

Greater Manchester Ecology Unit

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**Greater Manchester
Ecology Unit**

Bury Council
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Your ref : 71645
Our ref : DD24/6/1
Contact : David Dutton
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Date : 24th June 2025

Dear Helen

Planning application 71645 Land off Church St & Scobell St, Tottington, Bury, BL8 3DE

Summary

We regard this application as premature, as we have recommended several amendments to the site wide masterplan, that would if agreed require potential amendments to ecological mitigation strategy.

1.0 Statutory Protected Sites

On balance I agree with the consultant that it is very unlikely that there will be any likely significant effects on any European or UK designated sites.

1.1 The only potential effect on a European site would be if additional traffic movements along the M62 triggered the threshold for contributions as required by the Holcroft Moss SPD. I would regard this as very unlikely, however the transport assessment for the site and the cumulative effects in combination with other phases of the Walshaw pfe site, should assess the number of likely additional traffic movements along this section of the M62 given the precautionary approach required for European protected sites.

I therefore recommend that prior to determination, further information is provided with regards to traffic movements along the M62 and whether or not these movements would trigger the thresholds set out in the Holcroft Moss Planning Obligation SPD.

1.2 With regards to increased recreational disturbance to the West Pennine Moors SSSI, given the existing levels of recreational pressure on the moors, distance between the site and West Pennine Moors and recreational provision on site, I am satisfied that it is very unlikely that any significant additional disturbance will occur. No further information or measures are required.

2.0 Sites of Biological Importance (SBI) and Local Nature Reserves (LNR)

There are no direct impacts to any SBI's or LNR's. Indirect effects from recreational disturbance are however possible to the Kirklees Valley SBI and LNR and Cyrus Ainsworths & Parkers Lodges SBI. I agree with the consultant that no other SBI's are likely to be significantly effected directly or indirectly.

2.1 Kirklees Valley

There is public and permissive footpath linkage from the site to the Kirklees Valley and whilst the majority of this phase is over 800m away and therefore unlikely to generate significant additional footfall, other phases are within 400m, therefore there is a cumulative risk of a minor increase in recreational disturbance. I accept however that the proposed green infrastructure on the site and links to Dow Lane Open Space to the south are likely to absorb much of the additional recreational pressure and that the Kirklees Valley is already managed with recreation in mind. I would also note that the Masterplan for the overall site has yet to be agreed and this will ultimately determine whether or not any recreational contribution towards the management of the Kirklees Valley or other site is required. I am willing therefore defer to the recommendations of the agreed masterplan on this issue.

2.2 Cyrus Ainsworths & Parkers Lodges

I do not agree with the ecological consultant's view that the risks from an increase in recreational pressure to this site are negligible. Whilst accepting that this phase in isolation is sufficiently distant to be unlikely to result in a significant increase in recreational disturbance, the cumulative effect when combined with other phases immediately adjacent to this SBI could be significant, given the Cyrus Ainsworth part of the SBI currently has no recreational infrastructure. I am however also aware that the SBI appears to have been sold to developers with a couple of planning applications for single dwellings submitted to Bury Council in recent years and that the masterplan has not as yet been agreed. For this phase, I am therefore willing to defer to the recommendations of the finalised masterplan.

3.0 Bats

There are no buildings on this phase of the development, with all trees assessed as having negligible bat roosting potential. Bat activity surveys indicated moderate levels of activity, with the majority of bat recorded being common pipistrelle.

3.1 Bats & Trees

Whilst the ecological consultant, assessed all trees as having negligible bat roosting potential, I note that the objection from Dave Bently references one large alder where further assessment for bats is in the opinion of a local bat consultant required. I assume that this is T10 in the arboricultural report as only one alder trees is recorded on the southern boundary of the site. This tree currently appears to be retained, though as the plan is indicative and the application outline, this may change. I therefore recommend a condition along the following lines is applied to any permission

The removal of alder tree on the southern boundary may has the potential to cause harm to bats and shall not in any circumstances occur unless further bat assessment & survey has been provided to and agreed in writing by the local planning authority

3.2 Bats Activity

Whilst good numbers of bats were recorded, the vast majority were common pipistrelle, which whilst still a European protected species are widespread and less impacted by urban development, being capable of roosting in buildings and less impacted by lighting. The developer is also retaining significant linear features across the site. I am therefore satisfied that the development is very unlikely to have a negative effect on bat foraging and commuting and may benefit bats by providing additional bat roosting opportunities.

Notwithstanding that common pipistrelles are largely unaffected by external lighting, other species are. I therefore recommend sensitive external lighting is provided that retains dark corridors along the retained linear habitat features. I therefore recommend a condition along the following lines is applied to any permission.

As part of reserved matters an external lighting design strategy shall be submitted to and approved in writing by the LPA. The strategy shall:

- *Identify areas/features on site that are potentially sensitive to lighting for bats;*
- *show how and where street lighting and other external lighting will be installed and through appropriate lighting contour plans demonstrated clearly that any impacts on bats is negligible;*
- *Specify frequency and duration of use.*

All external lighting shall be installed in accordance with agreed specifications and locations set out in the strategy.

4.0 Great Crested Newts (Gcn)

As noted by Dave Bentley, the status of great crested newts is generally understood, with no records for gcn on or near this site, with the site isolated from known existing metapopulations, making colonisation of the site extremely unlikely. I am satisfied that no further information or measure relating to great crested newts is required.

5.0 Other Protected Species

No evidence of any other protected species was found on the site. I have no reason to doubt the findings of the report, with no other protected species previously recorded on the site, with only badger having any realistic potential to colonise the site, given their mobility presence in the wider borough and ability to create a new sett quickly. Whilst otter are currently expanding their range in the Irwell catchment, the Elton and Walshaw Brooks are disconnected from the wider catchment by significant lengths of culvert, making colonisation unlikely from the Irwell, though overland colonisation cannot be totally ruled out.

I therefore recommend the following condition is applied to any permission.

As part of any reserved matters and updated badger and otter survey will be provided to and agreed in writing by the LPA

6.0 Nesting Birds

Trees and shrubs will be lost, potential bird nesting habitat. No evidence of ground nesting birds was recorded. All British birds nests and eggs (with certain limited exceptions) are protected by Section 1 of the Wildlife & Countryside Act 1981, as

amended. I recommend a condition along the following lines be applied to any permission.

No works to trees or shrubs shall occur between the 1st March and 31st August in any year unless a precautionary working method statement for nesting birds by a suitably experienced ecologist has been supplied to and agreed in writing by the LPA.

7.0 Other Wildlife

The consultant has assessed the site as providing suitable habitat for hedgehog a UK Biodiversity Priority Species. It is likely that common toads are also present given the presence of the mill lodges around the Boholt Hotel. Other small mammals and wildlife will also utilise the hedgerows and scrub on site as cover. Roe deer are also present.

The consultant has recommended precautionary working measures during site clearance. I am satisfied that such an approach is reasonable for this site, given the majority of the development is on habitats that provide sub-optimal cover for such species. I therefore recommend a condition along the following lines is applied to any permission.

As part of reserved matters a precautionary working measures method statement for mammals and amphibians will be provided to and agreed in writing by the LPA.

8.0 Invasive Species

Himalayan balsam is widespread across the site (and other phases of the pfe site). Objectors have recorded three other species listed under schedule 9 part 2 of the Wildlife and Countryside Act 1981 (as amended), monbretia, Japanese rose and Cotoneaster horizontalis. As this is an outline application and given the nature of these species, current locations of such species are likely to change an updated survey should therefore be provided as part of reserved matters. A condition along the following lines would suffice.

As part of reserved matters an updated invasive species survey will be provided to and agreed in writing by the LPA.

The GMEU has however also recommended amendments to the masterplan requiring a strategic approach to the control of Himalayan balsam across the pfe site rather than a phase by phase approach. It is therefore premature to make any recommendations with regards conditions. Ie the development may need to adhere to a Himalayan balsam strategy for the entire site.

9.0 Proximity to Watercourses

The main Watercourse the Walshaw Brook is retained and buffered. A minor tributary also appears to be retained and potentially enhanced. The main risks are therefore indirect and include:

- Increased flow rates and flooding downstream if greenfield rates are not maintained;
- Increased pollution and sediment during construction and;
- Increased pollution and sediment post development.

These risks will be cumulative with the proposed housing to the south of Walshaw Brook.

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I note however that the Environment Agency has raised no objection to the development, I therefore assume they are of the opinion that adequate attenuation can be achieved on site for the loss of greenfield land and measures put in place to protect the watercourses and aquifers during and post development. As hydrology is not my area of expertise, I therefore defer to the EA's opinion.

Full details should however be provided via condition as part of reserved matters application on surface water drainage, foul drainage and the measures that will be put in place during construction for the protection of the watercourses.

10.0 Contributing to and Enhancing the Natural Environment & Biodiversity Net Gain (BNG)

Section 187 of the NPPF 2024 states that the planning policies and decisions should contribute to and enhance the natural and local environment. 10% BNG is mandatory under Schedule 7A of the Town & Country Planning Act 1990 (as inserted by schedule 14 of the Environment Act 2021).

10.1 Habitats

Farmland will be lost to development along with scrub, sections of hedge, part of a ditch and trees. Mitigation is proposed through habitat creation/enhancement and landscaping along the watercourses and some of the existing public rights of way and hedgerows. All the farmland has been assessed as low value in poor condition. This is disputed by objectors to the development, who have assessed the fields as moderate and high value grasslands.

I have visited the site, 1st July 2025 but unfortunately the fields had been cut. I revisited on 5th August 2025, where late flowering species were now in flower. Early flowering species however such as sweet vernal-grass, meadow foxtail and cuckooflower would not however have regrown. I am therefore unable to make a full assessment of the relative field values.

I would however note that there are clearly areas of other neutral grassland on the site, that have not been recorded by the applicant, around field margins and I am satisfied that a large part of the field recorded as MG6 by the applicant and F4 by the objectors is not improved grassland, with significant areas of other neutral grassland (coarse neutral grassland and tall herb towards the north with a strip of wet grassland/flush along the PROW with soft rush and tufted hair grass). There are also areas of higher value grassland within F8 as recorded by the objectors.

Large parts are however clearly grass dominated with the most common flowering species in August being abundant italien rye grass, with rye grass and Yorkshire fog also frequent to abundant. Common forbs were restricted to common species such as buttercups, ribwort plantain and sorrel, with indicators of higher value grassland rare, (the only occasional species in August of interest was bistort). Adjacent field that were uncut in July were dominated by sweet vernal-grass, Yorkshire fog and common bent all indicators of Semi-improved neutral grassland. Forbs indicative of lowland meadow were rare but so were indicators of improved grassland such as rye grass and white clover in these off-site fields.

Whether the fields on site are modified or other neutral grassland will depend on the percentage cover of the various grass species with UK HAB separating improved from other neutral grassland when the indicators of improved grassland, rye grasses,

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clovers and timothy grass drop below 40%. I therefore recommend a resurvey of these fields, once they have regrown enough to easily survey.

I also note that the developer appears to have under-recorded areas of bramble scrub and wet grassland elsewhere on the site, subsuming relatively small areas into the modified grassland. Given biodiversity net gain, at present, is triggered by habitat patches as low as 25sqm, I recommend that the UK habitat mapping is redrawn to include all such patches of bramble scrub, other neutral grassland and wetland greater than 25sqm prior to determination and the metric recalculated.

10.2 Species

10.2.1 Nesting Birds

This is the main wildlife issue, with the loss of potential nesting habitat through hedge, scrub and tree removal. Mitigation should therefore be provided, this best achieved through integration of bird bricks in to the new build, with bird boxes on retained trees also an option.

I note that swift, house sparrow and starling were all recorded on or over the site. During my site visit, I confirmed that swift and house sparrow probably nest in dwellings along Scobell Street. I therefore recommend inclusion of swift bricks and house sparrow terraces across the development, with a minimum of one per dwelling in-line with the developing Bury Local Plan policies and homes for nature guidelines.

10.2.2 Bats

Whilst there is no evidence of bat roosting habitat being lost, I recommend as enhancement provision of bat brick incorporated into new dwellings. I recommend a ratio of one bat box per five dwellings with bat boxes clustered.

10.2.2 Other Wildlife

I recommend connectivity is kept for other wildlife (such as hedgehog) through the site, with dense areas of scrub created (bramble or blackthorn) to provide shelter.

David Dutton
Ecologist GMEU.