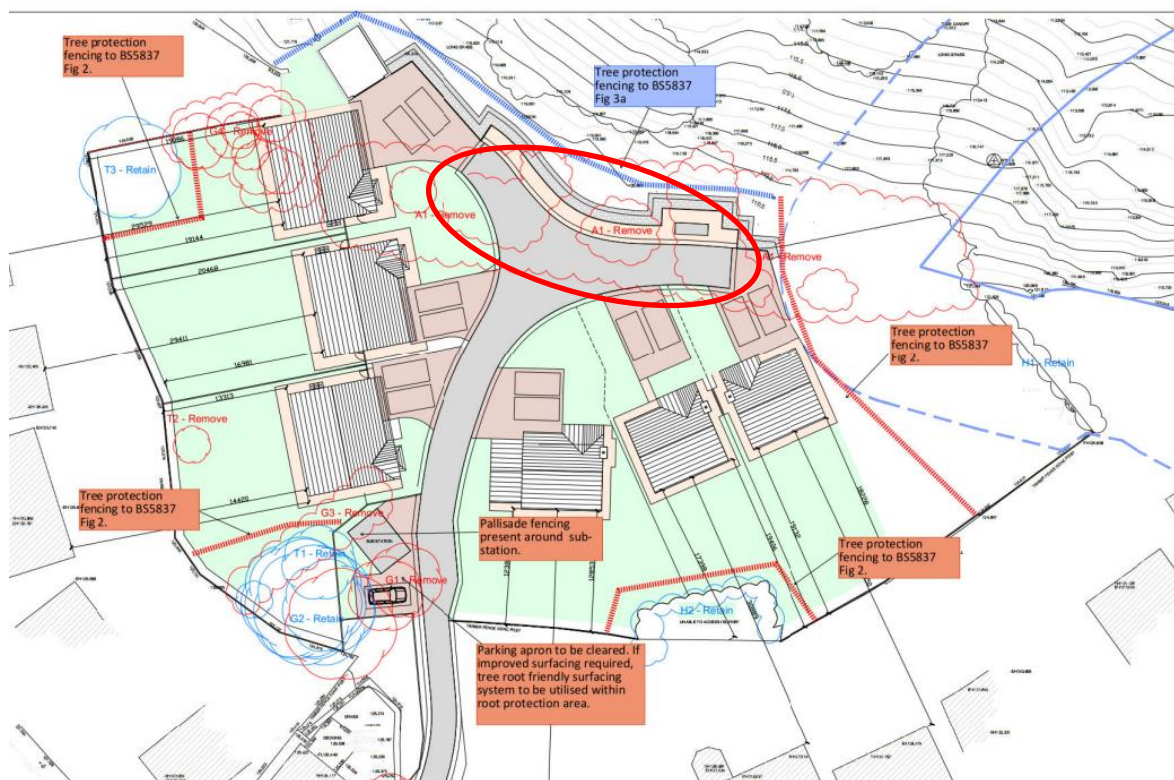


It would also be useful to have clarification from a planning perspective if these areas need to be included within the red line boundary, as this has implications from a BNG perspective, in addition to the impact assessment on the habitats in the site.

There is still an unresolved issue with the baseline habitat map presented in the PEA and BNG report compared to aerial photographs on the site and the arb report/tree removal plan. The area shown as other neutral grassland on the UKhab map (circled in red below), has no indication of individual trees provided either in the PEA map or the BNG, however the same area on aerial photographs appears to be wooded and the arb survey and tree removal plan indicated that trees are present in this area.



PEA map with grassland and no individual trees v Aerial Imagery appears to show woody vegetation



Tree removal plan shows removal of trees/group of trees in this area.

Photo 7 in the PEA report states it shows grassland associated with the woodland at the southern boundary (I would query if this should actually be the northern boundary given where the neutral grassland is mapped) but only shows a very small proportion of grassland – the majority of the habitat is woody/scrub vegetation in the photo and not grassland.

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The baseline habitat of the site must be accurately reflected in the PEA and the BNG assessment of the site. This would be aided if the site photographs were referenced to location labels marked on a plan, including the place the photograph was taken and the orientation of the photo.

I previously requested further clarity around the modified grassland on the site. This has been mapped as one compartment and a species list recorded as one list, despite there being two distinct areas of modified grassland recorded on the site, differentiated by the management regime. Due to the survey timings being sub-optimal and the data for each grassland not being separated out, it was not possible to be confident that the less intensively managed grassland (i.e. photo 5) isn't other neutral grassland. No additional survey work at an appropriate time of year, or further information around this point appears to have been provided. If the habitat type is 'other neutral grassland' it would likely be in a poor condition and therefore would not make a material difference to the BNG metric, therefore I would not insist on this update being provided, however it would have been preferable for these comments to have been reflected in the updated report.

Notwithstanding the proposed drainage works and the works outside the red line, there is a predicted loss of woodland habitat on the site. This woodland has been identified as 'other broadleaved woodland' and of being of local importance.

The PEA recommends (para 4.3.5 and 5.3.1) in the first instance that avoidance of this loss is explored over providing compensation for the loss, and is the approach that GMEU would advocate for, in line with Policy G7 of Rochdale's Local plan which identifies that:

"We will expect development proposals and improvements to:

- a. *Protect and include existing biodiversity (including established biodiversity interest on brownfield land) within new developments, public realm and open spaces and meet the requirements of the Biodiversity and Development SPD, Greater Manchester and Local Biodiversity Action Plans;*
 - b. *Protect and enhance existing features such as peatland, ponds, wetlands, reservoirs, mill lodges, trees, hedges, wooded areas, meadows, flora and fauna;*
 - c. Take opportunities to promote biodiversity and create new habitats through new development using landscaping and building and construction features wherever possible (e.g. ponds, species of vegetation, green roofs and walls, bat boxes, roof space, appropriate nest boxes and landscaping);
 - d. Enhance strategic wildlife corridors and the most natural areas and ensure that habitats and corridors are not fragmented by development;
 - e. Improve access where appropriate to new or existing biodiversity interest for public enjoyment; and
 - f. Protect important geology and take opportunities to increase interest and accessibility."
- (emphasis added)

If this is not possible, then the PEA states that enhancement of off-site areas of woodland could form part of any compensation effort of lost areas of woodland. If it is not possible to retain the broadleaved woodland, for other policy reasons, then GMEU would request that further details of this are explored and a woodland mitigation/compensation strategy is proposed. As well as management of the existing woodland within the ownership of the applicant, could new woodland creation be considered on the modified grassland habitat that is now within the 15m buffer of the AWI, which was previously proposed to be developed?

The policy (10.44) does acknowledge that in some instances it may be appropriate to require contributions for off-site habitat initiatives and enhancement. This approach is consistent with the BNG approach (Assessment of BNG report section 5.4c) whereby payment for off-site biodiversity units can be used to ensure a 10% net gain and all trading rules are met. The BNG assessment report has identified that, under the current proposal, a loss of -51.98% is predicted, although no further information is provided as to where and how many off-site units would be required to achieve a 10% net gain. GMEU would advise that the approach to buy off-site units is only appropriate if further information reveals that it is not possible to provide these units on-site. If that is accepted, then we would request that the number of units required and likely supplier of appropriate units is provided.

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Species

My previous comments requested further details with regards to lighting and bats. This has not been provided. I would therefore request that information is provided to identify likely sensitive features for bat flight lines and details of the proposed lighting levels in relation to these features, in order to demonstrate that appropriate dark corridors can be maintained on the site. If this information can't be provided, then additional bat surveys may be required to establish how bats are using the site and that appropriate mitigation can be provided.

In addition, any additional trees that the present on the site that have not been mapped (see comments above) will need to be assessed for their bat roost potential. Depending on the initial results, further survey work in relation to bats may be required.

Summary

Based on the above, I would request the following information:-

- Accurate reporting of desktop data relating to Priority Habitats and appropriate consideration of impacts of these habitats with the PEA (including drainage works and any other works outside the red line boundary). Clarification from the planning officer if works outside the red line boundary need to be included within the boundary.
- Clarification/remapping of the wooded vegetation cover on the site, especially with regards to the area mapped as other-neutral grassland. The BNG information will also need to be updated appropriately and bat surveys undertaken of any trees that haven't previously been assessed.
- Photographs correctly labelled and a map provided with location and orientation they were taken.
- Details of compensation strategy for the loss of the woodland on the site, considering habitat creation within the 15m buffer and enhancement of retained woodland within the ownership/control of the applicant.
- An updated BNG report to demonstrate how 10% BNG can be provided (If after on-site options are explored 10% BNG cannot be met on site, further information provided around how it will be achieved provided).
- Identification of sensitive habitats and clarification of lighting around these habitats— if lighting is proposed further details provided to demonstrate no impacts on bats and other nocturnal animals is provided.

Yours sincerely,

Emma Marston
Ecology Planning Manager