

65844 – Mondi Mill, Ramsbottom

Hope you are well and thank you for sending through the amended INNs and Landscape management plan

INNs Management Plan

Whilst the method statement has been amended it still fails to meet my concerns raised on the 7th October 2020.

- All three species are recorded as spreading in to the site. The first point I made regarding for the need for a resurvey if development could be easily picked up in the method statement if they are keen to reduce the number of pre-commencement conditions. ***A paragraph in the introduction i.e. a section 1.4 stating the need for a site resurvey prior to earthworks or by a certain date, which given the survey is already 2 years old would be due if CIEEM guidance a review anyway and a full resurvey if works were delayed beyond July 2022.***
- Some of the knotweed and balsam is within the development footprint. I note the proposal to fence off areas until treatment is successful, which would be adequate, but given the potential timescale for treatment using herbicide could be a couple of years for knotweed, may cause unnecessary delays. I would therefore recommend that the option to excavate is added should timescale dictate this is the only option.
- The Himalayan balsam hand pulling method statement is still not optimal. It has been amended to first pull in autumn prior to seed pods developing. This is far too late, seed pods start to become viable from beginning of August. Two further pulls in March and June are then proposed. The March pull whilst feasible is not optimal as the seeds only germinate in March and so will be only a few cm tall. June is at an optimal time but would leave no margin for error if any plants were missed. Follow up checks in winter would be too late. Seed are dispersed from early August through to sometime in October and potentially later. I have been involved in a hand pulling management plan for some years and we pull every 3 – 4 weeks from end of March through to October and find plants every time. Any longer after the beginning of August (less critical March to July) and plants we may have missed can have set seed.

Landscape Plan

Amendments have been made in line with my recommendations. I now support the proposed landscaping and welcome the use of the native black poplar in the species mix. ***I would have no objection to the landscape plan being conditioned.***

Ecologist
GM Ecology Unit