

70195 – Millwood School, School Street, Radcliffe

Thank you for consulting the GMEU

Summary

The main ecological issue is that the development will result in a loss of biodiversity at the site level.

Bats

The mature trees proposed for removal were assessed for bat roosting potential. No evidence of bat roosting features was identified. I have no reason to doubt the findings of the report. No further survey is required.

The biodiversity report also notes that external lighting could negatively impact on the retained trees and canal. An isolux plan has however been provided that demonstrates that lux levels will be at a level that are very unlikely to adversely effect bats or any other nocturnal wildlife. No further information or measures are required.

Other Protected Species

Previous surveys on the wider site have failed to find any evidence of protected species, with the new proposal restricted to a small area of amenity grassland. I am satisfied that all other protected species can be reasonably discounted.

Nesting Birds

Trees will be lost, potential bird nesting habitat. All British birds nests and eggs (with certain limited exceptions) are protected by Section 1 of the Wildlife & Countryside Act 1981, as amended. I recommend a condition along the following lines be applied to any permission.

No works to trees or shrubs shall 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 clearance and written confirmation provided that no active bird nests are present which has been agreed in writing by the LPA.

Manchester-Bolton & Bury Canal SBI

I note the response from the Canal & River Trust. I agree with their recommendations, which whilst made from the perspective of protecting their asset, would also protect the ecological value of the SBI. I have nothing additional to add.

Contributing to and Enhancing the Natural Environment & Biodiversity Net Gain

Section 174 of the NPPF 2021 states that the planning policies and decisions should contribute to and enhance the natural and local environment. The development will result in the loss of a small area of low ecological value grassland, some small recently planted trees and several mature trees that were retained as part of the previous development. The latter are the most significant features of ecological value. With regards wildlife the only likely adverse effect is with regards nesting birds.

Whilst the losses are significant only at the site level, there appears to be no proposals for mitigation.

With regards biodiversity net gain, whilst I accept that it is not as yet mandatory, there is now significant weight in the planning process at both the regional level due to policies in the draft PfE and nationally with secondary legislation to enact BNG now available on-line along with the draft guidance for implementation.

The development is therefore in my opinion contrary to section 174 of the NPPF and should as a minimum provide some form of mitigation for loss of trees in line with Bury UDP policy EN6/3. Mitigation should also be provided for loss of bird nesting habitat, through provision of bird boxes on mature retained trees. I therefore recommend a condition along the following lines is applied to any permission.

A biodiversity mitigation and enhancement plan shall be submitted to and approved in writing by the LPA, prior to commencement of development. The content of the plan should include elements to mitigate for loss of trees and bird nesting habitat. The approved plan will be implemented in accordance with the approved details.

Ecologist

GM Ecology Unit