

GMEU -- Thank you for consulting GMEU on the application at Unsworth Cricket and Tennis Club Ltd, Pole Lane, Bury (73059) for the erection of 5 padel courts.

The application is accompanied by a Preliminary Ecological Appraisal (PEA), Great Crested Newt eDNA Survey Technical Note and a Biodiversity Net Gain (BNG) assessment including statutory metric and report (Rachel Hacking Ecology, March/April 2026). Based on the submitted information, GMEU have the following comments:

Ecological Appraisal

The PEA report appears to provide robust ecological assessments, and I have no reason to doubt the findings. The report recommended further great crested newt (GCN) surveys which have now been carried out (see further comments below). The mitigation and enhancement recommendations made in the PEA report should be followed (section 5) and are recommended to be secured by condition, as below:

- Precautionary Working Methods Statement (PWMS) – to be implemented to safeguard potential common amphibians, badgers and other small mammals such as hedgehogs and any other wildlife which may be present.
- Construction & Environmental Management Plan (CEMP) – to be produced and implemented to detail the protection/prevention measures (e.g. the PWMS mentioned above) to safeguard wildlife and habitats adjacent to the site (e.g. the wooded area to the east).
- Sensitive lighting scheme – to be implemented to reduce disturbance to bats and other wildlife in the locality (e.g. [Artificial Lighting Guidance - Buildings, planning and development - Bat Conservation Trust](#)),

GMEU would also recommend the following:

- As all wild birds, their nest and eggs are protected under the Wildlife and Countryside Act 1981 (as amended), we would recommend that the following condition be attached to any permission, should it be granted:
No removal of or works to any trees/shrubs/vegetation shall take place during the main bird breeding season 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared and ensured that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site.
- Biodiversity Enhancements – it is recommended that enhancements are provided (to comply with paragraph 187 of the NPPF, 2024), such as incorporating bat and bird boxes into the proposal at the appropriate heights/aspects. These would be most suited to mature trees which may be present on the peripheries of the site or within the wider landownership area.

Great Crested Newts

The results of the further GCN surveys confirmed GCN presence in Ponds 1, 4, 5 and 6 (within 250m of the site). The report states that 0.12ha of short, regularly mown modified grassland and 0.07ha of tall forbs will be removed, although the BNG metric implies that 0.15ha of grassland and 0.11ha of tall forbs will be removed which is slightly higher. However, as per the report, the development would not impact any breeding habitat (ponds), and given its small scale, would not adversely impact potential GCN dispersal/movement corridors - I have no reason to disagree with this.

Whilst GCN have been confirmed present in the wider landscape, the area of clearance for the padel courts is very small and the habitats are of low value to GCN and therefore I agree that it is reasonable to suggest that Precautionary Working Methods are applied as opposed to the requirement for a mitigation licence. The PWMs detailed on pages 10-11 of the GCN

report are to be followed to safeguard any GCN in the unlikely event that they are present on-site. We would also recommend a two-stage cut of any tall vegetation present which entails cutting the vegetation down to around 150mm, leaving for 24-48 hours and then cutting the vegetation low to ground and maintaining it at this height until construction begins (if permission is granted), this allows any GCN/amphibians to move off-site before the vegetation is cut to ground.

We would recommend that the GCN Precautionary Working Methods (including two-stage cut) are secured by condition.

Biodiversity Net Gain (BNG)

- The BNG assessment appears to be accurate and is resulting in a gain of 0.06 habitat units (+11.14%) with the trading rules satisfied.
- As per the report, the gains to be delivered on-site meet the criteria of 'significant on-site enhancements' due to the medium distinctiveness habitats proposed (e.g. other neutral grassland and trees). Therefore, a Habitat Management and Monitoring Plan (HMMP) detailing management prescriptions for a 30-year period needs to be provided and this can be secured via a Section 106 agreement or a condition. GMEU recommends that a Section 106 is used in this instance as it provides a legal agreement to secure the mitigation for the habitat lost and also provides a resource for the monitoring required by the LPA, which cannot be secured via a condition. We would advise that mechanism is agreed between the applicant and the LPA before the application is determined.
- The statutory **Biodiversity Gain Condition** will be applied to the planning permission, should it be granted. To discharge the condition, the following is required: Biodiversity Gain Plan (using DEFRA template), final BNG metric and a 30-year HMMP for on-site gains. Please see [Biodiversity net gain - GOV.UK](#) for how this should be dealt with on the decision notice.

Summary

In summary, GMEU are satisfied that this application can be forwarded to determination and that any permission if granted is supported by the conditions recommended above, including the statutory Biodiversity Gain Condition and Precautionary Working Methods for great crested newts (GCN).

If you have queries relating to this advice, please do not hesitate to contact me.

Kind regards,

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