

Thank you for consulting GMEU on the below application (72313)

An Ecological Survey and Assessment (ERAP, 2025) has been undertaken. The site predominantly comprised woodland, and while this is identified as priority habitat on MAGIC, the ecologist found that the site was not representative of this. I have no reason to disagree with this assessment. The woodland did however have potential for species including badger, and Reasonable Avoidance Measures are proposed within Section 5.3.11 of the report. These should be adhered to and secured via condition. Nesting bird checks will also be required for any vegetation removal during the nesting bird season.

The trees on site were assessed for their potential to support roosting bats. Notably, one of the trees on site was identified as having PRF-M bat roosting potential. As per the PEA, if any works are proposed on T10 then further surveys will be required to determine the tree's suitability for use by roosting bats. It is unclear whether the tree will be retained through the development, though looking at the arboriculture impact assessment, it is likely that it will be impacted. I would therefore ask for further clarification regarding the status of the tree, and should it be removed or significantly impacted as a result of the proposals, further surveys will be required prior to determination.

The remaining trees on site were found to have PRF-I potential and removal of any of these should be undertaken in accordance with Section 5.3.9 – this should be secured via condition.

With regard to the Assessment of Biodiversity Net Gain (ERAP, 2025), this found that a loss of 0.31 habitat units will be incurred on site, and a 10% gain will likely be achieved through the purchase of off-site units. I would have no objection to this approach and have no reason to doubt the baseline or projected post-development value of the site. The LPA can also be reasonably confident that the small number of off-site units could be acquired from a nearby habitat bank when it comes to discharging the BNG condition. As such, the Biodiversity Gain Plan condition will apply should this planning application receive permission. At condition stage sufficient information will be required to demonstrate how a 10% net gain will be provided, including a Biodiversity Gain Plan, final version of the BNG metric (showing a 10% gain) and evidence of where BNG units have been purchased from.