

Thank you for consulting GMEU on this application at Philips High School, for the construction of full-size synthetic turf pitch and associated works. The ecology document that I have referred to in these comments is:

- Preliminary Ecological Appraisal, November 2025 (ArbTech);
- Biodiversity Net Gain Assessment (BNGA), February 2026 (ArbTech); and
- Biodiversity Net Gain Metric, April 2026 (ArbTech).

Based on this document, and the other plans submitted in relation to this application, I have the following comments:

Nesting Birds

There is habitat suitable for nesting birds present on the site. Work that will impact on habitats where nesting birds may be present (for example building works near to trees), should not be undertaken in the main bird nesting season (March – August) unless suitable checks for active bird nests have been undertaken. We would suggest that a condition to this effect be placed on any permission.

Planning policy encourages enhancements and net gains for biodiversity to be delivered through the planning system. Wherever possible, measures to enhance the site for biodiversity should be secured as part of this planning application and should include integration of at least two bird boxes onto trees or buildings within the blue line boundary, which should be secured via condition, to provide biodiversity enhancements.

Protected Species

Precautionary working methods for reptiles, amphibians, badgers and hedgehog should be followed prior and during development works (as per pages 8, 10, 11 and 12 of the PEA). This should be secured via a condition.

Protected species can turn up in unexpected places, and the granting of planning permission does not negate the need to abide by the laws which are in place to safeguard biodiversity. An informative should be used so that the applicant is aware that they must seek ecological advice should they find or suspect that the proposals will impact on protected species.

Biodiversity Net Gain (BNG)

A BNG Metric has been submitted, which shows a loss of 1.23 units (-69.55%) to be incurred on site. To achieve a net gain of 10%, 1.41 units are required. The BNGA proposes that off-site units are purchased from a nearby habitat bank and therefore at this stage, we would recommend a statement to confirm how the applicant will be achieving the 10% net gain (whether this would be on-site or with off-site unit purchase). As the on-site gains are not considered to meet the criteria of 'significant on-site enhancements', a simple management plan (such as a LEMP) should be submitted for the management of the modified grassland.

The statutory **Biodiversity Gain Condition** will apply should this planning application receive permission. To discharge the condition, the following is required: a Biodiversity Gain Plan (using the DEFRA template), final version of the BNG metric (including on-site and off-site information), plus evidence of the offsite provider (including gain site reference and units purchased). The off-site information in the final BNG metric must be filled in by the off-site provider. Please see [Biodiversity net gain - GOV.UK](https://www.gov.uk/guidance/biodiversity-net-gain) for how this should be dealt with on the decision notice.

Finally, it should be noted that there are trees and hedges near to the red line boundary which should be protected as per the arboricultural reports, during development works, to ensure that they are not damaged.

**Greater Manchester Ecology Unit
Tameside MBC, Dukinfield Town Hall
King Street, Dukinfield,
Tameside SK16 4LA**



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