



ECOLOGYSOLUTIONS

Part of the ES Group

SAFESTORE,
CHEETHAM HILL,
MANCHESTER

Ecological Assessment

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CONTENTS

1	INTRODUCTION	1
2	SURVEY METHODOLOGY	2
3	ECOLOGICAL FEATURES	4
4	WILDLIFE USE OF THE SITE	6
5	ECOLOGICAL EVALUATION	8
6	PLANNING POLICY CONTEXT	13
7	SUMMARY AND CONCLUSIONS	16

PLANS

PLAN ECO1	Site Location and Ecological Designations
PLAN ECO2	Ecological Features

PHOTOGRAPHS

PHOTOGRAPH 1:	Building B1
PHOTOGRAPH 2	Building B1 interior
PHOTOGRAPH 3	Building B2
PHOTOGRAPH 4	Building B3
PHOTOGRAPH 5	Hardstanding (southeast car storage area)
PHOTOGRAPH 6	Colonising vegetation, including Japanese Knotweed
PHOTOGRAPH 7	Japanese Knotweed encroaching onto site
PHOTOGRAPH 8	Amenity grassland

APPENDICES

APPENDIX 1	Information downloaded from Multi-Agency Geographic Information for the Countryside (MAGIC)
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1. INTRODUCTION

1.1. Background & Proposals

- 1.1.1. Ecology Solutions was commissioned in August 2023 by Vincent & Goring, on behalf of Safestore, to undertake an ecological assessment of the proposed development at Safestore, Cheetham Hill, Manchester (see Plan ECO1).
- 1.1.2. The proposals are for an extension to the east of the existing warehouse building and the installation of further storage units to the south of the site. This includes the demolition of an ancillary structure to the east to accommodate the warehouse extension.

1.2. Site Characteristics

- 1.2.1. The site is situated in Cheetham Hill, a heavily urbanised area in Manchester city centre. This location supports a mosaic of light industrial and residential areas, of which the development site is a part. The site is flanked by Cheetham Hill Road (A665) to the west and Stocks Street to the east, with industrial buildings surrounding the site in all directions. Said buildings separate the development site from large residential areas to the north and east. The site lies directly north of the Manchester Jewish Museum, on Broughton Street and Melloy Place, and south of a car wash facility off North Street, located along the entire northern boundary.
- 1.2.2. The site is an operational Safestore facility, consisting of a storage building, adjoining car park and ancillary structures. A strip of amenity grassland is present along the western site boundary.

1.3. Ecological Assessment

- 1.3.1. This document assesses the ecological interest of the site. The importance of the habitats within the site is evaluated with due consideration given to the guidance published by the Chartered Institute of Ecology and Environmental Management (CIEEM)¹.
- 1.3.2. Where necessary, mitigation measures are recommended so as to safeguard any significant existing ecological interest within the site and, where appropriate, potential enhancement measures are put forward and reference made to both national and local biodiversity priorities.

¹CIEEM (2018). *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*. Version 1.2 – Updated April 2022. Chartered Institute of Ecology and Environmental Management, Winchester.

2. SURVEY METHODOLOGY

2.1. The methodology utilised for the survey work can be split into three areas, namely desk study, habitat survey and faunal survey. These are discussed in more detail below.

2.2. Desk Study

2.2.1. In order to compile background information for the site and surrounding area, Ecology Solutions contacted the Greater Manchester Ecology Unit (GMEU).

2.2.2. Further information on designated sites from a wider search area was also obtained from the online Multi-Agency Geographic Information for the Countryside (MAGIC)² database, which uses information held by Natural England and other organisations. This information is reproduced in Appendix 1 and where appropriate on Plan ECO1.

2.2.3. When approximating the distance of records to the site, a red line boundary was produced, which included the extent of the area marked for development. All records have been measured to this boundary.

2.3. Habitat Survey

2.3.1. A habitat survey was carried out by Ecology Solutions in November 2023 in order to ascertain the general ecological value of the site and to identify the main habitats and associated plant species.

2.3.2. The site was surveyed based around extended Phase 1 Habitat Survey methodology³, as recommended by Natural England, whereby the habitat types present are identified and mapped, together with an assessment of the species composition of each habitat. This technique provides an inventory of the basic habitat types present and allows identification of areas of greater potential which require further survey. Any such areas identified can then be examined in more detail.

2.3.3. Using the above method, the land subject to the survey was classified into areas of similar botanical community types, with a representative species list compiled for each habitat identified.

2.3.4. All the species that occur in each habitat would not necessarily be detectable during survey work carried out at any given time of the year, since different species are apparent at different seasons. The initial habitat survey was undertaken outside the optimal period for Phase 1 surveys, but, given the habitats present and the urban nature of the site, it is considered that an accurate and robust assessment has been made.

²<http://www.magic.gov.uk>

³ Joint Nature Conservation Committee (2010). *Handbook for Phase 1 Habitat Survey – a Technique for Environmental Audit*. England Field Unit, Nature Conservancy Council, reprinted JNCC, Peterborough.

2.4. Faunal Survey

2.4.1. Obvious faunal activity, such as birds or mammals observed visually or by call during the course of the surveys, was recorded. Specific attention was paid to any potential use of the site by protected species, priority species, or other notable species.

2.4.2. Specific surveys were undertaken in respect of bats.

Bats

2.4.3. A field survey was undertaken with regard to best practice guidelines issued by Natural England (2004⁴), the Joint Nature Conservation Committee (2004⁵) and the Bat Conservation Trust (2016⁶).

2.4.4. The buildings within the site were assessed for their potential to support bats. The probability of a building being used by bats as a summer roost site increases if it:

- is largely undisturbed;
- dates pre-20th Century;
- has a large roof void with unobstructed flying spaces;
- has access points for bats (e.g. along gaps at the eaves, under gaps in the roofing tiles, or along gaps within the built structure);
- has a roof void which is not too draughty;
- has wooden cladding;
- has hanging tiles; and / or
- is in a rural setting and close to woodland and water features.

2.4.5. Exterior checks of the buildings were also undertaken in order to search for signs of any use by bats.

2.4.6. The potential opportunities for both foraging and commuting bats were also considered in terms of the habitats present within and immediately adjacent to the site.

⁴ Mitchell-Jones, A. J. (2004). *Bat Mitigation Guidelines*. English Nature, Peterborough.

⁵ Mitchell-Jones, A.J. & McLeish, A.P. (Eds.) (2004). *Bat Workers' Manual*. 3rd edition. Joint Nature Conservation Committee, Peterborough.

⁶ Collins, J. (2023). *Bat Surveys for Professional Ecologists: Good Practice Guidelines*. 4th Edition. The Bat Conservation Trust, London

3. ECOLOGICAL FEATURES

3.1. A habitat survey of the site was undertaken by Ecology Solutions in November 2023. The following main habitat / vegetation types were identified within the site:

- Buildings;
- Hardstanding; and
- Amenity Grassland.

3.2. The location of these habitats is shown on Plan ECO2, and they are described below.

3.3. Buildings

- 3.3.1. The main operational Safestore building (see Photograph 1) is divided into two sections. The larger double height warehouse (Building B1) is constructed of steel and includes roller doors that provide access to the interior. The interior is dominated by a large storage area but includes a network of storage units on the ground floor (see Photograph 2). The interior is well lit and includes skylights.
- 3.3.2. The remaining section of the Safestore building, which adjoins Building B1 to the west, is a two-storey office building (Building B2; see Photograph 3). The building is brick-built, with several windows and a flat roof and is in a good state of repair.
- 3.3.3. Building B3 (see Photograph 4) is an ancillary steel structure present along the eastern boundary of the site. It consists of eight storage units with roller doors and a flat, sloping roof. The structure is in good condition.

3.4. Hardstanding

- 3.4.1. A large portion of the site comprises hardstanding (see Photograph 5). This includes two areas along the eastern site boundary, comprising the northeast and southeast sections of the site, that are used for the open storage of cars, including several dilapidated vehicles. These storage areas are sectioned off by steel fencing, which extends along much of the site perimeter. Hardstanding in the centre of the site, adjacent to the south of Buildings B1 and B2, constitutes a car park.
- 3.4.2. Some plant species have begun to colonise areas of hardstanding at the margins of the site (see Photograph 6), most significantly *Buddleia* *Buddleia davidii*, which appears to be cut back periodically. Other species present include Herb Robert *Geranium robertianum*, Michaelmas-daisy *Aster*, Broad-leaved Willowherb *Epilobium montanum*, Dandelion *Taraxacum officinale*, Groundsel *Senecio vulgaris*, Canadian Fleabane *Conyza canadensis*, Bramble *Rubus fruticosus*, Wall Lettuce *Lactuca muralis*, Ribwort Plantain *Plantago lanceolata*, Annual Meadow-grass *Poa annua*, Petty Spurge *Euphorbia peplus*, Prickly Sow-thistle *Sonchus asper* and Ivy-leaved Toadflax *Cymbalaria muralis*. This vegetation is not sufficient to constitute a separate habitat, however.
- 3.4.3. The southwest boundary of the site has a significant number of self-sown shrubs on, or just outside of, the fence line. This consists mostly of

Buddleia, but also includes Silver Birch *Betula pendula* and Grey Willow *Salix cinerea*.

- 3.4.4. Small stands of Japanese Knotweed *Reynoutria japonica* are present within / adjacent to the site (see Photographs 6 and 7). Specimens are growing along the site boundary adjacent to Melloy Place in the southwest. A small stand is also present a short distance to the north of this boundary, growing within the site itself. The location of Japanese Knotweed is shown on Plan ECO2.
- 3.4.5. Along the northern boundary, behind the main building, the land was inaccessible. However, several large Elder *Sambucus nigra* shrubs were observed. Buddleia was also visible from the easterly side of the building along this boundary.

3.5. Amenity Grassland

- 3.5.1. A strip of amenity grassland is present along the western boundary of the site, fronting onto Cheetham Hill Road (see Photograph 8). This grassland is broken into three sections by stairs that provide access to the adjacent Building B2. At the time of survey, these areas had not been subject to recent management. Species present include Perennial Rye Grass *Lolium perenne*, Dandelion, Creeping Buttercup *Ranunculus repens*, Nipplewort *Lapsana communis*, Michaelmas-daisy, Creeping Thistle *Cirsium arvense*, Red Clover *Trifolium pratense*, Yarrow *Achillea millefolium*, Ribwort Plantain, Cocksfoot *Dactylis glomerata*, Cat's-ear *Hypochaeris radicata*, Common Bent *Agrostis capillaris*, Curled Dock *Rumex crispus*, Common Nettle *Urtica dioica* and Ragwort *Senecio jacobaea*.
- 3.5.2. The southern-most grassland verge grades into a slope with concrete blocks, which formerly formed boundary features facing onto Cheetham Hill Road at this location. Grassland here is of similar composition to the remaining grassland areas.

3.6. Background Records

- 3.6.1. Two records were returned by the data search relating to plant species of conservation concern. Records pertain to Yellow Bird's-nest *Hypopitys monotropa*, listed as a priority species by the UK Biodiversity Action Plan (UKBAP). Both records occur approximately 0.5 km to the east of the site and date from 2017.

4. WILDLIFE USE OF THE SITE

- 4.1. General observations were made during the surveys of any faunal use of the site, with specific attention paid to the potential presence of protected species.

4.2. Bats

- 4.2.1. The buildings on-site do not offer suitable bat roosting habitat. No entry points for bats into the buildings were identified and there are no obvious roosting features externally. The interiors, similarly, did not provide suitable roosting space and no evidence of bat presence, such as droppings or food debris, was observed within the buildings.
- 4.2.2. The immediate surroundings of the site do not offer any bat foraging or commuting opportunities and they are considered absent from the site.
- 4.2.3. The data search returned 24 records of bats that occur within a 2.5 km search radius of the site in the last decade. Records pertain to Common Pipistrelle *Pipistrellus pipistrellus* and unspecified Pipistrelle species *Pipistrellus* sp. The closest record pertains to Common Pipistrelle, located approximately 0.1 km west of the site in 2013. The most recent record is of an unspecified Pipistrelle species *Pipistrellus* sp., observed approximately 1.3 km southeast of the site in 2022.

4.3. Badgers

- 4.3.1. No signs of Badger *Meles meles* were recorded during the survey and the habitats present on site provide negligible opportunities for this species. They are considered absent from the site and pose no constraint to the development.
- 4.3.2. No records of Badgers were returned by the data search.

4.4. Hedgehogs

- 4.4.1. No signs of Hedgehog *Erinaceus europaeus* presence was recorded during the survey and the limited vegetation present on site provides negligible opportunities for this species.
- 4.4.2. Four records of Hedgehog were returned by the data search. The closest record was located 0.9 km south of the site and occurred in 2020. The most recent record dates from 2021 and was located approximately 0.9km northeast of the site.

4.5. Birds

- 4.5.1. Foraging opportunities for birds are limited, but the buildings present on-site offer potential nesting habitat. No birds nor bird nests were observed on-site during survey work.
- 4.5.2. Forty-one records of bird species protected under the Wildlife and Countryside Act 1981 (as amended) were returned by the data search. Species include Black Redstart *Phoenicurus ochruros*, Bullfinch *Pyrrhula pyrrhula*, Dunnock *Prunella modularis*, Herring Gull *Larus argentatus*,

House Sparrow *Passer domesticus*, Kingfisher *Alcedo atthis*, Peregrine *Falco peregrinus*, Song Thrush *Turdus philomelos* and Starling *Sturnus vulgaris*.

- 4.5.3. The closest record pertains to Starling, observed approximately 0.2 km southeast of the site in 2019. The most recent record pertains to Peregrine, observed approximately 1.3 km southwest of the site in 2022.
- 4.5.4. The data search also returned two records of birds listed in the UKBAP, including Cuckoo *Cuculus canorus*, and Yellow Wagtail *Motacilla flava*. The closest and most recent record pertains to Yellow Wagtail, located approximately 0.4 km south of the site in 2022.

4.6. Reptiles

- 4.6.1. The habitats present on site are not suitable for reptiles, and none were recorded during the survey. No further consideration is necessary for this group.
- 4.6.2. No records of reptiles were returned by the data search.

4.7. Amphibians

- 4.7.1. The habitats present on site are unsuitable for amphibians in their terrestrial and aquatic phases and, given the location of the site, it is highly unlikely that they would be present.
- 4.7.2. No records of amphibians were returned by the data search.

4.8. Invertebrates

- 4.8.1. The limited vegetation, including grassland and sections of colonising vegetation, provide some limited habitat suitable for invertebrates. It is likely a limited assemblage of common invertebrate species is present within the site, but there is no reason to suspect the presence of invertebrate species of elevated conservation concern.
- 4.8.2. Two invertebrate records were returned by the data search. The closest record relates to White-letter Hairstreak *Satyrrium w-album*, recorded approximately 0.7 km northeast of the site in 2019. The most recent record pertains to Cinnabar *Tyria jacobaeae* observed approximately 1.4 km southeast of the site in 2019.

5. ECOLOGICAL EVALUATION

5.1. The Principles of Ecological Evaluation

- 5.1.1. The guidelines for ecological evaluation produced by CIEEM propose an approach that involves professional judgement, but makes use of available guidance and information, such as the distribution and status of the species or features within the locality of the project.
- 5.1.2. The methods and standards for site evaluation within the British Isles have remained those defined by Ratcliffe⁷. These are broadly used across the United Kingdom to rank sites so priorities for nature conservation can be attained. For example, current Sites of Special Scientific Interest (SSSI) designation maintains a system of data analysis that is roughly tested against Ratcliffe's criteria.
- 5.1.3. In general terms, these criteria are size, diversity, naturalness, rarity, and fragility, while additional secondary criteria of typicalness, potential value, intrinsic appeal, recorded history, and the position within the ecological / geographical units are also incorporated into the ranking procedure.
- 5.1.4. Any assessment should not judge sites in isolation from others, since several habitats may combine to make it worthy of importance to nature conservation.
- 5.1.5. Further, relying on the national criteria would undoubtedly distort the local variation in assessment and therefore additional factors need to be considered, e.g., a woodland type with a comparatively poor species diversity, common in the south of England, may be of importance at its northern limits, say, in the border country.
- 5.1.6. In addition, habitats of local importance are often highlighted within a local Biodiversity Action Plan (BAP). The Manchester Biodiversity Strategy (2022-2030) has been considered as part of this assessment and is referenced where relevant.
- 5.1.7. Levels of importance can be determined within a defined geographical context from the immediate site or locality through to the international level.
- 5.1.8. The legislative and planning policy context are also important considerations and have been given due regard throughout this assessment.

5.2. Habitat Evaluation

Designated Sites

- 5.2.1. **Statutory Sites:** There are no statutory designated sites within or adjacent to the development site. The closest statutory site is The Cliff / Kersal Dale Local Nature Reserve (LNR), located approximately 2.1km northwest of the site. This area is designated for its wide range of habitats, including

⁷ Ratcliffe, D A (1977). *A Nature Conservation Review: The Selection of Biological Sites of National Importance to Nature Conservation in Britain*. Two Volumes. Cambridge University Press, Cambridge.

areas of neutral and acid grassland, tall herb vegetation, swamp, marsh, scrub, and both planted and semi-natural woodland. Birds and mammals have not been extensively recorded but the site has suitability for a good range of invertebrates. The development site is separated from The Cliff / Kersal Dale LNR by a densely built-up industrial / residential area and no adverse effects are anticipated to occur at this designated site resulting from the development.

- 5.2.2. The site is situated within an impact risk zone associated with Rochdale Canal SSSI, located approximately 4.7km northeast of the site. The nature of the proposed development does not meet any criteria that would require consultation with Natural England regarding impact risks, and these do not pose a hindrance to the development.
- 5.2.3. **Non-statutory Sites:** There are no non-statutory sites of conservation concern within or adjacent to the site. The closest non-statutory site is Rochdale Canal Site of Biological Importance (SBI), particularly the section of Stott's Lane to Ducie Street Basin which is located approximately 1.5 km southeast of the development site at its closest point. This site supports important populations of Floating Water-plantain *Luronium natans* (a UKBAP priority species). The canal also supports rare aquatic invertebrates, such as White-Clawed Crayfish *Austropotamobius pallipes*.
- 5.2.4. Kersal Dale, a section of The Cliff / Kersal Dale LNR, is also a designated SBI, present approximately 2.1km northwest of the development site.
- 5.2.5. The Reservoirs at Harpurhey SBI, located approximately 2.2km northeast of the site, includes two open water reservoirs and one colonised entirely by swamp, supporting a rich aquatic flora and fauna with marginal swamp and scrub.
- 5.2.6. Due to the nature of the proposed plans, the distance from the development site and the intermittent land uses, no adverse effects are expected on any local non-statutory sites.
- 5.2.7. The locations of local statutory and non-statutory designated sites are shown on Plan ECO1.

Habitats

- 5.2.8. The development proposals entail the erection of buildings in areas that currently comprise hardstanding / buildings. Given that neither represent ecologically valuable habitat, there will be no detriment to the ecological value the site provides. Small losses to marginal vegetation may occur, but species present here are not of elevated ecological interest. Indeed, much of this marginal vegetation is comprised of undesirable species, such as Buddleia or Japanese Knotweed, the removal of which is recommended (see below).

Biodiversity Net Gain

- 5.2.9. The development involves the replacement of like-for-like habitat and the habitat of greatest interest (relatively speaking) within the context of the

site, namely the grassland, is to be retained. Therefore, no net loss is expected to occur. Owing to the low ecological value of the site, net gain in biodiversity could easily be achieved by the provision of areas of amenity planting.

- 5.2.10. Guidance regarding Biodiversity Net Gain is provided by the Greater Manchester Combined Authority (GMCA). This guidance includes a requirement of 10% net gain in biodiversity post-development.

Invasive Species

- 5.2.11. Japanese Knotweed was observed within and adjacent to the site. Japanese Knotweed is listed under Schedule 9 Part II of the Wildlife and Countryside Act 1981 (as amended), and it is an offence to plant it or otherwise cause it to grow in the wild. Moreover, all parts of the plant and the substrate in which it grows are treated as controlled waste. Advice is generally that the presence of underground rhizomes should be assumed up to 7m from the visible plant. The species is highly invasive and known for its ability to grow through concrete and tarmac, and to regenerate from small fragments. Its treatment prior to commencement of development is strongly recommended. A specialist contractor should be consulted on the best approach given the constraints of the site.
- 5.2.12. Buddleia specimens were also identified within the site and their removal is similarly recommended. Although control is not a legal requirement for Buddleia, it is non-native and aggressively competes with native species. Thus, reasonable measures should be taken to prevent its spread. Where vegetation is to be removed, the material should be disposed of at an approved facility.

5.3. Faunal Evaluation

Bats

- 5.3.1. **Legislation.** All bats are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and included on Schedule 2 of the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations"). These include provisions making it an offence:
- Deliberately to kill, injure or take (capture) bats;
 - Deliberately to disturb bats in such a way as to:-
 - (i) be likely to impair their ability to survive, to breed or rear or nurture their young; or to hibernate or migrate; or
 - (ii) affect significantly the local distribution or abundance of the species to which they belong;
 - To damage or destroy any breeding or resting place used by bats;
 - Intentionally or recklessly to obstruct access to any place used by bats for shelter or protection (even if bats are not in residence).
- 5.3.2. The words deliberately and intentionally include actions where a court can infer that the defendant knew that the action taken would almost inevitably result in an offence, even if that was not the primary purpose of the act.

- 5.3.3. The offence of damaging (making worse for the bat) or destroying a breeding site or resting place is an absolute offence. Such actions do not have to be deliberate for an offence to be committed.
- 5.3.4. **Site Usage.** Buildings on-site were found to be unsuitable for roosting bats and no evidence for their presence was found during survey work. The habitats present with the site and in the surrounding area present no foraging or commuting opportunities for bats and they are considered absent from the site.
- 5.3.5. **Mitigation and Enhancements.** The provision of bat boxes on newly erected buildings would provide new roosting opportunities for bats post-development.

Hedgehogs

- 5.3.6. **Legislation.** Hedgehogs are not a protected species, but they are a priority species under Section 41 of the NERC Act 2006. The NERC Act 2006 requires the Secretary of State to:
- ...take such steps as appear...to be reasonably practicable to further the conservation of the living organisms and types of habitats included in any list published under this section, or...promote the taking by others of such steps.**
- 5.3.1. **Site Usage.** The site is currently of negligible value to Hedgehogs and other small mammal species. No evidence of Hedgehog presence was observed during survey work.
- 5.3.2. **Mitigation and Enhancements.** Any newly erected fencing should incorporate 'Hedgehog Gateways' to ensure the permeability of the site to Hedgehogs and other small mammals, post-development.

Birds

- 5.3.3. **Legislation.** Section 1 of the Wildlife and Countryside Act is concerned with the protection of wild birds. With certain exceptions, all wild birds and their eggs are protected from international killing, injuring, and taking; and their nests, whilst being built or in use, cannot be taken, damaged or destroyed.
- 5.3.4. Schedule 1 lists species which are protected by special (i.e. greater) penalties. These species also enjoy additional protection whilst breeding, as it is also an offence to disturb adults or their dependant young when at the nest.
- 5.3.5. **Site Usage.** The buildings on site offer some opportunities for nesting birds. There are limited bird foraging opportunities on site, however, and no birds nor bird nests were noted within the site during survey work.
- 5.3.6. **Mitigation and Enhancements.** The development will involve the demolition of Building B3 to facilitate the extension. However, it is not considered that this structure provides potential bird nesting habitat, and this demolition can proceed without the need for any nesting bird checks.

- 5.3.7. The provision of bird boxes on new and existing buildings would improve nesting opportunities for birds on-site post-development.

6. PLANNING POLICY CONTEXT

- 6.1. The planning policy framework that relates to nature conservation in at the site is issued at two main administrative levels: nationally through National Planning Policy Framework (NPPF) and, at the local level, through the Manchester Local Plan – Core Strategy and retained policies of the Manchester Unitary Development Plan (UDP). Any proposed development will be judged in relation to the policies contained within these documents. Guidance relevant to ecology and nature conservation is also provided at the local level by the Greater Manchester Combined Authority (GMCA), and relevant documentation provided by this authority is also discussed.

6.2. National Policy

National Planning Policy Framework (September 2023)

- 6.2.1. National policy for biodiversity and geological conservation is provided by the National Planning Policy Framework (NPPF), revised most recently in September 2023. It is noted that the NPPF continues to refer to further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system provided by Circular 06/05 (DEFRA / ODPM, 2005) accompanying the now-defunct Planning Policy Statement 9 (PPS9).
- 6.2.2. The key element of the NPPF is that there should be “a presumption in favour of sustainable development” (paragraphs 10 to 11). It is important to note that this presumption “does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site” (paragraph 182). ‘Habitats site’ has the same meaning as the term ‘European site’ as used in the Habitats Regulations 2017.
- 6.2.3. Hence, the direction of Government policy is clear. That is, the presumption in favour of sustainable development is to apply in circumstances where there is potential for an effect on a European site, if it has been shown that there will be no adverse effect on that designated site as a result of the development in prospect.
- 6.2.4. The NPPF refers to minimisation of impacts to and net gains for biodiversity (paragraph 174). The NPPF also considers the strategic approach that Local Authorities should adopt with regard to the protection, maintenance and enhancement of green infrastructure, priority habitats and ecological networks, and the recovery of priority species.
- 6.2.5. Paragraphs 179 to 181 of the NPPF comprise a number of principles that Local Authorities should apply, including encouraging opportunities to incorporate biodiversity in and around developments; provision for refusal of planning applications if significant harm cannot be avoided, mitigated or compensated for; applying the protection given to European sites to potential Special Protected Areas (SPA), possible Special Areas of Conservation (SAC), listed or proposed Ramsar sites and sites identified (or required) as compensatory measures for adverse effects on European

sites; and the provision for the refusal for developments resulting in the loss or deterioration of 'irreplaceable' habitats – unless there are 'wholly exceptional reasons' (for instance, infrastructure projects where the public benefit would clearly outweigh the loss or deterioration of habitat) and a suitable compensation strategy exists .

- 6.2.6. National policy therefore implicitly recognises the importance of biodiversity and that with sensitive planning and design, development and conservation of the natural heritage can co-exist, and benefits can, in certain circumstances, be obtained.

6.3. Local Policy

Manchester Local Plan – Core Strategy (2012-2027)

- 6.3.1. The Core Strategy is the principal document within the Manchester Local Plan. The document sets out the long-term strategic policies for Manchester's future development and forms the framework against which planning applications will be assessed. This document includes two policies that relate to ecology and nature conservation, which are described below.
- 6.3.2. **Policy EN9: Green Infrastructure.** This policy states that development will be expected to maintain and enhance the quality and quantity of green infrastructure.
- 6.3.3. **Policy EN15: Biodiversity and Geological Conservation.** This policy states that the Council will seek to maintain or enhance biodiversity throughout the city. Particular consideration will be given to designated sites (both statutory and non-statutory), protected and priority species, and trees and woodlands.
- 6.3.4. Policy EN15 further states that developers will be expected to identify and implement opportunities to enhance, restore or create biodiversity, either on-site or off-site, and contribute to linkages between valuable or potentially valuable habitat areas where appropriate. Any adverse effects on biodiversity will need to be justified against the wider benefits of the proposal and, where adverse effects are unavoidable, developers will be required to demonstrate that these will be minimal.

Manchester Unitary Development Plan (UDP)

- 6.3.5. The vast majority of UDP has now been superseded by the policies within the Core Strategy document, although certain policies have been safeguarded and remain applicable and part of the development plan. There is a single extant policy in the UDP that is relevant to ecology and nature conservation, which is described below.
- 6.3.6. **Policy E3.4** states that the Council will create a network of safe and attractive major linear recreational open spaces by linking and making better use of river valleys, canals, disused railways, and other appropriate areas of open space. Specifically, the policy aims to protect the natural environment.

Places for Everyone (GMCA)

- 6.3.7. The Places for Everyone plan is currently in production by GMCA and will include policy relevant to the environmental strategy for Greater Manchester. The Greater Manchester Spatial Framework (GMSF) was initially produced as a joint strategic plan for Greater Manchester. However, following the withdrawal of Stockport Council from this joint plan, a replacement document was required and the Places for Everyone plan began production.
- 6.3.8. Policies within the Places for Everyone plan are not yet available, but those previously produced for the GMSF likely give an idea of their possible nature. In summary, the GMSF sought to retain and enhance the ecological character of Greater Manchester, with an emphasis on improvement of green networks throughout the area. The GMSF stressed the importance of retaining extant ecologically valuable habitat in Greater Manchester, which would largely be possible through the protection of designated sites of nature conservation value. Finally, the GMSF outlined that developments should seek net gains in biodiversity.

GMCA Biodiversity Net Gain – Guidance for Greater Manchester (February 2021)

- 6.3.9. Specific guidance regarding Biodiversity Net Gain has been provided by GMCA and is included within this document. Most notably, Principle 5 outlines that, for developments in Greater Manchester, the minimum acceptable level for net gain is said to be achieved at an increase of 10%, or more, post-development.

6.4. Discussion

- 6.4.1. It is considered that development of the site would not affect any designated sites of nature conservation interest. Further to this, given that the site is of negligible intrinsic ecological value, the proposed development would not result in any reduction in ecological value of the area, and net gains to biodiversity would easily be achievable by an appropriate planting scheme. As such, it is considered that development at the site can be undertaken which fully accords with national and local policy in relation to ecology and nature conservation.

7. SUMMARY AND CONCLUSIONS

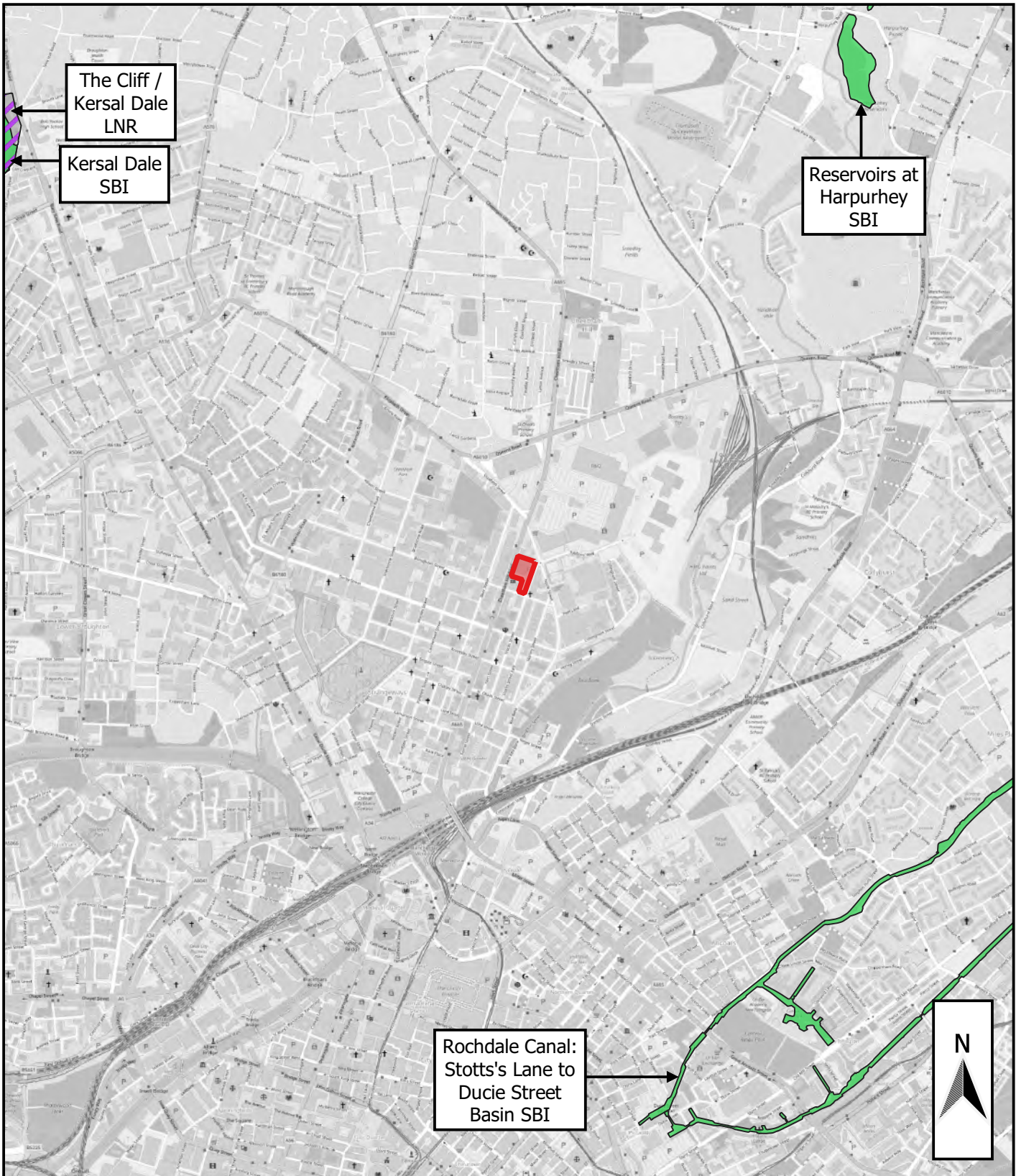
- 7.1. Ecology Solutions was commissioned in August 2023 by Vincent & Goring, on behalf of Safestore, to undertake an ecological assessment of the proposed development at Safestore, Cheetham Hill, Manchester.
- 7.2. The proposals are for an extension to the east of the existing warehouse building, and the installation of further storage units to the south of the site. This includes the demolition of an ancillary structure to the east to accommodate the warehouse extension.
- 7.3. The site is situated within a heavily urbanised area within Manchester city centre, namely Cheetham Hill. It is an operational Safestore facility, consisting of a storage building, adjoining car park and ancillary structures, with a strip of amenity grassland present along the western site boundary.
- 7.4. A habitat survey was carried out by Ecology Solutions in November 2023 to ascertain the general ecological value of the land contained within the site and to identify the main habitats and associated plant species. Specific attention was paid to any potential use of the site by protected species, including bats.
- 7.5. **Statutory Sites.** There are no statutory designations of nature conservation value within the site or immediately adjacent to the site. The nearest statutory site is The Cliff / Kersal Dale LNR located 2.1 km to the northwest of the site.
- 7.6. The site is situated within an impact risk zone associated with Rochdale Canal SSSI. The nature of the proposed development does not meet any criteria that would require consultation with Natural England regarding impact risks, and these do not pose a hindrance to the development.
- 7.7. No adverse effects on any statutory designated sites are anticipated from the development.
- 7.8. **Non-statutory Sites.** Several non-statutory designated sites are present in the local area, the closest of which being Rochdale Canal SBI, present approximately 1.5km southeast of the site. The development site is separated from non-statutory designated sites by extensive areas of industrial / residential land and no adverse effects are expected to be experienced at these sites.
- 7.9. **Habitats.** The development proposals largely include the replacement of areas of hardstanding with buildings. Given that neither represent ecologically valuable habitat, there will be no detriment to the ecological value the site provides. Losses to marginal vegetation will occur, but species present here are not of elevated ecological interest and many of which are invasive / non-native species, the removal of which is recommended.
- 7.10. **Biodiversity Net Gain.** The development involves the replacement of like-for-like habitat and the habitat of greatest importance (relatively speaking) within the context of the site, namely the grassland, is to be retained. Therefore, no net loss is expected to occur. Owing to the low ecological value of the site, net gain in biodiversity could easily be achieved by the provision of areas of amenity planting. It should be noted that a minimum net gain of 10% is required by guidance provided by the GMCA.

- 7.11. **Invasive Species.** Japanese Knotweed was observed within, and adjacent, to the site. Japanese Knotweed is listed under Schedule 9 Part II of the Wildlife and Countryside Act 1981 (as amended) and it is an offence to plant it or otherwise cause it to grow in the wild. Its removal prior to commencement of development is strongly recommended, and a specialist contractor should be consulted for this purpose. Buddleia specimens were also noted throughout the site and their removal is similarly recommended.
- 7.12. **Bats.** The buildings on-site do not offer suitable bat roosting habitat and the habitats present with the site and in the surrounding area present no foraging or commuting opportunities for bats. As a result, they are considered absent from the site. The provision of bat boxes on newly erected buildings would provide new roosting opportunities for bats post-development.
- 7.13. **Badgers.** No signs of Badger were recorded during the survey and the habitats currently present no opportunities for Badgers. They do not pose a constraint to the development.
- 7.14. **Hedgehogs.** No Hedgehogs were recorded during the survey and the habitats currently present on site provide negligible opportunities for this species. It is recommended that any newly erected fencing incorporates 'Hedgehog Gateways' to ensure the permeability of the site to Hedgehogs and other small mammals, post-development.
- 7.15. **Birds.** Building B3 offers no opportunities for nesting birds and its demolition can proceed unhindered. Bird nest boxes should be established on newly erected buildings to improve nesting opportunities for birds, post-development.
- 7.16. **Reptiles.** Habitat on-site and in the surrounding area is unsuitable for reptiles and they are deemed absent from it.
- 7.17. **Amphibians.** Habitat on-site and in the surrounding area is unsuitable for amphibians and they are deemed absent from it.
- 7.18. **Invertebrates.** The habitats present are likely to provide opportunities for a limited range of common invertebrates. However, there is no reason to suspect that invertebrates of elevated conservation value are present on-site.
- 7.19. Overall, on the basis of current evidence, the site is of negligible ecological interest. Furthermore, survey work has suggested that protected species are likely absent from the site. Recommendations are set out in this document that will provide enhancements to the ecological value of the site post-development, all while ensuring the proposals are in line with all relevant national and local planning policy.

PLANS

PLAN ECO1

Site Location and Ecological Designations



KEY:

-  SITE BOUNDARY
-  LOCAL NATURE RESERVE (LNR)
-  SITE OF BIOLOGICAL IMPORTANCE (SBI)



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MANCHESTER

PLAN ECO1: SITE LOCATION AND
ECOLOGICAL DESIGNATIONS

Rev: A
Nov 2023

PLAN ECO2

Ecological Features



- KEY:
- SITE BOUNDARY
 - BUILDINGS
 - HARDSTANDING
 - AMENITY GRASSLAND
 - ✱ JAPANESE KNOTWEED



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PLAN ECO2: ECOLOGICAL
FEATURES

Rev: A
Nov 2023

PHOTOGRAPHS

PHOTOGRAPH 1: Building B1



PHOTOGRAPH 2: Building B1 interior



PHOTOGRAPH 3: Building B2



PHOTOGRAPH 4: Building B3



PHOTOGRAPH 5: Hardstanding (southeast car storage area)



PHOTOGRAPH 6: Colonising vegetation, including Japanese Knotweed



PHOTOGRAPH 7: Japanese Knotweed encroaching onto site



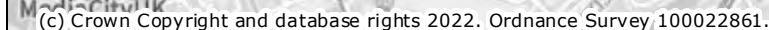
PHOTOGRAPH 8: Amenity grassland



APPENDICES

APPENDIX 1

Information downloaded from Multi-Agency
Geographic Information for the Countryside (MAGIC)



- Local Nature Reserves (England)
- National Nature Reserves (England)
- Ramsar Sites (England)
- Sites of Special Scientific Interest (England)
- SSSI Impact Risk Zones - to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites (England)
- Special Areas of Conservation (England)
- Special Protection Areas (England)

- Ancient and Semi-Natural Woodland
- Ancient Replanted Woodland

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Projection = OSGB36
xmin = 373900
ymin = 395100
xmax = 394200
ymax = 405000
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Map produced by MAGIC on 23 November, 2023.
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