

Thank you for consulting GMEU on the below application (73090)

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 hedgehog, 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. The tree will be retained under current proposals, and as such no further surveys are currently required. However, if at any point plans change and T10 (reference from PEA) will be removed, nocturnal bat surveys will need to be undertaken prior to the works proceeding. These should be secured via a condition. The results of the surveys and any mitigation measures proposed will need to be submitted to and approved by the local planning authority. Survey work must be undertaken by an appropriately qualified ecologist and the methodology and mitigation measures shall follow best practice guidelines. If bats are recorded roosting in the tree a protected species licence will be required from Natural England. Once approved by the local planning authority, the measures in the report must be carried out in full.

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

An informative should be used so that the applicant is aware of the legal protection that certain species receive and that the granting of planning permission does not negate the need to abide by the laws that are in place to protect biodiversity. If at any time any protected species are found or are suspected of being present on the site and adversely affected by the development, work should cease immediately, and an ecologist/LPA should be contacted.

Wherever possible measures to enhance the site for biodiversity should be secured as part of this planning application, which could include the integration of bat or bird boxes into the proposed buildings as per Section 5.4 of the PEA. Connectivity should

also be retained throughout the site, for example by ensuring the boundaries are as permeable for wildlife as possible. This could be achieved by providing suitable gaps in fencing as per Section 5.4.12 of the PEA.

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. While the BNG assessment is not based on final plans, it is unlikely that the overall figures will change significantly when updated, and a gain will still be unachievable on site. Overall, the LPA can also be reasonably confident that the small number of off-site units that will be required 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 based on final plans (showing a 10% gain) and evidence of where BNG units have been purchased from.