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

Email: gmeu@tameside.gov.uk
Telephone: 0161 342 2593

Principal Ecologist:
Derek Richardson BSc Hons MPhil

FAO Principal Planning Officer
Ribble Valley Council

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By e-mail

Dear Sir/Madam

Application / Appeal 3/2025/0196

Planning application for up to 300 residential dwellings, associated access, rail station car park, green infrastructure and sustainable drainage systems (all matters reserved except for access). Land off Longsight Road Langho bounded by the railway Northcote Park and Wildmans Farm,

Thank you for consulting the Ecology Unit on the additional information submitted to inform the Appeal made against the refusal of the above planning application.

Since the original planning application was submitted the Lancashire Local Nature Recovery Strategy (LNRS) has been published and there have been updates to the Ancient Woodland Inventory. Both of these changes have implications for the development proposals and are discussed below.

Updates to the Ancient Woodland Inventory (AWI)

The AWI was recently updated and the small woodland in the north-east of the application site (Green Nook Wood) has now been identified as Ancient Woodland, also supporting veteran trees. This change in status has been acknowledged by the applicant.

Lancashire Local Nature Recovery Strategy (LNRS)

Local nature recovery strategies are locally led strategies for nature and environmental improvement established by the Environment Act 2021. Each local nature recovery strategy:

- agrees priorities for nature's recovery,
- maps the most valuable existing areas for nature,

- maps specific proposals for creating or improving habitat for nature and wider environmental goals.

A Local Nature Recovery Strategy is an evidence base which contains information that may be a 'material consideration' in the planning system, including when making planning decisions. The Lancashire LNRS was published on 16th January 2026.

On the Lancashire LNRS Habitat Map Habitat Map | LNRS Local Habitat Map the application site includes a core area for wildlife (an area of particular importance for biodiversity), Green Nook Wood ancient woodland. Other areas of the application site include areas that could become of particular importance for biodiversity. Recommended Measures for these areas include –

- Measure U2.3 wooded habitat creation and enhancement in urban open spaces,
- Measure W1.5 retention and appropriate management of aged, ancient and veteran trees,
- Measure W2.1 establish riparian woodland and trees along water courses

The Ecological Mitigation Hierarchy

The Ecological Mitigation Hierarchy is a well-established protocol for minimising harm to habitats and species on development sites.

Described by CIEEM (the Chartered Institute of Ecology and Environmental Management) as "the cornerstone of achieving BNG", the hierarchy is a linear process; a sequential set of steps from best scenario to worst scenario, namely –

(1) Avoid harm,
(2) Minimise harm,
(3) Compensate,
(4) Enhance.

Aiming for BNG does not mean that the mitigation hierarchy can be side-stepped: projects cannot go straight to the compensation stage without first seeking to avoid and minimise the effects on biodiversity *(ref. Biodiversity net gain – good practice principles for development, CIRIA 2019)*

Ecology Survey Effort

Ecology surveys undertaken to inform the application have been carried out by suitably qualified ecologists and were to appropriate standards. No further surveys need to be undertaken prior to deciding the application, although updated surveys are likely to be required before the commencement of the development to ensure that the protection of more mobile species is fully taken into account.

Impact on Designated Sites

I would accept that the development will not affect any sites statutorily designated for their nature conservation value.

Impact on Notable Habitats

Although the majority of the habitats on the application site comprise grassland of limited species diversity currently used for horse grazing, the updated ecological surveys have now shown that the development will affect an area of ancient woodland, an irreplaceable habitat, and areas of priority habitat including lowland meadow and hedgerows. The site also supports watercourses, ponds and a number of mature broadleaved trees, habitats of local value.

Both the area of ancient woodland (Green Nook Wood) and the areas of priority habitat are relatively small, fragmented and in poor condition.

Impact on Ancient Woodland

The NPPF states that development resulting in losses to or deterioration of irreplaceable habitats such as ancient woodland must be refused, unless both of the following apply –

- There are wholly exceptional circumstances *and*
- A suitable compensation strategy exists

Harm to ancient woodland can be direct (direct habitat loss) or indirect, for example from increased noise and visual disturbance, changes to local hydrology, changes to lighting regimes, increases in recreational disturbance, habitat fragmentation and habitat isolation. These indirect pressures can lead to gradual and functional habitat loss, as more mobile species move away and are not able to be replaced, and tree cover and other vegetation fails.

To mitigate for potential harm to the ancient woodland the applicant has proposed some minor changes to the layout of the development to establish a buffer between built development and the woodland. It is also proposed that access to the woodland is restricted by means of fencing or hedges, and that the woodland could be enhanced through positive management. These measures are welcome. However, the woodland will inevitably become more isolated from other semi-natural habitats if the adjacent fields are developed. There will be no space for possible future expansion of the woodland or for the creation of new landscape corridors. The woodland is already small, in a relatively poor condition and constrained by the busy A road to the north, by the new housing development to the east and by established settlement to the south.

Impact on Priority Habitats

Public bodies have to have regard to the conservation and enhancement of biodiversity, including the conservation of priority habitats. In the light of the new information identifying part of the application site as the priority habitat lowland meadow, the developer has not substantively reduced the quantum of development proposed or significantly amended the layout to avoid losses to lowland meadow. Instead, they propose translocating the more diverse areas of grassland to another part of the site. Attempting habitat translocation should be regarded as a last

resort, only considered when other options to avoid habitat loss have been exhausted, because of the inherent uncertainties involved in translocation exercises. In this case, the translocated meadow will be relatively small, isolated and subject to public pressures from the adjacent large development. These factors mitigate against the chances of successful, sustainable translocation.

There is also an option of accepting the loss of the on-site lowland meadow habitat and purchasing relevant lowland meadow habitat units from an off-site habitat bank to re-establish the habitat elsewhere, if the habitat type cannot be retained or re-established locally.

Rather than attempting habitat translocation or requiring off-site habitat provision, a more acceptable solution in line with the mitigation hierarchy would be to avoid the losses altogether by refusing the application, or by reducing the size of the application to allow for habitat retention *in-situ*.

Lengths of hedgerow will be lost to the development, but it would be possible re-establish species-rich hedgerows on site as part of the development, or re-create hedgerows off-site. Again, it would be preferable to avoid losses altogether, but I would note that re-establishing hedgerows has greater success than re-establishing lowland meadow.

It would be possible to retain and protect notable individual trees on the site as part of the development.

Impacts on other habitats

Watercourses are capable of being retained and improved, and pond losses can be compensated by the creation of new waterbodies incorporated into SUDs proposals. Retained habitats should be robustly protected during the course of any development.

Impact on the LNRS

The development will affect an area of particular importance for biodiversity identified in the LNRS (the ancient woodland) by causing isolation of the habitat and habitat fragmentation.

In terms of the areas which could become of particular importance (the remainder of the site) the following measures would be able to be implemented on the development site -

- Measure U2.3 wooded habitat creation and enhancement in urban open spaces,
- Measure W1.5 retention and appropriate management of aged, ancient and veteran trees,

But habitat areas would be small, fragmented and subject to high levels of public pressure and disturbance.

Measure W2.1 (establish riparian woodland and trees along water courses) would be difficult to achieve on this site; although a watercourse running through the site is shown as retained, the watercourse corridor will be narrow and subject to public pressure and disturbance.

Overall, the development would compromise the creation of a local, coherent ecological network by reducing the areas available for habitat creation / restoration and by causing habitat fragmentation.

Impact on Notable Species

Bats

The bat community recorded by surveys does not appear to be exceptional in terms of the numbers of bats which use the site or in terms of the relative rarity of the bat species involved. No known bat resting places will be lost to the development, and there are areas of good bat foraging habitat in the wider area which will not be affected by the development. The development will result in some losses to bat foraging habitats, although habitats present which are of most value to bats (hedgerows, woodlands, trees and watercourses) will be largely retained, and new hedgerows and trees will be planted.

Nevertheless, all UK bats and their resting places carry a high level of legal protection and therefore measures to conserve bats are recommended. The development should avoid overly intrusive lighting of habitats of most value to bats and should incorporate opportunities for bat roosting (bat boxes and integrated features for bats).

Suggested Condition - Lighting Design Strategy for Biodiversity

Notwithstanding the submitted details, and within 6 months of any approval, a "lighting design strategy for biodiversity" in accordance with ILP Publications' "Guidance Note 8 Bats and artificial lighting" shall be submitted to and approved in writing by the Local Planning Authority for all existing and proposed lighting within the development hereby permitted. The strategy shall:

a. identify those areas /features on site that are particularly sensitive for bats and other nocturnal wildlife that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and

b. show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places. All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy.

Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

Reason: to protect biodiversity.

Final landscape plans for the development should incorporate new features of value for roosting bats (e.g. integrated bat bricks, bat boxes etc.).

Badgers

Although no badger setts have been recorded on the site it does support habitat of value to badgers and badgers are mobile in their habits. I would advise that a pre-commencement precautionary survey of the site for badgers is required to be undertaken before any groundworks or site clearance commences. Badgers and their setts are specially protected under the terms of the Protection of Badgers Act 1992.

Amphibians

The site is considered likely to support amphibians including common toads, common frogs and newts, although the specially protected species great crested newt is considered to be absent. There is a risk that amphibians could be harmed during site clearance and construction works. I would advise that -

- a reasonable avoidance method statement should be required to be prepared and implemented by Condition, providing details of measures to be taken during any site clearance works to avoid harm to amphibians.

Protection of Nesting Birds

Precautions will need to be taken throughout site clearance works and groundworks to avoid harm to nesting birds. I would advise that no vegetation clearance required to facilitate the proposals should be undertaken during the optimum time of year for bird nesting (March to August inclusive). All nesting birds their eggs and young are protected under the terms of the Wildlife and Countryside Act 1981.

A range of bird nesting boxes should also be provided throughout the site as part of any final landscape proposals.

Protection of Other Wildlife

To protect retained habitats and other wildlife which may use the site during the course of any groundworks and construction, I would advise that a Construction Environmental Management Plan (Biodiversity) should be required to be prepared and implemented by Condition

Suggested Condition - Construction Environmental Management Plan

No development shall take place (including demolition, ground works and vegetation clearance) until a Construction Environmental Management Plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) must include the following:

a) Risk assessment of potentially damaging construction activities.
b) Identification of “biodiversity protection zones”.
c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements) d) The location and timings of sensitive works to avoid harm to biodiversity features.
e) The times during which construction when specialist ecologists need to be present on site to oversee works.
f) Responsible persons and lines of communication.
g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
h) Use of protective fences, exclusion barriers and warning signs if applicable.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Reason: to protect biodiversity

Invasive species

Himalayan balsam has been recorded on the site. The spread of any of this invasive plant is prohibited under the terms of the Wildlife and Countryside Act 1981 (as amended). It is advised that measures are taken to control the spread of these plants during the course of any development.

Biodiversity Net Gain (BNG)

The development is required to achieve at least a 10% gain in Biodiversity as measured using a statutory Metric. Although a range of habitats will be able to be retained, created and/or enhanced on the site as part of the development, because of the extent of losses of open grassland overall the development will result in a significant net loss of on-site Biodiversity (34.51 habitat units). I have expressed some doubts about the potential success of the translocation of the lowland meadow on the site. If this meadow cannot be successfully re-created the on-site losses will be higher.

Off-site habitat creation will need to be provided to meet the biodiversity deficit and to provide the necessary gains in biodiversity.

Although there is a degree of confidence that the off-site BNG provision will be able to be sourced by off-site habitat creation on registered off-site habitat banks, in line with best practice principles for BNG on-site habitat losses should first be avoided if at all possible before considering off-site options.

If the Appeal is allowed a Biodiversity Gain Plan and a long-term Habitat Management and Monitoring Plan (HMMP) for retained, enhanced and re-created on-site habitats should be required to be provided by Condition, to secure the on-site contribution to BNG.

I would advise that because the on-site habitats can be regarded as significant, an S106 agreement should be required in order to properly resource the future indirect monitoring of the on-site Biodiversity Gain.

Conclusions

On balance I would advise that the application is refused because -

- the development would cause unacceptable impacts on irreplaceable and priority habitats and proposals for compensation and mitigation are inadequate,

  and

- the development will compromise the establishment of the Local Nature Recovery Strategy for Lancashire.

If the Appeal is allowed I have recommended a range of Conditions which should be applied to any permission to protect nature conservation impacts.

I hope that these comments are useful

Yours

Derek Richardson
Principal Ecologist