

Method Statement

Invasive Non-Native Plant Species
Upper Brook Street, Manchester



Site Name:	Upper Brook Street, Manchester	Reference:	MS-7036-01
Date	12/11/2024	No of pages:	9
Inspection carried out by:	Josh Birchall BSc (Hons), MCIEEM, CSJK Senior Ecologist		
Introduction:	This Method Statement (MS) is produced in order to address planning conditions relating to the proposed development at the site known as Upper Brook Street, Manchester (the Site). Application reference: 137399/FO/2023. Invasive Non-native Species (INNS) were previously identified at the Site during a preliminary ecological appraisal carried out by Brooks Ecological (report reference: ER-6550-01). Development plans are approved subject to the attachment of conditions relating to the monitoring and treatment of any invasive non-native species that may be present through construction. Planning Condition: <i>14) Prior to the commencement of a plot of the development, an invasive species management strategy (excluding demolition works) including an updated survey carried out between March and October, shall be submitted for approval in writing by the City Council, as Local Planning Authority,</i> <i>The agreed management strategy shall be implemented in full for the duration of the development.</i> Scope and purpose of this method statement (MS) This MS relates to the area identified within the Figure 1 plan below, comprising the development red line boundary. The risks from the presence of INNS are greatest during activities that cause disturbance to the areas they grow in. This MS sets out monitoring and controls required during the construction phase of development, along with recommendations for long term management to control the identified species should they be found. The focus on this MS is those species listed under Schedule 9 of in the Wildlife and Countryside Act, as these pose the greatest risk from a legislative and ecological		

Unit A, 1 Station Road, Guiseley, Leeds, LS20 8BX

Method Statement

Invasive Non-Native Plant Species
Upper Brook Street, Manchester



perspective.

Risks from the presence of INNS:

The Target species are scheduled on the basis that their presence in certain sensitive habitat areas can be detrimental to habitat quality and biodiversity. It would be an offence under the Wildlife and Countryside Act to allow or wilfully cause a scheduled plant to spread into the wild.

If and where found within the site, the movement of soils containing INNS propagules (seed, corms, stem fragments etc. from which the plant can reproduce) presents the greatest risk of spreading these species into off-site habitats. If removed from a property, soils or waste INNS plant material, or plant material they can grow from is classified as Controlled Waste and must be disposed of accordingly to ensure compliance with environmental and waste management legislation.

Risk assessment: Low risk

In order to facilitate the development and ensure compliance it will be necessary to monitor and mitigate the risk from INNS occurring within the site and from associated contaminated soils or plant material during construction works. Risk is assessed to be low due to the historic remediation of the site with deep compacted substrates.

General risks from INNS are set out in Appendix 1 with additional information on the risk and management categories currently in use by the RICS (primarily in relation to Japanese knotweed in particular).

Unit A, 1 Station Road, Guiseley, Leeds, LS20 8BX

Method Statement

Invasive Non-Native Plant Species
Upper Brook Street, Manchester



Figure 1 Red line boundary and survey area



Survey:

An updating site survey was undertaken on the 24th October 2024 to look for and confirm the extent of INNS.

The survey was carried out during fine conditions and although late in the survey season species could still be identified by the surveyor. Potential constraints to the survey included: dense vegetation, vegetation clearance and netting of vegetation all of which may have limited access and visibility. Given the urban location there is potential for the spread of INNS into the site via fly tipping or via birds spreading seed.

The survey identified the following INNS:

- Japanese Rose (*Rosa rugosa*)
- Cotoneaster (*Cotoneaster* sp.)

Both species were noted growing with ornamental planting beds which were being

Unit A, 1 Station Road, Guiseley, Leeds, LS20 8BX

Method Statement

Invasive Non-Native Plant Species
Upper Brook Street, Manchester



managed until recently and this may have helped to restrict their spread.

Cotoneaster included a variegated version of *C. horizontalis* currently listed on Schedule 9, and suspected *C. lacteus* not listed on Schedule 9. However given the difficulties in confidently identifying the Cotoneaster species, control of *C. laceteus* should be carried out in the same fashion *C. horizontalis* as a precaution.

Figure 2 INNS locations



Unit A, 1 Station Road, Guiseley, Leeds, LS20 8BX

Method Statement

Invasive Non-Native Plant Species
Upper Brook Street, Manchester



Objectives:	The primary objective is to: <i>Allow planned construction works with the site to proceed while mitigating the potential risks posed by the presence of INNS within the site.</i> Methods to achieve both this objective are set out in the following sections.
Method 1 Excavation and removal	<i>Excavation:</i> Given the locations of the identified INNS stands, within central areas of the Site, the potential for retention in situ is considered limited. Additionally, given the relatively contained nature of the INNS stand excavation and removal to a licenced landfill is likely to prove effective in this setting. This should be carried out ahead of any other groundworks or vegetation clearance to minimise the risk of disturbance. Excavation should be supervised by an ECoW or other suitably qualified individual. The excavations should be carried out with machinery utilising a suitably sized bucket to ensure material can be removed carefully. Removal via hand tools may also prove suitable for the smallest INNS stands 'Cot 3' and 'Cot 4'. Removal of INNS above ground vegetation, roots, rhizomes and associated contaminated soils will be required. As soon as possible following excavation INNS material should be buried on site or taken off site to an appropriately licensed landfill. The option to bury INNS would need to be carried out with planning approval as part of the development plan and have oversight and approval by an engineer. Burial will require a suitable location which can be retained and remain undisturbed during and after construction in perpetuity. Following excavation materials would be mulched and buried on Site at a minimum depth of 2m below clean capping material. If required, INNS materials can be temporarily stored on Site prior to further handling. This should be in a single clearly marked location where material can remain undisturbed without further movement until final removal. Storage should be over hardstanding or a suitable root barrier membrane. Limiting unnecessary access in the affected area during construction works will be necessary and may be achieved through: a) Signage to indicate the INNS presence within the Site as off limits to site

Unit A, 1 Station Road, Guiseley, Leeds, LS20 8BX

Method Statement

Invasive Non-Native Plant Species
Upper Brook Street, Manchester



	workers or machinery. b) Temporary fencing to limit everyday incursion to the affected parts of the Site. c) Briefing of construction workers to make them aware of the presence of INNS within the Site and the need to avoid further spread. <i>Removal/ Monitoring:</i> During excavation the suitably qualified contractor or ECoW should produce a report which details effective burial/ removal and/ or storage of material. Upon removal of INNS material from the Site the client should also gather waste transfer documentation from the waste carrier, indicating material has been removed as controlled waste to an appropriately licenced landfill. Further monitoring would not be normally be required.
Alternative Method 2 Long term control and remediation on Site via herbicide treatment	If possible, target species present within site remain should be retained undisturbed by construction works. This will mitigate the risk of causing spread to the greatest extent. Limiting unnecessary access in the affected area during construction works will be necessary and may be achieved through either or both: a) Signage to indicate the INNS presence within the Site as off limits to site workers or machinery. b) Temporary fencing to limit everyday incursion to the affected parts of the Site. c) Briefing of construction workers to make them aware of the presence of INNS within the Site and the need to avoid further spread. Should works require pedestrian or machinery access to areas affected by INNS growth, the following biosecurity protocol will be followed: d) to prevent spread of infected soils, all footwear or wheels will be washed down with water to remove soils that may contain seed or other INNS fragments. The washdown area will be set up such that waste water and soils are not allowed to spread outside of this area. In principle, INNS plants are to be retained within the site to be treated in situ and not removed from the Site with other plant material that may be disposed of during vegetation removal or other site clearance works. Control may be in situ where plants are found to be growing, or if the area is to be disturbed by construction works and where space is available on Site, affected soils be relocated and stockpiled in an undisturbed area of the site for subsequent treatment. If INNS are relocated storage should be as described previously .i.e. within clearly marked location and on top of an effective root barrier.

Unit A, 1 Station Road, Guiseley, Leeds, LS20 8BX



Phone: **01943 884451**
01943 879129

Email: admin@brooks-ecological.co.uk

www.brooks-ecological.co.uk

Registered in England Number 5351418

Method Statement

Invasive Non-Native Plant Species
Upper Brook Street, Manchester



Control options

Killing off individual plants either in situ or after physical removal is usually required to provide long term removal of an INNS species from a particular area.

Controls appropriate the identified species may typically require the use of applied herbicides, stem or foliage cutting, or the entire uprooting of plants. In this instance foliar application of glyphosate during the growing season is considered the preferred method.

Monitoring survey

During the growing season of each year (April - September) a site inspection by a suitably qualified invasive species surveyor or ecological clerk of works will identify and map the extent of any of the Target species present within and around the site (Figure 1). This will additionally allow the risk from identified species to be more fully assessed and advised in line with current development works.

Timing and seasonality

An annual monitoring survey within the growing season will identify the presence or current extent of Target INNS species in order to plan appropriate control, disposal or treatment programme.

	Year 1	Year 2	Year 3 +
Monitoring INNS survey Early season	May/June	May/June	May/June
Treatment in growing season - if required	May to Sept	May to Sept	May to Sept
Post treatment / late season monitoring	Sept / Oct	Sept / Oct	Sept / Oct

Once no regrowth is observed for a minimum of 12 months it is considered control has been successful and no further monitoring would be advised.

Unit A, 1 Station Road, Guiseley, Leeds, LS20 8BX

Method Statement

Invasive Non-Native Plant Species
Upper Brook Street, Manchester



Photo 1

Japanese Rose stand



Photo 2

Cot 1



Unit A, 1 Station Road, Guiseley, Leeds, LS20 8BX

Method Statement

Invasive Non-Native Plant Species
Upper Brook Street, Manchester



Photo 3

Cot 2



Photo 4

Cot 3



Unit A, 1 Station Road, Guiseley, Leeds, LS20 8BX

Method Statement

Invasive Non-Native Plant Species
Upper Brook Street, Manchester



Photo 5

Cot 4



Appendix 1

General Risks from the presence of INNS

The identified species are listed under Schedule 9 of the Wildlife and Countryside Act (1981) as amended.

For Schedule 9 species their presence on the site prior to any proposed development is not in itself a contravention of legislation; however, to inform land management and where development is planned the following legal constraints are relevant and may require action to ensure compliance.

General risks

Risks associated with the presence of invasive non-native species (INNS) fall into the following broad categories:

Offences in relation to wildlife / environmental legislation

Invasive species have long been controlled on the basis of the threat they pose to our native wildlife, reflected through controls provided in the Wildlife and Countryside Act (1981) amended by later Acts such as the Natural Environment and Rural Communities Act (2006) and the Countryside and Right of Way Act (2000). This legislation makes it an offence "to plant or otherwise cause to grow in the wild" any plant listed on Schedule 9 of the Act.

The protection of biodiversity from invasive or alien species has been strengthened

Unit A, 1 Station Road, Guiseley, Leeds, LS20 8BX

Method Statement

Invasive Non-Native Plant Species
Upper Brook Street, Manchester



by EU Regulation 1141/2014. This sets out targets for pre-emptive action, reporting and larger scale actions but also states that you must not "allow or encourage (listed INNS species) to spread outside your land". Where this cannot be guaranteed it is required that the plant in question be controlled or removed.

The costs of enforced action

The Infrastructure Act (2015) allows government agencies to enter into Species Control Agreements (SCA's) or to enforce Species Control Orders (SCO's) with / on landowners. These are likely to change significantly the ability of local authorities to negotiate with landowners in reducing issues of invasive species, and may lead to local authorities taking a more directed and prescriptive approach to dealing with problem species in particular cases.

Claims by third parties

The potential of invasive species to cause a private nuisance, or to result in damage to the property of others, is recognised in both the Common Law of Private Nuisance, and the Anti-Social Behaviour, Crime and Policing Act (2014), and can result in court orders or community protection notices requiring action or the payment of damages or fines. Recent case law (Waistell vs Network Rail) has demonstrated the ability of claimants to secure damages and compensation in relation to damage to property (and value of).

The Property Care Association (PCA) and the Royal Institute of Chartered Surveyors (RICS) provide guidance on the potential of JKW and other INNS to result in a private nuisance causing damage to the structure or value of property.

Offences relating to disposal and treatment of invasive species

Disposal of invasive species and soils containing their propagules (seed or rhizome) may be classed as 'controlled waste' and subject to relevant clauses of the Duty of Care Regulations (1991) under Part II of the Environmental Protection Act (1990). Only properly licensed organisations may remove this waste from a property, and they must take it to appropriately licensed waste facilities. The removal of contaminated or infected soil can result in the removal of very large amounts of material from a Site at considerable cost.

Unit A, 1 Station Road, Guiseley, Leeds, LS20 8BX



Phone: **01943 884451**
01943 879129

Email: admin@brooks-ecological.co.uk

www.brooks-ecological.co.uk

Registered in England Number 5351418

Method Statement

Invasive Non-Native Plant Species
Upper Brook Street, Manchester



References	RICS (2022) Royal Institution of Chartered Surveyors .Japanese Knotweed and Residential Property. RICS guidance note, UK 1st edition, January 2022 Property Care Association (2014) <i>PCA Guidance Note on Japanese Knotweed Control: Guidance Notes for Herbicide Treatment</i>. Last accessed online June 2018. Property Care Association (2014) <i>PCA Guidance Notes - The problems of Japanese knotweed - Advice for Developers</i>. Last accessed online June 2018. Property Care Association (2018) <i>Practical Management of Invasive Non-Native Weeds in Britain and Ireland</i>. Packard Publishing.
-------------------	--

Unit A, 1 Station Road, Guiseley, Leeds, LS20 8BX



Phone: **01943 884451**
01943 879129

Email: admin@brooks-ecological.co.uk

www.brooks-ecological.co.uk

Registered in England Number 5351418