

Thank you for consulting the GMEU.

Summary

There are no significant ecological issues associated with this development. The main ecological issue associated with this site is the proximity to the River Irwell and Kirklees Brook.

Bats

A valid bat assessment has been provided. Two buildings were assessed as having low potential and three with no potential for roosting bats. Whilst normally buildings with low bat roosting potential would require one dusk survey, the consultant regards the risks as very low and therefore suitable for precautionary working measures. I have no reason to doubt the conclusions of the report. I therefore recommend a condition along the following lines is applied to any permission.

The demolition of buildings B4 & B5 shall be carried out in accordance with section 4.3.8 of the Preliminary Ecological Appraisal, by Collington Winter Environmental ref: CW20-3204 RPT 001 as already submitted with the planning application and agreed in principle with the LPA prior to determination.

The River Irwell and Kirklees Brook are likely to be important corridors for bats. Whilst no new lighting appears to be proposed any new external lighting could negatively effect the functionality of these corridors. I therefore recommend a condition along the following lines be applied to any permission

Prior to development an external lighting impact plan for any new lighting shall be submitted to and approved in writing by the LPA. The strategy shall:

- *show how and where external lighting will be installed and through appropriate lighting contour plans demonstrated clearly that no negative impact on the River Irwell and Kirklees Brook will occur;*
- *Specify frequency and duration of use.*

All external lighting shall be installed in accordance with agreed specifications and locations set out in the strategy.

Other Protected Species

I am satisfied that it is very unlikely that any other protected species are present on the site. Whilst otter are known to be present in the River Irwell, the site is hostile to this species with no vegetation or cover. No further information or measures are required.

Nesting Birds

There are no trees or shrubs on the site, with the buildings all sub-optimal for nesting birds. Bird may however nest in adjacent habitats just off-site. I recommend as a precaution an informative along the following lines is applied to any permission.

The applicant is reminded that, under the Wildlife and Countryside Act 1981 as amended it is an offence to remove, damage, or destroy the nest of a wild bird, while the nest is in use or being built. Planning consent does not provide a defence against prosecution under this act. If a birds nest is suspected work should cease immediately and a suitably experienced ecologist employed to assess how best to safeguard the nest(s).

Other Wildlife

I am satisfied that the site is hostile for species such as hedgehog and amphibians. No further information or measures are required.

Invasive Species

Whilst there is no vegetation on the site, it is very likely that Japanese knotweed, Himalayan balsam and giant hogweed are present along the River Irwell and Kirklees Brook boundaries. I therefore recommend an informative along the following lines is applied to any permission.

It is an offence under the Wildlife & Countryside Act 1981, as amended to introduce, plant or cause to grow wild any plant listed in Schedule 9 part 2 of the Act. Species such as Japanese knotweed, giant hogweed and Himalayan balsam are included within this schedule. If any such species will be disturbed as a result of this development a suitably experienced consultant should be employed to advise on how to avoid an offence.

Proximity to River Irwell and Kirklees Brook

There are risks during and post construction of negative effects on these two watercourses, from sediment discharge, pollutants and changes to surface water discharge rates. There appears to be no new surface water drainage proposed with existing gully pots retained based on information relating to flood risk. The main risk would be during heavy rain, as a result of overland flow laden with sediment and pollutants, resulting from the demolition and construction activities, entering the river via the gully pots or in an extreme even via the river banks. I would therefore recommend covering of any gully pots during demolition and construction to prevent any direct discharge of water laden with sediment and pollutants into the river. This can be conditioned along the following lines.

No demolition, site clearance, earth moving shall take place on site until a method statement to protect the River Irwell and Kirklees Brook from overland flows laden with sediment and pollutants has been supplied to and agreed by the LPA. All measures will be implemented and maintained for the duration of the construction period in accordance with the approved details.

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

Section 187 of the NPPF 2024 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).

The development site has no vegetated habitats, with wildlife issues restricted to very low bat roosting potential and birds nesting off-site. I accept that the development is exempt from BNG under the de minimis rule.

In order to mitigate/enhance the site for wildlife, a bat and bird box could be provided on one of the proposed buildings. The details can be provided via condition.