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Good morning,

Thank you for consulting GMEU on the application at Hopwood Hall College, Rochdale Campus (25/00541/FUL).

This application is accompanied by a Preliminary Ecological Appraisal (PEA) Report (May 2025), Bat Survey Report (June 2025) and Biodiversity Net Gain (BNG) statutory metric and accompanying report (May 2025), all authored by ADAS. Based on the submitted information, GMEU have the following comments:

Ecological Appraisal

The PEA appears to provide robust ecological assessments, and no further surveys are required (with the exception of bat surveys which have now been undertaken). I have no reason to doubt the findings. Overall, the site holds relatively limited ecological value however the recommendations in the PEA report should be adhered to including pollution prevention measures for the River Roch. Additionally, work that will impact on habitats where nesting birds may be present (for example building demolition and hedgerow/shrub clearance), should not be undertaken in the main bird nesting season (March – August) unless suitable checks for active bird nests have been undertaken. We would suggest that a condition to this effect be placed on any permission.

As per the report, in line with the ecological objectives of the NPPF (2024) etc, the following ecological enhancements should be considered (and secured by condition):

- A minimum of two bird boxes are to be installed on existing trees or buildings onsite.

Bats

The Preliminary Roost Assessment (PRA) found Block A contained 'negligible' potential for roosting bats and Block B and the Garages contained 'low' potential for roosting bats. and B2 contained 'negligible' potential. Subsequently, bat dusk emergence surveys were carried out on Block B and the Garages on 27/05/2025.

Table 2 in the bat report details the weather conditions during the survey noting that it was 9°C. Best practice guidelines for emergence surveys state: '*The aim should be to carry out such surveys in conditions that are close to optimal (with sunset temperature 10°C or above without heavy rain or strong wind), particularly where low numbers of surveys are planned*'. Therefore, I would say that the temperature being lower than 10°C would be a slight limitation to the survey which hasn't been mentioned or addressed. However, given the existing lighting onsite, the low numbers of bat roosting features on the buildings and the limited bat activity recorded, I am willing to accept the survey data. Survey data in sub-optimal weather conditions should however be explained within limitations going forward. The results found no bats to be emerging from Block B and the Garages and therefore no roosts were identified. I have no reason to doubt the findings. No further surveys are required

however the below is recommended to be secured by condition:

- Installation of at least two bat boxes on existing trees and new buildings on the site
- A sensitive lighting scheme to reduce disturbance to bats and other wildlife in the locality, particularly along the River Roch (e.g. [Artificial Lighting Guidance - Buildings, planning and development - Bat Conservation Trust](#)).

Biodiversity Net Gain (BNG)

I have the below comments regarding the BNG assessment to be addressed:

- The latest proposed plan on the planning portal is: FE0012-ALA-XX-XX-D-L-0029_ Site Landscape Plan - Illustrative_ **P10**, however the BNG assessment uses **P06**. I assume the updated plan (P10) was produced after the BNG was finalised. There appears to be a difference in the tree planting proposals however the remaining habitats appear mostly the same between the two proposed plans. The BNG post-development plans must be accurate to the latest/final plans and the BNG updated.
- 'Other Neutral Grassland' (ONG) in 'moderate' condition is proposed onsite and although the report states that the area will not regularly be mown, it may be subject to regular recreational disturbance given that it is a college site. GMEU would not be confident that 'Other Neutral Grassland' in 'moderate' condition would be achieved and maintained for 30 years. We would recommend that 'Modified Grassland' in 'poor' or 'moderate' condition is targeted instead and this is still well exceeding 10% net gain and can still include a wildflower mix.

Summary

In summary, minor amendments are required for the BNG assessment and should be submitted prior to determination for GMEU to review.

Kind regards,

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