

INVASIVE NON- NATIVE SPECIES METHOD STATEMENT

SEPTEMBER 2024

JD Campus
Hollins Brook Way
Bury
BL9 8RR

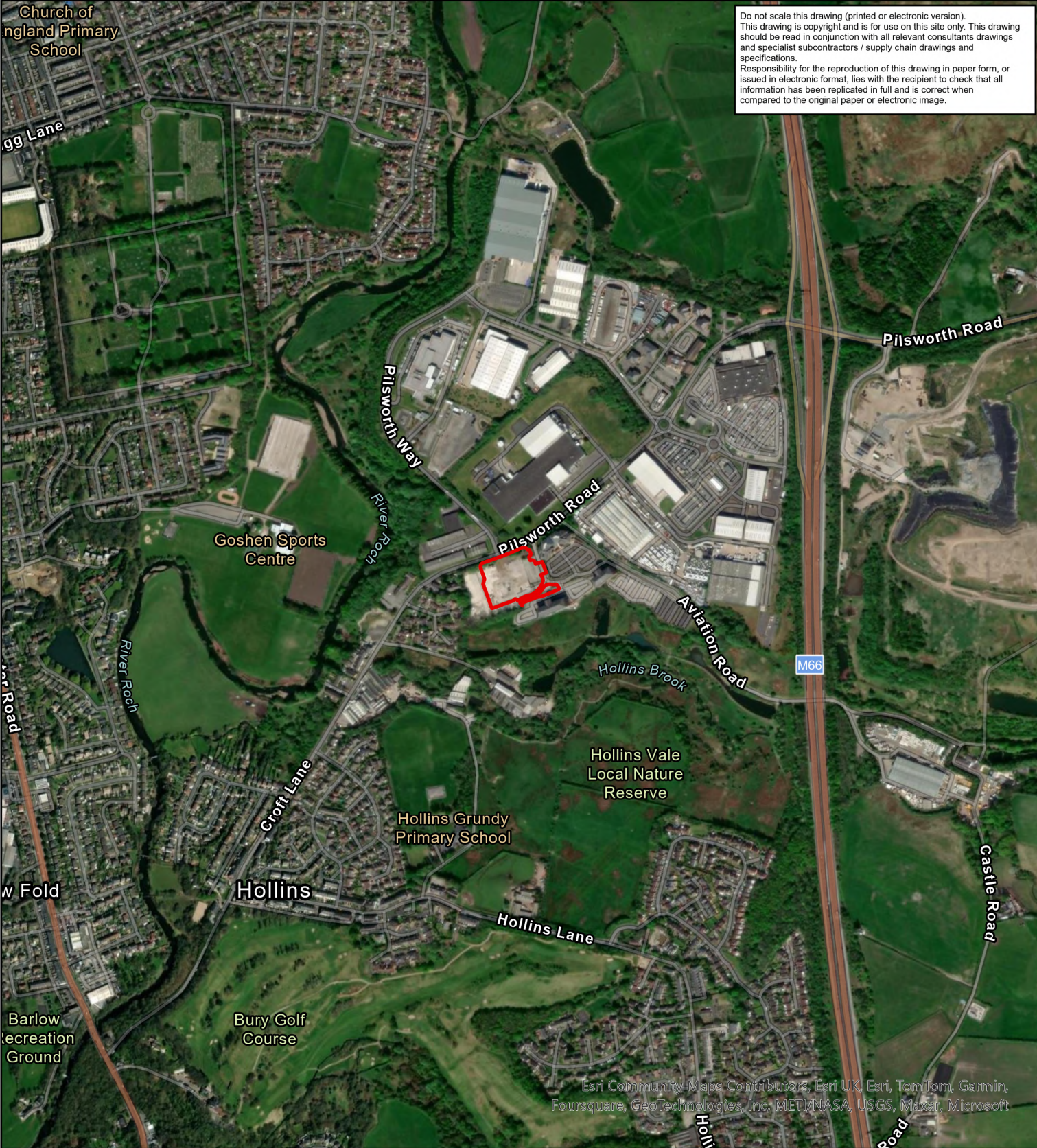
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QUALITY MANAGEMENT

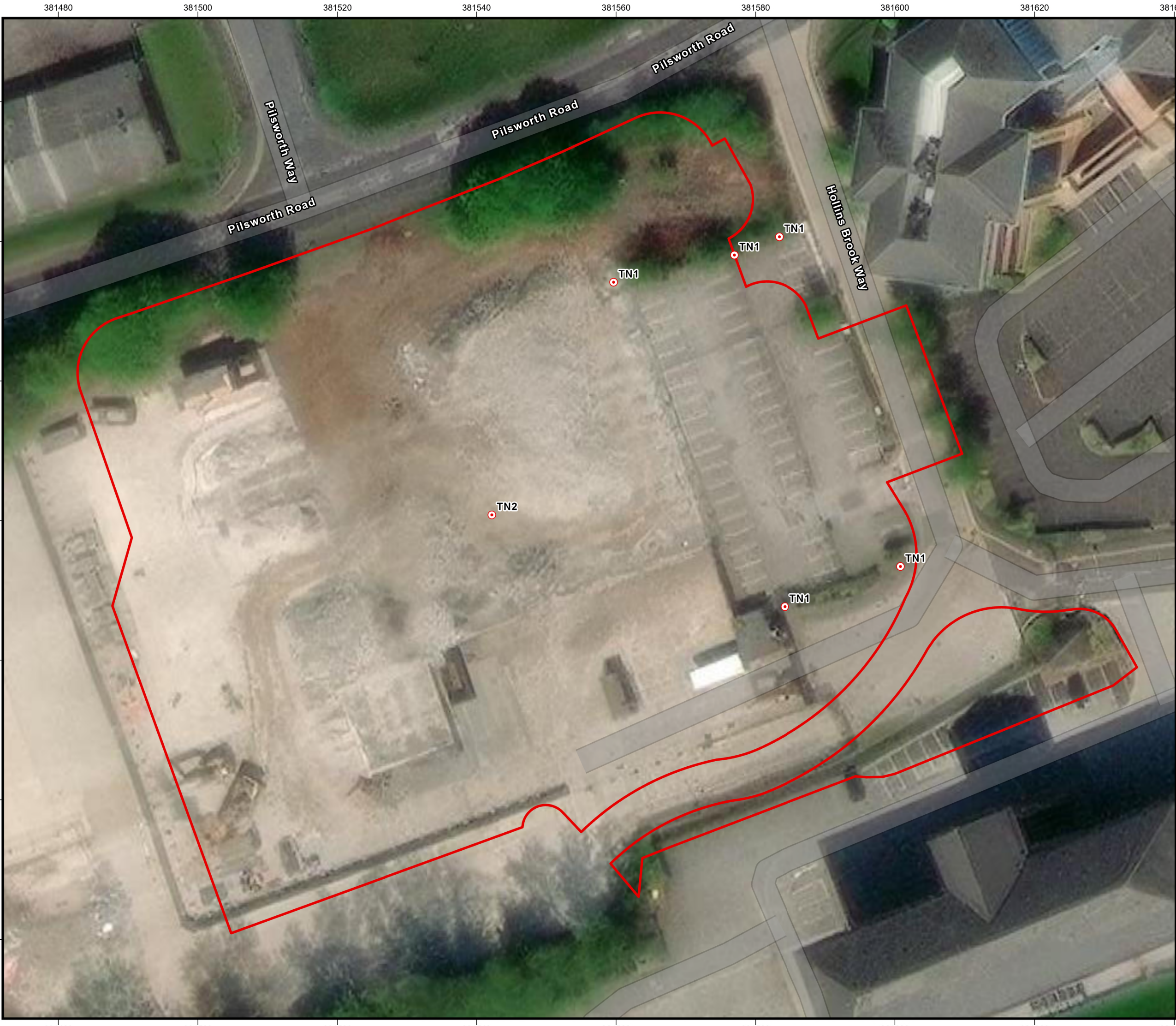
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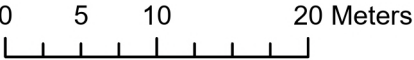
Legend: Red Line Boundary		0.85 Kilometers		N U R B A N G R E E N A: Ground Floor, The Tower, Deva City Office Park, Trinity Way, Manchester M3 7BF T: +44 (0) 161 312 3131 weareurbangreen.co.uk
Client: JD Sports		Issue: 01	Figure: 01	
Project: JD Campus		Scale @ A4 1:10,000		
Title: Site Context		Approved by: CL	Checked by: OJ	
Drawing Ref: UG_1466_SITE_CONTEXT		Author: CL	Date: 10/09/2024	



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Legend

- Red Line Boundary
- Invasive species
- TN1 - Cotoneaster
- TN2 - Himalayan balsam



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Client: JD Sports		
Project: JD Campus		
Title: Invasive Species and Non Native Survey Results		
Issue: 01	Figure: 00	
Drawn: CL	Checked: OJ	Approved: OJ
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1 Introduction

1.1 Scope

- 1.1.1.1 JD Group Ltd has instructed Urban Green to produce an Invasive Non-Native Species (INNS) Method Statement at JD Campus, Bury (hereafter referred to as ‘the site’) and produce our findings in a report.
- 1.1.1.2 The proposals include the construction of a multi-story hub building, parking, and leisure areas.

1.2 Site Context

- 1.2.1.1 The site is located at National Grid Reference SD 81523 08675 and comprises a total area of approximately 0.97ha (see Figure 1).
- 1.2.1.2 The site is located in a densely urban area of Bury, approximately 2.10km from Bury city centre. The wider area comprises of a mixture of residential buildings, fields, parks, and varied waterbodies.

1.3 Purpose of this Report

- 1.3.1.1 This report has been produced to discharge ‘Condition 34’ of the reserved matters planning application.
- 1.3.1.2 Planning Condition 8 states: *“As part of reserved matters a method statement detailing eradication and/or control and/or avoidance measures for Cotoneaster spp should be submitted to and agreed in writing to the LPA. The agreed method statement shall be adhered to and implemented in full to an approved timetable. Should a delay of more than one year occur between the date of approval of the management scheme and either the date of implementation of the management scheme or the date of development commencing, a further site survey must be undertaken and submitted to the Local Planning Authority.”*
- 1.3.1.3 Reason. To ensure the safe and satisfactory development of the site in the interest of UDP Policy EN9 - Landscape and pursuant to National Planning Policy Framework Section 15 - Conserving and enhancing the natural environment.

2 Site Assessment

2.1 Site Survey

- 2.1.1.1 The site was subject to a UK Habitat Classification (UKHab) survey on 19th August 2024, by Olivia Jones, Assistant Ecologist and Shannon Brady, Senior Biodiversity Net Gain Consultant of Urban Green. The weather conditions were 17°C, scattered clouds (4/8 oktas), wind speed 3 Beaufort scale.
- 2.1.1.2 Two cotoneaster species (*Cotoneaster sp.*) and one Himalayan balsam (*Impatiens glandulifera*) plant was identified at the centre of the site, and at the southeastern corner of site. All of these plants are mentioned within the recent PEA for Phase 2 of the development (Urban Green, 2024). Himalayan balsam was not identified during the site visit in 2022 (Urban Green, 2022).
- 2.1.1.3 These species are listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) and/or the Invasive Alien Species Protection Order 2019, as an invasive non-native species.

2.2 Himalayan Balsam Information and Identification

- 2.2.1.1 Himalayan Balsam is native to the Himalayan region of Asia. It was introduced to Britain in 1839 as an ornamental garden plant. However, it has now spread rapidly and is widespread throughout the UK in riparian and urban habitats.
- 2.2.1.2 It is a tall, annual plant that can reach up to 3m tall within one growing season. The tall red/purple hollow stems are topped with clusters of pink flowers from June to October followed by seed pods.
- 2.2.1.3 Each plant can produce up to 800 seeds in a year, which can remain viable for between 18 and 36 months without germinating if transported by water. It colonises rapidly and can prevent native plants from growing within that area. It creates dense, monoculture stands predominantly on riverbanks and other areas of damp ground. When the Himalayan balsam dies back in winter, the banks are left bare and liable to erosion. The invasive nature of this plant is accelerated because it has no natural forms of control (i.e.: herbivore grazing) in the UK.

2.3 Himalayan Cotoneaster Information and Identification

- 2.3.1.1 The Himalayan Cotoneaster is a deciduous or semi-evergreen shrub native to the Himalayas. It typically grows to about 2-3 meters in height and is known for its arching branches covered with small, elliptical, dark green leaves. In spring, it produces small white or pale pink flowers, which are followed by bright red berries in autumn. These berries are a key identifying feature and attract birds. The plant is often used in hedging and landscaping due to its hardiness and attractive seasonal changes. However, it can become invasive in some regions.

3 Relevant Legislation & Permits

3.1 Overview

- 3.1.1.1 It is an offence under Section 14(2) of the Wildlife and Countryside Act 1981 (as amended) to “plant or otherwise cause to grow in the wild” any plant listed in Schedule 9, Part II, which includes Japanese knotweed, montbretia and cotoneaster. Offences under Section 14 carry a maximum penalty of £5,000 fine and/or 6 months imprisonment on summary conviction (i.e. at Magistrates’ Court) and an unlimited fine (i.e. what the court feels to be commensurate with the offence) and/or 2 years imprisonment on indictment (i.e. at Crown Court).
- 3.1.1.2 Similarly, under the Invasive Alien Species Protection Order 2019 it is illegal to plant invasive species in the wild or cause them to spread.
- 3.1.1.3 Soil and other waste containing viable propagules of invasive non-native plant species is classified as ‘controlled waste’ under the Environmental Protection Act 1990. Subsequently, waste containing invasive species must be disposed of in accordance with official Environment Agency guidance designed to prevent further spread of the species. Any waste being disposed of must be accompanied by appropriate waste transfer documentation.
- 3.1.1.4 Local councils and the police (in most cases the local council) have the power to issue Community Protection Notices against “individuals who are acting unreasonably and who persistently or continually act in a way that has a detrimental effect on the quality of life of those in the locality”. The notice could require an individual or organisation to make reasonable efforts to rectify problems arising from invasive non-native species and/or make it a requirement to take reasonable steps to prevent future occurrence of the problem. For more information see “Reform of anti-social behaviours powers: Japanese knotweed and other invasive non-native plants” (Home Office, n.d.).
- 3.1.1.5 See Property Care Association Guidance Note – Legislation and Policy for Invasive Non-Native Plant Species (PCA, 2014) for further information.
- 3.1.1.6 Failure to comply with the relevant invasive non-native species legislation could lead to prosecution.

3.2 Permits

- 3.2.1.1 An Environment Agency permit will not be required to eradicate the onsite invasive species, providing that the conditions of the Environment Agency Regulatory Position Statement 178 – Treatment and Disposal of Invasive Non-Native Plants (RPS178) are met. The following method has been provided to comply with these conditions. **Note – If at any point the conditions of the RPS178 cannot be met, a permit must be applied for with the Environment Agency.**
- 3.2.1.2 See <https://www.gov.uk/government/publications/treatment-and-disposal-of-invasive-non-native-plants-rps-178> for further details.

4 Method Statement

4.1 Justification

- 4.1.1.1 Many invasive non-native plants spread rapidly and therefore, in the absence of mitigation, these species would likely colonise areas within the site boundary. This is relevant for Himalayan balsam and cotoneaster.
- 4.1.1.2 Although small, the scatter of distribution creates a risk that construction activities could cause the plant to spread (unintentionally) into the wild. This could be avoided through direct removal, prior to construction works commencing.

4.2 Site-Specific Method Statement

- 4.2.1.1 All actions involving invasive and non-native species should be conducted under appropriate biosecurity measures as detailed in Section 3.2 for Site Biosecurity.
- 4.2.1.2 The location of the invasive species can be found in Figure 2.
- 4.2.1.3 Two forms of treatment can be applied to control the invasive species on site (non-chemical and chemical).

Option 1: Non-Chemical Control

Hand-Pulling

- 4.2.1.4 Himalayan balsam can be hand-pulled as these species have very shallow roots growing to a depth of 10-15 cm. This method is particularly useful for smaller infestations and in high-ecological value areas where the use of herbicides, or indiscriminate cutting, should be avoided. Repeat treatment will likely be required.
- 4.2.1.5 Small Himalayan cotoneaster plants can be hand-pulled, ensuring that the roots are completely removed to prevent regrowth. For larger shrubs, cutting the plant at the base and removing the root system with digging tools is effective. This method is most successful when the soil is moist, making it easier to extract the roots.
- 4.2.1.6 Hand pulling should occur in May/June when plants can be easily identified and have not yet set seed. Hand-pulling is the less labour-intensive option; however, the effects are less instantaneous; therefore, multiple hand-pulling seasons will likely be required.

Cutting

- 4.2.1.7 Regularly cutting back the shrub to ground level can weaken the plant over time, especially if done multiple times during the growing season. This method helps prevent seed production and reduces the plant's energy reserves.

Option 2: Chemical Control

- 4.2.1.8 Chemical control is a second option for the control of these species and is less invasive than physical removal. It should be noted that chemical treatment is more suited to smaller plants, as larger and more established plants can be resistant to chemical treatment.
- 4.2.1.9 Herbicide must be used only in accordance with the directions on the product label and with all relevant legislation. Any person involved in the professional application of herbicides should possess the appropriate pesticide certificate of competence for the safe use of herbicides and hand-held herbicide applicators. Any plants treated with herbicide should be treated with a non-residual herbicide, e.g. glyphosate.

- 4.2.1.10 Spraying programmes should be required for two to three years to eradicate the plant. Records of herbicide use must be kept in accordance with all relevant legislation, e.g. a record must be made of the type, concentration and quantity of herbicide used, the operative's name, weather conditions and date of application. Records must be retained after each treatment.
- 4.2.1.11 Himalayan balsam's preference for habitats near water or with high moisture, this is very likely to limit herbicide selection to products approved for use near water if applicable.
- 4.2.1.12 If opted to follow the herbicide treatment route, the restrictions of RPS 178 must be complied with. An herbicide agreement with the Environment Agency is not required, however, reading the product labels of any herbicides used and/or contacting the manufacturer for advice is strongly recommended.
- 4.2.1.13 All use of herbicides including stem injection is to be judged at the discretion of an invasive species specialist.

4.3 Site Biosecurity

- 4.3.1.1 In accordance with the guidance set out by the GB non-native species secretariat (www.nonnativespecies.org), measures to prevent the spread of non-native invasive species within or off sites with infestation include:
- All site personnel must be fully briefed to ensure all staff are aware of the presence and locations of the invasive plants on the site and how to identify the species. This can be included during a site induction or through toolbox talks. Everybody working on site must understand the role and authority of the invasive species specialist managing the issue of the non-native species.
 - Clearly visible fencing must be erected around the areas of non-native invasive species (including contaminated soil, materials or water) and signs to warn site personnel of presence and identification of species within.
 - Ensure that vehicle use is kept to a minimum around infestations. Keep to hardstanding where possible.
 - Do not use vehicles with caterpillar tracks within infested areas.
 - All clothes, footwear and equipment including site vehicles and tools should be checked for plant material and soil before entering/leaving the site.
 - All vehicles leaving the infested area and/or transporting infested soil/materials must be thoroughly pressure-washed in a designated wash-down area before being used for other work.
 - All wash facilities including wastewater from washing vehicles, equipment or personnel should be managed in a responsible way so as not to cause spreading of the invasive species or harm to the environment.
 - Clothes, footwear and equipment should be thoroughly cleaned and ensure no contaminated material is present. Keep equipment on site where practical and free of contaminated material.

- Equipment used to treat invasive species should be kept separate from unused equipment and identifiable through clear signage or designated areas.
- All chemicals used for the control of non-native species (if applicable) should be stored and used in a responsible manner.
- Where cross-contamination is possible (i.e. from one site to another), designated vehicles or machinery must be used for specific sites where possible to prevent spread.
- All plant material will comply with BS 3936 1: 1992, BS 4043:1989 and BS 8545: 2014 or European equivalents. All planting shall be UK-grown and obtained from a reputable and approved nursery. Plant material should be fully hardy and free from pests and diseases.
- Existing and imported multipurpose topsoil shall be confirmed to BS 3882:2015. A Declaration of Analysis sheet should be supplied if requested. If acceptable, topsoil shall be taken from stockpiles on site or imported from an approved source. Imported soil shall be a loam type, according to BS 3882:2015, be free of contamination and contain a maximum of 15% clay or silt fines. A topsoil sample shall be provided with topsoil structure analysis for general landscape purposes. Topsoil should be free of any part of invasive plants (as identified by the Wildlife and Countryside Act 1981, as amended).

5 References

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Appendix 1 – Timetable of Works

Works	J	F	M	A	M	J	J	A	S	O	N	D
Burning of INNS Species	Can be conducted at any time of the year											
Chemical control: Timing is species dependent.			Initial application March/May, subsequent applications June/August and September/November									
Mechanical removal (inc. cutting, digging, and hand pulling) of Japanese knotweed and/or montbretia and/or wall cotoneaster and/or Himalayan balsam			Conducted when plants are in flower for easy identification									