

GMEU response

The application is accompanied by a Preliminary Ecological Appraisal (PEA) report and Biodiversity Net Gain (BNG) statutory metric (Pennine Ecological, October 2025). Based on the submitted information, I have the following comments:

Ecological Appraisal

The PEA report appears to provide appropriate ecological assessments, and I have no reason to doubt the findings. Given that it appears that the site has mostly been cleared already (prior to planning permission) it now has limited ecological value. I have the following recommendations:

- Given that Japanese knotweed was observed on-site, the following is recommended to be secured by condition:

It is an offence under the terms of Schedule 9 of the Wildlife and Countryside Act 1981 to allow Japanese knotweed to grow in the wild. We would therefore recommend that a condition be attached to any permission that prior to the commencement of any works on site (including vegetation clearance) a methodology for the control of invasive species be submitted to and agreed by the council. Once agreed the method statement must be implemented in full.

- Work that will impact on habitats where nesting birds may be present (for example vegetation clearance), should not be undertaken in the main bird nesting season (March – August) unless suitable checks for active bird nests have been undertaken.
- Planning policy encourages enhancements and net gains for biodiversity to be delivered through the planning system, which doesn't appear to have been acknowledged in the PEA report. Wherever possible measures to enhance the site for biodiversity should be secured as part of this planning application and could include integration of a bat and bird box onto the new building (at appropriate heights and orientations). We would suggest that a condition to this effect be placed on any permission.

Biodiversity Net Gain (BNG)

I have the below comments on the BNG assessment which need to be addressed:

- The PEA report states: '*Evidence from Google Earth and Google Streetview indicates that recent tree / vegetation removal has occurred along the eastern site boundary. In line with BNG guidance these habitats will be assessed based on historical aerial mapping evidence*'. The UKHabs Habitat Survey

map provided (Map 1), appears to show the current baseline(post-clearance) of the site as opposed to the baseline prior to clearance. A pre-degradation map should be provided to show the estimated clearance which has taken place. **Updated**

- The BNG metric implies that there was one medium sized and two small sized trees present prior to clearance, this may be correct however as per my above comment, it would be useful for this to be shown on a map to understand the baseline conditions pre-degradation. **Updated**
- The PEA report states that 'sparsely vegetated land' is present (ephemeral/ruderal within the recently disturbed ground), however I can't see that this has been inputted into the metric, with only 'introduced shrubs' entered for the Japanese knotweed. This should be accurately inputted into the metric. **Very localised ephemeral within the u1f. This has been added as a row in the metric.**
- The existing non-native and ornamental hedgerow appears to be noted as retained in the BNG metric, however from the 'Proposed Landscaping' plan (drawing no: TDS-25-196-05), there doesn't appear to be any hedgerows included and therefore I would assume that this is to be removed. This should be clarified and the BNG or landscape plan amended accordingly. **Landscaping plan updated.**
- The BNG scores may be altered slightly with the above amendments, however the proposal will be achieving a loss of habitat units and likely hedgerow units. This does not appear to be mentioned or acknowledged in the PEA report (or any BNG report). The report should also state how the applicant plans to achieve a minimum 10% net gain for this proposal, either on-site or off-site so that GMEU can be confident that the mandatory 10% will be achieved. **The BNG assessment summary report provides all of this and how the proposal will achieve 10%. Not required in the PEA report which simply recommends a BNG assessment is undertaken. No change required.**

Summary

In summary, minor amendments are required for the BNG assessment (as per my comments above) and this further information is required prior to determination of the application.

Ecologist

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