



Stables, Hardman Street, Radcliffe

Preliminary Ecological Appraisal,
BNG Baseline and Bat Roost Assessment

Date: 09/10/2024

By: Dominic Rigby MCIEEM

Ref: JE8372-24

Client: Peter Dickinson Architects Ltd.

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Any future readers should note that both the physical state of the site and the relevant environmental legislation may have changed since this report.

Ecological data remains valid for up to eighteen months following the surveys.

Revision Schedule				
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Stables, Hardman Street, Radcliffe

Ecology, BNG and Bat Scoping Report

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October 2024

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1. SUMMARY

Conservations Contracts Northwest Ltd. (CCNW) were contracted in August 2024 to undertake a preliminary ecological appraisal and bat scoping assessment at a stables/paddock at the end of Hardman Street, Radcliffe, in the Manchester Combined Authority borough of Bury.

The project site consisted of three block-built stable units, a Ménage, hardstanding and a small strip of grassland within its 1500m² plot.

The site was south west of Bury, on the northern edge of the urban conurbation of Radcliffe. To the east was grazing land leading to Elton Reservoir, immediately north and west was industrial, leading to more farmed grassland.

The site was proposed for a five-plot development and new stables. A preliminary ecological appraisal was undertaken in August, incorporating a baseline biodiversity net gain calculation. The survey included a preliminary bat roost assessment as bats *and* their roosts were fully protected in UK and European law. The buildings were assessed as having negligible bat roost potential. But there were several bird nests in the stables. Field surveys and records search discovered Himalayan balsam on site and Japanese knotweed close-by, but off site. Additionally, there were great crested newt and hare records within 2km of the site, but the habitat within the red line boundary was not suitable for these protected species. No further surveys were recommended.

Regarding Biodiversity Net Gain, the onsite baseline totalled less than 0.5 habitat units, as the only qualifying habitat was less than 0.25ha of low distinctiveness. There was a poor native hedgerow bounding the east of the site, but this was outside the red line boundary.

Recommendations:

The following recommendations were put forward to ensure the project had a positive impact on protected species. The best mechanism to ensure this was through the following planning conditions:

- R1** Amphibian protection precautions should be followed (see 5.3.3)
- R2** Nesting birds precautionary working method statement should be followed, if demolition work during the nesting season could not be avoided (see 5.3.4)
- R3** Invasive non-native species precautionary working method statement should be followed (see 5.3.10)
- R4** Mitigation for loss of nesting bird opportunities (see 6.2/Appendix 2)

2. INTRODUCTION

2.1 Principal author

This report was compiled by Dominic Rigby MCIEEM, Senior Ecologist at CCNW. He had 35 years' professional experience in the ecology sector and held survey/disturbance licences in England and Wales for great crested newts, bats and barn owls. He was an established ornithologist and a competent, trained surveyor for the suite of protected mammals potentially present at the site. He was up to date with advances in habitat classification and condition assessment, partaking in recent (2023/24) CIEEM/UK Habs training courses on UK Habs v2 and Condition Assessment, DEFRA Statutory Metric and Biodiversity Net Gain (BNG).

2.2 Guidelines

The Report followed Chartered Institute of Ecology and Environmental Management Guidelines on Ecological Report Writing (CIEEM 2017a; Dean, 2021) where a Preliminary Ecological Appraisal Report was defined as “a report that aims to provide general advice on ecological constraints associated with any site/development and includes recommendations for further survey.” The Report followed the Bat Conservation Trust (BCT) guidelines for undertaking and writing bat reports (Collins, 2023). The report considered the format and guidelines on Ecological Report Writing (Dean, 2021; CIEEM, 2017).

BNG calculations and habitat classifications utilised the statutory metric and UK Habs v2, respectively.

Species survey guidelines were described in Section Four (Methodology).

2.3 Client

Peter Dickinson Architects Ltd. on behalf of Mr. K McMinn (Landowner).

2.4 Site Location and Description

Stables and Equestrian site, Land at Hardman Street, Radcliffe M26 4GY

National Grid reference: SD77790892

Local Authority: Bury, Greater Manchester

The project site consisted of a block-built stable units, a Ménage, hardstanding and a small strip of grassland within its 1500m² plot. The site was south west of Bury, on the northern edge of the urban conurbation of Radcliffe. To the east was grazing land leading to Elton Reservoir, the north and west was industrial, leading to more farmed grassland. Figure One (p7, below), illustrated the site within the wider countryside.

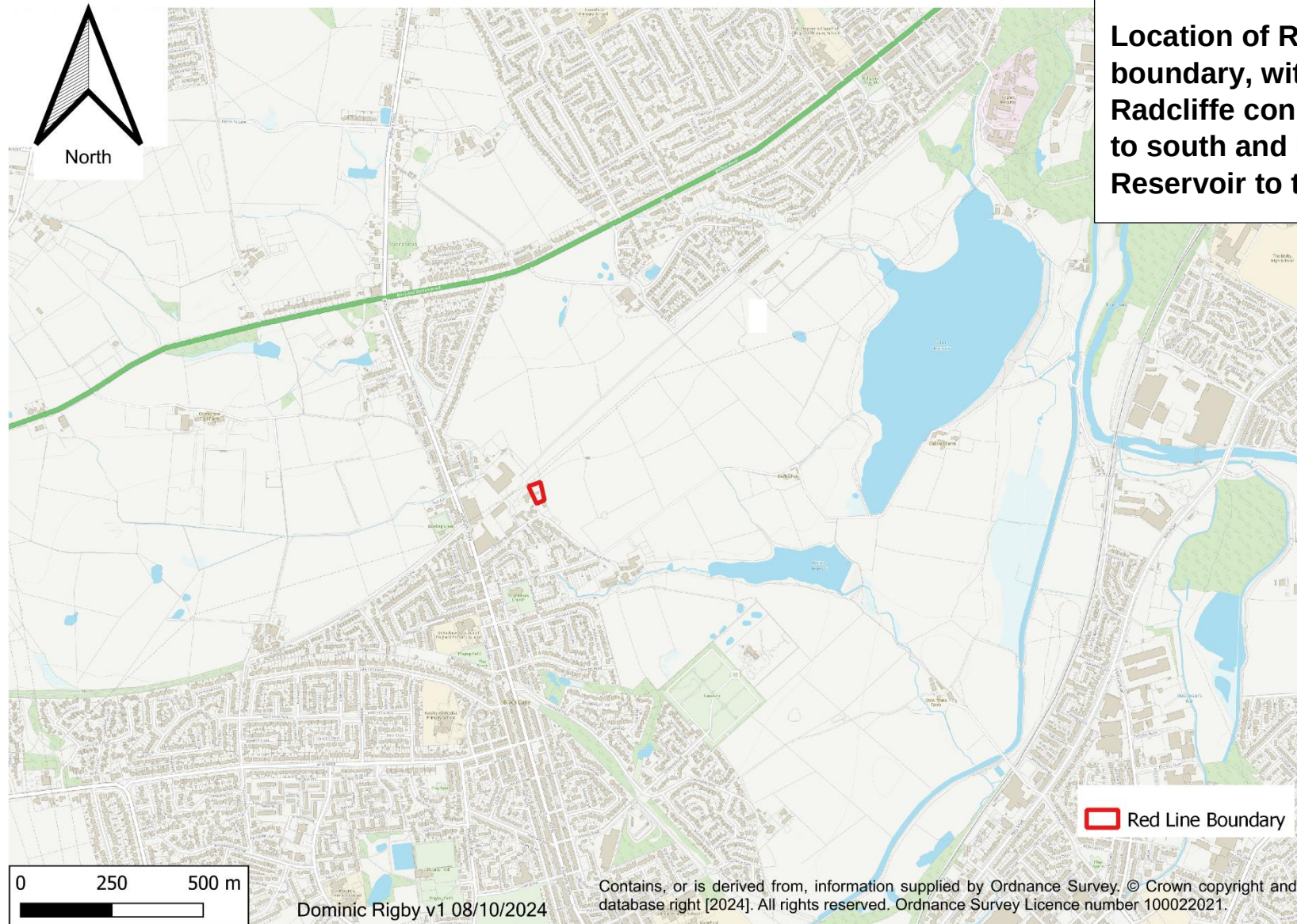


Figure One:

Location of Red Line boundary, with Radcliffe conurbation to south and Elton Reservoir to the east

2.5 Purpose of Report

This report was compiled to inform the client of any procedures necessary regarding protected habitats or species. The preliminary inspection would inform the quantity and method of any subsequent ecological surveys and constraints.

A baseline Biodiversity Net Gain calculation was to be provided.

The stables were targeted for demolition and replacement with new five dwellings and a new stable block.

3. LEGISLATION, POLICY AND PLANNING

3.1 Legislation

3.1.1 European Protected Species

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

Formerly The Conservation of Habitats and Species Regulations 2017, these provided safeguards for European Protected Sites and Species (as listed in the Habitats Directive). This had recently been amended by the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) Regulations 2019 which continued the same provision for European protected species, licensing requirements, and protected areas after Brexit.

During the implementation period the 2017 Regulations would continue to be in force unamended. At the end of the implementation period the 2017 Regulations would continue to be in force but will be amended to make certain areas of the 2017 Regulations operate.

These regulations provided legal protection for European Protected Species (those listed under Annex IV of the EU Habitats Directive - Council Directive 92/43/EEC). With regards to European Protected Species, this made it an offence to:

Regulations made it an offence to:

- deliberately capture, injure or kill a bat;
- deliberately disturb a bat (which included any disturbance which is likely to impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or in the case of animals of a hibernating or migratory species, to hibernate or migrate or to affect significantly the local distribution or abundance of the species to which they belong);
- damage or destroy a breeding site or resting place of a bat; or
- possess, control, transport, sell or exchange, or offer for sale or exchange any live or dead bat or part of a bat or anything derived from a bat or any part of a bat.

Potentially relevant to this site:

Bats and great crested newts and otter were listed under Schedule 2 of The Conservation of Habitats and Species Regulations and Schedule 5 of The Wildlife & Countryside Act 1981 (as amended).

The Wildlife & Countryside Act 1981 (as amended)

Under Section 9 of the W&CA 1981 it was an offence to:

intentionally kill, injure or take any European protected species (EPS).

possess or control any live or dead EPS or anything derived from it;

intentionally or recklessly damage or destroy any structure or place which an EPS uses for shelter or protection;

intentionally or recklessly disturb an EPS while it is occupying a structure or place of shelter or protection;

intentionally or recklessly obstruct access to any structure or place used by an EPS for shelter or protection; and

sell, offer or expose for sale, or have in their possession or transports for the purpose of sale, any live or dead EPS or any part of, or anything derived from an EPS.

Former (post-Brexit) EPS are covered by 9 (4) b, c and 5 only.

Together however, these two Acts resulted in a level of protection that prohibited the intentional, deliberate or reckless:

- killing, injuring, taking or disturbance of EPS;
- damaging, destroying or obstructing any place used by bats for the purposes of breeding, sheltering or protection; and,
- selling and/or advertising for sale a bat or any part thereof.

3.1.2 Birds**The Wildlife & Countryside Act 1981 (as amended)**

The following parts of this Act could be relevant to this site:

*Part One: **ALL** Birds*

It was an offence to “Intentionally take, damage or destroy the nest of any wild bird while it is in use or being built”.

Schedule 1

All birds were protected in some form, but some species had additional protection during the breeding season as did their nests, eggs and dependent young. To disturb these a special licence would be required in advance.

This Schedule covered the following species potentially relevant to this site:

Barn owl

3.1.3 Other Legislation

The Natural Environment and Rural Communities (NERC) Act 2006

Section 40 of the NERC Act required that local and regional authorities had regard to the conservation of biodiversity in England, when carrying out their normal functions. Species of principal importance for nature conservation in England were listed in Section 41 of NERC Act. Section 40 of the same Act required that local and regional authorities had regard to the conservation of biodiversity in England, when carrying out their normal functions.

- Species in s41 potentially relevant to this development were, **common toad**, **hedgehog**, **brown hare**, along with several bat and bird species (referred to in aforementioned Acts).
- Habitats potentially relevant were: **Ponds/Lakes**

Birds of Conservation Concern (BoCC)

The list was used in the ecological consultancy industry to inform ecological valuation as part of the impact assessment process. All species on the red and amber lists would be considered in the same way as those on the s41 list (see NERC Act above). The 5th edition of this publication was published in 2021 (Stanbury *et al*, 2021).

The following species whose status on site (for example “breeding”) could coincide with the criteria for inclusion on the red list (for example long-term UK breeding decline) could be present on the site:

Red list:

Starling, song thrush, mistle thrush, house sparrow, swift, house martin

Protection of Badgers Act 1992

Under this Act it was an offence to kill or take a badger, to cruelly ill-treat a badger, or to interfere with a badger sett, including disturbing a badger while occupying a sett. In certain circumstances, licences could be granted to permit some actions prohibited under the Act.

The Environment Protection Act 1990

This classified as controlled waste any soil and waste containing propagules of a plant species listed in Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

Potentially relevant to this site were:

Himalayan balsam (*Impatiens glandulifera*), Japanese knotweed (*Reynoutria japonica*), Giant hogweed (*Heracleum mantegazzianum*), Variegated yellow archangel (*Lamium galeobdolon* subsp. *argentatum*), *Cotoneaster* spp., *Rhododendron ponticum* and Montbretia (*Crocasmia* × *crocosmiiflora*).

3.2 Policy

3.2.1 National Planning Policy Framework

The National Planning Policy Framework (Gov.uk, 2021 section: Conserving and enhancing the natural environment, 7/2021 revision) set out the framework for planning decisions regarding ecological considerations. The relevant sections on the natural environment were paragraphs 174-188.

Of particular significance in the 7/2021 amendment para 180(d) of the NPPF (2021) required opportunities to incorporate biodiversity improvements in and around development, rather than simply making them optional.

3.2.2 The British Standard for Biodiversity 42020:2013

British Standards Institution (2013) defined the requirements for ecological input in the planning process and illustrated how that fitted with the Royal Institute of British Architects (RIBA) Plan of Work guidance stages. It also included suitable wording for planning conditions and other controls (e.g., Section 106 Agreements for maintenance of a building as a bat roost, or conservation agreements under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006).

3.2.3 The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations [2024]

In the 2019 Spring Statement the Chancellor delivered the following statement: “to ensure that wildlife isn’t compromised in delivering necessary infrastructure and housing, the government will Mandate net gains for biodiversity on new developments in England to deliver an overall increase in biodiversity”.

This concept of biodiversity net gain (BNG) was then incorporated into the Environment Act 2021, the secondary legislation to enable this was introduced in February 2024, and April 2024 for small sites.

Not all development was required to achieve a 10% net gain in biodiversity units. Defra provided a list of exemptions associated with mandatory BNG, to keep the policy proportionate. This included development impacting habitat of an area below a ‘*de minimis*’ threshold of 25m² or 5m for linear habitats such as hedgerows.

3.3 Planning

3.2.1 Bury Local Plan Topic Paper 7 Natural Environment 2018

Bury Council were currently in the process of preparing a new Local Plan that will guide future development in the borough. It produced a Topic Paper on Natural Environment 2018.

3.2.2 Places for Everyone

'Places for everyone' is a long-term joint development plan for nine Greater Manchester districts (including Bury), which set out what kind of development would take place. Within 'Places for everyone', the following Strategic Objective (number 8) was laid out:

- Improve the quality of our natural environment and access to green spaces:
- Enhance special landscapes, green infrastructure, biodiversity and geodiversity;
- Improve access to the natural environment and green spaces including parks;
- Promote the role of green space in climate resilience and reducing flood risk.

Policy JP-G 9 'A Net Enhancement of Biodiversity and Geodiversity' specifically dealt with biodiversity and BNG.

4. METHODOLOGY

4.1 Desk Study

The objective of the desk study was to review the existing information available from the local records centre (GMEU) and in the public domain concerning species and habitats to identify the following:

- Relevant designated sites for wildlife or geology on or neighbouring the site, using GMEU database and the Multi Agency Geographic Information for the Countryside (MAGIC) website ([Defra](#), 2013, updated 2024). Local Wildlife Sites are referred to as Sites of Biological Importance (SBIs) in Greater Manchester.
- Protected Species distributions were checked using the GMEU data; the NBN Atlas (NBN Atlas Partnership, 2024) was checked to see if any additional data sets existed within the public realm of through licence/purchase – there were none not covered by GMEU/MAGIC.
- Aerial photographs and Ordnance Survey (OS) maps were reviewed to identify features of ecological interest surrounding the Site, nearby areas of ecological interest and features connecting these habitats (hedgerows, watercourses, railway lines); and,
- Bury Council website to check for Tree Preservation Orders (see 3.2.1.1).

and together the following information was acquired:

- *Designated sites comprising part of the National Site Network within a 5km radius of the route;*
- *Other statutory designated sites within a 1km radius of the route;*
- *Non-statutory designated sites within a 0.5km radius of the route;*
- *Records of protected and notable species within 1km of the route; and*
- *Priority habitats and landscape classifications present at the site and the surrounding environs within 500m of the route.*

Records of protected and notable species within 1km were usually considered to be of the greatest relevance and given the limited size, impact and scale of the proposal, this search area was considered appropriate for this study. Consideration had been given in the discussion to those species with a greater range with regards to habitat connectivity and other impacts. Only biological records that were no more than 15 years old were included within this report, unless stated otherwise.

4.2 Field Surveys

4.2.1 Habitat Assessment

A UK Habitat Classification (UK Hab) survey was undertaken by Dominic Rigby MCIEEM (see para 2.1), of CCNW on 5th August 2024.

The site was mapped using the Professional UK Habitat Classification System v2.0 (UK Hab) (Butcher et al 2023). A fine scale minimum mapping unit was used, i.e., 25m² for habitat areas and 5m length for linear habitats (which may be 1m width maximum). Secondary codes clarifying habitat mosaic features, habitat complex, management and origin were also recorded. This level of survey identified broad habitat types only and did not aim to compile a complete floral and faunal inventory for the preferred alignment.

To inform Biodiversity Net Gain implications, a condition assessment of mapped habitats was also undertaken in line with Natural England Biodiversity Metric Statutory Guidance (2024).

Condition assessment tables for each relevant habitat (grassland-only in this case) can be provided, based on the 2024 visit should the project require a BNG.

A biodiversity unit baseline assessment was also undertaken in accordance with these guidelines to provide an indication of Biodiversity Net Gain requirements and results.

4.2.1.1 Recording

Data was collected in the field, following the UKHab Field Key v2.1 (UK Habitat Classification Working Group, 2020). The UKHab was a canopy-based classification. For grasslands additional note was made of the number of species per m² and total species in the compartment.

Field data was collected by writing over paper CAD maps printed from a 25cm resolution supplied by the Architects. The new field data were then transferred onto fair-copy OS versions at the desk, checked (see below) and digitised using QGIS v3.28.

4.2.1.2 Mapping

The habitat maps were digitised using QGIS v3.28 at a scale of a minimum of 1:50 on a site-wide OS 1:10 000 geo-referenced vector base map, using co-ordinate reference system EPSG: 27700 OSGB 1936 / British National Grid.

The habitat polygons were depicted using the symbology for statutory Biodiversity Metric Statutory version of the QGIS template.

4.2.2 Species Assessment

During the survey visit, the site was checked for evidence of protected and priority species (see Section Three) and habitats were assessed for their potential to support such species. In addition, a search was made for evidence of invasive non-native species.

The scope of species surveys undertaken was defined following the initial studies described above (desk study, maps).

All surveys were completed by Dominic Rigby in August 2024. Brief methodologies are summarised below, with reference to appendices, figures and sources of further detailed information where applicable.

4.2.2.1 Plants

Any notable plants considered to be at least locally significant were recorded during the UKHab surveys. Species lists in any potentially affected grassland was taken.

4.2.2.2 Amphibians

All habitat within 200m of the potential works imprint was assessed for suitability for amphibians using a combination of field and desk data.

4.2.2.3 Birds

Species and notable counts of birds were taken. Habitat was assessed regarding potential breeding birds and the stables were inspected for nests.

4.2.2.4 Bats

- **Bat Preliminary Roost Assessment**

A Preliminary roost assessment (PRA) was undertaken on all buildings on 5th August 2024. The PRA followed the procedure recommended in the BCT Guidelines (Collins, 2023). A visual inspection of the external features was followed by a thorough inspection of the inside of the building.

The weather was dry, still and fine.

4.2.2.5 Brown Hare

Habitat suitability was noted during the habitat surveys. The mix of habitats on site was considered alongside the suitability/desk study records of the wider landscape.

4.2.2.6 Hedgehogs

Habitat suitability was considered, and searches made following desk search evidence.

4.2.2.7 Badgers

Suitability of habitat and detailed searches for badgers were noted/undertaken during the habitat surveys.

4.2.2.8 Reptiles

Habitat suitability for reptiles was noted during the habitat surveys.

4.2.2.9 Invertebrates

Day-flying invertebrates identifiable in the field were noted.

4.2.2.10 INNS

Any species relevant to INNS legislation (see 3.1) was noted during the habitat survey and assessment.

4.5 Constraints and Implications

4.5.1 Time of Year

The August date of the surveys meant that breeding bird evidence was sub-optimal. This was compensated by extrapolation from habitat data and detailed reviews of the desk study data.

5. RESULTS

The following results combined the desk and field survey results.

5.1. Designated Sites

5.1.1 International/Nation Designations

There were no internationally/nationally designated sites within a 5km search area.

5.1.2 Locally Designated Sites

Withins Reservoir SBI was 350m east of the red line.

Marl Pits at Black Lane SBI were 450m south.

Wetlands & Meadows near Coggra Fold SBI were 820m west.

Those within 500m are mapped in Figure Two below.

5.2 Habitats

5.2.1 Desk Study

There was no priority habitat on or abutting the site.

5.2.2 Field Study

5.2.2.1 Priority Habitat

There was no priority habitat/NERC S41 habitats of principle importance on site.

5.2.2.2 Other Non-linear Habitats

The baseline habitats amassed zero habitat units (at 1 decimal place). Figure Three below mapped the habitat within the red line boundary.

Medium Distinctiveness

There were no medium (or higher) distinctive area-habitats on site.

- **Low-distinctiveness Habitats**

Modified Grassland

A strip of 24m² modified grassland ran along the eastern edge of the ménage. This had been regularly sprayed in the past but at the time of the field survey it keyed out as modified grassland but was below the 25m² UK Hab and BNG *de minimis* threshold. Nevertheless, it was mapped as part of the PEA/BNG process, it was in poor condition as the *fescue/Lolium* mix hosted only one forb, *Rumex obtusifolius*.

Photograph One: Poor condition Modified Grassland, adjacent to Ménage

- **Very-low Distinctiveness Habitats**

The remainder of the site was “Developed land, sealed surface” (stable blocks and concrete and tarmac hardstanding) or “Artificial unvegetated, unsealed surface” (broken tarmac, Mot Type-3 75mm to dust surface or woodchipped ménage).

Figure Two:
Protected Sites and Species
within 500m of Project Site

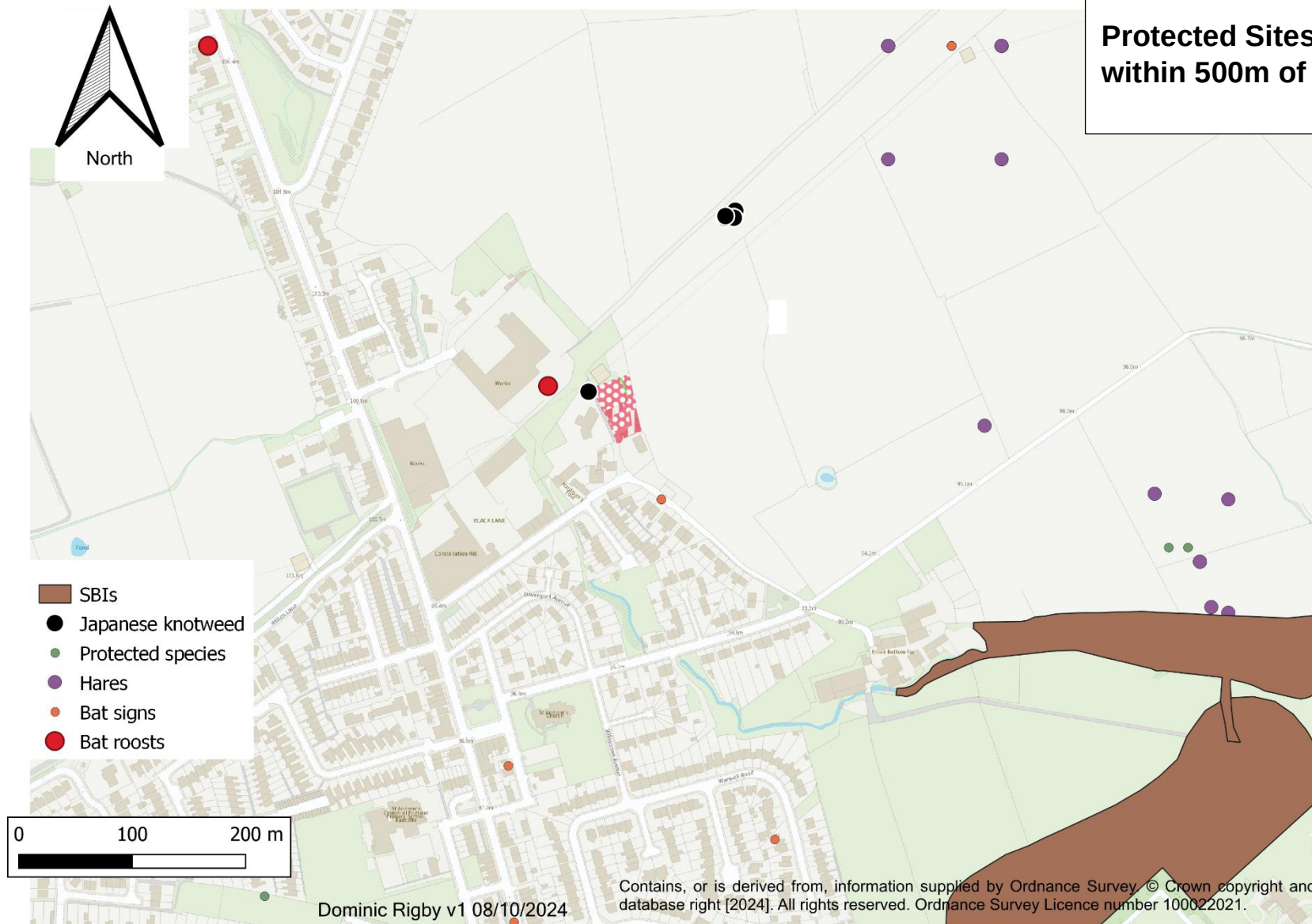
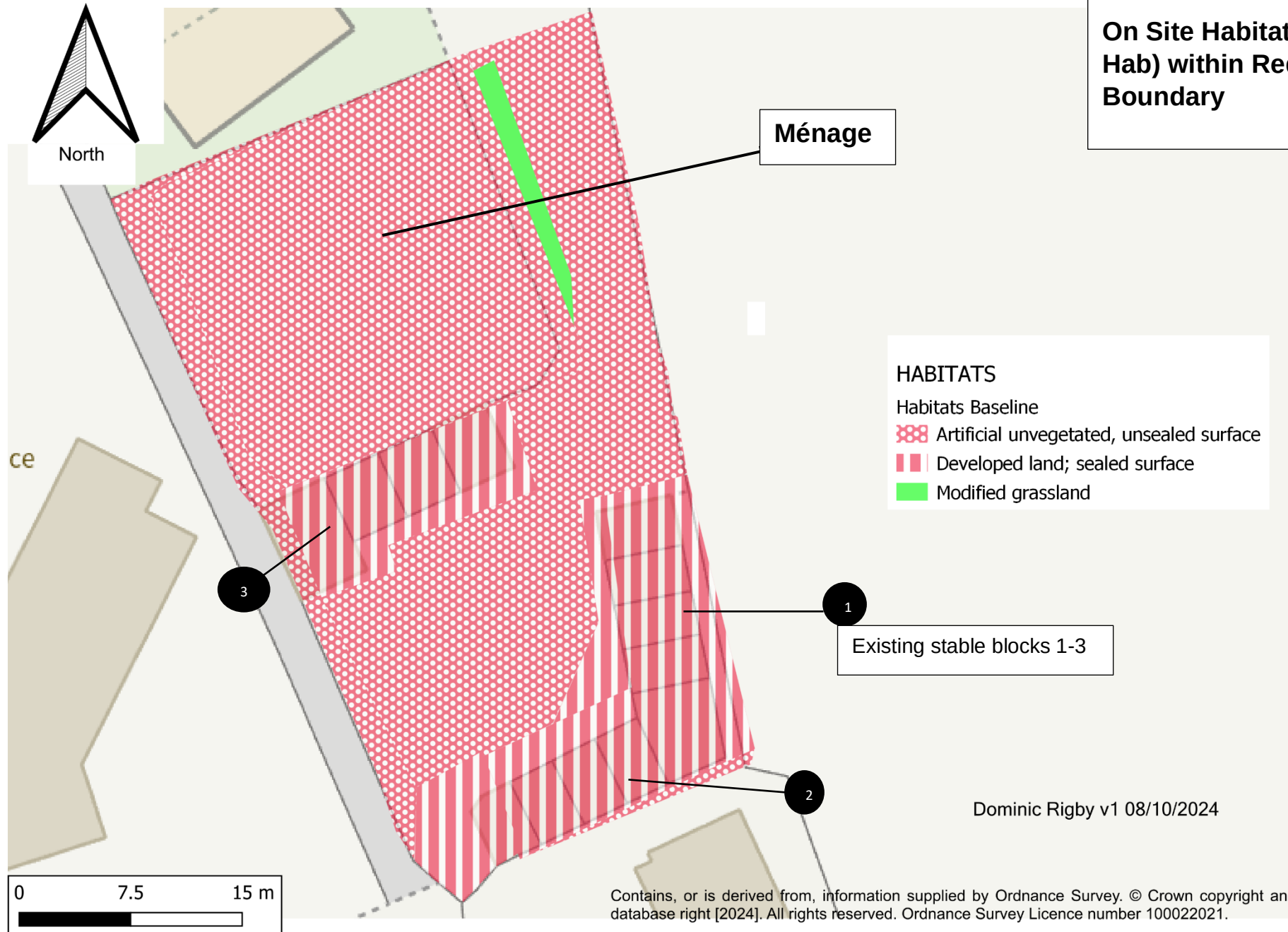


Figure Three:
On Site Habitat (UK
Hab) within Red Line
Boundary



5.3 Species

5.3.1 Bats

5.3.1.1 Desk Study

The GMEU/South Lancashire Bat Group database held many bat records in the vicinity for roosting and foraging bats. There was a common pipistrelle roost less than 50m from the site, within the business block off Miller Street.

All roosts referred to common pipistrelles (or “pipistrelle”), the closest other species’ roost was a Daubenton’s roost 1750m east near the Daisyfield Greenway.

5.3.1.2 Bat Preliminary Roost Assessment (PRA)

The PRA took place on 5th August 2024. The weather was dry, bright and still.

There were three stable blocks on the site, labelled 1-3 on Figure Three (above). The stables were a block-built structure with gently sloping corrugated roofs, joined by wooden trusses.

Photograph Two: Stable blocks One (foreground) and Two.



Stables One and Two (Photograph Two, above) had a metal roof, with many large gaps around the stable doors. This made them largely unsuitable for bats, with poor thermal qualities and exposure to outdoor weather and disturbance.

Photograph Three: Internal: Stable One



Stable Three was in a poorer state. With gaps in some of the block work (Photographs Four to Six below).

Photograph Four: Stable Three- front



Photographs Five and Six: Stable Three, facing ménage and facing footpath west of site respectively.



The gappy, metal roofed stables blocks had negligible bat roost potential and were unsuitable for hibernation.

5.3.2 Plants

No notable plants were recorded. Recorded across the poor condition modified grassland were: Red fescue (or similar fine-leaved fescue turf variety), rye grass and broad-leaved dock.

5.3.3 Amphibians

The GMEU database held several records of great crested newt within 2km of the project area. The closest was 750m SE of the site at Doffer Fold.

Figure Four presented post-2015 great crested newt records from the data search.

There was a field pond 170m SE of the red line boundary. However, that pond was separated from the project site by a hedgerow and the project area lacked terrestrial habitat for amphibians.

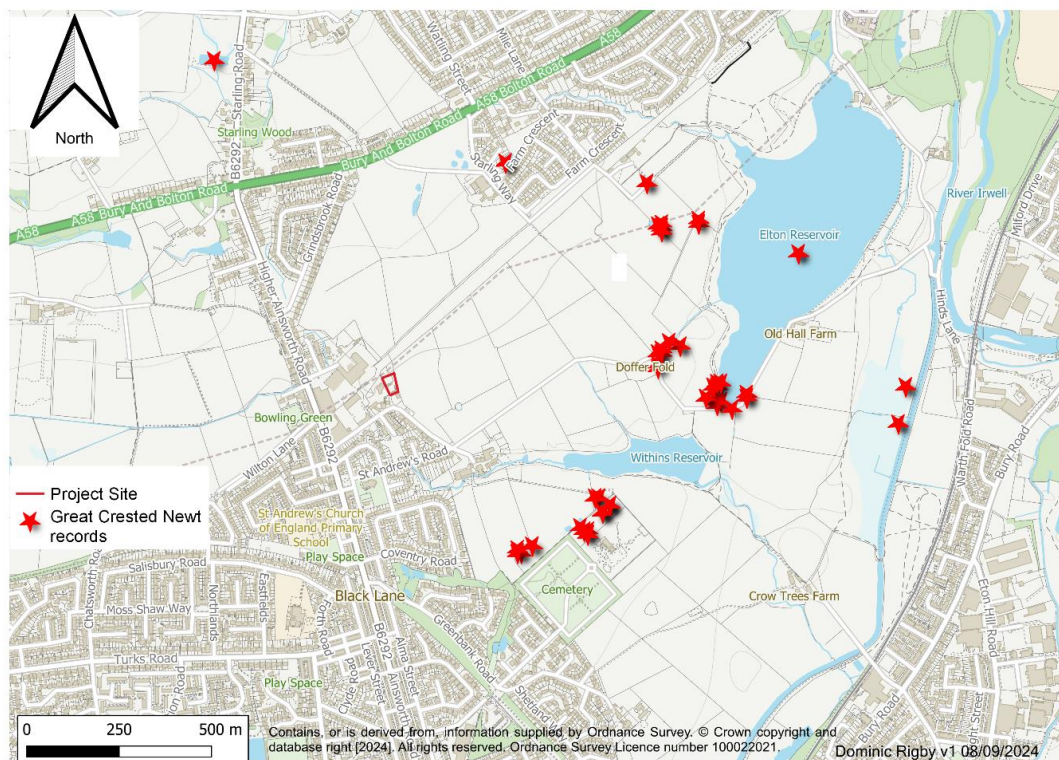
Given the unsuitability of the on-site habitat and the absence of impact on the neighbouring ponds, the likelihood of encountering and disturbing great crested newt was negligible.

However, given their possible presence nearby, the presence of unsurveyed pond less than 200m from the site and the presence of a hedgerow (terrestrial-phase amphibian habitat) close off site, it is advised that the (off-site) boundary hedgerow (eastern boundary) was protected from disturbance from construction activities. This could be done by the utilisation of the Heras-type fencing that would be surrounding the site during development..

It is advised that the undertaking of the following Reasonable Avoidance Measures (RAMs) during the construction phase, secured by a suitably worded planning condition (and/or as part of a CEMP):

The off-site hedgerow bounding the east of the site should be protected from disturbance from construction activities by the utilisation of barrier fencing throughout the demolition and construction period.

Figure Four: Great Crested Newt Records within 2km of project site



5.3.4 Birds

There was one recorded barn owl (Schedule One) breeding location within 2km of the site. The stables were checked for breeding evidence (under appropriate class licence). No evidence was found.

Disturbance/development at the site would not affect Schedule One birds.

However, the stables provided suitable nesting habitat for starling, house sparrow, house martin and swallow. All but the latter were red listed (see 3.1.3) for their breeding status in the UK. Swallow was formerly amber listed (because of its status elsewhere in Europe). There was swallow nesting evidence in the stables, targeted for demolition. (Photograph Seven, below).

Clearance work within the red line boundary should be undertaken mid-September to early February to avoid nesting season. If the nesting season was unavoidable, it is advised that the undertaking of the following Reasonable Avoidance Measures (RAMs) during the construction phase, secured by a suitably worded planning condition (and/or as part of a CEMP):

- No demolition shall take place between 14th February and 14th September inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site.

Any such written confirmation should be submitted to the local planning authority in addition to the approved Method Statement.

Photographs Seven: Swallow nest in Stable One, August 2024



5.3.5 Brown Hare

There were several records of brown hare in the fields to the east of the site, the closest 300m (see Figure Two above). However, on-site habitat was not suitable and therefore this protected mammal can be scoped out of the appraisal at this point.

Brown hare was not considered to be a constraint to the proposed development

5.3.6 Hedgehog

There were several records of hedgehog in the fields to the east of the site, the closest 800m. However, on-site habitat was not suitable and therefore this protected mammal can be scoped out of the appraisal at this point.

Hedgehog was not considered to be a constraint to the proposed development

5.3.7 Badger

The desk study returned no records for badger within a 500m radius of the site boundary, but they were known from a wider radius. There was no on-site habitat that could support sett creation, and no field signs or setts were identified.

The likelihood of badger activity within 50m of the site was considered negligible and the species was scoped out at this stage of the assessment.

Badger was not considered to be a constraint to the proposed development

5.3.8 Reptiles

There were no records of slow worm and common lizard.

The site imprint offered only sub-optimally suitable terrestrial habitat to support reptiles. Reptiles were scoped out of the appraisal at this point.

Reptiles were not considered to be a constraint to the proposed development.

5.3.9 Invertebrates

This proposed project would not have a detrimental effect on the populations of invertebrates. Therefore, invertebrates could be scoped out of the appraisal.

Invertebrates were not considered to be a constraint to the proposed development.

5.3.10 INNS

There were several populations of Japanese knotweed close to, but not on, site (see Figure Two). The closest was on the far side of the right of way that bounded the western side of the site.

Himalayan balsam was on site at the rear (east) of Stable One (see Photograph Eight, below).

Figure Six (Appendix One) mapped the INNS.

Photograph Eight: Himalayan balsam at rear of Stable One



It was an offence to cause the spread of both these INNS (See Section 3). As a precaution, the undertaking of Reasonable Avoidance Measures (RAMs) during the construction phase should be secured by a suitably worded planning condition (and/or as part of a CEMP). (See Appendix One).

6. DISCUSSION AND ANALYSIS

The stables buildings were assessed as having negligible potential for bat roosts and hibernation.

Amphibians, nesting birds and INNS presented differing degrees of ecological constraint, which would require avoidance measures.

There was no medium or higher distinctiveness habitat within the red line. Just off-site was a native hedgerow (east) and this would require protection from construction activities.

6.1 Precautionary Working Method Statements

It was advised that the undertaking of Reasonable Avoidance Measures (RAMs) during the construction phase, secured by a suitably worded planning conditions (and/or as part of a CEMP) should be conditioned for

Amphibians (as detailed in 5.3.3),

Nesting Birds (5.3.4); and,

INNS (Appendix One).

6.2 Bird nesting Mitigation

The loss of established swallow nesting areas, as well as enhancement by providing swift, house martin, starling and house martin nesting provided biodiversity opportunities

Accordingly, integrated swift, starling boxes and externally mounted house martin and house sparrow boxes were recommended. There were several options for boxes and integrated nesting bricks, many could be customised to fit existing finishes.

Examples of some boxes were:

[Swift Nesting Brick | Manthorpe \(manthorpebp.co.uk\)](http://manthorpebp.co.uk) , [Integrated Starling box | NHBS Practical Conservation Equipment](#) , [Vivara Pro WoodStone House Sparrow Nest Box | NHBS Practical Conservation Equipment](#) , [Vivara Pro WoodStone House Martin Nest | NHBS Practical Conservation Equipment](#)

Swallow nest mitigation

If the new stable block was of a similar design to that present, then swallow nesting provision was likely to be maintained. However, if this was not the case nesting provision may be conditioned by the planning authority.

See Appendix Two for potential swallow nest mitigation that could be incorporated into the development's design. Swallow was previously Amber listed (BoCC, 3.1) because of its status elsewhere in Europe. It was Green listed in 2021 (Stanbury *et al*).

6.3 Biodiversity Net Gain

Table One: On-site BNG unit baseline

Existing area habitats				Distinctiveness	Condition		Ecological baseline	
Broad Habitat	Habitat Type	Irreplaceable	Area (hectare)	Distinctiveness	Condition	Score	Total habitat units	
Urban	Artificial unvegetated, unsealed surface	No	0.0534	V.Low	N/A - Other	0	0	
Urban	Developed land; sealed surface	No	0.0115	V.Low	N/A - Other	0	0	
Grassland	Modified grassland	No	0.0024	Low	Poor	1	0.0048	
Urban	Artificial unvegetated, unsealed surface	No	0.0474	V.Low	N/A - Other	0	0	
Urban	Developed land; sealed surface	No	0.0032	V.Low	N/A - Other	0	0	
Urban	Developed land; sealed surface	No	0.0208	V.Low	N/A - Other	0	0	
Urban	Developed land; sealed surface	No	0.0058	V.Low	N/A - Other	0	0	
Urban	Artificial unvegetated, unsealed surface	No	0.0087	V.Low	N/A - Other	0	0	
Urban	Artificial unvegetated, unsealed surface	No	0.0008	V.Low	N/A - Other	0	0	

With less than 0.25m² of habitat and less than 0.5 habitat units, this project was exempt from BNG, satisfying the *de minimis* criteria.

7. RECOMMENDATIONS

The following recommendations were put forward to ensure the project had no impact on protected species. The best mechanism to ensure this was through the following planning conditions.

- R1** Amphibian precautionary working method statement should be followed (see 5.3.3)
- R2** Nesting birds precautionary working method statement should be followed if work during the nesting season could not be avoided (see 5.3.4)
- R3** Invasive non-native species precautionary working method statement should be followed (see Appendix One)
- R4** Mitigation for loss of nesting bird opportunities (see 6.2/Appendix 2)

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APPENDIX

Appendix ONE:

Invasive Non-native Species (INNS)

Reasonable Avoidance Measures Method Statement

Invasive Non-native Species (Himalayan Balsam and Japanese knotweed) Reasonable Avoidance Measures

1. BACKGROUND INFORMATION

In August 2024 CCNW was commissioned by Peter Dickinson Architects Ltd. to assess the potential ecological impacts associated with the design and implementation of demolishing three stable blocks at the end of Hardman Street, Radcliffe, and replacement with five dwellings and new stable block. A PEA was produced by CCNW in October 2024 to inform clients re: ecological constraints and opportunities for the project.

1.1 Site Location and Description

Stables and Equestrian site, Land at Hardman Street, Radcliffe M26 4GY National Grid reference: SD77790892 Local Authority: Bury, Greater Manchester

The project site consisted of a block-built stable units, a menage, hardstanding and a small strip of grassland within its 1500m² plot

The site was south west of Bury, on the northern edge of the urban conurbation of Radcliffe. To the east was grazing land leading to Elton Reservoir, the north and west was industrial, leading to more farmed grassland. Figure Five (below), located the site, with Radcliffe to the south.

Figure Five: Site Location



1.2 Development Proposals

The existing land and buildings were to be completely re-formed to create a five-plot residential development and new stable block.

1.3 Himalayan Balsam on Site

Himalayan balsam, an undesirable species on site had been identified along the verges behind the easternmost stable block.

1.4 Japanese Knotweed

There was no Japanese knotweed site, but a clump was located just 5m off-site.

Figure Six: INNS at Development Site



2 LEGISLATION

Section 14 of the Wildlife and Countryside Act 1981 (as amended) made it an offence to grow or cause the spread in the wild any plant listed in Part II of Schedule 9 of the legislation. Himalayan Balsam is listed on Schedule 9

The Environment Protection Act 1990 classified as controlled waste any soil and waste containing propagules of a plant species listed in Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

3 POTENTIAL IMPACTS AND MITIGATION

3.1 Impact of Planned Works

The planned works required construction and demolition machinery, digging and path-laying across the site.

All persons working on Site must be aware that Himalayan balsam is on site and Japanese knotweed very close and should be familiar with the method of working to avoid their spread.

A risk assessment was carried out and it was considered that the works carried a high risk of spreading the Himalayan balsam plant without adherence to the reasonable avoidance measures (RAMS).

The risk was high because Himalayan was abundant on part of the site and that soil verge would have a large seed bank (with up to 7-year dormancy) of this annual species. (Very local) soil movement was necessary for the project, and this carried a risk of spreading the seeds into habitats beyond the red line boundary.

The following RAMS was designed to minimise the risk off-site and when coupled with post-project measures to uplift the remaining habitats within the red line there should be a reduction of the plant on site and no offence in law would be committed.

4. REASONABLE AVOIDANCE MEASURES METHOD STATEMENT

4.2 Pre-works survey

Prior to commencement of any works on site, including site clearance or construction, further survey shall be undertaken for plant species listed in Part II of Schedule 9 of the Wildlife and Countryside Act, 1981 (as amended), within 8 metres of the proposed working area.

The survey shall be undertaken during a season when most plant species are likely to be visible, typically May to September inclusive.

The survey shall be undertaken by a competent person with the necessary identification skills.

Disturbance of any stands of invasive species will be avoided during the survey.

All areas occupied by plants listed on schedule 9 (above) shall be mapped and marked *in situ*.

A 2-metre exclusion zone shall be mapped around Himalayan balsam within the survey area and marked on the ground and a further 8m impact zone marked on the ground.

If other species listed on Schedule 9 of the legislation, in addition to Himalayan balsam, are found during the survey, then this method statement will be reviewed and revised if necessary to address any necessary species-specific control measures.

If more than 12 months elapses between completion of the survey and commencement of development works, then the above survey will be repeated.

4.3 Construction Phase

- **Supervision**

All works within exclusion zones identified during the surveys will be supervised by an ecological clerk of works, to ensure that all invasive weed control measures are fully implemented. A briefing will be given to all personnel on site to make them aware of the requirements of the legislation stated above and the necessary working methods stated in this document.

- **Working Area**

No works shall take place within the exclusion zones described above, unless unavoidable (e.g. if the construction footprint coincides with an exclusion or if weed control procedures need to be implemented). This shall include any vehicle movements, pedestrian access, and storage of materials.

- **Timing of works**

If site clearance and development work within the exclusion zones described above takes place between November and May (inclusive) this will avoid the period when Himalayan Balsam is likely to be flowering and setting seed (typically late June to October). If clearing works take place outside that period the plants should be pulled, bagged and treated as controlled waste.

- **Construction methods**

Within the 2m and 8m exclusion zones identified during the above surveys, soil excavation will be avoided wherever possible. However, given the nature of the project this will not be possible in some areas. Within these areas adherence to the disposal of plant material and contaminated soil section below is crucial.

- **Machinery and equipment**

Prior to leaving the planning application area, all machinery, tools, equipment, and boots shall be brushed or washed as necessary to remove any propagules of invasive plants.

- **Disposal of plant material and contaminated soil**

Any materials unavoidably removed from an identified Himalayan balsam area can remain on site, *within the planning application boundary*, if placed within an existing Himalayan Balsam area, within the planning application boundary, in an area that is not prone to flooding and is targeted for post-construction conservation management as referred to in the BNG plan. These areas must be included in the monitoring and post-construction treatment regimes described below. If suitable locations cannot be identified on site, then the material must be treated as controlled waste and removed from site as controlled waste.

- **Mechanical and chemical weed control**

This is the minimum required to ensure compliance with legislation/planning policy.

For three years following completion of the proposed construction works, all Himalayan Balsam within the planning application area will be spot treated with herbicide during the growing season (May-July), if new shoots come up later in the season a combination of herbicide and hand pulling will be used, hand pulled plants will be left *in situ*. Strimming below the lowest node may be used as an alternative, with the agreement of the ecological clerk of works, and only if damage to native woodland ground flora can be avoided. However, strimming may be less effective and may need to be repeated.

Routine August mow/cut of the verges will help mulch any strimmed/pulled arisings and prevent any late-emerging specimens from flowering.

Subject to the construction programme, balsam pulling / strimming will also take place after completion of the pre-works survey, in May/early June if this is prior to commencement of works.

- **Monitoring**

The success of the above treatment will be monitored by mapping the extent of invasive non-native species within the application boundary annually for three years following completion of construction. The control regime will be adjusted if monitoring visits indicated the need.

NOTE REGARDING JAPANESE KNOTWEED

Japanese knotweed was not on the site, the closest specimens were 5-10m from the red line, on the opposite of the public right of way. The generic securing (Heras fencing, or similar) of the construction footprint should ensure no disturbance of the plant from the activities of this project. However, the Site Ecologist (and subsequently site operatives) should be aware of the location of the Japanese knotweed and include it in the Tools Talk.

5. TOOLBOX TALK AND ECOLOGICAL WATCHING BRIEF

5.1 Toolbox Talk

A toolbox talk would be given by the Site Ecologist to all site operatives in advance of any works.

The briefing would include:

- Invasive Non-native Species and details of the current legal status;
- guidance on how Himalayan balsam could be identified and its life cycle;
- areas of habitat to be avoided; and,
- the procedure to follow to prevent its spread.
- Presence of Japanese knotweed nearby, and site exclusion procedures to ensure this is not disturbed.

Following the toolbox talk, this Method Statement would be read and signed by all site operatives/contractors. A copy of this Method Statement would be kept on site throughout the construction phase.

TOOLBOX TALK RECORD SHEET: Invasive Non-native Species

I (insert name of ecologist)
confirm that I have administered a toolbox talk in accordance with this Precautionary
Working Method Statement

on (insert date) at:

Land at end of Hardman Street, Radcliffe

I confirm that the following personnel attended the Toolbox Talk.

Attendees Name	Attendees Signature

Appendix Two: SWALLOWS

POTENTIAL MITIGATION FOR SWALLOWS

It was likely that the new stables block would offer nesting opportunities for swallow nesting. However, if the design was not appropriate an integrated swallow nest box could be incorporated into the new building/s to mitigate the permanent loss of nesting provision within the current stables.

An eaves/ridge “overhang” box with an open bottom and ledges for swallows to nest on, 250mm wide, 400mm deep (half shelf, half open); 450mm tall (to apex) could be integrated into the new building design.

The structure could be incorporated into the western or southern elevation of the new builds to enable open, unrestricted flight access for the birds.

Figure Seven: Eaves/Ridge overhang swallow integrated nest box design

Eaves/ridge overhang swallow nest box



This figure was used courtesy of Richard Green Ecology Ltd., who successfully used this design on a new build

