

Thank you for consulting the GMEU

Summary

The only potential ecological issue is biodiversity net gain.

Protected Species

I am satisfied that it is very unlikely that there are any significant ecological issues associated with this development, given the footprint of the development and extensive surveys that occurred for the existing sport club, that found no evidence of any such species. No further information or measures are required.

Nesting Birds

Scrub 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 nesting survey method statement by a suitably experienced ecologist has been supplied to and agreed in writing by the LPA.

Contributing to and Enhancing the Natural Environment & Biodiversity Net Gain (BNG)

Section 180 of the NPPF 2023 states that the planning policies and decisions should contribute to and enhance the natural and local environment. 10% BNG is mandatory under Schedule 7A of the Town & Country Planning Act 1990 (as inserted by schedule 14 of the Environment Act 2021).

A small area of scrub will be lost to development. Mitigation in the form of scrub planting is proposed on adjacent modified grassland. The only wildlife issue is nesting birds.

A biodiversity metric has been provided, I have no issues with the baseline value of the site. To ensure 10% net gain mixed scrub is proposed. However, to achieve 10% moderate condition is proposed. I have two issues with this:

- First the biodiversity net gain assessment whilst noting 3 condition criteria need to be met, which is correct, includes only one scrub criteria and two grassland criteria. This needs to be amended to the three target scrub criteria and;
- I am not convinced that it is possible to meet more than two condition criteria for such a small area and the realistic outcome is mixed scrub in poor condition at which point the development fails to achieve 10% BNG.

Whilst noting the above, the number of units involved is very small and the area of modified grassland available within the red edge is more than enough if more mixed scrub in poor condition was planted to achieve 10% BNG. Achieving 10% BNG should not be an issue for this development and should they prefer not to plant more mixed scrub, the number of units to be found is so small that funding off-site compensation should also not be an issue.

I therefore recommend that prior to determination the BNG assessment is reviewed in light of my comments above and a revised metric or more detailed explanation on how moderate condition will be achieved provided.

One bird box should also be provided.

