

Greater Manchester Ecology Unit

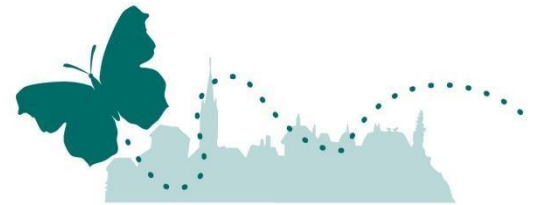
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**Greater Manchester
Ecology Unit**

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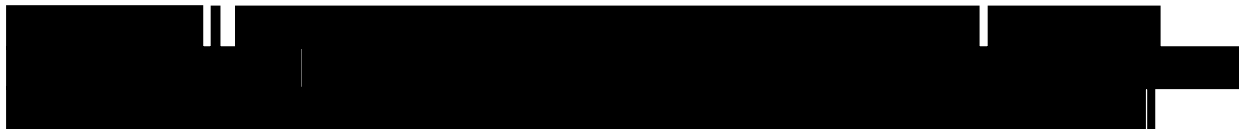
18th May 2025

By e-mail

Dear Sir/Madam

**RE: PLANNING APPLICATION 142223/FO/2025 | ERECTION OF A RESIDENTIAL DEVELOPMENT
COMPRISING 120 DWELLINGS, LONGFORD ROAD/RYEBANK ROAD, MANCHESTER**

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



Ecology Surveys

A range of Ecology surveys have been undertaken to inform the development, some undertaken on behalf of the applicant and others undertaken on behalf of the Friends Group associated with the site. GMEU has also carried out some (limited) ecological surveys and assessments of this site.

Impact on Designated Sites

The development will not affect any sites statutorily designated for their nature conservation value. The site has not been identified in the emerging Local Nature Recovery Strategy as a priority part of the Strategy.

Impact on Notable Habitats

The application site supports a locally valuable mosaic of semi-natural habitats, including neutral grassland, scrub, woodland, scattered trees and hedgerows. The habitats present appear to have developed naturally over a number of decades and have consequently developed a reasonable level of species diversity.

I note that valuable trees (black Poplars) and boundary hedgerows, which are priority species and habitats for conservation, will be retained, but also note that there will be significant losses to neutral grassland.

The neutral grassland on the site is a of more than local value, supporting amongst other species Meadow Vetchling, Early Marsh Orchid, Bee Orchid, Northern Marsh Orchid and Goat's-beard. The presence of these plants is an indication that the sward is at least moving towards a species-rich community, and also that with appropriate management good quality, sustainable species rich grasslands would be achievable.

Currently I would regard the compensation proposed for the loss of the grassland (and other habitats) to be inadequate. The Biodiversity Gain Metric provided as part of the application shows a significant loss in local biodiversity, and the Metric may have undervalued parts of the site. It is stated that habitat compensation (and a required gain in biodiversity) will be achieved off-site, but no details of this off-site provision appear to have been provided.

Impact on Notable Species

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Bats

The site is used as a local foraging resource for bats and the loss of semi-natural habitats on the site may reduce this available foraging habitat. However, I note that –

- Some of the habitat of most value to bats (trees and hedgerows) will be retained,
- There is extensive high-value bat foraging habitat in the wider area, including Longford Park and the Mersey Valley,
- New landscaping is planned which will have some value for foraging bats,
- It would be possible to install features of value to roosting bats on the site, including bat boxes and features integrated into buildings.

I would conclude that it ought be possible to allow the development without causing long-term harm to local bat populations.

I would advise that the development should avoid overly intrusive lighting of habitats of most value to bats and should incorporate opportunities for bat roosting (bat boxes and integrated features for bats).

Amphibians

The site is considered likely to support amphibians including common toads, common frogs and newts, although the specially protected species great crested newt is considered to be absent.

While it is considered unlikely that the development will significantly affect amphibian breeding habitats, there will be losses to terrestrial habitat used by amphibians and there is a risk that amphibians could be harmed during site clearance and construction works.

Regarding the loss of habitats, I would refer you to my comments above in respect of habitats.

I would advise that if permission is to be granted to the development a reasonable avoidance method statement should be required to be prepared providing details of measures to be taken to avoid harm to amphibians during construction works.

Nesting Birds

A range of relatively nesting birds have been recorded across the site. Precautions will need to be taken throughout any site clearance works and groundworks to avoid harm to nesting birds. All nesting birds their eggs and young are protected under the terms of the Wildlife and Countryside Act 1981.

It should be possible to install a range of bird nesting boxes throughout the site, post-completion, as part of any detailed landscaping proposals.

Invasive Plants

The invasive non-native species three cornered garlic (*Allium triquetrum*) and two small areas of variegated yellow archangel (*Lamium galeobdolon* subsp. *argenteum*). The spread of these plants is prohibited under the terms of the Wildlife and Countryside Act 1981 (as amended).

Precautions should therefore be taken to avoid the spread of this species during the course of any approved works.

Biodiversity Net Gain (BNG)

The development is required to achieve at least a 10% gain in Biodiversity as measured using a statutory Metric. Losses to semi-natural habitats will be significant. It has been demonstrated that the habitat and landscape enhancements planned for the site will not be able to meet the 10% gain, and therefore it is proposed that off-site Biodiversity units will be sought. Habitat losses are significant, with 26.42 area-based habitat units and 0.26 watercourse habitat units required in order to achieve an overall gain.

However, no details appear to have been supplied as to how and where these off-site Units will be provided. I would prefer it if details of off-site provision for BNG could be provided before the application is decided, in order to give confidence that the BNG Condition which will apply to any permission granted to the application will be able to be met.

In any case a comprehensive Biodiversity Gain Plan and a long-term Habitat Management and Monitoring Plan (HMMP) should be required to be provided by Condition, to secure the required Biodiversity Gain.

Conclusion and Suggested Conditions

I would advise that the application is refused on nature conservation grounds, because of –

- Inadequate compensation for loss of local biodiversity, notably losses to species-rich neutral grassland, with no details of off-site habitat creation/enhancement provided,
- [REDACTED]
- Lack of information concerning proposed off-site provision for the development to achieve an overall net gain in biodiversity

If for overriding reasons permission is to be granted to the application, I would advise that a number of Conditions should be applied to the permission in the interests of nature conservation.

Condition - Construction Environmental Management Plan

No development shall take place (including ground works and vegetation clearance) until a more detailed 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

[REDACTED]

[REDACTED]

[REDACTED]

Condition - Lighting Design Strategy for Biodiversity

Notwithstanding the submitted details, and within 6 months of the date of this 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.

Condition - Time Limit on Development Before Further Surveys are Required

If the development hereby approved does not commence (or, having commenced, is delayed for more than 12 months) within 1 year from the date of the planning consent, further ecological surveys must be commissioned to –

- i) establish if there have been any changes in the species / habitats present at the site and
- ii) identify any likely new ecological impacts that might arise from any changes.

The amended survey reports shall be submitted to and approved in writing by the local planning authority prior to commencement of development.

Condition – Preparation of a Reasonable Avoidance Method Statement for the protection of amphibians

No development shall commence until a Reasonable Avoidance Method Statement (Amphibians) has been prepared. Once agreed, the method statement should be required to be implemented in full.

Reason: to protect biodiversity.

Informatives

The Applicant is reminded that under the Wildlife and Countryside Act 1981, as amended (section 1), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this act. Trees and scrub are likely to contain nesting birds between 1st March and 31st August inclusive. Trees / scrub are present on the application site and are to be assumed to contain nesting birds between the above dates, unless a recent survey has been undertaken by a competent ecologist to assess the nesting bird activity on site during this period and has shown it is absolutely certain that nesting birds are not present.

The spread of invasive plant species should be avoided during the course of any development.

I hope that these comments are useful.

Yours

Derek Richardson

Principal Ecologist