



Victoria Court, Tottington, Bury

Preliminary Ecological Appraisal,
Bat Roost Assessment and BNG Draft Plan

Date: 26/02/2025

By: Dominic Rigby MCIEEM

Ref: JE8459-25

Client: Peter Dickinson Architects Ltd.

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The results and any advice contained here is based on the information available during the agreed period of study and within the resources available. All reasonable effort has been taken to ensure that an accurate assessment of the subject is provided at the time of the survey. However, the absence of recorded evidence should not be taken as an absolute guarantee that the site was not being used by a particular species.

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				
Version	Date	Prepared by	For Comment	Checked by
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Victoria Court Tottington

Ecology, BNG and Bat Scoping Report

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February 2025

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1. SUMMARY

Conservations Contracts Northwest Ltd. (CCNW) were contracted in January 2025 to undertake a preliminary ecological appraisal, bat scoping assessment and biodiversity net gain plan on vacant land immediately south of 31/33 Victoria Court, Tottington, in the Manchester Combined Authority borough of Bury.

The project site consisted of invasive non-native scrub, unmanaged modified grassland and scattered trees, with a sloping wooded and scrubbed river cutting (Black Brook) adjacent. Together these accounted for an area of 0.1ha.

The site was within the town of Tottington, an urban setting, although less than 500m east and west of the site, the landscape opened to largely managed agricultural grasslands.

The site was proposed residential development. A preliminary ecological appraisal was undertaken in January along with both baseline and proposed biodiversity net gain (BNG) calculations, including the Black Brook river condition assessment (RCA). The surveys included a preliminary bat roost assessment as bats *and* their roosts were fully protected in UK and European law. The trees were assessed as having negligible bat roost potential. Field surveys and records search discovered Himalayan balsam on site. Additionally, there were great crested newt (closest 500m), bat roost (closest 280m) and hedgehogs (355m) within 2km of the site. No further surveys were recommended.

Regarding Biodiversity Net Gain, the onsite baseline totalled 1.14 habitat units, and the river 0.44. The Black Brook adjacent to the project site was in “Fairly Poor” condition owing to builders’ rubble on the bank sides and river channel and invasive species on the bank top and sides. A Watercourse BNG uplift of 13.25% was prescribed.

Area habitat BNG could be attained for the project and trading rules satisfied if a recently pollarded willow tree was retained and allowed to grow back (11.7% BNG).

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 methods should be followed (5.3.10)
- R4** Protected Mammals precautionary working method statement should be followed
- R5** External and internal lighting should be designed to not project more than 1lux onto the retained woodland and scrub from the bank sides of the Black Brook.
- R6** Temporary, rigid external fencing should be placed on the eastern boundary of the construction imprint to prevent building materials and paraphernalia from entering the riparian zone.

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 Habitat Classification 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 Hab v2, respectively.

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

2.3 Client

Peter Dickinson Architects Ltd. on behalf of Mrs. A Delaney (Landowner).

2.4 Site Location and Description

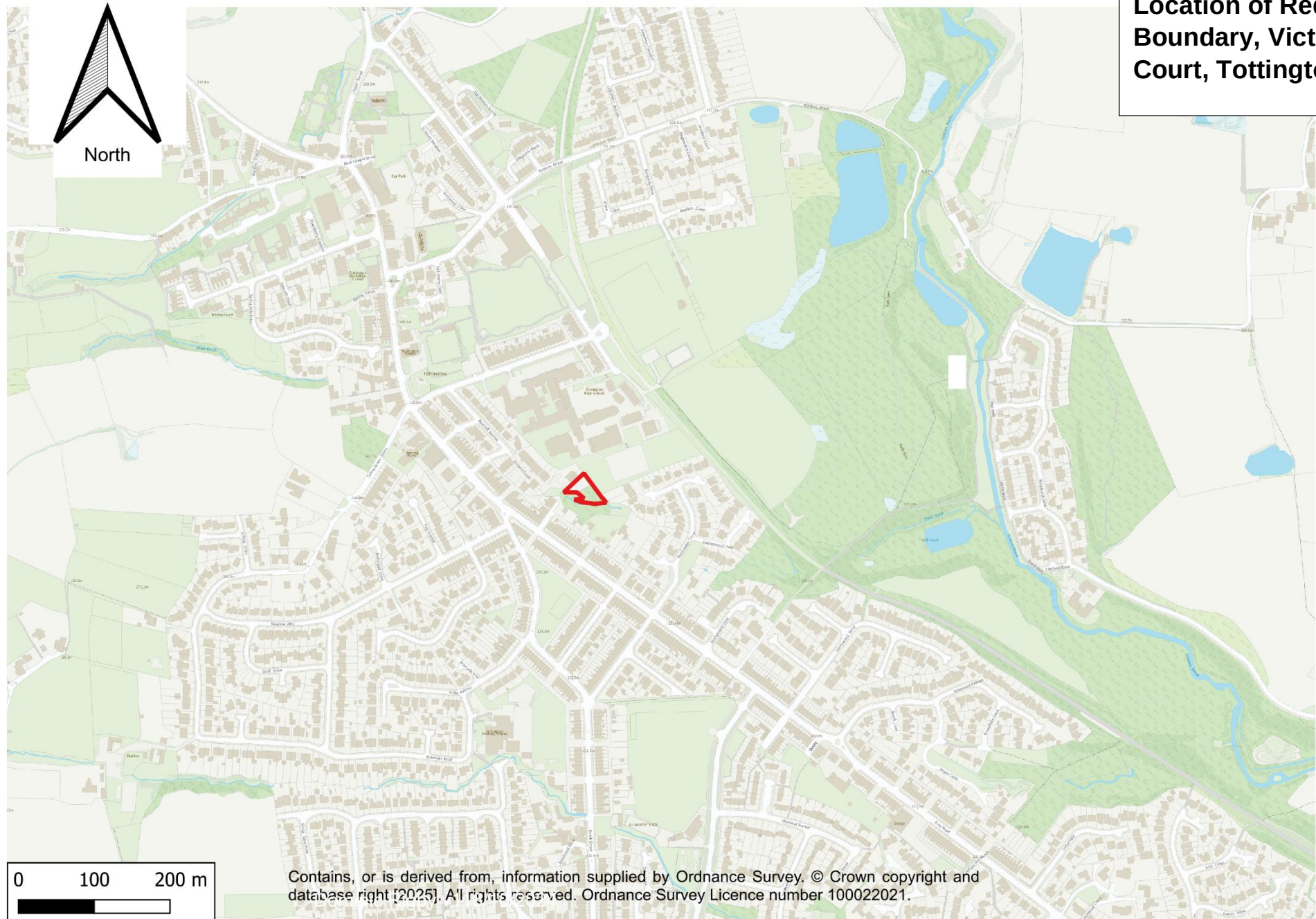
Proposed development of 2 no. family dwellings on vacant land at Victoria Court, Ryecroft Avenue, Tottington, Bury, BL8 3GY

National Grid reference: SD77801279

Local Authority: Bury, Greater Manchester

The project site consisted of neglected modified grassland, invasive non-native bramble, scrub and woodland, leading down to a river that was just off-site. The site was 1000m². The site was within the town of Tottington, an urban setting, although less than 500m east and west of the site, the landscape opened to largely managed agricultural grasslands. Figure One (p7, below), illustrated the site within the wider countryside.

Figure One:
Location of Red Line
Boundary, Victoria
Court, Tottington



2.5 Purpose of Report

It was proposed to develop two family dwellings on vacant land at Victoria Court, Tottington, Bury.

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.

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 2025). 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 and Becci Curtis on 21st January 2025.

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 (7/2024).

Condition assessment tables for each relevant habitat were zipped to this Report.

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.

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 v3.34.

4.2.1.2 Mapping

The habitat maps were digitised using QGIS v3.34 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 January 2025. 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.

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.

4.2.2.4 Bats

- **Bat Scoping Assessment**

A Potential Roost Features assessment (PRF) was undertaken on all trees on 21st January 2025. The ground-based tree survey followed the procedure recommended in the BCT Guidelines (Collins, 2023).

The weather was dry, still and fine.

4.2.2.5 Hedgehogs

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

4.2.2.6 Badgers

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

4.2.2.7 Otter/Water Vole

Black Brook was inspected for evidence/signs of these protected mammals.

4.2.2.8 Reptiles

Habitat suitability for reptiles was noted during the habitat surveys.

4.2.2.9 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 January date for the survey was sub-optimal for grassland and woodland field layer assessment.

However, the abundance of rye grass, white clover and fine-leaved fescues in the neglected grassland enable a straightforward assessment. The date of the surveys meant that breeding bird evidence was sub-optimal.

The woodland field layer was largely bare, thick with bramble (some non-native) or dumped inorganic materials. An accurate assessment of woodland type and condition was considered reasonable.

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

4.5.2 Degradation

The sloping land from the bank down to the river was intact. However, much of the land from the current properties up to an existing fence had been cleared. This included a mixed scrub area, and two trees.

There was another scrub compartment abutting the on-site woodland, this was assessed as “Poor”, scoring zero. Therefore, rather than allocating an unrealistic “Good” to the degraded compartment, those parcels were assessed as “Moderate”.

The cleared area included two stumps that were more 7.5cm at dbh were mapped. Extrapolating from the stump sizes and stacked timber, these were recorded as a moderate sized cherry (assumed native) and a large, multi-stemmed willow. These were both assessed as “Good” condition, to tally with the Statutory BNG Guidance.

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

Those within 1km are mapped in Figure Two below.

- **Kirkless Brook (SD782130) SBI**

This site of biological importance (SBI) was designated for its ponds and lodges, proving important habitat for bats, invertebrates and amphibians. The Brook was surrounded by a native scrub and broad-leaved woodland.

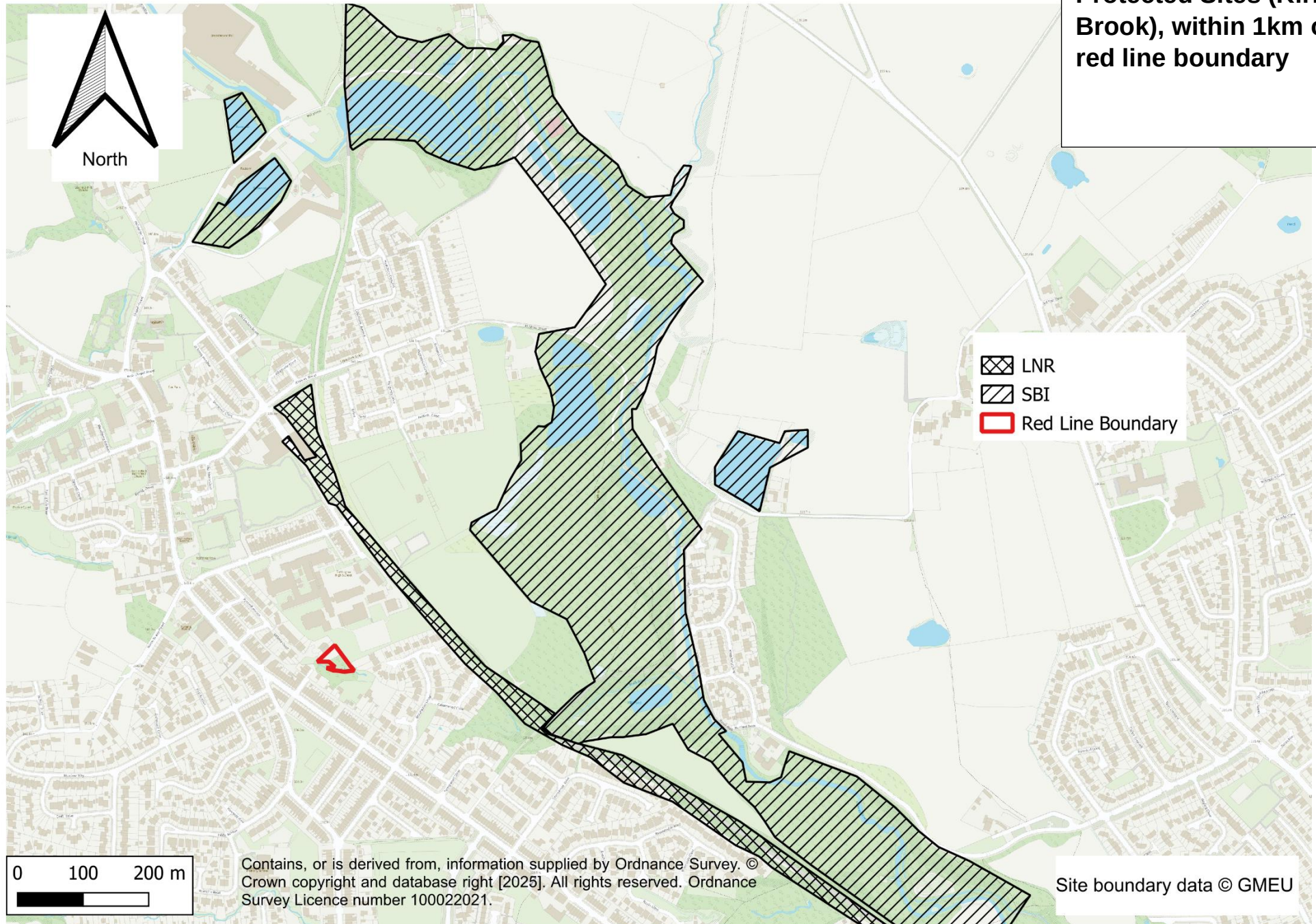
At its closest point this site was 275m from the project site.

- **Kirklees Brook LNR**

Overlapping the SBI was the more extensive Kirklees Brook local nature reserve.

At its closest, the LNR was 125m from the project site, with Tottington High School separating the two sites.

Figure Two:
Protected Sites (Kirklees Brook), within 1km of the red line boundary



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. The closest was lowland deciduous woodland 180m SE of the project site.

5.2.2.2 Other Non-linear Habitats

The baseline habitats amassed 1.14 habitat units. Figure Three below mapped the habitat within the red line boundary.

Table One: Baseline Habitat Areas

Habitat type	Condition	Area m ²	
Individual trees	Good	366	529
	Moderate	163	
Other Woodland, broadleaved	Moderate	287	
Bramble scrub	N/A	262	
Modified grassland	Poor	154	
Mixed scrub	Moderate	75	129
	Poor	54	
Introduced Shrub	N/A	102	
Vegetated garden	N/A	74	

Medium Distinctiveness

There were three broad medium distinctive area-habitats on site, accounting for four habitat types.

- **Individual trees**

Two felled trees that were not part of the scrub or woodland habitats were mapped (see 4.5.2). Using the BNG tree helper a moderate sized cherry and large willow (species) were the area equivalent of 529m².

Photograph One: Heavily pollarded willow, and partially cleared giant bramble patch



- **Other Woodland, broadleaved**

A small plantation of predominantly sycamore woodland was present in the south of the site, continuing down to the Black Brook. The woodland included a single pedunculate oak and a shrub layer composed of native and non-native bramble. The field layer was sparse, with builders' rubble scattered across. Himalayan balsam was present, particularly towards the bank sides of the brook.

Photograph Two: Woodland from Bank Top



- **Heathland and Scrub**

Bramble and Mixed Scrub habitats

- **Bramble Scrub**

Bramble (*Rubus* agg.) dominated the SW of the site down to Black Brook. There was more than one species of bramble, including some specimens of the invasive, non-native, giant bramble (*Rubus armeniacus*).

- **Mixed Scrub**

There was mixed scrub that had been recently cleared in the NW corner of the site, and an uncleared section abutting the western boundary of the on-site woodland.

The latter was composed of bramble and elder.

Photograph Three: Cleared (degradation) Mixed Scrub patch



Low-distinctiveness Habitats

- **Modified Grassland**

A neglected lawn neighbouring the existing property contained rye grass, fine-leaved fescues and white clover. It was characteristic of a classic lawn (modified grasslands) and there no other floral rosettes or non-grass leaves present.

- **Urban Habitats**

Vegetated Garden and Introduced Shrub

- **Introduced Shrub**

Surrounding the lawn area was a large band of the highly invasive, non-native Giant Bramble *Rubus armeniacus*. There has been recent discussion within BNG Forums as how this should be mapped (e.g. [\(8\) Biodiversity Net Gain UK | Facebook](#) 14/2/25). In this context it was mapped as “Introduced Shrub” and the species was also treated as an invasive non-native when condition assessing other on-site habitats in which it occurred.

- **Vegetated Garden**

The remainder of the site was mapped as vegetated garden. This was a strip of grass and path next to the neighbouring property.

Photograph Four: Modified Grassland



5.2.2.2 Other linear Habitats

The Black Brook riparian zone (10m) fell within the project red line. The woodland and scrub habitats that bordered the river within the red line were echoed on the right bank, though with more trees and less scrub.

The river ran west to east and was culverted a few metres east and west of the site.

An RCA was conducted and the preliminary condition score of the F-type (Straight/Sinuuous) river was 0.125506, and the river shape index was 0.671858.

The preliminary condition score placed in the river in the “Fairly Poor” category (-0.9 to 0.4). The score was reduced because of the occurrence of Himalayan balsam and on the bank top/sides by giant bramble. There was builders’ rubble on the bank sides and river bed too, which affected the river condition.

The river would require protecting from disturbance from the building activities. This must be done without impact the functioning of the watercourse. There was a buffer of retained scrub and woodland within the red line (see Figure Six, grey area) and this should be fenced off with ridged (Heras-type) fencing during the construction phase.

The river condition scores were added as an additional tab to the statutory condition assessment sheets.

Photograph Five: Scrub down to the river, with builders’ rubble viewable in watercourse



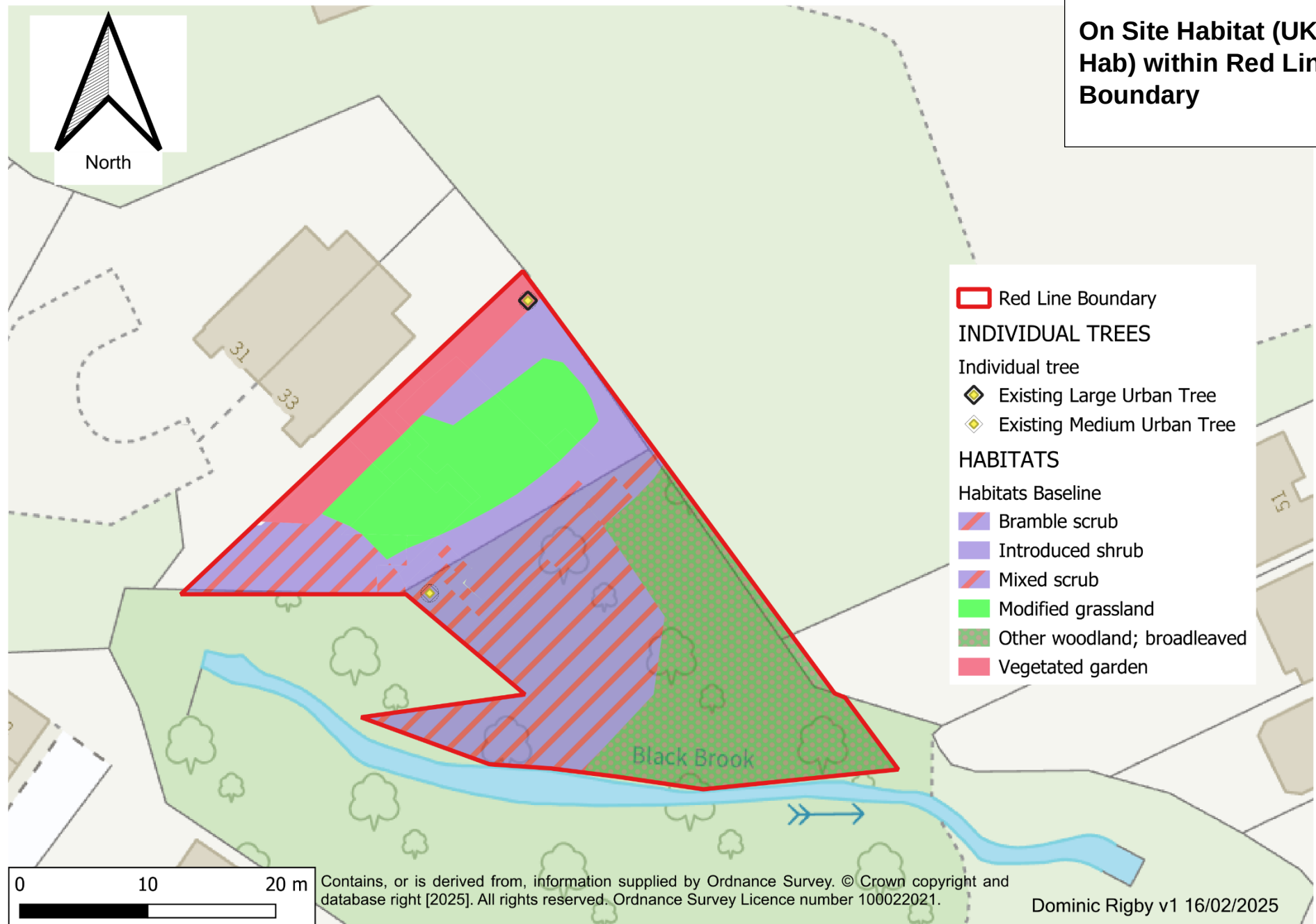
Photographs Six and Seven: Rubble and other unnatural materials in the Black Brook



Photograph Eight: Builders' rubble affecting river flow



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



5.3 Species

Protected species distribution was marked in Figure Five below.

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. Within 1km of the site there were eleven roosts recorded, the closest roost was 280m from the site, recorded from a domestic property over 30 years ago.

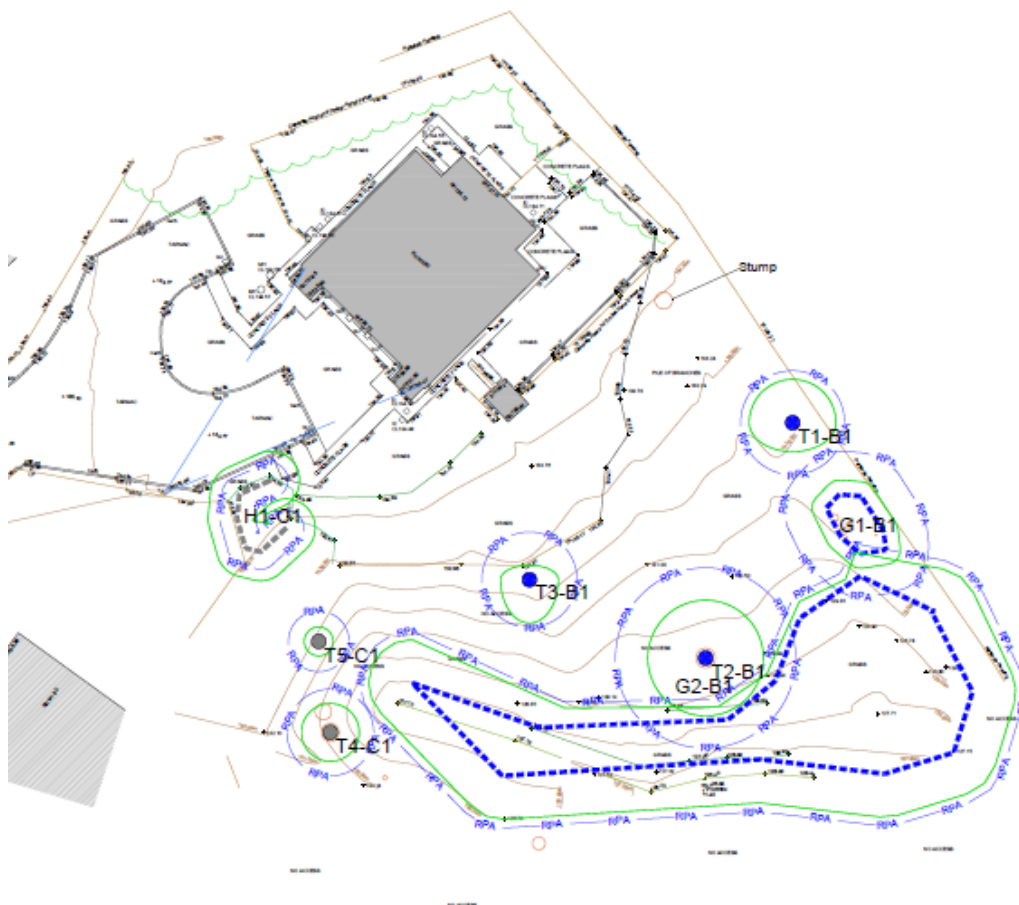
All but one roost referred to common pipistrelles (or “pipistrelle”), the other species was a Daubenton’s bat, roosting 900m north in a bridge over Kirklees Brook

5.3.1.2 Bat Preliminary Roost Assessment (PRA)

The PRA took place on 21st January 2025. The weather was dry, bright and still, there were no constraints.

A ground-level bat tree assessment for potential roost features was undertaken, referenced against the trees from the Arboricultural Report.

Figure Four: Arboricultural Report Plan (orientation North)



T1 was a sycamore, 13m, dbh, 30cm, it had a single, smooth trunk with no prfs.

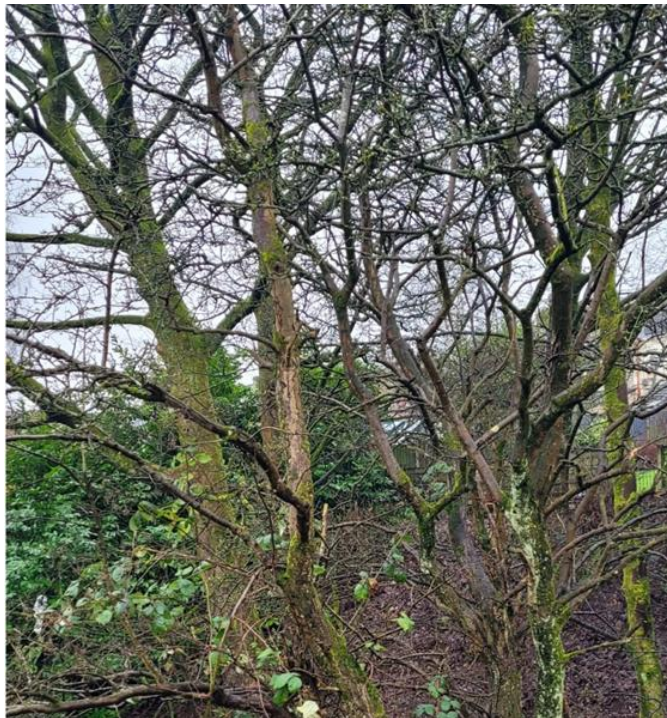
T2 was a slightly taller, and multi stemmed, again though there were no crevices or features suitable for bat roosting.

T3 was like T1 and had no prfs.

The trees labelled as G1 and G2 in the Arb report referred to plantation sycamores that had grown tall and straight with no apparent defects. Some of the G2 trees contained ivy, but this was not too dense as to hide any prfs.

Among the mixed and bramble scrub along the bank sides there were several hawthorns, none taller than 5m. Although the trunks/bark on these was characteristically gnarled, there was no evidence or potential for bats on close inspection.

Photograph Nine Hawthorn T4 inspected for bat prfs



The Black Brook and its woodland and scrub provided foraging opportunities for bats. However, activity surveys were not considered proportional to the potential impact of the development. However, it was advised to undertake the following Reasonable Avoidance Measure during the construction phase and implementation phases, secured by a suitably worded planning condition (and/or as part of a CEMP) would be :

- External and internal lighting proposed for the development should be designed to not project more than 1lux (full-moon equivalent) onto the retained woodland and scrub from the bank sides of the Black Brook (as depicted in see Figure Four).

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 white clover.

5.3.3 Amphibians

The GMEU database held several records of great crested newt within 2km of the project area. The closest was 500m NNE of the site within Kirklees LNR.

Given the distance from the site of known records, the lack of suitable water bodies for amphibians nearby (closest 450m and separated from the project site by a housing development) and the unsuitability of the on-site habitat within the construction imprint, the likelihood of encountering and disturbing great crested newt during construction was negligible.

However, given their possible presence nearby, and the suitability of the Black Brook bank side vegetation (terrestrial-phase amphibian habitat) within the red line boundary, it would be advised that the recommended clearance of builders' rubble from that area was done under a Method Statement.

It was advised that the undertaking Reasonable Avoidance Measures (RAMs) during the construction phase, secured by a suitably worded planning condition (and/or as part of a CEMP) would ensure no offence in law was committed and any protected amphibians would not be affected detrimentally:

- Existing vegetation on the site will be gradually cut and removed under ecological supervision during the autumn and resumed in spring onwards if construction works were delayed, to encourage any amphibians present to move away from the affected areas (no cutting/clearing should be done after a prolonged - 3days+) of freezing night-temperatures, and only resume once the GCN-licensed ecological clerk of works considers the likelihood of encountering hibernating amphibians negligible ;
- The working area, together with any storage areas, will be kept clear of debris, and any stored materials will be kept off the ground on pallets to prevent amphibians from seeking shelter or protection within them;
- Any open excavations (e.g. foundations / footings / service trenches etc) will be covered with plywood sheeting (or similar) at the end of each working day. The edges of these sheets will be covered with a thick layer of topsoil or similar) to prevent amphibians from seeking shelter beneath them; and,
- Any excavation must be in-filled and made good to ground level with compacted stone or similar at the earliest opportunity, to remove any hazard to amphibians.

5.3.4 Birds

The scrub and woodland along the Black Brook bank side provided suitable nesting habitat common woodland edge/garden birds.

Should there be another growing season before development then clearance work may be needed within the construction imprint. This 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 clearance work 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.

Regarding the bank side area, which was outside the construction imprint but the narrative of the development design, and red line, works for uplift of these habitats should take place outside the nesting season.

- BNG uplift works to the bank side scrub, woodland and river footprint shall not 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.

5.3.5 Hedgehog

Hedgehogs were a priority species listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. The retained woodland and scrub offered good foraging and refuge opportunities for this species which was recorded in the local area in gardens south of the project site, the closest was 355m SW.

No evidence of the species was noted on the site. If clearance works were undertaken over the winter period, then care should be taken to ensure any hedgehogs present within the site are not harmed. The presence of the species could not be ruled out.

This species hibernated over winter and was vulnerable to disturbance then. Care would also need to be taken not disturb any nesting hedgehog if work were undertaken between spring and autumn. Hedgehogs were likely to hibernate or nest within areas of dense scrub or woodland leaf litter/dead wood.

Thus, site checks immediately before construction and habitat intervention stages should be undertaken.

- This should be secured through a protected mammals RAMS.

The enhancement of the retained native habitats on site enabled by the proposed schemes would provide increased foraging, hibernating and nesting habitat for hedgehogs.

5.3.6 Badger

The desk study returned no records for badger within a 1km radius of the site boundary. The bank sides offered on-site habitat that could support sett creation, but 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. But checks relating to protected mammals RAMS would include observations for new badger signs.

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

5.3.7 Otter/Water Vole

There were no water vole or otter signs within the red line boundary. There were no records within 1km of the site, which included superior riverside habitat in the Kirklees valley.

Otter and water vole were not considered to be a constraint to the proposed development

5.3.8 Reptiles

There were no records of reptiles in the area.

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.

5.3.10 INNS

Himalayan balsam canes from the previous summer were present within the scrub and woodland habitats on the bank side of the Black Brook, within the red line boundary.

However, the closest was 8m from the construction imprint (see Figure Six below).

It was an offence to cause the spread of both these INNS (See Section 3). Any Himalayan balsam within the project boundary would be hand pulled, bagged and removed as controlled waste.

This should be secured by a suitably worded planning condition (and/or as part of a CEMP):

“Any Himalayan balsam within the project boundary should be hand pulled between May and July before seeding, bagged and removed as controlled waste”.

Figure Five:
Protected Species
Records within 1KM of
Project Site

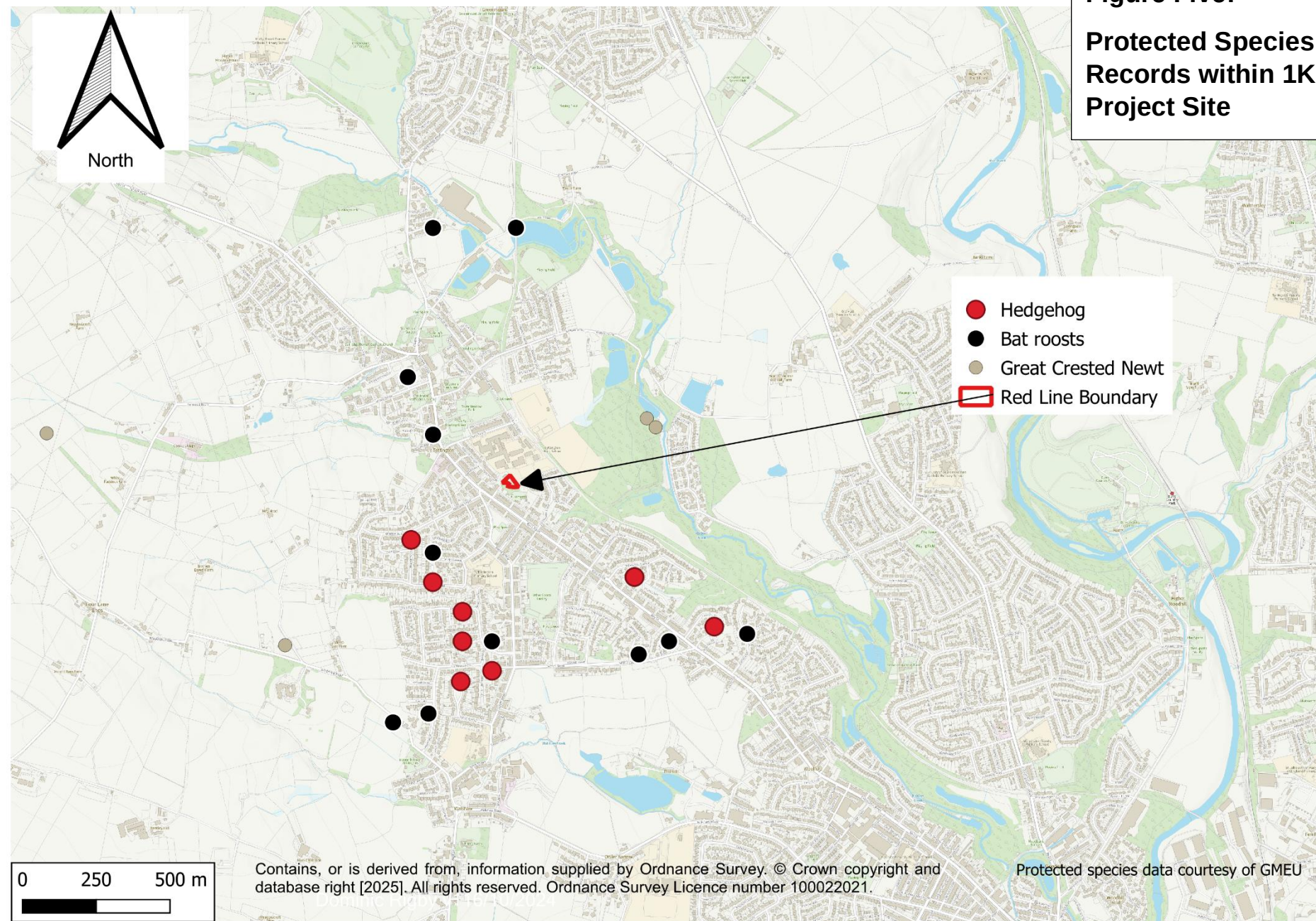
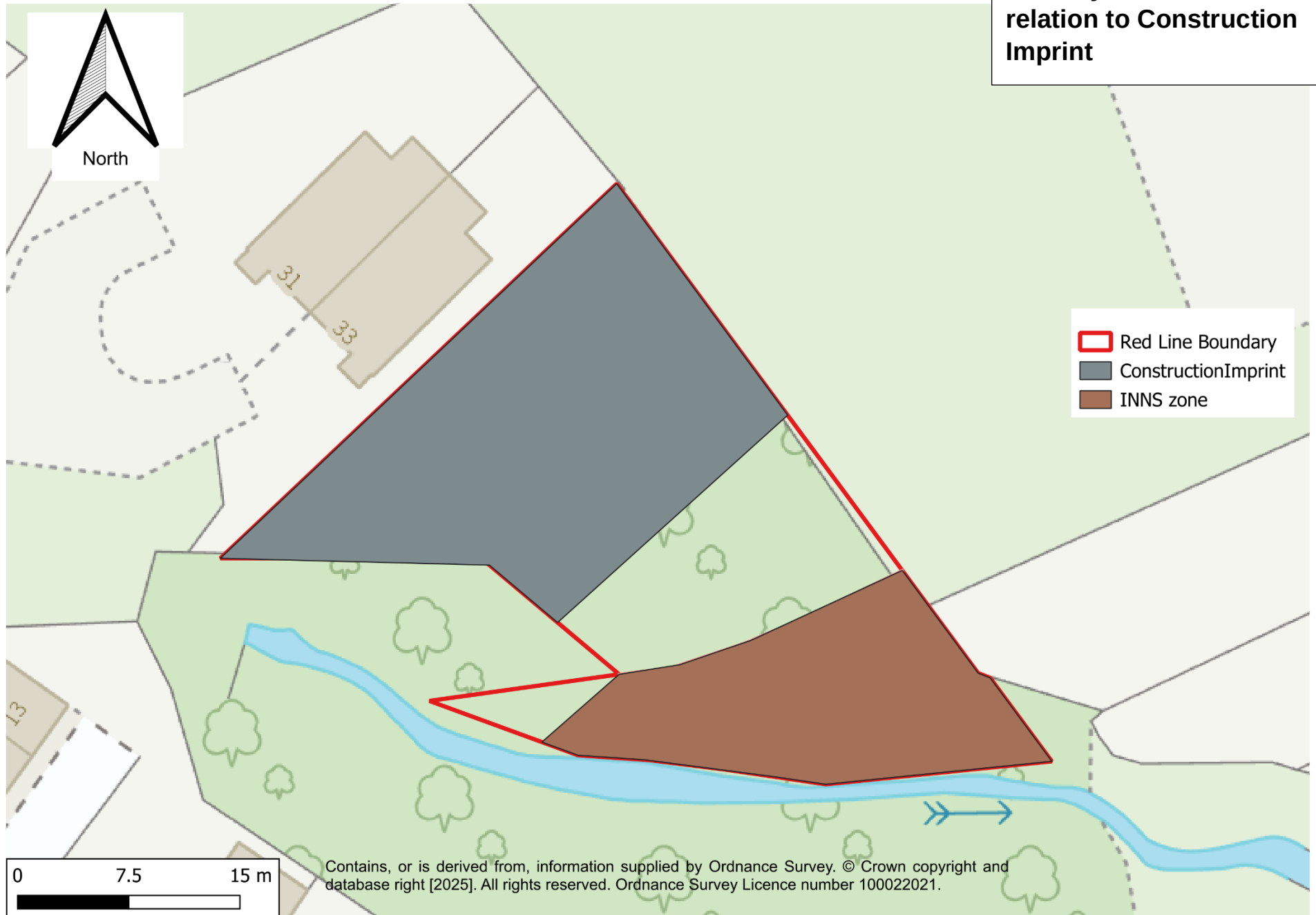


Figure Six:
Himalayan Balsam Zone in
relation to Construction
Imprint



6. DRAFT BNG Report

6.1 Post-Development Calculations

The post-development calculations were based on Drawing R-0823-02 Proposed Site Location Plan, supplied by Equilibrium Architects.

There would be a net increase in the “developed land, sealed surface”, but there were opportunities elsewhere on site to enhance medium- distinctiveness habitats (woodland and scrub, and watercourse). Together, these initiatives led to a net increase in habitat units of 11.77% and watercourse units of 13.25%.

- **Change in Ecological Value**

Table Two (below) summarised the net habitat unit changes and trading rules. Figure Seven (p18) displayed the post development habitats.

Table Two: Headline Change in Habitat Units

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	0.13
	<i>Hedgerow units</i>	0.00
	<i>Watercourse units</i>	0.06
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	11.70%
	<i>Hedgerow units</i>	0.00%
	<i>Watercourse units</i>	13.25%
Trading rules satisfied?	Yes ✓	

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
<i>Habitat units</i>	10.00%	1.14	1.25	0.00
<i>Hedgerow units</i>	10.00%	0.00	0.00	0.00
<i>Watercourse units</i>	10.00%	0.44	0.49	0.00

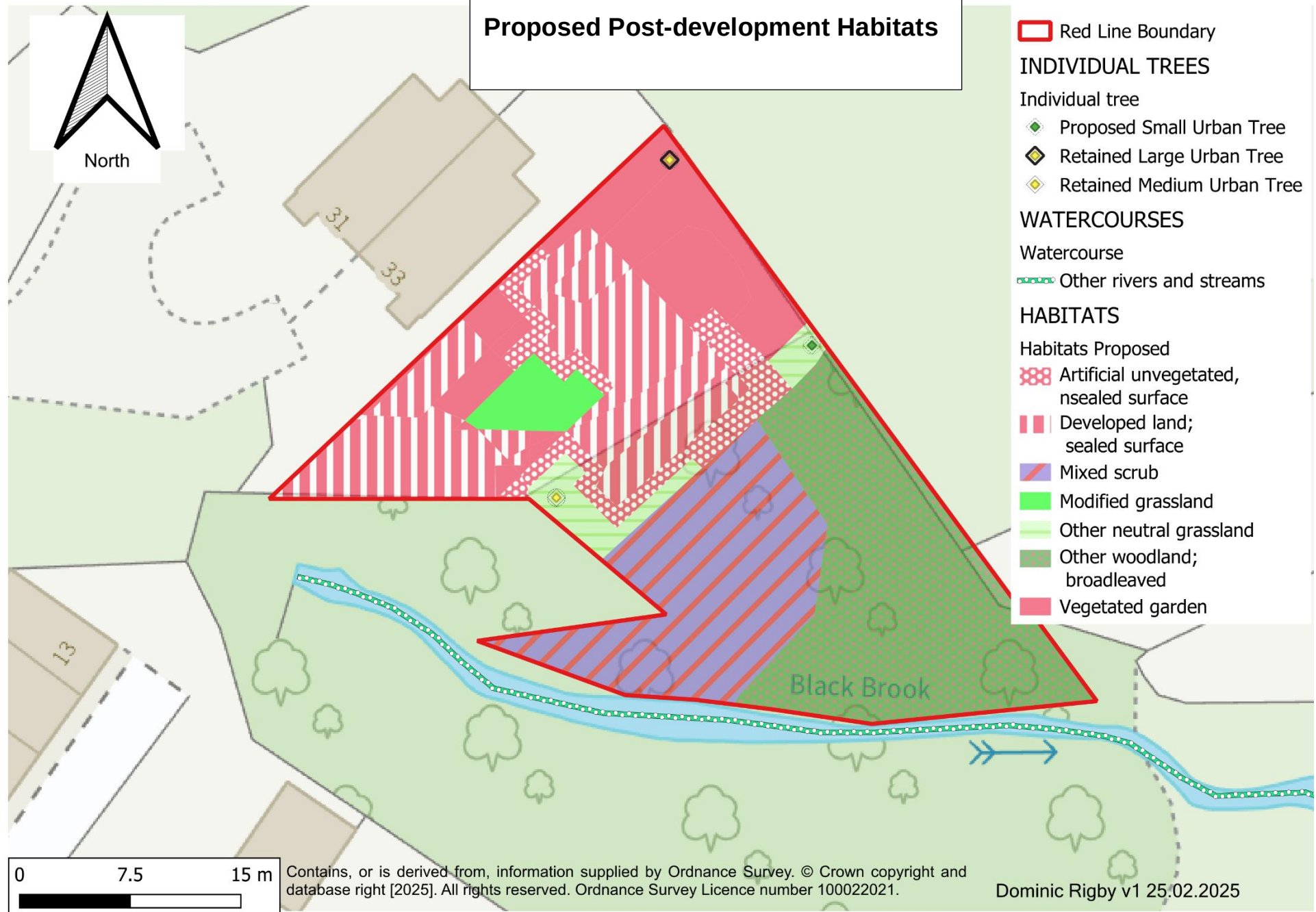
No additional area habitat units required to meet target ✓

No additional hedgerow units required to meet target ✓

No additional watercourse units required to meet target ✓

Although there was a loss of grassland and scrub to the development, the project recorded an overall increase in the units of these habitats, post development.

Figure Seven:
Proposed Post-development Habitats



6.2 Post-development Habitat Calculation Assumptions and Rationale

6.2.1 Individual Trees

The new native tree planting (pedunculate oak) was entered into the metric as “Urban Tree”.

All newly planted trees have been classed as small in “Moderate” condition.

6.2.1 Grasslands

- **Other Neutral Grassland**

This was replacing bramble and non-native bramble scrub. Given the voracity of the Giant bramble and its likely regeneration the two neutral grassland parcels will require rotovating and seeding to create moderate condition neutral grassland.

6.2.2 Woodlands

All the woodland on site was to be uplifted in condition. There was no characteristic field layer, and the shrub layer was inconsistent. The planting of honeysuckle (*Lonicera periclymenum*), hawthorn and hazel (*Corylus avellana*) in the shrub layer would be targeted.

6.2.4 Scrub

Bramble scrub can be difficult to create. Where it was being “retained” it would be augmented with hawthorn and hazel thus creating mixed scrub.

Where mixed scrub was being created or enhanced, the addition of characteristic woody, species (hawthorn, hazel, holly) would be added to the regenerating species on site.

6.3 Feasibility and Summary Management of Post Development Habitats

6.3.1 Woodland

There was no woodland creation planned. The retained area was targeted for uplift from “Moderate” to “Good” condition, within the metric target time of ten years (score increasing from 27-35).

Woodland Enhancement

It was not proposed to fell any of the mature sycamore. However, any with a dbh <7.5cm would be removed, opening up the canopy to create open spaces, establish deadwood and get light and temperature fluctuations to the field layer.

Some open spaces created from the very-small tree removal would be retained, there would be establishment of native shrub layer (hazel and holly; it was considered hawthorn would self-regenerate), retention of bramble and planting of selected saplings/smaller trees (3-5cm dbh) to create age classes (pedunculate oak).

Year One:

- INNS eradication regime (Himalayan balsam and giant bramble).
- Winter bare root planting as prescribed above. 2m centers including shrub layer and established trees/shrubs. In the following summer, a watering regime may be needed if drought/near-drought conditions.

Year Two:

- Beat up and replace any failed specimens (tree and shrub). If (>20%) failure was due to deer browsing, deer fencing would be required in the northern compartment too.
- Annual weeding out of undesirable field layer species (those listed in grassland and woodland Condition Assessments).
- Continuation of INNS eradication regime (Himalayan balsam and giant bramble)
- Survey (any time May- July).

Year Three

- Planting of woodland bulbs (wood anemone, lesser celandine) and honeysuckle.
- Continuation of INNS eradication regime (Himalayan balsam and giant bramble)

*Woodland BNG Uplift management/monitoring cont.***Year Five:**

- Removal of tree protection stakes/ties. Renewal of tree cones in northern compartment.
- Continuation of INNS eradication regime (Himalayan balsam and giant bramble)
- Assess success of woodland bulb planting. Replace if 10-25% failure. (<10% acceptable, >25% would imply unsuitability unless otherwise proven.
- Assess recruitment of hawthorn
- Survey/Monitor.

Year Seven:

- Monitor and review management, all compartment should on target for “Moderate” condition by Year 10.

Year Ten:

- Monitor/review. All woodland should be achieving “Good” score.

Year Twelve:

- Monitor/Review.

Year Fifteen:

- Replace any failed specimens beyond 10% failure rate of both trees and shrubs in individual parcels. Review management against monitoring and Condition Assessment target.

Year Twenty:

- Monitor/review. All woodland should have achieved target score, review management accordingly.

Year Twenty-five:

- Continue to replace any failed specimens beyond 10% failure rate of both trees and shrubs in individual parcels. Review management against monitoring and Condition Assessment target.

6.3.2 Scrub

Mixed Scrub

At 208m² parcel of bramble scrub with occasional hawthorn was to be enhanced to good condition mixed scrub.

Year One:

- Hand digging of giant bramble (under supervision of ecologist who can mark the target brambles).
- Planting and spiral-protection of dense (1-2m centres) bare rooted mixed shrub (hazel, holly, hawthorn. Bare rooted stock (Nov-Feb) Spirals and canes. Watering, if necessary, in first summer

Year Two:

- Quarterly inspection and *replacement* of any failed specimens. Weeding within spirals.
- INNS management: Continued removal of giant bramble as necessary. Hand pulling of Himalayan balsam

Year Three:

- Winter and summer inspections. Replacement of failed specimens.
- Removal of tree protection as necessary. Monitor and revisit management
- INNS management (see above)

Year Four:

- INNS management

Year Five

- Monitor, target condition should be at least moderate mixed scrub.
- Removal of spirals. Replace any failed specimens beyond 10% failure rate.

Years Five onwards

- Replace any failed specimens beyond 10% failure rate

Year Seven

- INNS management, monitor

Year Ten

- Target condition should be met. Revisit management if not.

Years Seven, Ten, Fifteen, Twenty-five

- Monitor and report; prescribed remedial work as prescribed. INNS management

6.3.4 Grassland

6.3.4.1 Modified Grassland

The modified grassland outside the house/garden curtilage (i.e. shared land in front houses) was to be retained. If this was beyond repair following construction the following was recommended to uplift it to moderate condition. The modified grasslands in the urban section would be created from turf, containing >6 species including at least two forbs at the time of laying.

Year One:

- A watering and regular (monthly) mowing regime would be required. With mowing arisings removed.

Years Two-Three:

- The mowing regime would be relaxed: one spring cut/collect in April. “No Mow May” would be followed, with monthly mows/collect resuming June to September. No more mowing after September until the following April.

Years Four-Five:

- As above but adoption of “Let it Bloom, June” as well, by leaving the grassland unmown in May *and* June.

July Year Five:

- Review of the condition of the modified grassland and perception by residents of the unmown spring months. Revisit management if necessary to maintain/reach moderate condition or higher.

Years Five onwards:

- Continuation of Yr4-5 management unless prescribed otherwise in Year Five review.

6.3.4.2 Other Neutral Grassland

Year One:

- Remove any weeds (those listed in Grassland Medium Distinctive etc Condition Assessment Footnote 3) and Giant bramble (remaining bramble should be transferred to the retained scrub and woodland parcels. using repeated cultivation.
- September: plough in/dig any surface vegetation, rake to produce a medium tilth, and roll, to produce a firm surface.
- October: surface sow an appropriate seed mix (e.g. Emorsgate EM2 Standard General Purpose Meadow Mixture) by machine or broadcast by hand. Firm in with a roll, or by treading.
- Leave a 5m margin around the pond to vegetate naturally and provide a buffer from nutrients/arising entering the pond.

Year Two:

- Leave uncut until late summer (August). Then cut and remove arisings and continue mowing every six weeks (arisings can be left) or so through to the end of March (in Year 3). Regularly remove any residual perennial weeds (footnote 3 species, see above).

Year Three:

- Mow and remove arisings in March (to around 50mm) and leave unmown until late July. Late-July/early August mow/collect (to ca150mm) and again in September (100mm).

Years Four to Five:

- Continue with March, July (or August) and September cut/clear, this time all cuts to 50mm.

July Year Five:

- Review of the condition of the grassland parcel. Revisit management if necessary to maintain/reach moderate condition or higher.

Year Six onwards

- Continuation of Yr4-5 management mowing regimes but only remove July arisings after 2-7 days to allow for seed shedding and only undertake March cuts if growth >100mm.

Year Ten

- Monitoring and management review. Review necessity for spring cut.

6.4 Individual Trees

A single pedunculate oak, semi standard was to planted, as marked on Figure Seven.

Year One:

Planting of native stock tree. Tree protection cone and stake/tie and mulch around base.

Summer watering regime

Years Two-Three:

Repeat of Year One maintenance and replacement if failed.

Years Four-Five:

Continuation of replacement of if diseased/dead; Cessation of watering from Year Four.

Years Six-Fifteen:

Replacement of diseased/dead specimen. Winter pruning as necessary for tree health and safety reasons only. Check and change of tie/cone as necessary.

Years Fifteen -Thirty

Continue to replace if diseased/dead and reconsider placement if this happens more once. Replacement to have summer watering (*for first three years only*). Winter pruning as necessary (see above).

Removal of any remaining stake, tie and cone on established tree (Year 15).

6.5 Watercourse

The watercourse RCA score was 0.356, with the lowest threshold for “Moderate” being 0.4. There was to be no changes in the encroachment of the riparian or watercourse, however, the removal of INNS (already prescribed within the habitat prescriptions above) and builders’ rubble from the bank top, sides and river bed would raise the score to >0.75, in the middle of the “Moderate” band.

6.6 Biodiversity Net Gain Summary

This scheme required a minimum of 10% net gain and this target was assessed as providing a greater uplift, of 11.7% for habitats and 13.25 for watercourses.

A BNG plan, incorporating maintenance and monitoring, should be conditioned at the planning acceptance stage in line with current BNG planning guidance.

The completed Biodiversity Metric Calculation Tool and Condition Assessments were submitted in tandem with this report and should be considered alongside.

7. DISCUSSION AND ANALYSIS

The was assessed as having negligible potential for bat roosts.

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

There should be a temporary rigid fence at the bank top to prevent construction works affecting Black Brook, but without affecting the function of the riparian zone (see 5.2.2.2 and Figure Six, Construction Imprint).

Statutory 10% area habitat and linear watercourse BNG was deliverable on-site.

7.1 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);

Protected Mammals (see Appendix One)

INNS (see 5.3.10)

and Bats.

7.2 Biodiversity Net Gain

A BNG Habitat Management and Monitoring Plan should be conditioned at planning validation stage and should be based on the prescriptions in Section 6 of this report.

8. 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 methods should be followed (see 5.3.10)
- R4** Protected Mammals precautionary working method statement should be followed (see Appendix One)
- R5** External and internal lighting should be designed to not project more than 1lux onto the retained woodland and scrub from the bank sides of the Black Brook.
- R6** Temporary, rigid external fencing should be placed on the eastern boundary of the construction imprint to prevent building materials and paraphernalia from entering the riparian zone.

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APPENDIX

Appendix ONE:

Protected Mammals Reasonable Avoidance Measures Method Statement

1. INTRODUCTION

The habitat on the site was suitable for hedgehogs (records close to site), badger (no records within 2km). Both species afforded protection, and this Method Statement sets out how they can be protected during construction and habitat works.

2 LEGISLATION

2.1 Hedgehogs

These are listed in Section 41 of the Natural Environment and Rural Communities Act, 2006 and thus should be considered in any development and land use change. Section 40 of the same Act required that local and regional authorities have regard to the conservation of biodiversity in England, when carrying out their normal functions.

2.2 Badger

Under the Protection of Badgers Act 1992 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.

3 POTENTIAL IMPACTS AND MITIGATION

3.1 Impact of Planned Works

The planned works required light construction machinery, digging, materials storage and sealed path-laying over the construction imprint and habitat works required debris removal, planting, tree and scrub removal.

All persons working on Site must be aware that protected species are likely to occur around the Site and should be familiar with the method of working to avoid disturbance to these.

A risk assessment was carried out and it was considered that the works carried a low risk of disturbing protected species providing reasonable avoidance measures (RAMS) were adhered to.

The risk was low because:

- The works zone would be checked for protected species before works commenced,
- A phased work programme, preceded by searches was proposed,
- The works zone would be checked regularly throughout destructive work activities,
- The disturbance/construction-phase works were short-term,
- The disturbance activities would take place during the day,
- None of the protected mammals/reptiles had been recorded on the imprint of the works

The imprint of the works was entirely within the red line area.

Hedgehogs hibernate over winter: generally, November to February, depending on seasonal temperatures, although there are often mild periods, when hedgehogs can re-emerge. Hedgehogs and badgers are largely nocturnal and movements across the site are unlikely during the day. This Report outlines measures to ensure that the risk of disturbance to protected species remained low.

4. REASONABLE AVOIDANCE MEASURES METHOD STATEMENT

4.1 Programme

The works were planned to take place from Autumn 2025.

4.2 Pre-works Site Preparation

- A detailed examination of the area would be conducted by an experienced ecologist the prior to the works.
- A tools talk would be conducted by the ecologist at the start of the site works,
- Both the tools talk and run through of this Method Statement would be undertaken by the ecologist and a signed list of attendees will be retained by the ecologist and site manager.

4.3 Construction Phase

- A search for protected species will be undertaken by a competent operative before works start on construction phases (Phases to be agreed at the start of the project).
- A tools talk and run through this Method Statement should be undertaken by a competent authority.
- A competent operative should look for evidence of protected species within materials piles prior to storing/removing.
- If a protected species was discovered an ecologist should advise further, with the scenario depending on weather, avoidance potential and further likelihood of encountering protected species. Avoidance of hibernating species by re-phasing, delaying or minor re-routing of trail (under ecological supervision) providing no other mitigation/potential impacts are affected.
- It was likely that the Method Statement would need to be amended if the presence of hedgehog, common lizard or nesting birds was confirmed.
- During construction, any open excavations should be covered overnight using plyboard and sandbags to fully seal any gaps. If this was not possible, a plank of wood placed at an angle no steeper than 40° should be left within the excavations so any hedgehogs or small mammals which fell into the trenches were able to escape.
- Should there be a “downtime” of >3 weeks further checks will be necessary.

4.4 Habitat Phase

- A search for protected species will be undertaken by an ecologist before works start on the habitat phases (Phases to be agreed at the start of the project).
- A tools talk and run through this Method Statement should be undertaken by a competent authority.
- A competent operative should look for evidence of protected species within rubble piles, and any stacked timber or any long-term accumulations of leaves/branches prior to removing/trampling.
- If a protected species was discovered an ecologist should advise further, with the scenario depending on weather, avoidance potential and further likelihood of encountering protected species. Avoidance of hibernating species by re-phasing, delaying or minor re-routing of trail (under ecological supervision) providing no other mitigation/potential impacts are affected.

4.5 Avoiding High Risk Areas

- The site manager should supervise all personnel to ensure that machinery, tool and personnel movements are kept to a minimum and within a small area.

4.6 Machinery Movements

- Machinery should avoid unnecessary movement across the Site.

4.7 Recording

Any protected species encountered would be recorded and forwarded to the GMEU.

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:

- Hedgehog/badgers/protected species ecology and details of the current legal status;
- guidance on how species could be identified;
- areas of habitat to be avoided; and,
- the procedure to follow in the event of discovering them.

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: Protected Species (incl. hedgehog/nesting birds)

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 adjacent to Victoria Court, Tottington

I confirm that the following personnel attended the Toolbox Talk.

Attendees Name	Attendees Signature