

I have restricted my response to biodiversity net gain, other ecological recommendations remain unchanged.

Biodiversity Net Gain

The full metric has now been provided apart from the addition of the post development units the metric appears to be unchanged in terms of baseline and proposal for off-site units on land within the developer's ownership. Looking at the updated landscape masterplans this appears reasonable as there appear to be no obvious significant changes to the soft landscaping or red edge. This indicates a shortfall of 5.49 units to achieve 10% net gain that will require purchasing from an off-site habitat bank.

They have also provided a phasing plan that indicates some habitat creation and enhancement works will not commence until after 18 months of initial habitat losses. However, some of the baseline habitats will also not be lost for over one year. On balance it is therefore reasonable to accept that no time delay is required in the metric. They have not as yet taken on board my recommendation to extend the red edge to enable the off-site proposals on their own land to become on-site and thereby remove the need for a legal agreement and registration with defra.

I would note that some of the proposed habitat enhancement and creation is targeting good condition, which is likely to be high risk and in some cases very unlikely, for instance a very small area of mixed scrub creation covering just 150sqm will struggle to achieve the diversity required, whilst area of other neutral grassland targeting good condition whilst theoretically feasible may struggle if nutrient levels prove too high, preventing essential criteria F for instance being achieved.

Finally, I would note that with regards to utilisation of their own land, the land adjacent to Chapelfield LNR is covered by the Greater Manchester Nature Network. If they were to enhance this area they would gain a significance multiplier to the habitats created.

On balance however whilst they maybe over-estimating what is achievable on-site at present, given the area of land at their disposal, if they were prepared to enter it into positive management and the acceptance already that a significant off-site payment is required, I am willing to leave further amendments to habitat proposals to discharge of statutory condition stage and production of the Habitat Management and Monitoring Plan. The only potential issues from a planning perspective being

potential amendments to the red edge, which I assume would be preferable to resolve prior to determination.

With regards the on-site proposals as they stand, the creation of the traditional orchard, other neutral grassland, mixed scrub, broadleaved woodland and urban tree planting and enhancement of retained grassland, scrub and woodland would be regarded as significant and included with a 30yr Habitat Management and Monitoring Plan (HMMP). The number of units and level of risk associated with habitats targeting good condition, warrant control via a section 106, in order primarily to re-coop monitoring costs.