

Dated: 22/07/2025

Our Ref: P2582 New Yard Areas, Land at Eton Business Park, Eton Hill Road, Radcliffe

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Response To Matters Raised by Greater Manchester Ecology Unit Dated 27th November 2024 (Planning Ref: 71000)

Introduction

This response note has been prepared by Petrina Harris BSc (Hons) MSc ACIEEM of Elton Ecology Ltd on 22/07/2025 in order to clarify its position on GMEU comments raised on 27th November 2024 with reference to the above planning application.

Elton Ecology Ltd welcomes the constructive comments provided, and in close liaison with our client we have provided feedback in the present response note.

Foreword On Proportionality

With reference to the British Standards Institute *BS 42020:2013 Biodiversity — Code of practice for planning and development*:

'The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development.

Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate. [our emphasis].

The above approach to proportionality has been taken to survey effort and in the development of the mitigation and compensation scheme by Elton Ecology Ltd.

Table 1: Summary Of Responses and Actions

Ecology Consultee Comment*	Issue Raised	Elton Ecology Ltd Response Summary
Dated: 27/11/2024 Officer: Suzanne Waymont MCIEEM	<i>'In terms of Biodiversity Net Gain, under Schedule 14 of the Environment Act, where unauthorised degradation of the onsite habitats has taken place on the land between 30 January 2020 and the relevant date (in this case 14/07/2024), the biodiversity pre development value of the onsite habitats should be calculated as the biodiversity value of the habitats on the date immediately before the carrying out of these degradation activities. In other words the biodiversity value of the site is taken to be as it was before the site was cleared and as detailed in the Metric dated 14th July 2024.'</i>	The BNG Report & Metric Version V1 Dated 14th July 2024 addresses this comment. Further explanation is provided below. The BNG report and Metric relates to the habitats prior to the site clearance in the north of the site, and therefore the baseline value of the site in the Metric dated 14th July 2024 is considered appropriate.
	<i>'If they have removed vegetation that was previously going to be retained (e.g. trees in north of the site), this must now be counted as lost and the metric revised on this basis.'</i>	The BNG Report & Metric Version V1 Dated 14th July 2024 and images provided by the client via email dated 9th July 2025 addresses this comment. Further explanation is provided below. Images provided by the client showing the extent of site clearance and habitat retention are provided in Appendix 1. The images show that the area of modified grassland within the north of the site has been impacted via the site clearance. This area had already been recorded as lost within the BNG report and Metric, and therefore no further BNG work is required relating to the grassland. The images also show that the line of trees at the north site boundary has been retained and unimpacted by the site clearance. Therefore, the BNG report and Metric still align with the linear habitats retention and enhancement on site, and no further BNG work is required relating to the line of trees.

*Taken from GMEU comment.

Appendix 1: Photographs

