

Thank you for consulting GMEU on the application at Former Bury Fire Station, The Rock, Bury (73330) for the proposed change of use of land to a vehicle storage yard.

I can see that a Biodiversity Net Gain (BNG) report and statutory metric have been provided and I have the below initial comments before providing a formal response:

- The report contains no surveyor information such as the name, credentials and experience the surveyor has with undertaking BNG assessments. As per the Statutory Biodiversity Metric user guide – the full metric must be completed by a competent person such as a qualified and experienced ecologist. The small sites metric can be filled in by a ‘non-ecologist’ but this hasn’t been provided for this application.
- The metric appears to have been completed by and reviewed by P. Horrell but there is no further information provided as to P. Horrell’s credentials or who they work for.
- I can’t see that any Habitat Condition Assessment (HCA) sheets have been provided but these will be required to evidence the condition of the habitats on-site.
- Section 5.2.4 refers to ‘knotweed’ being present on-site, it should be confirmed whether this is Japanese knotweed given that this is an Invasive Non-Native Species listed on Schedule 9 of the Wildlife and Countryside Act.
- We would expect the report to detail the botanical and tree species found which appears to have only partially been included for the scrub species only.
- In the document overview table, it says that the metric shows a loss of 0.34 habitat units. This isn’t in accordance with the submitted metric which shows a loss of 0.27 habitat units and a unit deficit of 0.34 units.
- There appears to be no assessment provided for the impacts to protected species such as nesting birds, hedgehogs and any other species which could be present on-site.

Please can clarifications/further information be provided to address my comments above, prior to determination of the application.

Kind regards,

Melissa Sullivan

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