

St John Street, Manchester Ecological Impact Assessment (EclA)

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July 2024

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Report to: Anthony and Callum Ford

Report Title: St John Street, Manchester

Version: V1.0

Issue Date: July 2024

Report Ref: 23740

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Version	Author	Description	Date
V0.1	SA	First Draft	26/07/2024
V0.2	JS	QA1	05/08/2024
V0.3	JS	QA1 Amendments	06/08/2024
V0.4	JG	QA2	06/08/2024
V1.0	JS	QA2 Amendments and Issue	07/08/2024
V1.1	ML	Inclusion of Bat Survey Results	05/09/2024
V1.2	AP	QA of bat changes before re-issue	10/09/2024
V1.3	JS	QA2	27/09/2024

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Executive Summary

Ecus Limited (Ltd.), were commissioned in May 2024 by Anthony and Callum Ford to undertake an Ecological Impact Assessment (EclA) in relation to proposed residential development plans for 8 and 8a St John Street, Manchester, (Ordnance Survey (OS) National Grid Reference (NGR): SJ 83462 97942), hereafter referred to as ‘the Site’. The Site location and boundaries are presented on Figure 1 Site Location Map.

The proposed works will involve the construction of a new two-storey building, partial reconstruction and renovation of the existing building with associated tree plantings. All current Site habitats are anticipated to be lost.

The Site totals approximately 0.72 ha and is located just south-west of Manchester City Centre within the Castlefield area. The Site is comprised of the following urban habitats; buildings (u1b5), sealed surface (u1b6), sparsely vegetative urban land (u1f) with scattered (32) or felled trees (206) and bare ground (510). Habitat locations at the Site can be seen in Figure 2.

The surrounding area is predominantly commercial and residential developments with an urban greenspace, St John’s Gardens, 100 m west of the Site. The Rochdale Canal runs 360 m south-west of the Site, and the River Irwell runs 450 m north-west of the Site (Figure 1).

The purpose of the EclA was to carry out an ecological desk study and an Extended UK Habitat Classification (UKHab) survey to inform an assessment of the ecological value of the Site and its potential to support notable or protected habitats and species.

The EclA identified a number of ecological constraints to the proposed works requiring the following recommendations:

<u>Ecological Constraints</u>	<u>Reason</u>	<u>Potential Impact</u>	<u>Recommendations</u>
Bats	Building has been classed as Moderate due to multiple potential bat roost features (PBRFs). A historic 2020 roost in the north-east section of roof. Details of historic roost within St John’s Street Ecological Assessment Pareto Properties LLP dated July 2020. Low suitability foraging	Potential for bats to be disturbed or injured, roost to be damaged or destroyed by building renovation. Breach of legislation.	Following the completion of three presence / absence surveys undertaken between July – August 2024, surveys confirm the continuing use of the building onsite as a common pipistrelle roost. As such, works should proceed under a Natural England Bat Mitigation Class Licence (CL21) – Annex B, via a ‘Registered Consultant’.

	and commuting habitat for bats.		
Birds	Nests were identified in two of the rear courtyard trees. Potential nesting site within the open-air brick cavity on the building's northern wall.	Disturbance or damage to active bird nests. Breach of legislation.	Felling of trees and renovation works to the building is advised to be undertaken outside of the nesting bird season (March to August, inclusive). If this is not possible, both the trees and wall cavity need to be checked for active nests by an ecologist a maximum of 24h before the work begins. If an active nest were to be discovered, an exclusion zone around the nest would need to be established and adhered to until the chicks fledged (to be monitored and confirmed by an ecologist).

Biodiversity Net Gain

The total area of the Site has been calculated at 0.72 ha. Baseline area habitats are calculated to have a biodiversity value of 5.28 habitat units.

Post-development habitats have a biodiversity value of 0.06 Option 1 or / 0.01 Option 2 Habitat Units (HU) respectively. This equates to a % change in units of -98.91% for Option 1 or- 99.86% for Option 2.

The current proposals do not currently achieve a HU net gain for the proposed development, however due to the relatively small size of the Site and the limited areas of green space for habitat creation, retention or enhancement, it is unlikely that the development could feasibly achieve an overall HU net gain on Site. It is therefore recommended that offsite habitat creation and enhancement is considered to improve the post-development HU score.

1. Introduction

1.1 Background

- 1.1.1 Ecus Limited (Ltd.), were commissioned in May 2024 by Anthony and Callum Ford to undertake an Ecological Impact Assessment (EcIA) in relation to proposed residential development plans of 8 and 8a St John Street, Manchester, (Ordnance Survey (OS) National Grid Reference (NGR): SJ 83462 97942), hereafter referred to as 'the Site'. The Site location and boundaries are presented on Figure 1 Site Location Map.

1.2 Proposed Development

- 1.2.1 The proposals for the Site are taken from Proposed Site Plan', ref: 1084-TGA-ZZ-ZZ-DR-A-0201-Proposed Site Plan, July 2024 (Appendix 8). Proposals include the construction of a new two-storey building, partial reconstruction and renovation of the existing building. All current Site habitats are anticipated to be lost.

1.3 Site Location

- 1.3.1 The Site totals approximately 0.72 ha and is located just south-west of Manchester City Centre within the Castlefield area. The Site is comprised of the following urban habitats; buildings (u1b5), sealed surface (u1b6), sparsely vegetative urban land (u1f) with scattered (32) or felled trees (206) and bare ground (510). Habitat locations at the Site can be seen in Figure 2.
- 1.3.2 The surrounding area is predominantly commercial and residential developments with an urban greenspace, St John's Gardens, 100 m west of the Site. The Rochdale Canal runs 360 m south-west of the Site, and the River Irwell runs 450 m north-west of the Site (Figure 1).

1.4 Purpose of this Report

- 1.4.1 The purpose of the EcIA was to carry out an ecological desk study and an Extended UK Habitat Classification (UKHab) survey to inform an assessment of the ecological value of the Site and its potential to support notable or protected habitats and species. Inclusive of species protected under the Wildlife & Countryside Act 1981 (WCA) (as amended), the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) 2019 and the Natural Environment and Rural Communities (NERC) Act 2006. Full details of legislation relating to those habitats and species discussed within this report can be found at: <http://www.legislation.gov.uk>.
- 1.4.2 This report details the findings of an ecological desk study and the extended UKHab survey carried out in June 2024. The methodologies employed during the survey and all survey findings are described along with an evaluation and assessment of the ecological value of the Site.
- 1.4.3 Following the initial assessment, further nocturnal bats surveys have commenced within the Site

to confirm the presence/absence of roosting bats and an internal inspection (under licence) of the roof cavity.

- 1.4.4 Further information and details of UK legislation for those species which are formally protected is defined in Appendix 1.

1.5 Biodiversity Net Gain Assessment (BNGA)

- 1.5.1 Under the Environment Act 2021, developments are required to achieve 10% Biodiversity Net Gain (BNG) to ensure that biodiversity post-development is greater than present pre-development. BNG calculations are conducted through assessing the condition of habitats on a site and then comparing the anticipated changes in biodiversity value based on the development proposals. A BNGA follows the mitigation hierarchy, which sets out that everything possible must be done firstly to avoid, secondly minimise and thirdly restore/rehabilitate losses of biodiversity on site. Only as a last resort are residual losses compensated for through biodiversity offsetting, whereby the loss of biodiversity is compensated for via new habitat creation off site or by paying a financial sum to an offset provider. BNGA reports should adhere to the BNG good practice principles (Appendix 2).
- 1.5.2 BNGAs account for biodiversity losses, which prior to its introduction could not be fully assessed nor mitigated for, via legal and planning systems. Whilst some species are extensively protected, most habitat types are not; with the consequence that development could previously be 'legally compliant' but still result in biodiversity loss. BNGA guards against this, enabling development to contribute towards the national and global target of halting biodiversity loss (DEFRA, 2011) and towards local and national strategies (listed below with full details provided in Appendix 3) for conserving and enhancing wildlife. BNGAs allow stakeholders to demonstrate adherence to national legislation and local policy concerning biodiversity.

1.6 Relevant Legislation and Policy

- 1.6.1 This BNGA has been compiled with reference to the following relevant nature conservation legislation, planning policy and the UK Biodiversity Framework from which the protection of sites, habitats and species is derived in England including:
- UK Government's 25 Year Environment Plan (Defra, 2018);
 - Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (Defra, 2011);
 - National Planning Policy Framework (NPPF) (DLUHC, 2023);
 - The Natural Environment and Rural Communities (NERC) Act (HMSO, 2006);
 - The Environment Act (Defra, 2021);and,
 - The Greater Manchester Biodiversity Action Plan (GM BAP).

2. Methodology

2.1 Desktop Study

2.1.1 A desktop study was undertaken by Ecus Ltd in June 2024 via data purchased from Greater Manchester Local Records Centre (GMLRC). The desktop study was undertaken to obtain ecological records held for protected and notable species of flora and fauna and local non-statutory designated sites within 2 km of the Site. All records received have been reviewed, but records dating from the last ten years are considered to have greater relevance.

2.1.2 Multi-Agency Geographical Information for the Countryside (MAGIC) website (<https://magic.defra.gov.uk/>) and Natural England's Open Data Geoportal (<https://naturalengland-defra.opendata.arcgis.com/>) were also consulted in May 2024 to obtain the following information:

- European Statutory Designated Sites (i.e., Special Areas of Conservation (SAC) and Special Protection Area (SPA)) and Ramsar Wetland Sites of International Importance located within 5 km;
- Statutory Designated Sites of national (i.e., Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR)) and local importance (i.e., Local Nature Reserve (LNR)) located within 2 km;
- European Protected Species (EPS) mitigation licences for great crested newts *Triturus cristatus* (GCN) and bats within 2 km of the Site; and,
- Any other relevant environmental datasets on protected or priority habitats and species, for example Ancient Woodland Inventory, GCN Class Survey Licence Returns, and GCN eDNA Pond Surveys for District Level Licensing (DLL).

2.2 Extended UK Habitat Classification Survey

2.2.1 The Site was surveyed by Consultant Ecologist Sophie Arnold on 17th of June 2024. Weather conditions during the survey were cloudy with some light drizzle and a light breeze (temperature = 12°C, cloud cover = 100%, wind = Beaufort 1, precipitation = light drizzle).

2.2.2 The survey followed the extended UKHab Classification System methodology (UK Habitat Classification Working Group (UKHCWG) 2018) and was conducted in accordance with the industry best practice guidance given by Chartered Institute for Ecology and Environment Management (CIEEM) "Guidelines for Preliminary Ecological Appraisal" (PEA) (CIEEM, 2017). This survey method aims to characterise habitats and communities present and is not intended to provide a complete list of all plants occurring across the Site.

2.2.3 Habitats and vegetation types present within the Site were recorded on to a field map and presented in Figure 2. Notable, rare or scarce plant species, including other features of ecological

interest, were highlighted and marked using Target Notes (TN) and are presented in Figure 2 and in Appendix 4 Site Photographs.

- 2.2.4 A list of characteristic plant species for each vegetation type was compiled. This survey method aims to define the habitat types present and is not intended to provide a complete list of all plants occurring across the Site.
- 2.2.5 Evidence of protected species or species of nature conservation importance were recorded where present at the time of survey. Habitats present that are listed under Section 41 of the NERC Act 2006 or the Biodiversity Action Plan (BAP) for Greater Manchester were also noted.

2.3 Protected and Key Species

- 2.3.1 Any evidence of protected species or groups encountered during the survey was recorded, including any observations of field signs and an assessment of the suitability of the habitats present to support protected species. For full details of legislation relating to all habitats and species discussed within this report visit <http://www.legislation.gov.uk>.

Amphibians

- 2.3.2 To assess the potential presence of great crested newt *Triturus cristatus* (GCN) and other common amphibian species, a desk-based assessment was undertaken using a 1:10,000 scale OS mapping to identify all waterbodies within 500 m of the Site that are not separated by a significant barrier to amphibian dispersal (such as a major road and/or fast flowing watercourse). As garden ponds within residential properties are often absent from OS map sources, aerial photography was also used to search for additional ponds.
- 2.3.3 Of the identified waterbodies within 500m of the Site, those that are within 250 m were then focused upon during the assessment as in accordance with the Great Crested Newt Conservation Handbook “*at most sites, the majority of adults probably stay within around 250 m of the breeding pond, so the density of individuals gradually decreases away from the pond*”. (Froglife, 2001).
- 2.3.4 The terrestrial habitats present within the Site were assessed for their suitability to support amphibians during their terrestrial stage and with consideration to their connectivity to other suitable habitat within the surrounding area.

Badger

- 2.3.5 Field signs for badger *Meles meles* were searched for within the Site and up to 30 m from the Site boundary, where accessible. The survey followed standard methodology detailed in “*Surveying Badgers*” (Harris *et al.*, 1989). This included surveying for badger setts, latrine/dung pits, foraging marks, feeding signs and pathways, specifically along linear features, and boundaries within the Site.

Bats

Roosting Bats

- 2.3.6 All structures and trees within the Site were subject to an external visual assessment undertaken on 17th June 2024, undertaken from ground-level. This approach permitted a search for the presence of Potential Roosting Features (PBRFs) that have potential to be used by roosting bats. An internal inspection was carried out by a licensed ecologist (Principal Ecologist Andrew Campuzano, license number: 2017-32023-CLS-CLS) and Assistant Ecologist Emma McCartney on 16th July 2024.
- 2.3.7 An individual tree or structure may have several features of potential interest to roosting bats associated with it. It is not always possible to confirm if a feature is used by bats given the transient nature of these species.
- 2.3.8 In accordance with the Bat Conservation Trust's (BCT) Good Practice Guidelines (Collins, 2023), the potential suitability of trees within the Site to support roosting bats were categorised as either None, FAR (Further Assessment Required) or PBRF (Potential Roost Feature).
- 2.3.9 The potential suitability of structures within the Site to support roosting bats were categorised as either Negligible, Low, Moderate, High, or Confirmed, based on the number and type of roosting features and surrounding landscape character, in accordance with BCT Good Practice Guidelines (Collins, 2023).
- 2.3.10 Following the results of the Preliminary Bat Roost Assessment (PBRA; see section 3.3.13-16), along with the historic evidence of a roost in 2020 (St John's Street Ecological Assessment Pareto Properties LLP dated July 2020) it was recommended that three dusk emergence surveys should be undertaken at the Site during separate visits.
- 2.3.11 Emergence surveys were undertaken by experienced bat surveyors positioned to cover all building elevations with suitability for roosting bats using Night Vision Aids (NVAs). Survey details including date of survey, surveyor names and weather conditions are shown in Table 2 (section 3).
- 2.3.12 Three surveyors and four infra-red cameras (one focused on the historical roost entrance point) were considered appropriate for the dusk surveys, which allowed for suitable visibility of the building's potential entry and emergence features.
- 2.3.13 The nocturnal surveys were undertaken following best practice guidance (Collins, 2023) with surveyors equipped with fully recordable and professional bat detectors. Bat activity, including passes, foraging, roosting locations and species type were recorded onto field maps, along with other incidental bat activity, if and when observed on Site.

Commuting and Foraging Bats

2.3.14 Habitats within the Site were also assessed for their potential to support foraging and commuting bats. The commuting and foraging assessment methodology is based on information contained within the BCT Good Practice Guidelines (Collins, 2023), which categorises the habitat as either Negligible, Low, Moderate, or High suitability for commuting and foraging bats.

Birds

2.3.15 A detailed bird survey was not undertaken as part of this EclA, however, whilst undertaking the UK Habitat Classification Survey, the opportunity was taken to assess habitats within the Site for their suitability to support nesting, wintering, and breeding birds, including those with enhanced statutory protection.

2.3.16 In 2021, a re-assessment of Birds of Conservation Concern 5 (BoCC5) was published by Stanbury et al. (2021), which defined rare and threatened bird species on two lists (Red and Amber) describing the varying levels of conservation concern for each species.

2.3.17 “Red” is the highest conservation priority, with species needing urgent action due to either a historical decline in breeding population, severe (>50%) decline in breeding or non-breeding population, or severe decline in breeding range over 50 years or more. “Amber” is the next most critical group, with species qualifying for this status as a result of either recovery from red list criterion, being classed as rare breeders in the UK, moderate (>25%) decline in breeding or non-breeding population or moderate decline in breeding range over 25 years or more. These categories are followed by “Green”, indicating that the species are relatively unthreatened.

2.3.18 Desk study data was filtered for Wildlife and Countryside Act (WCA) 1981 Schedule 1 bird species, and those species protected under Annex 1 of the EU Directive on the Conservation of Wild Birds, also known as the Birds Directive (2009/147/EC). Priority species (NERC Act 2006; Local BAP) were likewise highlighted and the UK Red List for birds, also known as the BoCC5 as described above, was also referred to.

Reptiles

2.3.19 The habitats present within the Site were assessed for their suitability to support reptiles, and with consideration to their connectivity to other suitable habitat within the surrounding area. Habitat requirements were assessed with reference to the “*Reptile Habitat Management Handbook*” (Edgar, Foster & Baker, 2010). Any incidental reptile encounters made during the survey were recorded.

Riparian Mammals and White-clawed Crayfish

2.3.20 A desk-based assessment was undertaken using 1:10,000 scale OS mapping, to identify watercourses within 100 m of the Site that offer potential to support otter *Lutra lutra*, and within 30 m of the Site for water vole *Arvicola amphibius* and/or white-clawed crayfish *Austropotamobius*

pallipes. Any watercourses separated from the Site by a major migration barrier (i.e., major roads) were not considered further as part of the assessment.

- 2.3.21 Any watercourses present within the survey area, where accessible, were assessed using standard survey methodologies for their suitability to support otter (Chanin, 2003), water vole (Strachan, Moorhouse & Gelling, 2011) and white-clawed crayfish (Peay, 2002).

Other Key and Notable Species

Other Protected Species

- 2.3.22 Habitats were assessed for their potential to support other protected species, nationally or locally scarce or notable species, or any further species protected under nature conservation law which have not been highlighted above.

2.4 Invasive Species

- 2.4.1 During the extended UKHab survey any evidence of invasive species, as listed on Schedule 9 of the WCA 1981 (as amended), was recorded and subsequently mapped where seen.

2.5 Biodiversity Net Gain

- 2.5.1 Biodiversity metric calculations have been completed to generate the baseline habitat values, using the Department for Environment, Food & Rural Affairs (DEFRA) 'Statutory Biodiversity Metric' (SBM) (February 2024).
- 2.5.2 The SBM uses habitat features as a measure for the value and importance to nature. The following information on each habitat are required for the metric inputs:
- Type;
 - Area/length;
 - Distinctiveness (automatically calculated);
 - Irreplaceable habitat;
 - Condition; and,
 - Strategic significance.

2.6 Biodiversity Metric Inputs

Habitat Type and Area/Length

Baseline

- 2.6.1 The Site was surveyed on 17th June 2024 by Consultant Ecologist Sophie Arnold BSc MSc.
- 2.6.2 The Site visit included an ecological walkover survey using the UK Habitat Classification (UKHab 2.0) system (UKHab Ltd., 2023) and was conducted as part of the PEA survey. The habitats present within the Site were identified and classified according to the UK Habitat Classification

system which closely aligns with the SBM. The baseline habitats are displayed in Figure 2.

2.6.3 The SBM uses a classification system based mainly on the UKHab, with input from other systems including the Water Framework Directive (WFD) Lakes Typology (UKTAG, 2003), the European Nature Information System (EUNIS) habitat type hierarchical view (EEA, 2019), Natura 2000 Annex I habitats (JNCC, 2019) and habitats specific to the SBM.

2.6.4 The area/length covered by each habitat type was mapped using the QGIS 3.32.1 Geographical Information System (GIS).

Post-Development

2.6.5 Proposals for the Site have been analysed and assumed habitats present post-development have been based on the 'Proposed Development Plan' and using best knowledge of the likely habitats to be retained, created and enhanced in accordance with the habitat classification system used by the SBM.

Habitat Distinctiveness

2.6.6 For all baseline and post-development habitats the distinctiveness of each habitat type is automatically calculated within the SBM.

Habitat Condition

2.6.7 The condition of a habitat is a measure of the state of a habitat type judged against the perceived ecological optimum state for that particular habitat. The condition assessments were undertaken using the 'The Statutory Biodiversity Metric -Technical Annex 1: Condition Assessment Sheets and Methodology' spreadsheet (February 2024).

Baseline

2.6.8 Following the UKHab ecological walkover survey at the Site the condition of each habitat type was assessed and categorised as either Good, Moderate or Poor.

2.6.9 If a habitat type varied in condition within the Site this was recorded and mapped.

Post-development

2.6.10 The condition of habitats post-development has been assigned based on assumptions of likely habitat condition in line with the condition assessment criteria.

Habitat Strategic Significance

2.6.11 The SBM accounts for whether the habitat is situated in an area locally identified as significant for nature.

2.6.12 Data on areas and habitats locally identified as significant for nature were obtained from the

following sources:

- Multi-Agency Geographical Information for the Countryside (MAGIC) website for mapped statutory designated sites (<https://magic.defra.gov.uk/magicmap.aspx>);

Biodiversity Metric Calculations

- 2.6.13 Biodiversity metric calculations provide a numerical score for the value of existing habitats on the Site and their likely value post-development in Habitat Units (HU), Hedgerow Units (HeU) and Watercourse Units (WU), in order for the impact of the proposed development to be quantitatively assessed.
- 2.6.14 Using the SBM, habitat values are calculated based on whether they occur commonly or whether they are rare, their area (ha) (or length (km) for linear features such as hedgerows), condition and importance within the local area, usually identified from local relevant planning policies or documents. This gives individual baseline HU, HeU and WU.
- 2.6.15 Individual trees are classified as either Urban Tree or Rural Tree, depending on the extent of urbanisations around them. The size of a tree is either Small, Medium, Large or Very Large, dependent on the diameter at breast height (centimetres). A biodiversity metric area equivalent (hectares) is automatically calculated within the SBM dependent on the tree size; however, this area measurement is not included within the total habitat area (in ha) of the Site.
- 2.6.16 The post-development value can also be calculated for habitats where factors including time to target condition and difficulty of creation/enhancement are also taken into consideration. The values for area habitats and linear habitats are calculated separately. This provides an overall assessment of the biodiversity net gain or loss as a result of a development. To achieve biodiversity net gain, all three of HU, HeU and WU are treated separately, the individual gains cannot be combined to form an overall gain for the Site.

2.7 Trading Rules

- 2.7.1 The SBM considers distinctiveness as described earlier and using this data, SBM applies trading rules that require that any habitat loss is replaced on a 'like for like' or 'like for better' basis. The trading rules are detailed below in Table 1.

Table 1: Trading Rules within the SBM

Distinctiveness Group	Trading Rules
Very High	Bespoke compensation likely to be required
High	Same habitat required
Medium	Same broad habitat or a higher distinctiveness habitat required
Low	Same distinctiveness or better habitat required

Very Low	Compensation not required
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Assumptions and Limitations

- 2.7.2 For strategic significance, all area-based habitats on the Site have been considered 'Area/compensation not in local strategy/no local strategy' as they do not qualify as priority habitats and are not identified on any strategic plans.
- 2.7.3 Calculations are based on the loss of all of the Site's habitats to facilitate the development.
- 2.7.4 The condition of post-development habitats has been estimated based on the criteria within 'The Statutory Biodiversity Metric -Technical Annex 1: Condition Assessment Sheets and Methodology' (DEFRA, 2024) and based on reasonable assumptions for the habitat types taking into account feasibility, the locality, and their extent within the Site.
- 2.7.5 The quantification of biodiversity is one of a number of factors to be considered when assessing the impact of the proposed development on biodiversity.
- 2.7.6 The information contained within this report is considered valid for a period of 18 months from the date of the June 2024 PEA survey visit (CIEEM, 2019). If the development has not commenced by December 2025, it is recommended that the Site is re-surveyed to determine if there have been any significant changes to baseline habitats within that timeframe.

2.8 Survey Limitations

- 2.8.1 An Extended UKHab survey is intended to provide a rapid assessment of habitats present within a Site and is not intended to replace detailed vegetation or targeted protected species surveys, where deemed necessary. The surveys may be limited by a variety of factors which affect the presence of flora and fauna (e.g., climatic variation, season, and species behaviour). A lack of evidence of a protected species during a survey does not mean that the species is absent; hence the survey also records and assesses the ability of habitats to support such species. The time frame in which the survey is implemented provides a snapshot of activity within the survey area and cannot necessarily detect all evidence of use by a species.
- 2.8.2 The rear courtyard was not accessible at the time of the survey visit, although no major constraint to the overall survey as the surveyor was able to identify the habitats from the fence, it did limit inspection of the trees for potential bat roost features (PBRFs). These were scoped out later during vegetation clearance undertaken by the Client.
- 2.8.3 Both the external, internal PBRAs and emergence bat survey work were undertaken under optimal conditions, following standard methodology outlined within the Bat Survey Guidelines (Collins, 2023). As such, it is considered that a robust assessment of the presence of, and potential for roosting bats within the Site has been made.

3. Results and Evaluation

3.1 Designated Sites

- 3.1.1 No statutory designated sites of International importance within 5 km or National importance within 2 km of the Site are present.

Non-Statutory Designated Sites

- 3.1.2 Three non-statutory designated sites are located within 2 km of the Site, all are designated as Sites of Biological Importance (SBI), namely:

- River Irwell, located 1.2 km north-west of the Site;
- Ashton Canal (west), located 1.2 km east of the Site;
- Rochdale Canal (Stott's Lane to Ducie Street Basin) located 1.2 km east of the Site.

- 3.1.3 All designated sites, and their locations in relation the Site, are illustrated in Figure 3.

3.2 Habitats

- 3.2.1 Habitats recorded within the Site, along with their distribution and composition are discussed below. Habitat locations are presented on Figure 2.

- 3.2.2 No areas of Habitats of Principal Importance (HPI) or ancient woodland were identified within 500 m of the Site boundary.

Urban

Developed Land; Sealed Surface – Buildings (u1b5)

- 3.2.3 A semi-detached three-storey office/residential brick building with a pitched slate-tiled roof, four chimneys and wooden window frames (Photos 1-3, Appendix 4). The building is located at the southern end of the Site and is in a moderately poor condition.

Developed Land; Sealed Surface – Other developed land (u1b6)

- 3.2.4 The Site contains a section of concreted hard standing to the rear of the building with drainage grates (Photo 4, Appendix 4) and a tarmacked car parking area central to the Site. To the rear is a fenced paved courtyard with six raised brick planters (Photos 5-6, Appendix 4). The courtyard is bounded by metal rail fencing along the north, east and southern aspects.
- 3.2.5 Sealed surfaces such as this support a very low biodiversity and abundance of botanical species and are considered to be of negligible value for nature conservation.

Sparsely vegetated urban land (u1f) with bare ground (510) and scattered trees (32) / felled trees (206)

- 3.2.6 The six raised planters have been cleared of vegetation by the Client, back to bare ground. Three of the planters contain semi-mature trees of silver birch *Betula pendula* and Norway maple *Acer platanoides* (32, Photo 7, Appendix 4). The other three planters contain tree stumps from recently felled trees (206, Photo 8, Appendix 4), the brash is piled up near the southern fence (TN5, Photo 22, Appendix 4).
- 3.2.7 The trees species present are common and widespread throughout the UK with many similar specimens that can be found planted within the surrounding urban environment. The trees do however offer some structural diversity and are therefore considered to be of value to nature conservation at Site level only. A full arboricultural impact assessment of the trees is provided in a separate report ('BS 5837:2012 Tree Survey, Arboricultural Impact Assessment and Arboricultural Method Statement', 2020. Ref: Arboricultural_Impact_Assessment-1516984).

3.3 Species

Amphibians

- 3.3.1 GMLRC returned five recent records of amphibians within 2 km of the Site comprising two records for great crested newt (GCN) *Triturus cristatus*, the closest record was located 1.4 km north-west of the Site, dated 2019. Three records for common toad *Bufo bufo* were returned with the closest record situated 1.4 km north-west of the Site, dated 2014.
- 3.3.2 No European Protected Species (EPS) licences, class survey licence return data or pond survey data pertaining to GCN were identified within 2 km of the Site on MAGIC.
- 3.3.3 A search of OS and Google Earth aerial imagery did not identify the presence of any ponds within 500 m of the Site as identified on Figure 4.
- 3.3.4 This Site falls within the green zone for GCN DLL, therefore the Site is in an area that contains sparsely distributed GCN and is less likely to contain important pathways of connecting habitat for this species.
- 3.3.5 No GCN or common amphibians were recorded during the survey and the Site is surrounded by commercial and residential developments with limited suitable habitat connectivity.
- 3.3.6 Given the absence of suitable waterbodies on or immediately adjacent to the Site to support GCN during the breeding season and the surrounding urban habitats, GCN are not considered to be an ecological constraint.
- 3.3.7 The Site habitats are considered completely unsuitable for amphibians and is isolated by the

surrounding urban environment. Therefore, amphibians are not considered to be a constraint and are not discussed further in this report.

Badgers

3.3.8 GMLRC returned no recent records for badger within 2 km of the Site.

3.3.9 No evidence of badger, such as setts, latrines, footprints, or hair were recorded during the survey. The Site is largely comprised of developed land; sealed surface with limited sparsely vegetated urban land, therefore the area is considered to offer very limited foraging and unlikely to be suitable for sett creation opportunities within the courtyard space. The Site habitats are considered completely unsuitable for sett building or foraging, therefore, badgers are not considered to be a constraint and are not discussed further in this report.

Bats

3.3.10 GMLRC returned 114 recent records of bats on or within 2 km of the Site. Of these records, 90 pertain to commuting and foraging bats. Records for 6 species comprised 60 common pipistrelle *Pipistrellus pipistrellus*, 4 soprano pipistrelle *Pipistrellus pygmaeus*, 15 unidentified pipistrelle species, *Pipistrellus sp.*, 2 Noctule *Nyctalus noctula*, 1 Daubenton's bat *Myotis daubentonii*, and 8 unidentified bat species. The nearest bat record returned is situated 279 m north of the Site and pertains to common pipistrelle, dated 2023.

3.3.11 Twenty-four records pertained to bat roosts and comprised 3 species, 19 common pipistrelle, 4 unidentified pipistrelle bat and 1 myotis *Myotis sp.* The closest record was for common pipistrelle situated 585 m west of the Site, dated 2015.

3.3.12 Twenty-three EPS licences relating to bats were identified within 2 km of the Site using MAGIC (a complete list can be found in Appendix 5). The closest licences are noted below:

- **EPSM2012-4767**, located 59 m north-east that allowed for the destruction of a common pipistrelle resting place dated 2012-2013;
- **EPSM2012-5061**, located 59 m north-east that allowed for the destruction of a BLE resting place dated 2012-2015.

Preliminary Bat Roost Assessment

Building

3.3.13 Multiple Potential Roosting Features (PBRFs) were identified during the external survey. A large vertical crack in the brickwork located at the north-west corner where the building joins the adjacent property (TN2, Photo 11, Appendix 4) and two small holes in the brickwork above the window on the protruding north-west wall (TN2, Photo 12, Appendix 4). Multiple gaps in the northern aspect

fascia boarding (TN2, Photos 13-14, Appendix 4) and between the fascia boarding and downpipe on the eastern aspect (TN2, Photo 15, Appendix 4), gaps along all the cornicing (TN2, Photo 16, Appendix 4) and a substantial gap in the soffit box on the north-east corner of the roof (TN2, Photo 17, Appendix 4). Air vents on both the buildings back door and adjacent properties wall are broken (TN2, Photo 18, Appendix 4) or open (TN2, Photo 19, Appendix 4).

- 3.3.14 A historical common pipistrelle roost (St John's Street PEA, 2020) was located on the western side of the upper roof (TN3, Photo 20, Appendix 4).

Internal Survey

- 3.3.15 The internal inspection of the roof void found approximately 5 bat droppings (TN6) above the office 1 space that appeared to be old and brittle (Photo 23, Appendix 4) and a gap between the fascia boarding and wall (TN6, Photo 24, Appendix 4) located on the eastern aspect of the building. No other signs of roosting bats were observed.

Trees

- 3.3.16 One Norway maple and silver birch onsite were highlighted during the 2020 PEA (St John's Street PEA, 2020) as having features in the form of knotholes (TN2, Photos 25-26, Appendix 4). These have been scoped out and noted as having low roosting potential, therefore no further surveys are required.

Foraging and Commuting Bats

- 3.3.17 Some limited foraging opportunities are present within the Site in the form of the scattered trees. These are, however, likely to only be utilised by common, light tolerant bat species such as pipistrelles, given the level of noise and light disturbance in this environment.
- 3.3.18 Considering all habitats present at the Site and connectivity to other areas in the wider landscape, in line with best practice guidelines found in (Collins, 2023), the Site is considered to have low potential for use by foraging and commuting bats, with suitable foraging and commuting opportunities for bats limited to the trees, with much higher quality of habitats located to the west. As such, it is considered disproportionate to carry out bat activity surveys at the Site.
- 3.3.19 In accordance with current guidelines (Collins, 2023), habitats on Site have been assessed as providing low potential to support commuting and foraging bats. The Site is considered likely to be of importance to foraging and commuting bats at a Site level only.

Emergence surveys

- 3.3.20 Details of the findings from the 2024 nocturnal activity surveys are presented below with a brief summary of any bat activity recorded. Survey conditions are detailed in Table 2. Surveyor positions, any approximate roost locations and observed bat flight paths are illustrated as part of Appendix

7.

Survey 1 – 16th July 2024

3.3.21 No emergencies were observed during the first survey, and overall moderate levels of foraging and commuting activity were recorded. During the survey a total of 298 calls were recorded pertaining solely to common pipistrelle, with passes recorded throughout the duration of the survey particularly around the courtyard (Appendix 7; Figure 1).

Survey 2 – 7th August 2024

3.3.22 One emergence was observed during the second survey at 21:16, as confirmed by NVA footage analysis. The emergence was a common pipistrelle which emerged from the eastern eaves on the south facing aspect of the building (Appendix 7; Figure 2).

3.3.23 During this survey, very low levels of foraging and commuting activity were recorded, with a total of 22 calls pertaining to common pipistrelle and Myotis Sp recorded throughout its entirety. It is thought that this may be due to recent vegetation management works on neighbouring trees.

Survey 3 – 29th August 2024

3.3.24 One potential emergence was observed during the final survey at 20:40, pertaining to a common pipistrelle emerging from the same location on the eastern eaves on the south facing aspect of the building (Appendix 7; Figure 3). Though the emergence is likely, this emergence could not be confirmed due to a file corruption within the NVA data. This is not, however, considered to be a significant limitation, due to the presence of a surveyor observing the structure, and there being a previous emergence record from that location confirming presence of bats during survey 2.

3.3.25 Overall, low levels of foraging and commuting activity were recorded onsite during the survey with a total of 67 calls recorded across all surveyors. Calls were predominantly attributed to common pipistrelle, although both noctule and Myotis sp., calls were also recorded.

Table 2: Survey conditions

Survey	Date/Time	Surveyors	Air temp (°C)	General Conditions
1	16/07/2024 21:13 – 22:58 Sunset: 21:28	EM, DH & AH	Start: 16 End: 14	Wind: BF3 Cloud cover: 100% Precipitation: Dry
2	07/08/2024 20:37 – 22:23	EM, DH & AH	Start: 17 End: 16	Wind: BF3 Cloud cover: 100%

	Sunset: 20:53			Precipitation: Dry
3	29/08/2024 19:51 – 21:34	EM, DH & EO	Start: 16 End: 15	Wind: BF1 Cloud cover: 0% Precipitation: Dry

EM – Emma McCartney, DH – Daniel Heaton, AH – Amy Harris, EO – Ellie Oldland

Birds

3.3.26 GMLRC returned 617 recent records of birds within 2 km of the Site, pertaining to 19 species. Of these records a total of 3 Schedule 1 species listed under the WCA 1981 (as amended) comprising black redstart *Phoenicurus ochrurus*, little ringed plover *Charadrius dubius* and peregrine Falco perigrinus. The closest record was for peregrine, located 91 m north-east of the Site, dated 2018. Thirteen records pertained to bird species listed under Schedule 41 of the NERC Act 2006.

3.3.27 Of the records which were returned, 11 species are also listed on the Birds of Conservation Concern 5 (BoCC5) red list, with a further 6 included on the amber species list. The majority of records were mainly associated on or near to the River Irwell.

3.3.28 The habitats within the Site are considered to have some suitability to support nesting opportunities for a common assemblage of urban fringe bird species within the courtyard trees and the open-air brick on the building's north face (TN4, Photo 21, Appendix 4). The 2020 PEA survey (St John's Street PEA, 2020) recorded an active nest within the cavity. During the 2024 survey, signs of nesting birds were observed onsite with a small nest in the silver birch (TN1, Photo 9, Appendix 4) and a larger nest in the western maple tree (TN1, Photo 10, Appendix 4) within the courtyard but was not seen as active during this time. The open-air brick cavity on the building showed droppings on the outside but activity was not confirmed during the visit.

3.3.29 Given the presence of nests onsite, the Site is considered to be of value to common nesting and foraging bird species at no greater than the Site level.

Reptiles

3.3.30 GMLRC returned no records of reptiles on or within 2 km of the Site.

3.3.31 No reptiles were observed during the visit. The Site is surrounded by commercial and residential developments with limited suitable habitat on Site and limited connectivity to the wider landscape; therefore, reptiles are not considered to be a constraint and are not discussed further in this report.

Riparian Mammals

3.3.32 GMLRC returned five records of otter *Lutra lutra* within 2 km of the Site, the closest is situated 517

m south-west of the Site, dated 2022. All records are associated with the River Irwell and Rochdale Canal.

- 3.3.33 No waterbodies or watercourses have been identified within 500 m of the Site boundary and there is a lack of suitable riparian habitat within, or surrounding, the Site. As such, riparian mammals are not considered to be a constraint to the works and are not discussed further within this report.

Other Key and Notable Species

Hedgehog

- 3.3.34 GMLRC returned 24 records of hedgehog *Erinaceus europaeus* within 2 km of the Site, the nearest record is situated 858 m south of the Site, dated 2020.
- 3.3.35 No evidence of hedgehog was found during the survey. The raised planters are too high for hedgehogs to access within the Site and the hard standing is unsuitable for foraging. The brash pile (TN5) may provide shelter for a commuting hedgehog.
- 3.3.36 Given the limited presence of suitable habitat within the Site, the opportunities that the Site provides are considered to be of importance to hedgehog at no greater than the Site level.

Invasive Species

- 3.3.37 GMLRC returned no records of botanical Invasive Non-Native Species (INNS) on or within 2 km of the Site.
- 3.3.38 No INNS were observed onsite during the survey and the Site does not have potential to support other INNS as all vegetation has been cleared from the raised planters and the remaining habitat is hard standing or building. As such, INNS are not considered a constraint and will not be discussed further in this report.

3.4 Biodiversity Net Gain

- 3.4.1 Baseline UKHab habitat types featured onsite comprises of urban – buildings, urban – developed land; sealed surface, urban - sparsely vegetated urban land and individual trees (Figure 5). As these habitats are described using the UKHab methodology, the conversions to the habitats described within the SBM are listed in Table 3 below.

Table 3: Baseline UKHab to SBM habitat conversions

UKHab Habitat Type	SBM Habitat Type
Urban – Buildings	Developed land; sealed surface

Urban – Developed land; sealed surface	Developed land; sealed surface
Urban - Sparsely vegetated urban land	Bare ground
Individual trees	Urban tree

3.4.2 The total area of the Site has been calculated at 0.72 ha. Baseline area habitats are calculated to have a biodiversity value of 5.28 HU. No Hedgerow or Watercourse Units are present at the Site. Site baseline calculations and condition scores can be found in Appendix 9.

3.5 Post-Development Biodiversity

3.5.1 The following calculations present a version of the completed feasibility biodiversity metric calculations based on the post-development proposals shown in the 'Proposed Development Plan'. A summary of the calculations is provided in Appendix 10.

3.5.2 It is anticipated that loss of all of the Site's habitats will be required to facilitate the development.

3.5.3 Two options have been identified for post development calculations:

- **Option 1** – Biodiverse green roof (Figure 6a) and remaining units delivered offsite;
- **Option 2** – No onsite replacement habitat (Figure 6b) – all units delivered offsite.

3.5.4 The predicted habitat type, condition, area and HU of the post-development habitats are provided within Tables 4 and 5. Post-development, the area-based habitats for Option 1 are estimated to deliver a biodiversity value of 0.06 HU and a 0.01 HU value for Option 2. Predicted development habitats are mapped in Figure 6a Option 1 and Figure 6b Option 2. Appendix 11 shows the SBM for both options.

Table 4: Option 1 - Site Post-development Area-based Habitats, Condition and Habitat Units

Habitat Type	Distinctiveness	Condition	Area (ha)	Habitat Units
Created				
Biodiverse green roof	Medium	Moderate	0.0112	0.05
Modified grassland	Low	Moderate	0.0021	0.01
Total Habitat Units (HU)				0.06

Table 5: Option 2 - Site Post-development Area-based Habitats, Condition and Habitat Units

Habitat Type	Distinctiveness	Condition	Area (ha)	Habitat Units
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Created				
Modified grassland	Low	Moderate	0.0021	0.01
Total Habitat Units (HU)				0.01

3.5.5 The construction of the proposed development is predicted to result in a net unit change of -5.22 for Option 1 and -5.27 for Option 2, which is a net percentage change of -98.91% for Option 1 and -99.86% for Option 2 as detailed in Table 6.

Table 6: Summary of Biodiversity Net Gain Calculations

	Baseline Units	Proposed Units	Change in Units	% Change in Units
Habitat Units (HU) - Option 1	5.28	0.06	-5.22	-98.91
Habitat Units (HU) - Option 2	5.28	0.01	-5.27	-99.86

3.5.6 For the Site to achieve a 10% net gain in HU, a total of 5.33 HU would have to be proposed. This leaves a deficit of 5.27HU for Option 1 or 5.32 HU for Option 2, as detailed in Table 7.

Table 7: Summary of Biodiversity Units Required Post Development

	Target	Baseline Units	Post-development Units	Units Required	Unit Deficit
Habitat Units (HU) - Option 1	10%	5.28	0.06	5.33	5.27
Habitat Units (HU) - Option 2	10%	5.28	0.01	5.33	5.32

4. Ecological Assessment and Mitigation

4.1 Designated Sites

- 4.1.1 Due to the distance, lack of hydrological connection or similar habitat types between the Site and designated sites, it is considered unlikely that the proposals will directly impact upon these designated sites.

4.2 Habitats

- 4.2.1 Habitats recorded within the Site are mostly developed sealed surface, the remaining habitat of sparsely vegetated urban land has low botanical significance. Therefore, it is considered that the loss of these habitats during the completion of any de-vegetation or development works will not have any significant ecological impacts.
- 4.2.2 Although the two individual trees may have potential value for nesting birds, the intrinsic value of the habitats are considered to be of importance at Site level only. Further recommendations in relation to tree removal and planting will be provided as part of the arboricultural assessment report.
- 4.2.3 Any loss/reduction of habitats will require adequate compensation; this may be in the form of enhancement of existing habitats, and/or creating new areas of appropriate habitats, with associated management plan.

4.3 Protected and Key Species

Bats

Building

- 4.3.1 Following the results of the Preliminary Bat Roost Assessment (PBRA; see section 3.3.13-16), along with the historic evidence of a roost in 2020 (St John's Street Ecological Assessment Pareto Properties LLP dated July 2020) and confirmed continued use of the building during the 2024 nocturnal surveys, roosting bats need to be taken into consideration .

Potential Impacts

- 4.3.2 All species of bat occurring within the UK are included in Schedule 2 of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Under regulation 41, bats are protected from deliberate capture, injury or killing, from deliberate disturbance and from deliberate damage or destruction of a breeding site or resting place (roost).
- 4.3.3 All UK bats are also included on Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). However, their protection is limited to certain offences. Under the 1981 Act (as amended) it is an

offence to intentionally, or recklessly disturb bats while they are occupying a structure or place used for shelter or protection, or to obstruct access to any such place.

- 4.3.4 Under current work proposals, this may result in the destruction of the historical 2020 roost used by common pipistrelle and the 2024 confirmed bat roost, which will need to be mitigated for accordingly.
- 4.3.5 In the absence of mitigation, demolition and renovation works may also result in individual bats being injured or killed. Due to the legal status of bats, these actions would result in a criminal offence being committed.

Mitigation

- 4.3.6 Given the low numbers and widespread nature of roosting bat species recorded within the building, the proposed development, works will need to proceed under a Natural England Bat Mitigation Class Licence (CL21) – Annex B, via a 'Registered Consultant'. This allows for:
- the disturbance and capture up to 3 'common or widespread' bat species (which are those listed in each annex) and/or;
 - damage or destruction up to 3 'low conservation status roosts' (these are: feeding, day, night and transitional roosts) provided that:
 - your action has a low or temporary impact on bats or their roosts.
 - sites are registered before you start work.
- 4.3.7 An application for Site registration must be completed a minimum of 3 weeks before a licence may be issued, and no more than 12 weeks in advance of undertaking any licensable works. Licences will only be granted for the period of the licensable works, which should be no longer than six months.
- 4.3.8 Any licence application needs to be issued to Natural England using the current survey season data. Therefore, if there is a delay in applying for the licence, further bat surveys in 2025 will be required to obtain the necessary licence to legally allow the works to proceed.
- 4.3.9 Appropriate bat roost habitat mitigation will need to be designed and incorporated into the building development such as replacement roosts if they are to be lost. Appendix 7 shows the location of all roosts to date.
- 4.3.10 Any proposed soft landscaping should use native species of local provenance and/or be wildlife friendly suitable for local bat species.

Bat Lighting Plan

4.3.11 Following good practice guidance shown in Bat Conservation Trust (BCT) and Institution of Lighting Professionals (ILP, 2023), to minimise the disruption to potential bat flight lines during the development and operational phases of the project, it is recommended that a Sensitive Lighting Plan for Biodiversity is produced, particularly if night works are required. The Lighting Plan should be developed in accordance with current guidance from the Bat Conservation Trust and Institution of Lighting Professionals '*Bats and Artificial Lighting in the UK – Bats and the built environment series*' (Guidance note 08/18). In particular, it should avoid/minimise light spill onto the off-site habitats, lighting columns should be kept as short as possible, hoods or cowls added to avoid unnecessary light spill and lighting must also be turned off when not in use.

Birds

4.3.12 The Site provides limited suitable habitat for nesting and foraging birds in the form of trees and the open-air brick cavity. Given the presence of similar habitats in the wider area, the Site is considered to be of value to common urban fringe species at no greater than the Site level.

4.3.13 If proposed works require pruning or felling to be undertaken during the active bird nesting season (March to August inclusive), then any areas to be impacted should be checked by an ecologist for active bird nests no more than 24 hours before the works begin, or subject to clearance under the supervision of a suitably experienced ecological clerk of works (ECoW). If an active nest were to be discovered, an exclusion zone around the nest would need to be established and maintained until a suitably qualified person has confirmed the birds have fledged or that the nesting attempt has concluded.

Other Key and Notable Species

Hedgehog

4.3.14 No evidence of hedgehog was found during the survey; however, the brash pile may provide some limited foraging and/or shelter for commuting hedgehog.

4.3.15 As such, it is recommended that any vegetation / brash clearance which is completed is carried out adhering to BPMs for hedgehog, which includes the following:

- Should any excavations need to be left open and unattended during the night for a long period of time, it is recommended that they are covered and weighed down, or that a suitable escape ramp is installed, e.g. a long scaffold board, inserted to allow escape should small mammals fall in.
- Any existing log/ brash piles to be retained where possible, if required to be moved must be dismantled by hand to search for animals prior to removal.
- It is recommended that if night works are required, these should follow a sensitive lighting plan to minimise unnecessary disturbance to any mammals that may be in the local area. This involves

keeping light to a minimum throughout the works and ensuring that only the task area is lit and light spill onto vegetated and surrounding habitats is avoided where possible.

- If a hedgehog is discovered during the works at any time during active period (April to October inclusive), they should be allowed to move away on their own volition. In the event that hedgehogs are in immediate danger they can be moved carefully with clean gloved hands to a sheltered area (e.g., dense scrub).
- If any hedgehogs are encountered between November and March, or if any juveniles or injured hedgehogs are encountered at any time, an ecologist will be contacted for advice immediately, it is likely that the ecologist will remove the individuals and take them to a local wildlife rescue centre.

4.4 Summary of Biodiversity Net Gain Delivery

- 4.4.1 Post development, the habitats on Site produced a biodiversity value between 0.01 HU Option 1 and 0.06 HU Option 2, representing a % change of 98.91% Option 1 and -99.86% Option 2. The loss in HU at the Site does not meet the statutory requirement for 10% net gain post development.
- 4.4.2 This is due to the proposals involving the loss of all areas of existing vegetation, most notably the seven trees onsite. Without significant changes to the Site layout and provision of an ecologically sensitive soft landscaping plan, it is considered unlikely that an on-Site net gain in HU can be achieved.

4.5 Off-Site Compensation

- 4.5.1 Off-site compensation either through direct delivery of off-site habitat enhancements at land owned by the Client or a suitable location (agreed between the Client and the Local Planning Authority); or payment of a mutually agreed financial contribution towards a local habitat provision project would be required. In addition another option involves the application for Biodiversity Units supplied by a third-party Habitat Bank (e.g., Environment Bank), to compensate for the biodiversity loss across the Site.

4.6 Habitat Management and Monitoring

- 4.6.1 The production of a Habitat Management and Monitoring Management (HMMP) is recommended to ensure the off-site habitats deliver the habitat scores listed within the final design stage BNGA, to be agreed with the LPA, which will also serve to support protected and notable species. This includes management of post-development habitats to the condition required to deliver the BNG score specified in accordance with the condition assessment methodology.

4.7 BNG Principles

- 4.7.1 Appendix 2 details the BNG good practice principles (CIEEM, CIRIA, IEMA, 2019) which should

be adhered to when undertaking BNG assessments in association with proposed developments. The actions within Appendix 2 should be taken into account throughout the design stage of the development off-site.

5. References

Bat Conservation Trust (BCT) and Institution of Lighting Professionals (ILP) (2023) 'Bats and Artificial Lighting in the UK – Bats and the built environment series' (Guidance note 08/18). ILP, Rugby, Warwickshire. BCT, London.

Chanin P (2003). Ecology of the European Otter. Conserving Natura 2000 Rivers Ecology Series No. 10. English Nature, Peterborough.

CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM (2019) Advice note on the lifespan of ecological reports and surveys. Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM, CIRIA & IEMA (2019). Biodiversity Net Gain: Good practice principles for development

Available:

<https://www.iema.net/assets/newbuild/documents/IEMA%20Biodiversity%20Net%20Gain.pdf>

Collins, J. (eds.) (2016). '*Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn)*'. The Bat Conservation Trust, London.

DEFRA. (2018). 'A Green Future: Our 25 Year Plan to Improve the Environment'. [online]. Last accessed July 2024. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

DEFRA (2024). 'The Statutory Biodiversity Metric -Technical Annex 1: Condition Assessment Sheets and Methodology' (2024). Natural England.

Department for Environment, Food and Rural Affairs (DEFRA) (2011). 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services'. [online]. Last accessed July 2024. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf

Department for Environment, Food and Rural Affairs (2024). 'The Statutory Biodiversity Metric – User Guide'. Available from: https://assets.publishing.service.gov.uk/media/65673fee750074000d1dee31/The_Statutory_Biodiversity_Metric_-_Draft_User_Guide.pdf

Department for Levelling Up, Housing and Communities (DLUHC). (2023). 'National Planning Policy Framework'. [online]. Last accessed June 2024. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Edgar, P., Foster, J., and Baker, J. (2010). '*Reptile Habitat Management Handbook*'. Amphibian and Reptile Conservation, Bournemouth.

EEA (European Environment Agency). (2019). EUNIS Habitat Classification. Available at: <https://www.eea.europa.eu/data-and-maps/data/eunis-habitat-classification>

Harris, S., Cresswell, P. and Jefferies, D. (1989). '*Surveying Badgers*'. Mammal Society (Occasional Publication No 9).

HMSO (2006). Natural Environment and Rural Communities Act. HMSO, Norwich. Available: https://www.legislation.gov.uk/ukpga/2006/16/pdfs/ukpga_20060016_en.pdf

JNCC (Joint Nature Conservation Committee) Annex I Habitat Types (2019) Available at: <https://sac.jncc.gov.uk/habitat/>

Joint Nature Conservation Committee (JNCC). (2019). 'Annex I Habitats List'. Last accessed July 2024. Available at: <https://sac.jncc.gov.uk/habitat/>

Langton, T.E.S., Beckett, C.L., and Foster, J.P. (2001). '*Great Crested Newt Conservation Handbook*'. Froglife, Halesworth.

Peay, S. (2002). '*A Survey and Monitoring Protocol for the White-Clawed Crayfish Austropotamobius pallipes in the UK SAC Rivers*'. LIFE in UK Rivers Project Contract No. LIF 02-11-37. English Nature, Peterborough.

Stanbury, A., Eaton, M., Aebischer, N., Balmer, D., Brown, A., Douse, A., Lindley, P., McCulloch, N., Noble, D. and Win, I. (2021). '*The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain*'. British Birds, 114, 723-747.

Strachan, R., Moorhouse, T. and Gelling, M. (2011) '*Water vole Conservation Handbook*'. Third Edition. Wildlife Conservation Research Unit, Oxford.

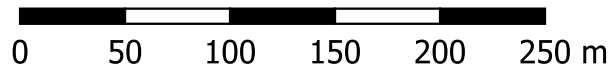
UKHab Ltd. (2023). 'UK Habitat Classification Version 2.0' [online]. Last accessed July 2024 Available at <https://www.ukhab.org>

Figure 1: Site Location Map



Key

 Site boundary



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Figure 1
Site Location Map

A	04/06/24	SA	XX	XXX
Rev	Date	Drawn by	Checked by	Revision Comments

Site centred on: SJ 83462 97942

Figure 2: UK Habitat Classification Map and Target Notes

Target Note	Description
TN1	Birds nest
TN2	PBRF / FARs
TN3	Historic 2020 Bat roost
TN4	Open-air brick cavity
TN5	Refugia (brash pile)



Key

Habitat

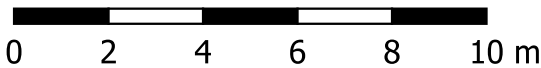
-  u1b5 - building
-  u1b6 - other developed land
-  u1f - sparsely vegetated urban land

-  Trees

Target Notes

-  TN1 - Birds nest
-  TN2 - PBRF
-  TN3 - Bat roost
-  TN4 - Open-air brick cavity
-  TN5 - Brash pile

Secondary code	Description
32	Scattered trees
206	Felled tree
510	Bare ground



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UK Habitat Classification Map

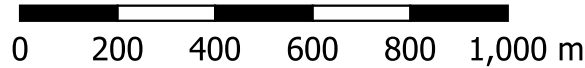
A	18/06/2024	SA	XX	XXX
Rev	Date	Drawn by	Checked by	Revision Comments
Site centred on:		SJ 83462 97942		

Figure 3: Designated Sites



Key

-  Site boundary
-  2 km buffer
-  Sites of Biological Importance (SBI)



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Figure 3
Designated Sites

A	05/07/2024	SA	XX	XXX
Rev	Date	Drawn by	Checked by	Revision Comments

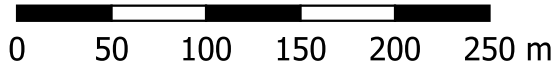
Site centred on: SJ 83462 97942

Figure 4: Watercourses



Key

-  Site boundary
-  500 m buffer
-  Watercourse



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Figure 4
Watercourses

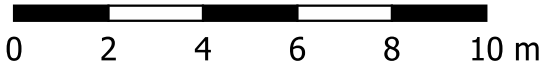
A	04/06/24	SA	XX	XXX
Rev	Date	Drawn by	Checked by	Revision Comments
Site centred on:		SJ 83462 97942		

Figure 5: BNG Baseline Habitat Map



Key

-  Site boundary
- Habitat
 -  Bare ground
 -  Developed land; sealed surface
 -  Baseline urban trees



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Figure 5
BNG Baselinbe Habitat Map

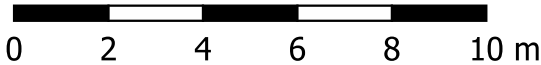
A	26/07/24	SA	XX
Rev	Date	Drawn by	Checked by
Site centred on:		SJ 83462 97942	

Figure 6a & 6b: BNG Post-development Plans



Key

-  Site boundary
- Habitat
 -  Biodiverse green roof
 -  Developed land; sealed surface
 -  Modified grassland

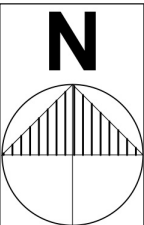


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Figure 6a
BNG Post development - Option 1

A	26/07/24	SA	XX
Rev	Date	Drawn by	Checked by
Site centred on:		SJ 83462 97942	



Key

 Site boundary

Habitat

 Developed land; sealed surface

 Modified grassland



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Figure 6b
BNG Post development - Option 2

A	26/07/24	SA	XX
Rev	Date	Drawn by	Checked by
Site centred on:		SJ 83462 97942	

Appendix 1: Relevant Legislation

A.1.1 This section briefly summarises the relevant legislation pertaining to the relevant designated sites, habitats and species. The full legislation is detailed below. Please note that the following text does not constitute legal advice.

Ecological feature	Summary of relevant legislation
Statutory Designated sites	<p>Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) were designated under the EU Birds Directive and Habitats Directive, respectively. Together, SPAs and SACs make up a series of sites collectively known as Natura 2000, or European, sites.</p> <p>Sites of Special Scientific Interest (SSSI) are notified under the Wildlife and Countryside Act (WCA) 1981 (as amended). Improved provisions for the protection and management of SSSIs were introduced by the Countryside and Rights of Way (CROW) Act 2000 (in England and Wales).</p> <p>See below for further legislative details and Appendix B for specific site information.</p>
Non-statutory Designated sites	Local Wildlife Sites (LWS) and Biological Heritage Sites (BHS) do not receive any specific legal protection.
Habitats of Principal Importance	The list of Habitats of Principal Importance (HPIs) was prepared in response to the Natural Environment and Rural Communities (NERC) Act 2006. Under the NERC Act, the Secretary of State must take such steps as appear to be reasonably practicable to further the conservation these habitats or promote the taking by others (e.g. LPAs) of such steps.
Bats	Bats and their roosts are legally protected under the Habitats Regulations (Conservation of Habitats and Species Regulations, 2017 (as amended) making them a European Protected Species (EPS)) and the Wildlife and Countryside Act, 1981 (as amended). Some species of bat (e.g. the brown long-eared, noctule and soprano pipistrelle) are also Species of Principal Importance (SPI) included on a list that was prepared in response to the Natural Environment and Rural Communities (NERC) Act.
Great Crested Newt	Great crested newts and their habitat are legally protected under the Conservation of Habitats and Species Regulations (the 'Habitats Regulations') 2017 (as amended) and the Wildlife and Countryside Act, 1981 (as amended) (WCA). Great crested newts are classified as Species of Principal Importance (SPI) under the NERC Act.
Badger	Badgers and their places of shelter (setts) are protected under specific legislation known as the Protection of Badgers Act 1992. This prohibits (among other things) the killing or injury of badgers, the damage or destruction of setts and disturbance of badgers occupying setts.
Birds	<p>All nesting birds are legally protected from killing and injury with their active nests and eggs being protected from damage and destruction under the WCA. A selection of bird species (including the dunnock, song thrush and starling among others) are also SPI under the NERC Act. Some bird species are on the 'Red List and Amber List' of species of high and medium conservation concern respectively. This does not confer any additional legal protection or status but should be taken into consideration.</p> <p>Bird species listed on Schedule 1 of the WCA are subject to additional protection, which prohibits their disturbance whilst breeding, and would include activities near to a nest site. Wintering birds are not protected by legislation in this context (they are only protected during the breeding season from disturbance).</p>

Ecological feature	Summary of relevant legislation
Reptiles	Reptiles are legally protected from intentional killing and injury under the WCA; reptiles are also classified as SPIs.
Non-native Invasive Plant Species	Cotoneaster was identified on the Site and is listed on Schedule 9 of the Wildlife and Countryside Act, 1981 (as amended). It is illegal to plant or other cause to grow in the wild any plant included on Schedule 9 of the WCA. Note that the Department for Environment Food and Rural Affairs (DEFRA) do not consider planting of Schedule 9 species in private gardens, estates and amenity planting as 'planting in the wild' so long as reasonable measures are taken to confine them to the cultivated area (i.e. to prevent spread into the wild).

Conservation of Habitats and Species Regulations 2017 (as amended)

- A.1.2 The conservation of Habitats and Species Regulations transpose the Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora ("The Habitats Directive") into law.
- A.1.3 The 2017 Regulations consolidate the various amendments made to the Conservation (Natural Habitats, &c.) Regulations 1994 in respect of England and Wales. The regulations provide for:
- designation and protection of European Sites (Special Protection Areas (SPA) and Special Areas of Conservation (SAC)) including the need for 'Appropriate Assessment' of plans and proposals;
 - protection of European protected species.
 - adaptation of planning and other controls for the protection of European Sites; and
 - make it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2.
- A.1.4 Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) were designated under the EU Birds Directive and Habitats Directive, respectively. Together, SPAs and SACs make up a series of sites collectively known as Natura 2000, or European, sites. If plans or projects (not directly related to site management) are proposed that could have an effect on the interest features of a Natura 2000 site (even if the proposed works are outside the boundary of the designated area), the relevant competent authority (in consultation with Natural England) has a duty to consider whether the site could be affected. If effects could occur, an appropriate assessment is required to determine whether significant adverse effects on the qualifying interest of the site could occur, either alone or in combination with other plans or projects. This enables avoidance or mitigation to be developed to ensure potential adverse impacts are no longer significant. If negative impacts cannot be avoided, or if uncertainty remains, consent for works will only be granted if there are no alternative solutions, there are imperative reasons of over-riding public interest for the works and compensatory measures have been secured. As a matter of policy, Ramsar sites (wetland sites of international importance designated under the Ramsar Convention 1971) are protected as European sites in the same way.
- A.1.5 No steps that will impact upon a European protected species or its habitat can be undertaken unless authorised by a European Protected Species licence issued by Natural England. Such a licence is granted until after planning consent has been granted once Natural England are satisfied that adequate measures are to be put in place to mitigate for the impact of the development.

Wildlife and Countryside Act 1981 (as amended)

- A.1.6 The Act implements the Convention of European Wildlife and Natural Habitats (The Bern Convention) and the Directive 2009/147/EC 'The Birds Directive'.
- A.1.7 The 1981 Act has been amended by the Countryside and Rights of Way (CROW) Act 2000.
- A.1.8 Schedules 1 (birds) and 5 (animals) of the Act identify species of bird and other animal in relation to which the Act makes killing, injury, taking and disturbance an offence while Schedule 8 to the Act lists species of plant in relation to which the Act makes it an offence to intentionally pick, uproot or destroy.
- A.1.9 Section 14(2) of the Act makes it an offence to cause any species of animal or plant listed in Schedule 9 of the Act to grow in the wild.
- A.1.10 Sites of Special Scientific Interest (SSSI) are notified under the Wildlife and Countryside Act (WCA) 1981 (as amended). Improved provisions for the protection and management of SSSIs were introduced by the Countryside and Rights of Way (CROW) Act 2000 (in England and Wales). In essence, SSSIs are protected through the approach to land use and management. Certain activities are prohibited within a SSSI (generally those likely to damage the special interest) or require consent from the relevant statutory body (in this case Natural England). Each SSSI has a list of 'operations requiring consent'; if any of these activities are proposed, a landowner or site manager must first seek permission from Natural England in writing prior to undertaking the activity. Works can be excluded from the consenting process if they are required in an emergency (although Natural England must be notified as soon as possible) or if they have been approved through the planning application process, or by other statutory bodies, where Natural England have already been consulted.

The Natural Environmental and Rural Communities Act 2006 ('NERC')

- A.1.11 The NERC Act sets a duty on public bodies (including Local Authorities) to have due regard for habitats and Species of Principal Importance for biodiversity in England when carrying out their duties.
- A.1.12 Section 41 (S.41) the Act requires the Secretary of State to publish a list of habitats and species which are of principal importance for the conservation of biodiversity in England. The list is used by decision-makers, such as Local Authorities, in implementing their protection duties under this Act when carrying out their functions.
- A.1.13 The S.41 list includes 56 habitats and almost 1000 Species of Principal Importance in England. Since the UN Convention on Biological Diversity (CBD) in 2010 the UK identify these habitats and species as conservation priorities under the UK Post-2010 Biodiversity Framework, (they were formerly identified as UK BAP habitats and species).

The Protection of Badgers Act, 1992

- A.1.14 Badgers are protected under the Protection of Badgers Act 1992. This makes it an offence to wilfully kill, injure, take, possess or cruelly ill-treat a badger, or to attempt to do so; or to intentionally or recklessly interfere with a sett. Sett interference includes disturbing badgers whilst they are occupying a sett, as well as damaging or destroying a sett or obstructing access to it. A licence can be granted by Natural England to permit works that would otherwise result in an offence (e.g. to allow sett closure where activities close by may otherwise result in disturbance or damage to the sett).

Wild Mammals (Protection) Act, 1996

- A.1.15 Under the Wild Mammals (Protection) Act 1996 it is an offence to cause unnecessary suffering to wild mammals, including crushing and asphyxiating. This Act is primarily concerned with animal welfare and aims to prevent cruelty. As a result, offences include those actions with the intent to inflict unnecessary suffering. A wild mammal includes any mammal which is not domestic or captive. Red foxes, wild deer and other mammals such as rabbits are therefore covered by the Act.

Invasive Non-native Species

- A.1.16 Schedule 9, Section 14 of the Wildlife and Countryside Act (1981, as amended) prohibits the introduction into the wild of any species that is not ordinarily resident in and is not a regular visitor to Great Britain in a wild state, or any species of the 69 plants listed on Schedule 9. Schedule 2 of The Invasive Alien Species (Enforcement and Permitting) Order 2019 aims to prevent and manage the introduction and spread of invasive alien species.

Appendix 2: BNG Best Practice Principles

Principle	In practice
Apply the mitigation hierarchy	Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decisionmakers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset by biodiversity losses by gains elsewhere.
Avoid losing biodiversity that cannot be offset elsewhere	Avoid impacts on irreplaceable biodiversity - these impacts cannot be offset to achieve NNL/net gain.
Be inclusive and equitable	Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluating the approach to net gain. Achieve net gain in partnership with stakeholders where possible.
Address risk	Mitigate difficulty, uncertainty and other risks to achieving net gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between the losses occurring and the gains being fully realised.
Make a measurable net gain contribution	Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.
Achieve the best outcomes for biodiversity	<p>Achieve the best outcomes for biodiversity by using robust credible evidence and local knowledge to make clearly justified choices:</p> <ul style="list-style-type: none"> • Delivering compensation that is ecologically equivalent in type, amount and condition and that accounts for the location and timing of biodiversity losses. • Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation. • Achieving net gain locally to the development or also contributing towards nature conservation priorities at local, regional and national levels. • Enhancing existing or creating new habitat. • Enhancing ecological connectivity by creating more, bigger, better and joined areas for biodiversity.
Be additional	Achieve nature conservation outcomes that demonstrably exceed existing obligations, ie do not deliver something that would occur anyway.
Create a net gain legacy	<p>Ensure net gain generates long term benefits by:</p> <ul style="list-style-type: none"> • Engaging stakeholders and jointly agreeing practical solutions that secure net gain in perpetuity. • Planning for adaptive management and securing dedicated funding for long-term management. • Designing net gain for biodiversity to be resilient to external factors, especially climate change. • Mitigating risks from other land uses. • Avoiding displacing harmful activities from one location to another. • Supporting local-level management of net gain activities.
Optimise sustainability	Prioritise BNG and, where possible, optimise the wider environmental benefits for a sustainable society and economy.
Be transparent	Communicate all net gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

Appendix 3: BNG Policy and Legislation

National

UK Government's 25 Year Environment Plan

The UK Government's 25 Year Environment Plan (DEFRA, 2018) states a desire to 'embed a *'net environmental gain' principle for development to deliver environmental improvements locally and nationally*' and plans to consult on making Biodiversity Net Gain a mandatory requirement. On 14th March 2019, Her Majesty's Treasury confirmed that following consultation, the government will use the forthcoming Environment Bill to mandate BNG for development in England, ensuring that the delivery of much-needed infrastructure and housing is not at the expense of vital biodiversity.

Biodiversity 2020: A strategy for England's wildlife and Ecosystem Services

Biodiversity 2020: A strategy for England's wildlife and ecosystem services (DEFRA, 2011) is the national strategy for biodiversity. This sets out an ambition to halt the loss of biodiversity and see an increase in the area of priority habitats by 200,000 ha by 2020. Biodiversity 2020 sets in policy the objectives to improve our wildlife sites, make them bigger, develop more of them and join them up (summarised as 'Bigger, Better, More and Joined').

National Planning Policy Framework

The revised National Planning Policy Framework (NPPF) (DLUHC, 2023) refers to conserving and enhancing the natural environment. This requires Local Authorities in England to take measures to:

Conserve and enhance biodiversity;

Protect the habitats of these species from further decline;

Protect the species from the adverse effect of development; and

Refuse planning permission for development, if significant harm resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for.

Although not currently a legal obligation, the NPPF refers to biodiversity and environmental net gains in the following paragraphs:

Transport Infrastructure

- Paragraph 102. *"Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

*d) the environmental impacts of traffic and transport infrastructure can be identified assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for **net environmental gains**."*

Planning Decisions

- Paragraph 120. *"Planning policies and decisions should a) encourage multiple benefits from both urban and rural land ... and taking opportunities to **achieve net environmental gains - such as developments that would enable new habitat creation**."*
- Paragraph 174. *"Planning policies and decisions should contribute to and enhance the natural and local environment by: ... d) minimising impacts on and **providing net gains** for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures."*
- Paragraph 179. *"To protect and enhance biodiversity and geodiversity plans should b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the*

*protection and recovery of priority species; and identify and pursue opportunities for securing **measurable net gains for biodiversity.***

- Paragraph 180. *“When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; ... and d) ... opportunities to improve biodiversity improvements in and around developments should be integrated as part of their design, especially where this can secure **measurable net gains for biodiversity.**”*

Natural Environment and Rural Countryside Act

The Natural Environment and Rural Countryside (NERC) Act (HMSO, 2006) requires public bodies, including local authorities, *‘to have regard to the conservation of biodiversity in England when carrying out their normal functions’*.

Section 40 sets out that:

Paragraph 1. *“Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”*; and that

Paragraph 3. *“Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat”*.

Section 41 sets out that:

Paragraph 1. *“The Secretary of State must... publish a list of the living organisms and types of habitat ... of principal importance for the purpose of conserving biodiversity”* based on consultation with Natural England; and that

Paragraph 3a. Every planning authority must *“a) take such steps... to further the conservation of the living organisms and types of habitat included in any list published under this section, or (b) promote the taking by others of such steps”*.

Environment Act

Schedule 7a of the Environment Act (HMSO, 2021) makes provision for grants of planning permission in England to be subject to a condition to secure that the biodiversity gain objective is met.

Schedule 7a Part 1 sets out that:

(1) The biodiversity gain objective is met in relation to development for which planning permission is granted if the biodiversity value attributable to the development exceeds the pre-development biodiversity value of the onsite habitat by at least the relevant percentage.

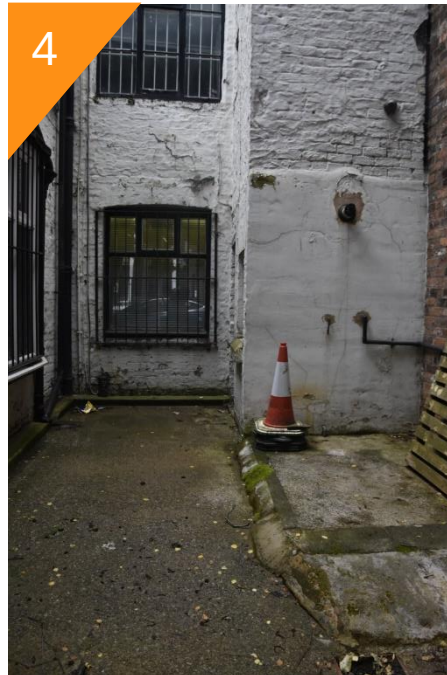
(2) The biodiversity value attributable to the development is the total of—
(a) the post-development biodiversity value of the onsite habitat,

(b) the biodiversity value, in relation to the development, of any registered offsite biodiversity gain allocated to the development, and

(c) the biodiversity value of any biodiversity credits purchased for the development.

(3) The relevant percentage is 10%.

Appendix 4: Site Photos



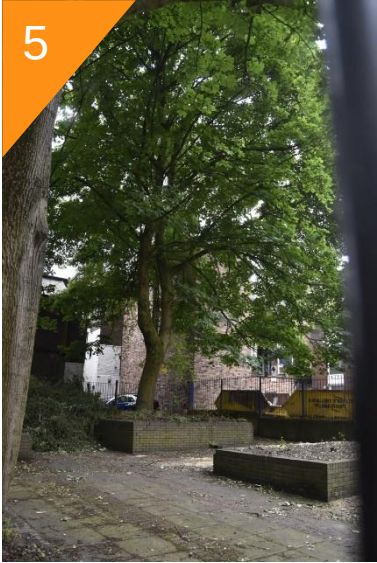
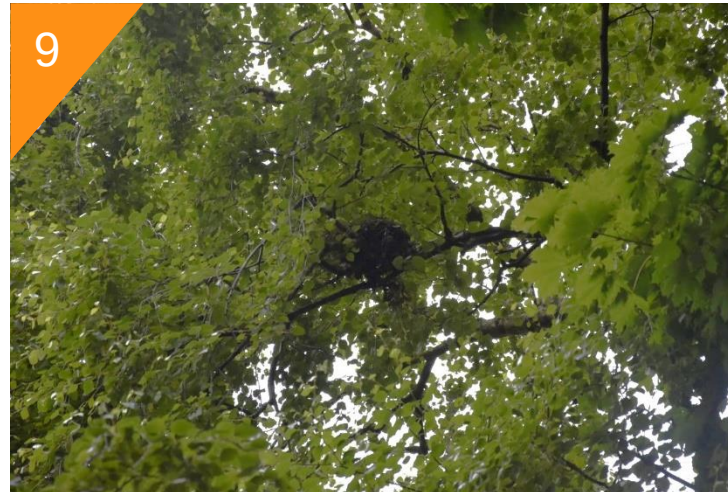
- Photo 1 u1b5 – building (southern aspect)
- Photo 2 u1b5 – building (eastern aspect)
- Photo 3 u1b5 – building (northern aspect)
- Photo 4 u1b6 – other developed land (concrete)

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Appendix 4 Site Photographs

Ecus Ltd.

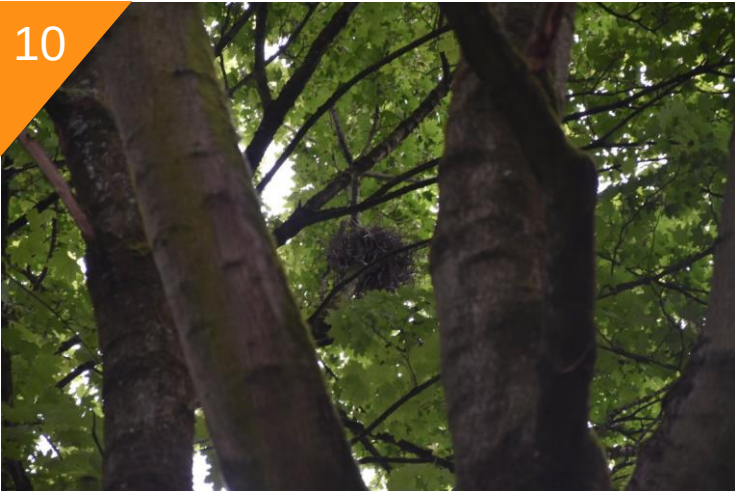
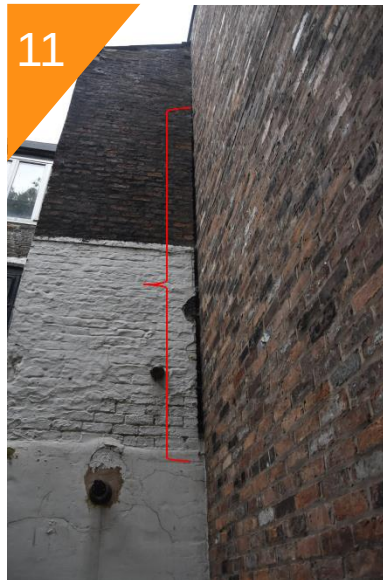
MIOC, Styal Road, Wythenshawe, Manchester, M22 5WB



- Photo 5 u1b6 – other developed land (paving and raised planters)
- Photo 6 u1b6 – other developed land (paving and raised planters)
- Photo 7 u1f – sparsely vegetated urban land with bare ground (510) and scattered trees (32)
- Photo 8 u1f – sparsely vegetated urban land with bare ground (510) and felled trees (206)
- Photo 9 TN1 – small bird's nest in silver birch (south-western corner of the courtyard)

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Appendix 4: Site Photographs



- Photo 10 TN1 – large bird's nest in Norway maple tree (central to courtyard)
- Photo 11 TN2 – linear crack on north-west wall and adjoining property
- Photo 12 TN2 – holes above window (western aspect)
- Photo 13 TN2 - gaps in fascia board (western aspect)

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Appendix 4: Site Photographs

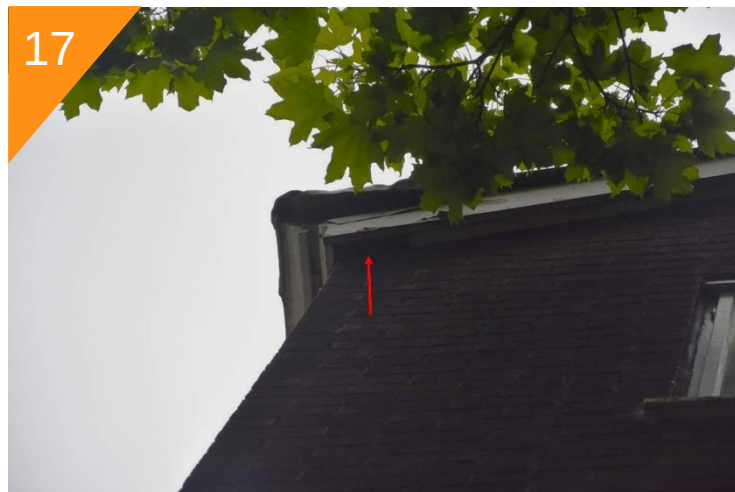


Photo 14 TN2 - gaps in fascia board (western aspect)

Photo 15 TN2 – gap in fascia boarding and downpipe (eastern aspect)

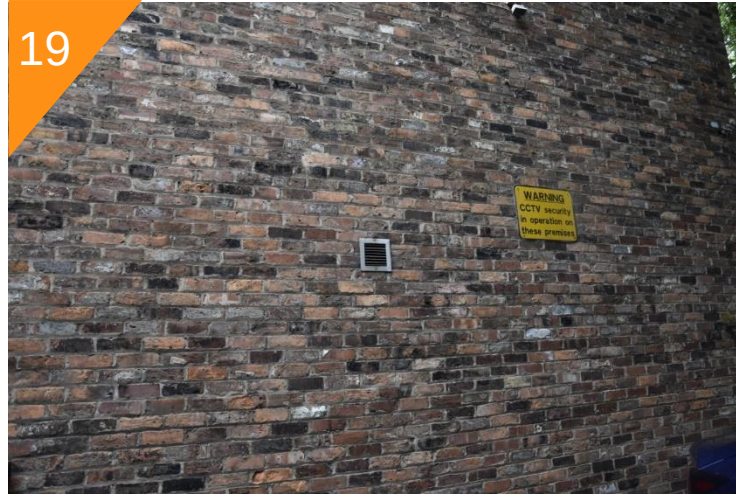
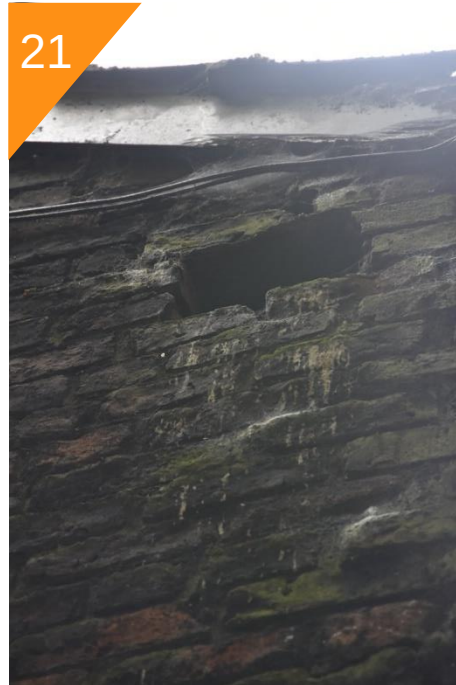
Photo 16 TN2 – gaps along corning (southern aspect)

Photo 17 TN2 - gap at end of soffit box



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Appendix 4: Site Photographs



- Photo 18 TN2 – broken vents on back door
- Photo 19 TN2 – open air vent on adjoining property wall
- Photo 20 TN3 – bat roost entrance (upper floor, western aspect)
- Photo 21 TN4 – open-air brick cavity (north aspect)

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Appendix 4: Site Photographs



Photo 22 TN5 - brash pile

Photo 23 TN6 – bat droppings in roof space (eastern aspect)

Photo 24 TN7 – gap between fascia and wall (eastern aspect)

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Appendix 4: Site Photographs

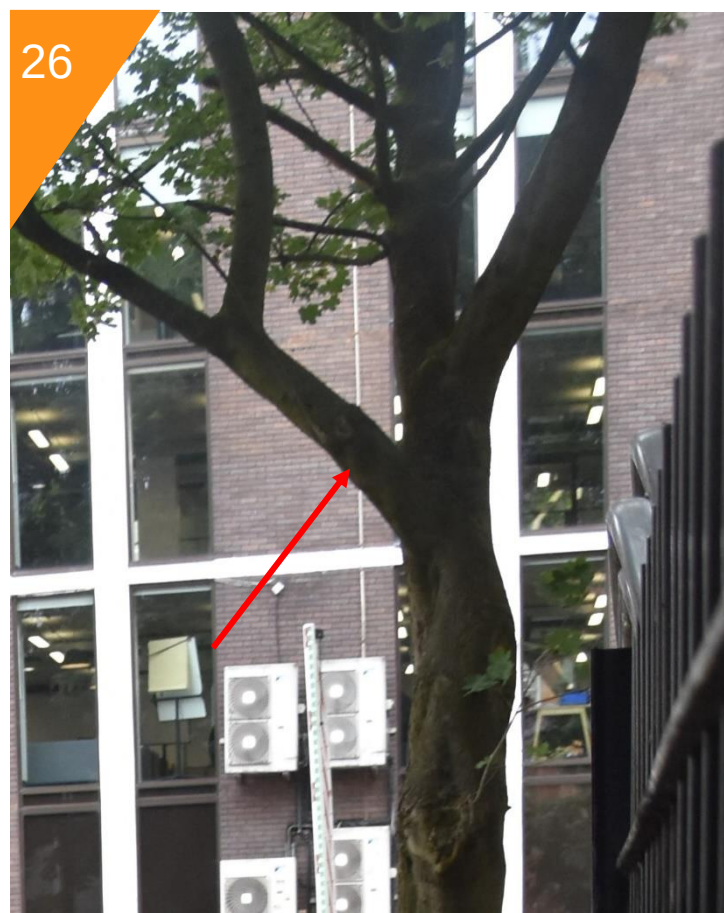


Photo 25 TN2 – knotholes in silver birch

Photo 26 TN2 – knothole in Norway maple tree

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Appendix 4: Site Photographs

Appendix 5: European Protected Species Licences - Bats

Case reference of granted application	Species on the licence	Licence Start Date	Licence End Date	Does licence impact on a breeding site	Does licence allow damage of a resting place	Does licence allow destruction of breeding site	Does licence allow destruction of a resting place	Distance from Site (m)	Direction
EPSM2012-4767	C-PIP	28/08/2012	30/09/2013	N	-	N	Y	59	NE
EPSM2012-5061	BLE	10/12/2012	31/08/2015	Y	-	Y	Y	59	NE
2020-45213-EPS-MIT	C-PIP	05/03/2020	01/01/2025	N	N	N	Y	325	NE
EPSM2013-5575	C-PIP	23/05/2013	30/09/2016	N	-	N	N	544	SE
2018-33674-EPS-MIT	C-PIP	12/03/2018	30/04/2040	N	Y	N	Y	625	NE
2015-16009-EPS-MIT	C-PIP	28/01/2016	27/01/2021	N	N	N	Y	685	NW
2017-31569-EPS-MIT	C-PIP	26/10/2017	31/10/2019	N	N	N	Y	856	N
2014-4219-EPS-MIT	C-PIP	27/10/2014	31/10/2020	N	N	N	Y	874	NE
2014-3569-EPS-MIT	C-PIP	07/10/2014	30/11/2014	N	N	N	Y	932	NW
2014-490-EPS-MIT	C-PIP S-PIP	23/04/2014	30/06/2017	N	N	N	Y	1022	E
2014-6380-EPS-MIT	C-PIP	18/02/2015	16/02/2020	N	N	N	Y	1120	NE
2014-6380-EPS-MIT-1	C-PIP	01/12/2015	16/02/2020	N	N	N	Y	1120	NE
2014-6380-EPS-MIT-2	C-PIP	15/08/2017	30/06/2023	N	N	N	Y	1120	NE
2019-38955-EPS-MIT	C-PIP	14/02/2019	28/02/2021	N	Y	N	Y	1441	SE
EPSM2013-5644	C-PIP	04/07/2013	01/03/2015	N	-	N	Y	1508	NE
2020-50604-EPS-MIT	C-PIP	22/01/2021	16/01/2022	N	N	N	Y	1590	SE
2016-24504-EPS-MIT	C-PIP	15/07/2016	01/01/2018	N	N	N	Y	1625	NE
2016-24504-EPS-MIT-1	C-PIP	21/11/2016	21/11/2016	N	N	N	Y	1625	NE
2014-3531-EPS-MIT	C-PIP	01/10/2014	30/09/2019	N	N	N	Y	1748	NE
2014-3531-EPS-MIT-1	C-PIP	06/01/2015	30/09/2020	N	N	N	Y	1748	NE
2014-3531-EPS-MIT-2	C-PIP	01/12/2016	01/12/2016	N	N	N	Y	1748	NE
2014-4400-EPS-MIT	C-PIP	23/12/2014	30/04/2015	N	Y	N	N	1916	SE
2014-4400-EPS-MIT-1	C-PIP	25/03/2015	30/04/2015	N	Y	N	N	1916	SE

Appendix 6: 2024 Bat Survey Results



Key

- Site Boundary
- Building
- + Surveyors
- Camera Directions
- Common Pipistrelle



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St John's Street

Figure 1
Nocturnal Bat Survey 1

A	06.09.2024	SB	AP
Rev	Date	Drawn by	Checked by
Site centred on:		SJ 83466 97936	



Key

- Site Boundary
- Building
- + Surveyors
- Camera Directions
- ★ Bat Roosts
- ↗ Common pipistrelle



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Figure 2
Nocturnal Bat Survey 2

A	06.09.2024	SB	AP
Rev	Date	Drawn by	Checked by
Site centred on:		SJ 83466 97936	



Key

- Site Boundary
- Building
- + Surveyors
- Camera Directions
- ★ Bat Roosts
- ↻ Soprano pipistrelle
- Common pipistrelle



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Figure 3
Nocturnal Bat Survey 3

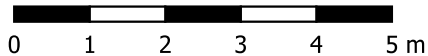
A	06.09.2024	SB	AP
Rev	Date	Drawn by	Checked by
Site centred on:		SJ 83466 97936	

Appendix 7: – Historic and 2024 Bat roosts



Key

-  2020 Historic Bat Roost
-  2024 Confirmed and Possible Roost
-  Site Boundary
-  Buildings



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St John's Street

Appendix 7
Historic and 2024 Bat Roosts

A	17.09.24	EM	JS
Rev	Date	Drawn by	Checked by
Site centred on:		SJ 83466 97936	

Appendix 8: Proposed Development Plan



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Rev	Description	Date	By
P1	Issued for Planning	17.07.20	JB



Client
Owner

Project
St John Street

Title
Proposed Site Plan

Status
Planning

Project number	Date
1084	07/16/20

Drawn by	Checked by
JB	Checker

Scale	Revision
1 : 200@A1	P1

Drawing No
1084-TGA-ZZ-ZZ-DR-A-0201

Appendix 9: BNG Baseline Calculations and Condition Scores

Appendix 10: BNG Post Development Calculations

Appendix 11: SBM Option 1 and Option 2

