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**FAO Principal Planning Officer**  
**Rochdale Council**

7<sup>th</sup> Sept 2026

**By e-mail**

Dear Sir/Madam

**App PL/2026/0383**

**Description** Public Service Infrastructure development comprising of the construction of a part one, two and three storey (split level) new Alternative Provision (AP) School with associated parking, play space and landscaping.

**Site Address** Land off Mayfield Street, Rochdale

Thank you for consulting the Ecology Unit on the above planning application

**Ecology Survey Effort**

A range of ecology surveys and assessments of the site have been undertaken by suitably qualified ecologists to inform the application. The survey effort has been acceptable, no further surveys are required prior to determining the application.

**Impact on designated nature conservation sites**

The proposals will not affect any sites specially designated for their nature conservation value.

**Impact on notable habitats**

The development will cause losses to some habitats of local nature conservation value, including scrub woodland and neutral grassland. It is noted that part of the site has recently been cleared of vegetation, but the overall biodiversity losses and gains have been calculated on the condition of the site pre-clearance.

To protect remaining areas of retained habitat, and particularly retained trees, I would advise that Conditions are placed on any permission which may be granted to the proposals.

### **Suggested Condition - Construction Environmental Management Plan (Biodiversity)**

No development shall take place (including ground works and vegetation clearance) until a Construction Environmental Management Plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) must include the following:

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of “biodiversity protection zones”.
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements)
- d) The location and timings of sensitive works to avoid harm to biodiversity features.
- e) The times during which construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECow) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs if applicable.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

*Reason:* to protect biodiversity

### **Suggested Condition – Arboricultural Method Statement**

The Arboricultural Method Statement provided to inform the application (including Tree Protection Measures) – *Pennine Ecological 2026* - should be required to be implemented in full.

*Reason* – to protect trees

### **Impact on Notable Species**

#### **Bats**

No known bat resting places will be lost to the development, although the application site is likely to be used by foraging bats

The development will result in some losses to bat foraging habitats, although some of the habitats present on site and nearby which are of most value to bats (mature trees) will be retained, and new landscaping will be introduced which could benefit bats. Nevertheless, all UK bats and their resting places carry a high level of legal protection and therefore other measures to conserve bats are recommended.

The development should avoid overly intrusive lighting of habitats of most value to bats (particularly mature trees) and should incorporate new opportunities for bat roosting (e.g. bat boxes and integrated features for bats).

**Suggested Condition - Lighting Design Strategy for Biodiversity**

Notwithstanding the submitted details, and within 6 months of any approval, a "lighting design strategy for biodiversity" in accordance with ILP Publications' "Guidance Note 8 Bats and artificial lighting" shall be submitted to and approved in writing by the Local Planning Authority for all existing and proposed lighting within the development hereby permitted. The strategy shall:

- a. identify those areas /features on site that are particularly sensitive for bats and other nocturnal wildlife that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
- b. show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places. All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy.

Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

*Reason:* to protect biodiversity.

Final landscape plans for the development should incorporate new features of value for roosting bats (e.g. integrated bat bricks, bat boxes).

**Protection of Nesting Birds**

Precautions will need to be taken throughout any further site clearance works and groundworks to avoid harm to nesting birds, including ground nesting birds. I would advise that no vegetation clearance required to facilitate the proposals should be undertaken during the optimum time of year for bird nesting (March to August inclusive) unless nesting birds have been shown to be absent by a suitably qualified person. All nesting birds their eggs and young are protected under the terms of the Wildlife and Countryside Act 1981.

A range of bird nesting boxes should also be provided throughout the site as part of any final landscape proposals as a useful biodiversity enhancement measure.

## **Biodiversity Net Gain (BNG)**

The development is required to achieve at least a 10% gain in Biodiversity as measured using a statutory Metric. Currently there will be a small loss in biodiversity following development. To achieve the required gains off-site habitat units will need to be sourced from a registered Habitat Bank. Given that the habitat types which need to be created are relatively common, and the number of habitat units required is small, there is a high level of confidence that off-site provision will be available and that the required biodiversity gains will be able to be achieved.

I would advise –

- That a final Biodiversity Gain Plan will be required to be provided to the Council by the statutory pre-commencement Biodiversity Gain Condition.
- Full details of where and how the off-site gains will be achieved must be given in the Biodiversity Gain Plan.
- The on-site habitat gains should be secured in the long-term (30 years) by requiring the preparation of a Habitat Management and Monitoring Plan (HMMP) by Condition. Once agreed by the Council in writing, the HMMP must be implemented in full.

I hope that these comments are useful

Yours

Derek Richardson  
Principal Ecologist

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