

From: [Samuel Bolton](#)
To: [Development Management](#)
Cc: [Tom Hiles](#)
Subject: 2025_08_15 Ecology comments 25/00621/FUL
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For the attention of Tom Hiles

Application: 25/00621/FUL

Dear Tom,

Summary

The main consideration for this application are bats, nesting bird & BNG. All can be covered by either informative or condition text.

Bats

Preliminary Roost Assessments (Urban Green – December 2023 and July 2025) have been submitted. A full internal and external inspection of the property found negligible potential for the building to support roosting bats. GMEU have no reason to question the finding of the report. The Local Records Centre holds few records of foraging or roosting bats in the area. Having assessed the work planned for the building, there is negligible potential for the works to disturb roosting bats and no further surveys are required.

Whilst the works to the property have been assessed as having negligible risk for bats, the applicant is reminded that under the Habitat Regulation it is an offence to disturb, harm or kill bats. If a bat and the signs of bats is found all work should cease immediately and a suitably licensed bat worker employed to assess how best to safeguard the bat(s). Natural England should also be informed. We would suggest an informative to this effect be placed on any permission.

Bat & lighting

Artificial lighting can affect the feeding and commuting behaviour of bats. Bats are likely to use the retained trees on site for commuting and foraging. Therefore prior to the commencement of the development a lighting plan should be submitted to and agreed by the council, once agreed the plan should be implemented in full. A **condition** to this effect should be placed on any permission.

Nesting Birds

The trees to be removed will have the potential to support nesting birds. All British birds nests and eggs (with certain limited exceptions) are protected by Section 1 of the Wildlife & Countryside Act 1981, as amended. Should the tree removal be delayed until after the 1st of March, I would recommend the following condition be added.

No tree or shrub clearance shall occur or demolition of the building occur between the 1st March and 31st August in any year unless a detailed bird nest survey by a suitably experienced ecologist has been carried out immediately prior to works and written confirmation provided that no active bird nests are present, which has been agreed in writing by the LPA.

Precautionary Working Methods

The applicant's ecologist (Urban Green – December 2023 and July 2025) felt that the development had the potential to harm common amphibians, hedgehogs and badgers.

I recommend a condition along the following lines is applied to any approval.

- Prior to development a reasonable avoidance measures method statement of for amphibians, hedgehogs and badgers will be provided to and agreed in writing by the LPA.

Biodiversity Net Gain

The information submitted with the application includes a Biodiversity Net Gain (BNG) report and statutory Biodiversity Metric from Urban Green (July 2025)

The appraisal found the site had some ecological value, consisting of residential garden and urban trees.

I have examined the Biodiversity Net Gain (BNG) metric spreadsheet and I am happy with the calculations provided.

After construction of the development, onsite biodiversity remediation and the 10% net gain requirement there is due to be a deficit of 0.81 Area Habitat units and a gain of 0.36 linear hedgerow units;

The applicant will need to purchase the required area units offsite. With the developing offsite market, this appears to be a realistic achievement for the site and therefore the LPA can be reasonably confident that the statutory biodiversity requirements could be discharged.

(Link to various wording for signposting applicant to statutory framework for Biodiversity Net Gain https://assets.publishing.service.gov.uk/media/663251d969098ded31fca800/BNG_Decision_Notice_Text.odt)

I would not consider the onsite biodiversity mitigation/enhancement to be significant.

PAS has provided some guidance on how to secure BNG via various conditions. [PAS Biodiversity Net Gain \(BNG\) Legal Agreement and Planning Condition Templates | Local Government Association](#).

If approved, the Biodiversity Gain Plan (BGP) and amend metric should be completed to show how the biodiversity gain will be achieved and approved by the LPA, before the automatically applied statutory biodiversity gain condition can be released.

Biodiversity Enhancement

We would also expect any such scheme to include measures to enhance biodiversity at the site and to provide a net gain for biodiversity, in line with the requirements of the National Planning Policy Framework. We would recommend that opportunities for biodiversity enhancement be incorporated into the new development. These should include:

0. Bat bricks and/or tubes within the new development
1. Bird box/swift nesting bricks
2. Hedgehog friendly fencing

We suggest a condition to this effect be placed on any permission.

In conclusion we are satisfied that the application can be forwarded for determination and that any permission if granted is supported by the **conditions/informative** above.

Yours sincerely,

Sam

Samuel Bolton

Ecologist - Greater Manchester Ecology Unit

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