

Thank you for consulting GMEU on the below Application (72938).

A Protected Species Survey (Dunelm Ecology, 2026) has been undertaken which found the building to be impacted to have moderate bat roosting potential, and therefore two nocturnal bat surveys will need to be undertaken, between May and September (inclusive). These will not yet have been undertaken.

As you may be aware, all species of bat and their roosts are protected under UK and European legislation and are a material consideration when determining planning applications. If the development is likely to disturb a potential bat roost then a bat survey should be carried out before the application is determined. Furthermore, as per Paragraph 98 and 99 of the ODPM Circular 06/2005, the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. As such, it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development is established before the planning permission is granted. Ecological surveys should therefore only be left to coverage under planning conditions in exceptional circumstances.

GMEU are not aware of any exceptional ecological circumstances which would apply in this instance. As such, we would recommend that the application be deferred until the lacking information on protected species is provided.

With regard to Biodiversity Net Gain, the report states that this site is exempt under the self-build exemption, while the application form claims that the gain condition will apply. Suitable evidence to demonstrate that the application qualifies as a self-build will need to be submitted and verified by the LPA for the exemption to apply. If this does not apply, a Biodiversity Net Gain Assessment will need to be submitted prior to determination. We would expect that an excel metric including the baseline and predicted post development biodiversity value of the site is submitted, along with a statement or report that provides adequate information for the LPA to be satisfied that a 10% net gain in biodiversity units is achievable, either on or off-site.

**Greater Manchester Ecology Unit**