

Ecological Impact Assessment



**Tyler
Grange**

Winners Chapel, Blackley
25th November 2024

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Summary

- S.1. This report has been prepared by Tyler Grange Group Limited on behalf of World Mission Agency – Winners Chapel International. It sets out the findings of an Ecological Impact Assessment at Chain Road, Blackley, hereinafter referred to as 'the site'. The proposals are for the construction of a church with parking, access and associated landscape.
- S.2. In terms of protected sites, the production and implementation of a CEMP, to include standard best practice pollution prevention is considered sufficient to prevent impacts to these designated sites from development and will mitigate for potential effects identified during construction.
- S.3. Habitats of negligible ecological importance to be lost to the development, such as bramble scrub, introduced shrub, and modified grassland, require no specific mitigation. Habitats of local ecological importance to be lost, such as scattered trees, neutral grassland and hedgerows will be compensated for through replacement planting in the form of native species tree, hedgerow, and grassland planting. Due to the retention and enhancement of high-value habitats, the effect of the development on protected species will be minimised. A CEMP will be required to detail protection measures.
- S.4. Species-specific enhancements recommended within this report, including provision of bat and bird boxes, would enhance the site for wildlife and increase the habitat diversity on site providing a range of nesting, foraging and commuting opportunities for species such as invertebrates, bats and birds.
- S.5. In addition the following mitigation will be required:
- A Lighting plan will be required to ensure sensitive areas will be maintained as dark areas during and post construction, to ensure bats, otter and other wildlife are not deterred from using them.
 - During works to T87, 108 and 123 a suitably qualified ecologist (SQE) should be present and features should be relocated or replaced at a 1:1 ratio with bat boxes.
 - A pre-commencement check of the suitable habitats on-site to support badger, immediately prior to the start of works should be completed.
 - If any clearance works to nesting habitats are required during the nesting season, then pre-removal checks for nesting birds must be carried out by a suitably experienced SQE no more than 48 hours prior to the works commencing.
- S.6. The biodiversity net gain assessment found that the proposals would result in a loss of 20.59% in habitat units and a net gain of 105.06% in hedgerow units. To comply with local, National Planning Policy Framework (NPPF) and the Town and Country Planning Act 2023 a 10% net gain in biodiversity units is required off-site and can be secured through a section 106 agreement.
- S.7. It is therefore concluded that the proposed development complies with relevant policy S06, G6, JP-G8 and legislation relating to biodiversity. Required mitigation and enhancement could be controlled by condition and a section 106 agreement.



Section 1: Introduction and Context

Introduction

- 1.1. This report has been prepared by Tyler Grange Group Ltd on behalf of World Mission Agency – Winners Chapel International. It sets out the findings of an Ecological Impact Assessment (EclA) at Chain Road, Blackley, M9 6QQ (OS Grid Reference SD 85746 04532) hereafter referred to as 'the site'. See **Figure 1.1** for the indicative red line boundary.



Figure 1.1: Indicative red line boundary (© Google Aerial Imagery)

- 1.2. This assessment has been undertaken to inform a planning application for the development of a church with parking, access and associated landscape. The site proposals are shown in **Appendix 1**.

Site Context

- 1.3. The site is approximately 2.51 ha in size and comprises bare ground, introduced shrubs, modified grassland, hardstanding, neutral grassland, bramble scrub, scattered trees, tree line and hedgerow habitats. The site is surrounded by mostly urban development with woodland to the west and north of the site.



Purpose

- 1.4. This report:
- Uses available background data and results of the field surveys to describe and evaluate the ecological features present within the likely "Zone of Influence"¹ (Zol) of the proposed development;
 - Describes the actual or potential ecological issues and opportunities that might arise as a result of the site's development.
 - Where appropriate, makes commitments for mitigation measures for adverse effects on ecological features as well as ecological enhancements, to ensure conformity with policy and legislation listed in **Appendix 2**; and
 - Can be used to inform a planning application for the site's development.
- 1.5. This assessment and the terminology used are consistent with the Guidelines for Preliminary Ecological Appraisal² and the Guidelines for Ecological Impact Assessment³. A full methodology is set out in **Appendix 3**.

Methodology

- 1.6. Full methods for the data search, 'extended' phase 1/ UK Habs survey, Ground level tree assessment for bats, badger survey, and BNG work can be found in **Appendix 3**.

Quality Control

- 1.7. All ecologists at Tyler Grange Group Limited are members of the Chartered Institute of Ecology and Environmental Management (CIEEM) or are working towards membership, and act under the direction of members and abide by the Institute's Code of Professional Conduct⁴.

¹ Defined by the CIEEM (2018) Guidelines for Ecological Impact Assessment as the area over which ecological features may be affected by biophysical changes as a result of the proposed project and associated activities. This is likely to extend beyond the project site, for example where there are ecological or hydrological links beyond the site boundaries

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

³ CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management, Winchester.

⁴ CIEEM (2022) Code of Professional Conduct, CIEEM, Winchester



Section 2: Ecological Features and Evaluation

Designated Sites

- 2.1. The data search was based on records purchased from the Greater Manchester Local Records Centre (GMLRC), as well as data from the Multi-Agency Geographic Information for the Countryside (MAGIC). See **Appendix 3** for full methodology.
- 2.2. In Manchester, non-statutory sites designated for their biodiversity importance are known as Sites of Biological Importance (SBI).
- 2.3. The data search returned one Natura 2000 site within 10 km of the site, and ten statutory and non-statutory designated sites within 2 km of the site. These are detailed in **Table 2.1** below.



Table 2.1: Designated Sites

Designated site	Distance and direction from site	Citation	Ecological Importance
Rochdale Canal (SAC)	3.2 km east	Inland water bodies make up 90% of the designation area. Floating water-plantain <i>Luronium natans</i> are Annex II species that are a primary reason for the selection of this site.	International
Boggart Hole Clough (LNR) (SBI)	1.7 km southeast	This is the biggest clough in Manchester and part of the site is identified as ancient woodland.	National
Alkington Woods & Rhodes Lodges (LNR) (SBI)	0.56 km northeast	Mosaic of habitats present within the site. And Habitats present within the site include woodland, grassland, marsh, standing water and amenity areas.	County
Broadman Brook (SBI)	0.57 km north	Valley supporting woodland, scrub, marsh, swamp and a stream. The site is adjacenountyt to Alkington Woods & Rhodes Lodges SBI and a Local Nature Reserve in Rochdale.	County
Streams and Flushes near Bradley Hall Farm (SBI)	1.35 km northwest	Qualifies for the presence of semi-natural grassland including marshy grassland/flush, acid grassland and neutral grassland. Site also supports scrub, running water and hedgerows. Recognisable butterfly assemblage present.	County
Bailey’s Wood (SBI)	1.50 km southeast	Woodland present within the site.	County
Blackley Forest & Heaton Vale Reservoirs (SBI) (LNR)	1.60 km southwest	Plantation woodland and lodges present within the site.	County
Boggart Hole Clough (SBI)	1.75 km southeast	Ancient woodland and recognisable bird assemblage present within the site.	County
Lakeside woodland in Heaton Park (SBI)	1.97 km southwest	Habitats present include woodland and grassland	County



- 2.4. The site falls into the SSSI Impact Risk Zone for the Rochdale Canal. However, the development does not fall into any of the criteria set out by Natural England requiring further assessment, such as airports, agricultural development or development relation to combustion processes. As such consultation with Natural England is not considered necessary, and this is **not discussed further within this report**.

Habitats and Flora

- 2.5. The habitats present on site are summarised below in **Table 2.2**, along with a description of the composition of the main plant species present and an assessment of their ecological importance. The location of habitats are shown on the Habitats Features Plan 16680/**P0a**.



Table 2.2: Habitats and Flora

Habitat	Description and Species	Ecological Importance	Photograph
Primary Code Modified grassland g4 (poor condition)	Large areas around the site comprise of well maintained species-poor amenity grassland with a sward dominated by Perennial rye-grass <i>Lolium perenne</i> with black medick <i>Medicago lupulina</i>, ragwort <i>Senecio</i> sp, Yorkshire fog <i>Holcus lanatus</i>, nettle <i>Urtica dioica</i>, cock's-foot <i>Dactylis glomerata</i>, rough meadow-grass <i>Poa trivialis</i>, creeping buttercup <i>Ranunculus repens</i>, red fescue <i>Red fescue</i>, white clover <i>Trifolium repens</i> and horsetail <i>Equisetum</i> sp .	Due to the limited floristic diversity across the whole area and history of intensive management, this habitat is considered to be of negligible importance	
Modified grassland g4 (Moderate Condition)	One large section of previously maintained amenity grassland has overtime become overgrown comprising sweet vernal grass <i>Anoxanthum odoratum</i>, creeping bent <i>Agrostis stolonifera</i>, Yorkshire fog, dandelion <i>Taraxacum officinale</i>, rough meadowgrass, meadow buttercup <i>Ranunculus acris</i>, ragwort, broadleaved plantain <i>Plantago major</i>, false brome <i>Brachypodium sylvaticum</i> , and timothy grass. This area also had encroaching Himalayan Balsam <i>Impatiens glandulifera</i> and cotoneaster <i>Cotoneaster</i> sp. with scattered trees, scrub and ornamental shrubs recorded throughout the grassland parcel.	Due to the limited floristic diversity across the whole area and history of intensive management, this habitat is considered to be of negligible importance	
Other neutral grassland g3c (Poor Condition)	The small area of neutral grassland located directly north of the site comprised red fescue <i>Festuca rubra</i>, rough meadowgrass, common bent <i>Agrostis capillaris</i>, selfheal <i>Prunella vulgaris</i>, sweet vernal grass, Yorkshire-fog, ribwort plantain <i>Plantago lanceolata</i>, creeping buttercup, ragwort, greater birdsfoot trefoil <i>Lotus pendunculatus</i>, cock's-foot, broadleaved dock <i>Rumex obtusifolium</i> and red clover <i>Trifolium peatense</i>.	Due to the limited floristic diversity across the small area and history of intensive grazing, this habitat is considered to be of negligible importance.	

Other neutral grassland g3c (Moderate Condition)	The large area of unmanaged grassland consisted a tall tussocky sward, with varying conditions. Drier areas along the northern edge of the parcel while the rest was fairly wet. Species comprised common bent, timothy <i>Phleum pratense</i>, creeping buttercup, Yorkshire fog, meadow buttercup, soft rush, broadleaved dock, perennial ryegrass, rough meadow grass, coks-foot, lesser pond sedge <i>Carex acutiformis</i>, marsh foxtail <i>Alopecurus genticulatus</i>, horsetail, oval sedge <i>Carex leporina</i>, self heal, broadleaved plantain, sweet vernal. Mosses were also frequent throughout. In the centre of the site, the tall sward and unmanaged grassland was wet with species comprising rough meadow-grass, soft rush <i>Juncus effusus</i>, marsh hawkweed <i>Crepis paludosa</i>, creeping buttercup, vetch sp <i>Vicia sp</i>, hogweed, ragwort, nettle, creeping bent, red clover, Himalayan balsam, meadow foxtail <i>Alopecurus pratensis</i>, bramble <i>Rubus fruitcosus</i>, meadow vetchling <i>Lathrus pratensis</i>.	Due to the species diversity, this habitat is considered to be of Local Importance	
Rhododendron scrub h3g	Rhododendron shrubs were recorded along the western boundary of the site in a patch of introduced shrub.	Due to the low species diversity, invasive species presence, and small size of this habitat, it is considered to be of negligible importance .	
Bramble scrub h3d	Two areas of predominately bramble scrub with standards of European Larch <i>Larix decidua</i> , Leyland Cypress <i>Cupressocyparis leylandii</i> , Italian Alder <i>Alnus cordata</i> and some elder <i>Sambucus nigra</i> present at the eastern edge of the scrub were located onsite. Pendulous sedge, rough meadow-grass and creeping buttercup were abundant throughout the ground flora layer.	Due to the low species diversity and small size of this habitat, it is considered to be of negligible importance .	

Line of trees <u>Secondary code(s): 33</u>	Line of trees (LT1) along the south boundary predominately consisted of cypress. While the line of tree (LT2) in the east of the site comprised hawthorn, Red Norway Maple <i>Acer platanoides</i> , sycamore <i>Acer pseudoplatanus</i> and willow <i>Salix</i> sp	Due to this habitat connectivity, this habitat is considered to be of Local importance	
Ornamental hedgerow h2b	Garden privet <i>Ligustrum</i> sp hedges (H1, 2, 3, 5, 6, 7 and 8) were present along footpaths and roads across the site.	Due to intensive managment of the hedge and low species diversity, the habitat is considered to be of negligible importance	 

Other native hedgerow h2a6	Hedge with trees (H4) consisted of predominately self-set hawthorn <i>Crataegus monogyna</i> saplings with occasional holly <i>Ilex aquilinum</i> with sycamore canopy trees.	Due to the semi-mature trees present, this habitat is considered to be of Local Importance.	
Built-up areas and gardens u1 <u>Secondary code(s):</u> Scattered trees 11	A large number of scattered trees were present throughout the garden area, species present included ash <i>Fraxinus excelsior</i> , weeping willow <i>Salix babylonica</i> , wild cherry <i>Prunus padus</i> , sycamore, Box <i>Buxus sempervirens</i> , Monterey cypress <i>Cupressus macrocarpa</i> , Goat Willow <i>Salix Caprea</i> , Larch, Holly, Leyland cypress, beech <i>Fagus sylvatica</i> , laburnum <i>Laburnum anagroides</i> , apple <i>Malus</i> sp, sitka spruce <i>Picea stichensis</i> , plum <i>Prunus</i> sp. , sprindle <i>Evonymus europaeus</i> , lime <i>Tilia europaea</i> and alder <i>Alnus glutinosa</i> .	Many of the scattered trees are native, mature species. As such, although they are very common in the wider landscape, they are considered to be of local Importance.	



- 2.6. The site also contained areas of hardstanding, a complex of buildings and bare ground all of which have no inherent ecological value and are considered to be of **negligible importance**. Their potential to support bat roosts is being assessed in a separate report.
- 2.7. Additionally, non-native invasive species including Himalayan balsam, rhododendron, and cotoneaster were recorded onsite. These species are listed under Schedule 9 of the Wildlife and Countryside Act (WCA), and as such causing these species to spread is unlawful. It is recommended that these species are removed by a specialist invasive species contractor prior to the start of works on-site.

Protected and Notable Species

- 2.8. The below section sets out the potential for protected species on site. Species which are considered likely absent from the site based on professional judgement, including consideration the of habitats within the site, signs of species presence at the time of survey and data search records, are not discussed.

Amphibians

- 2.9. The data search returned records of common frog *Rana temporaria*, smooth newt *Lissotriton vulgaris* and great crested newt (GCN) *Triturus cristatus* within 2 km of the site. All three were identified at the same site and were recorded 1.58 km northeast of the site in 2005. There have been no records within the last 10 years of great crested newt. The nearest of these was a record of a common frog 0.7 km northeast of the site in 2022. No European Protected Species (EPS) licenses were returned for GCN within 2 km of the site.
- 2.10. The data search found no waterbodies on or within 250 m of the site, which is generally considered to be within the typical migratory range of GCN from a waterbody⁵. The terrestrial habitats on site could offer some suitable habitat for GCN (scrub and hedgerow), however, given the lack of aquatic habitat within the site and surrounding area, as well as the presence of dispersal barriers such as roads, the site is considered unlikely to support GCN.
- 2.11. As such GCN considered **likely absent from the site and are not discussed further within the report**.
- 2.12. Other more mobile amphibian species such as common toad may be present. Common toads are a priority species under The Natural Environment and Rural Communities (NERC) Act 2006⁶. It is considered any population utilising terrestrial habitats on site, such as the vegetated gardens and introduced shrub, will also be using further habitats beyond the site boundary and not reliant site alone.
- 2.13. As such any population of amphibians such as common toad on site would be of **negligible ecological importance**.

⁵ Cresswell, W. & Whitworth, R., 2004. An assessment of the efficiency of capture techniques and the value off different habitats for the great crested newt *Triturus cristatus*: English Nature Research Report 576 , Peterborough: English Nature.

⁶ Section 40 of the NERC Act puts a duty on local authorities to have regard for the conservation of species and habitats listed at Section 41, including when considering planning applications.



Badger

- 2.14. The data search returned 10 records of badger *meles meles* within 2 km of the site within the last 10 years, with the closest being under 1 km away from the site (confidential records).
- 2.15. No badger setts were located on-site or within 30m of the site. As such, badger setts are not currently present within the site. There were suitable habitats in the off-site woodland north of the site and the site provides foraging habitat for the species, by way of the modified/neutral grassland and scrub. The site may therefore be used by low numbers of commuting and foraging badger, with habitats of higher importance to the species present in the surrounding area.
- 2.16. It is considered that any badger population that may use the site for foraging and commuting are not regularly using the site. Nevertheless, consideration for badgers during construction to avoid breach of legislation is discussed in Section 3 of this report. Given the lack of setts and availability of other resources It is considered the site would be of **negligible ecological importance** in maintaining populations locally.

Bats

- 2.17. The data search returned records for four roosting bat species within 2 km of the site. Species included common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus* and Daubenton's bat *Myotis daubentonii* along with an unidentified bat species, unidentified *Myotis* species unidentified *Pipistrellus* species. The nearest of these was a record of an unidentified bat species roost species roost in 2014, 0.72 km southeast of the site. No European Protected Species (EPS) licences were returned for GCN within 2 km of the site.

Bat Activity

- 2.18. The site lies within an urban context, with light pollution within and adjacent to site, and limited habitats for commuting and foraging bats in the wider landscape. It is assumed that light tolerant species, such as common and soprano pipistrelle, could forage within and adjacent to the site. The habitats on site, such as urban trees and native hedgerows, don't provide significant commuting and foraging opportunities for bats due to their small size and low diversity.

Preliminary Bat Roost Assessment

- 2.19. The buildings are assessed separately for their ability to support roosting bats and are not discussed in this report.
- 2.20. A Ground Level Tree Assessment (GLTA) and three aerial inspections were conducted on trees which may be impacted by the development, to assess the suitability onsite and directly adjacent to site to support roosting bats. See **Appendix 3** for methodology, and the tree retention and removal Plan **16680/P04** for locations.
- 2.21. A total of four trees were assessed to have roost potential of PRF-M or require further assessment (FAR) during the initial GLTA, which were then subject to aerial inspection. **Table 2.3** below summarises the results following the three tree climbing surveys, highlighting the



revised roost potential and if bats were found during the surveys. The locations of these trees are seen in plan **16680/P04**.

Table 2.3: GLTA/ aerial inspection Results

Tree No	Species (Common name)	Tree PRF Features as per BTHK 2018			
		Value	Description/ (Result)	Method	Photo
T87	Hawthorn	PRF-M	Wound/ tear out (No bats found)	Ladder/ Pole cam and endoscope	
T99	Sycamore	Negligible	Knot holes with no suitable PRF	Pole cam	



T108	Lime	PRF-I	Basal cavity (No bats found)	Endoscope	
T123	Sycamore	PRF-M	Woodpecker hole and wound – inspection only possible ground level due to presence of bee colony (No bats found)	Pole cam from ground level	

- 2.22. No bats were found during the inspections and overall, the assemblage of bats utilising the site for foraging and commuting is considered to be of **negligible ecological importance**.

Birds

- 2.23. The data search returned a number of records of 16 protected and notable birds species within 2 km of the site. Of these, some species of relevance to the site include house sparrow *Passer domesticus*, and starling *Sturnus vulgaris*.
- 2.24. Habitats on site, such as the building, scrub, scattered trees, tree lines and hedgerows, have the potential to support common and widespread nesting birds.
- 2.25. Additionally, the site is not considered suitable to support ground nesting birds due to the small size and enclosed nature restricting flight lines.
- 2.26. It is considered the assemblage of birds that may use the site for foraging and breeding is of **negligible ecological importance**, nevertheless consideration for nesting birds to avoid a breach of legislation is discussed in **Section 3** of this report.



Hedgehog

- 2.27. The data search returned a number of records of hedgehog within 2km of the site. The nearest of this was a record of hedgehog 0.23km south of the site in 2020.
- 2.28. The habitat onsite including scrub and hedgerows could provide potential foraging and nesting opportunities onsite and cause hedgehogs to commute through the site but the habitat is limited and there is a lack of connectivity in the wider urban areas. Given this limitation it is considered the site would be of **negligible ecological importance** in maintaining hedgehog populations locally.

Other mammals

- 2.29. The data search returned one record of otter within 2km of the site. This record was located 0.23km north of the site in 2018.

Due to the lack of habitat to support otter (woodland and water courses). Overall it is considered that the site is not important in maintaining a local population of otter and is considered to be of **negligible ecological importance. Therefore, they are not considered any further in this report.**



Section 3: Ecological Impacts, Mitigation, and Enhancement

Proposed Development

- 3.1. The proposals are for construction of a church with associated parking, access and soft landscaping. The potential impacts at this site as a result of the proposed development are set out below, with reference to relevant legislation and planning policy, which is summarised in **Appendix 2**.

Design Evolution

- 3.2. The design of the Development has been iterative, and in accordance with policy and best practice guidance, follow the 'mitigation hierarchy'. As such, the Development has been designed to avoid and retain the most important ecological features to ensure they can be managed in the long-term to enhance their importance for biodiversity. Where this is not possible, new habitats have been proposed to compensate for habitat losses with the aim of maximising the overall ecological value of the habitats proposed on site. A summary of how the design follows the mitigation hierarchy is set out below:
- Incorporation of pollution prevent schemes into Construction Management Plans (CEMPs)
 - Scattered trees and hedgerows onsite are retained and enhanced where possible;
 - Planting of mixed scrub and neutral grassland within the site

Designated Sites

Statutory Sites

- 3.3. Given the nature of the site proposals and the distances involved between the site and Rochdale Canal SPA, no adverse direct or indirect effects are anticipated, and no specific mitigation is required.

Non-statutory Sites

- 3.4. Seven non-statutory sites are located within 2km of the site with the closest being Alkrington Woods and Rhodes Lodges SBI 0.56 km northeast of the site. Impacts during the operational phase are not anticipated due to the nature of the proposals. Impacts during construction activities could potentially occur to these sites via dust deposition and run-off.



- 3.5. Standard best practice pollution prevention⁷ is expected to be incorporated into a Construction Environmental Management Plan (CEMP). These potential impact pathways will therefore be controlled, and impacts to all statutory sites avoided.
- 3.6. In summary, the production and implementation of a CEMP, to include standard best practice pollution prevention, is expected to be conditioned and therefore prevent impacts to the designated sites above.

Habitats and Flora

- 3.7. Most of the habitats onsite to be impacted by the proposals are of negligible ecological importance, namely building, hardstanding, scrub, introduced shrub, modified grassland and ornamental hedgerows and as such no specific mitigation is required for these habitats.
- 3.8. 24 scattered trees are scheduled to be removed as part of the proposals, which are of local ecological importance, will be lost to provide access to the proposed development. The planting of 64 native species trees (see **Appendix 1**) is expected to more than mitigate for the loss of these trees.
- 3.9. Additionally, areas of locally important neutral grassland will be removed as part of the proposals. This will be mitigated for through the inclusion of modified grassland planting and enhancement to areas of existing neutral grassland across the site, areas of which will be maintained specifically for wildlife.
- 3.10. Overall, the native planting of trees, shrubs, and grassland is expected to improve the site overall for biodiversity and the biodiversity net gain assessment will ensure that any losses are mitigated for.
- 3.11. A biodiversity net gain calculation using the statutory metric has been completed and is shown in **Section 4**. This calculation does not satisfy the trading rules regarding neutral grassland and individual trees and therefore off-site habitat provision as part of BNG offsetting will be required to replace these habitats or provide habitat of high distinctiveness.

Protected and Notable Species

Badger

- 3.12. No badgers were recorded on-site, however, badgers can create a new sett in a matter of days, a pre-commencement check of the woodland within 30m of the site boundary should be completed to ensure no new setts have been created. If a sett is located, a 30m buffer will be required around each individual sett entrance in which no works can be completed until the sett is closed under licence.

Bats

- 3.13. Trees that are affected by the proposals were found not to support roosting bats during three inspection surveys. T108 has the category PRF-I and T87 and T123 have the category PRF-M.

⁷ CIRIA (2015) Construction Work Sector Guidance for Designers. Fourth edition



of these trees T108 and T87 should be removed under the supervision of a suitably qualified ecologist (SQE) as they could be fully inspected during the three surveys.

- 3.14. A full inspection of T123 was not possible due to the presence of a bee colony on the tree and views from the ground being too limited for nocturnal surveys. It is therefore advised that contractors monolith this tree to retain the PRF-M features or that they are carefully removed and tied to an alternative tree during the winter to reduce the risk of bats and bees being present, and under the supervision of an SQE.
- 3.15. All other trees are either being retained as part of proposals or were categorised as having negligible bat roosting potential. Retained trees PRFs will be suitably buffered by within the root protection area of trees fencing (see **Arboricultural Impact Assessment 16680_R02**).
- 3.16. Where roost opportunities are lost from these three trees, compensation should be provided in the form of bat boxes or relocation of tree features strapped to alternative retained tree, which will provide alternative roosting opportunities for bats in place of PRFs that have been lost with proposals. A bat box plan should therefore be implemented, with which bat boxes are installed on site in place of trees with PRFs that have been lost at a ratio of 1:1.
- 3.17. Indirect impacts associated with dust and noise during the construction phase will be minimised by the implementation of a CEMP. No lighting during construction is proposed. It is anticipated that lighting levels post-construction will not be greater than current levels. However, during operation of the development any outside lighting should avoid spilling onto retained habitats include retained trees across the site.
- 3.18. With the implementation of the suggestions outlined above, the conservation status of the species shall be maintained and a net gain of roosting opportunities for bats will be achieved. As a result, the proposed development should conform with all legislation with regards to bats as well as all local and national planning policy.

Birds

- 3.19. All birds, their nests and eggs, are protected by law and as such it is an offence to intentionally kill, injure, or take any wild bird; intentionally take, damage, or destroy the nest of any wild bird while it is in use or being built; and intentionally take or destroy the egg of any wild bird.
- 3.20. To avoid triggering the legislation protecting nesting birds, clearance of suitable habitat (the buildings, trees, and hedgerow) should be timed outside the nesting bird season (generally taken as March to September inclusive, though this is not defined in law and birds may nest outside of this time). If any clearance works to nesting habitats are required during the nesting season, then pre-removal checks for nesting birds must be carried out by a suitably experienced Ecological Clerk of Works (ECoW), no more than 48 hours prior to the works commencing. If any nesting birds are found to be present, an appropriate buffer zone will be implemented, within which works are excluded for the duration of the breeding attempt. Any active nests will need to be left in situ until a suitably experienced ecologist confirms that the chicks have fledged and the nest is no longer active.
- 3.21. Habitat creation such as native shrub and tree planting is expected to increase nesting opportunities on site. Additionally, four bird boxes are recommended to be incorporated



within the scheme, targeting species of conservation concern known to be present (expected to be secured via a suitably worded planning condition).

Hedgehog

- 3.22. Suitable habitat for foraging and sheltering hedgehog is present on-site within the scrub, and hedgerow vegetation. It is therefore recommended that during vegetation clearance, any hedgehogs uncovered should be carefully moved by hand to a suitable area of vegetation outside of the working area. It is considered that the sensitive working methodologies recommended to protect badger and other small mammals would be appropriate to protect any hedgehogs during the construction phase of the proposed works.
- 3.23. To maintain connectivity for commuting and foraging hedgehog through the site, proposals should include 'hedgehog highways' where interior and exterior fencing/walls to ground level are proposed. This is the practice of creating small holes in fence panels (approximately 13 cm²) at ground level to allow hedgehog to move freely through the site, or providing a 13-15cm gap at the base of fence lines and the ground.



Section 4: Biodiversity Net Gain

- 4.1. Policy JP-G8, as well as the NPPF, requires developments to demonstrate a net gain in biodiversity. (see **Appendix 2**). In addition 10% BNG is now mandatory as part of the updated Town and Country Planning Act.
- 4.2. A development achieves biodiversity net gain when the total biodiversity units present post-development is higher than that of the biodiversity units present on site prior to development. The Statutory Biodiversity Metric has been used to calculate the biodiversity value of the site before and after development in terms of "biodiversity units" to calculate an overall biodiversity net gain or loss.

Existing Habitats

- 4.3. The following habitats are present within the red line boundary of the site and are shown on Habitat Features Plan **16680/P03b**. No watercourse habitats were present. The rationale for condition assessments is detailed within the metric **16680/BNG**.



Table 4.1: Baseline Habitats and Areas Retained and Enhanced

Broad Habitat	Habitat Type	Area (hectares)	Distinctiveness	Condition	Area retained (hectares)	Area enhanced (hectares)	Area lost (hectares)
Grassland	Modified grassland	0.16	Low	Moderate	0.13		0.03
Grassland	Modified grassland	0.73	Low	Poor	0.01		0.72
Grassland	Other neutral grassland	0.59	Medium	Moderate	0.08		0.51
Grassland	Other neutral grassland	0.05	Medium	Poor		0.02	0.03
Heathland and shrub	Bramble scrub	0.15	Medium	Condition Assessment N/A		0.07	0.08
Heathland and shrub	Rhododendron scrub	0.03	Low	Condition Assessment N/A			0.03
Urban	Introduced shrub	0.03	Low	Condition Assessment N/A			0.03
Urban	Developed land; sealed surface	0.74	V.Low	N/A - Other			0.74
Urban	Bare ground	0.02	Low	Poor			0.02
Individual trees	Urban tree	1.05	Medium	Moderate	0.68		0.37



Table 4.2: Baseline Hedgerows and Lengths Retained and Enhanced

Hedge number	Hedgerow type	Length (km)	Distinctiveness	Condition	Length retained (km)	Length enhanced (km)	Length lost (km)
H1	Non-native and ornamental hedgerow	0.13	V.Low	Poor			0.13
H2	Non-native and ornamental hedgerow	0.13	V.Low	Poor	0.03		0.10
H3	Non-native and ornamental hedgerow	0.02	V.Low	Poor			0.02
H4	Species-rich native hedgerow	0.03	Medium	Good	0.02		0.01
H5	Non-native and ornamental hedgerow	0.03	V.Low	Poor			0.03
H6	Non-native and ornamental hedgerow	0.04	V.Low	Poor	0.04		0.00
H7	Non-native and ornamental hedgerow	0.02	V.Low	Poor	0.02		0.00
LT1	Line of trees	0.08	Low	Poor	0.08		0.00
LT2	Line of trees	0.1	Low	Poor	0.1		0.00
H8	Non-native and ornamental hedgerow	0.03	V.Low	Poor			0.03



Proposed Habitats

- 4.4. The proposals, as shown within **Appendix 1** and the Post-development Habitat Plan **16680/P03**, have been used to calculate the proposed habitat areas. The rationale for target condition assessments is detailed within the metric **16680/BNG**.

Table 4.3: Created and Enhanced Habitats

Broad Habitat	Proposed habitat	Area (hectares)	Created/enhanced	Baseline condition	Distinctiveness	Target condition
Individual trees	Urban tree	0.68	Created	N/A	Medium	Moderate
Grassland	Modified grassland	0.57	Created	N/A	Low	Moderate
Urban	Vegetated garden	0.06	Created	N/A	Low	N/A
Heathland and shrub	Mixed scrub	0.21	Created	N/A	Medium	Moderate
Grassland	Other neutral grassland	0.02	Enhanced	Modified grassland (poor)	Medium	Moderate
Heathland and shrub	Mixed scrub	0.07	Enhanced	Bramble Scrub	Medium	Moderate
Urban	Developed land; sealed surface	1.35	Created	N/A	N/A	N/A

Table 4.4: Created and Enhanced Hedgerows

Habitat type	Length (km)	Created/enhanced	Distinctiveness	Target condition
Species-rich native hedgerow	0.24	Created	Medium	Moderate



Results Summary

- 4.5. As described within The Statutory Biodiversity Metric **16680/BNG** and summarised below in **Figure 4.1**, based on the habitats present on site that will be lost and those to be created, the development would result in a loss of 3.33 habitat units, and a gain of 1.18 hedgerow units. This is a percentage loss of 20.59% in habitat units and 105.06% in hedgerow units.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	-3.33
	<i>Hedgerow units</i>	1.18
	<i>Watercourse units</i>	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	-20.59%
	<i>Hedgerow units</i>	105.06%
	<i>Watercourse units</i>	0.00%
Trading rules satisfied?	No - Check Trading Summaries ▲	

Figure 4.1: Biodiversity Net Gain Assessment Results Summary, taken from The Statutory Biodiversity Metric.

Management

- 4.6. The results of The Statutory Biodiversity Metric are based on the habitats within the site being maintained at a certain condition, as prescribed by the condition assessment sheets published by Defra.
- 4.7. To achieve a 10% net gain in biodiversity for habitat units, it will be necessary for the creation of an additional 4.95 biodiversity units off-site. This is calculated as: 10% increase on the baseline of 16.18= 17.80. Residual post-development value= 12.85. 17.80- 12.85 = 4.95 units. These off-site units will also need to satisfy the trading rules as described in **16680/BNG**.
- 4.8. Details of habitat establishment and long-term management will be provided through the production of a Landscape and Ecological Management Plan (LEMP). The LEMP would set out the prescriptions for the establishment and maintenance of the habitats on site for 30 years.



Section 5: Conclusions

- 5.1. One statutory designated sites: Rochdale SPA, was assessed. No impacts are anticipated due to the nature of the proposals. Three non-statutory sites were assessed, and no impacts are anticipated as a result of development, as long as standard best practice is followed to control impacts via air, run-off, and other pollutants. These are to be incorporated into a CEMP.
- 5.2. The development will primarily affect habitats of negligible ecological importance. Loss of 24 trees, neutral grassland and hedgerows of local ecological importance will be compensated for by replacement tree and hedgerow planting and grassland planting/ enhancement. With the enhancements and habitat creation proposed, including native species planting, habitats of ecological importance on site will be enhanced, providing additional opportunities for biodiversity within the site.
- 5.3. In addition the following mitigation will be required:
- A Lighting plan will be required to ensure sensitive areas will be maintained as dark areas during and post construction, to ensure bats, otter and other wildlife are not deterred from using them.
 - During works to T87, 108 and 123 a suitably qualified ecologist (SQE) should be present and features should be relocated or replaced at a 1:1 ratio with bat boxes.
 - A pre-commencement check of the suitable habitats on-site to support badger, immediately prior to the start of works should be completed.
 - If any clearance works to nesting habitats are required during the nesting season, then pre-removal checks for nesting birds must be carried out by a suitably experienced SQE no more than 48 hours prior to the works commencing
- 5.4. The biodiversity net gain assessment found that the proposals would result in a loss of 20.59% in habitat units and a net gain of 105.06% in hedgerow units. To comply with local, National Planning Policy Framework (NPPF) and the Town and Country Planning Act 2023 a 10% net gain in biodiversity units is required off-site and can be secured through a section 106 agreement.
- 5.5. An appropriately worded planning condition is expected to secure a suitable LEMP or Ecological Enhancement Plan to ensure the long-term management of the proposed habitat enhancements, including proposed tree, hedge, and shrub planting, as well as provision of enhancements for specific species groups such as bird and bat boxes.
- 5.6. In conclusion, in anticipation of the implementation of any necessary mitigation, the proposed development will be compliant with relevant planning policies S06, G6, JP-G8 of the Local Plan, as well as legislation with regard to ecology.



Appendix 1: Proposed Site Plan [425-LST-XX-XX-DR-L-0301]





NOTES:
1. Do not scale from this drawing.
2. Always work to noted dimensions.
3. All dimensions are in millimetres unless otherwise stated.
4. All setting out, levels and dimensions to be agreed on site.
5. The dimensions of all materials must be checked on site before being laid out.
6. This drawing must be read with the relevant specification clauses and detail drawings.
7. Order of construction and setting out to be agreed on site.

KEY	
	Species rich meadow (3995m²)
	Scrub enhanced (2830m²)
	Enhanced existing modified grassland (2340m²)
	Enhanced existing neutral grassland (1685m²)
	Yellow meadow flower mix
	Orange meadow flower mix
	Blue meadow flower mix
	Pink meadow flower mix
	Productive planting beds (586m²)
	Raingarden planting (64m²)
	Mown meadow path
	Proposed Tree (31 medium, 30 small)
	Proposed Multi-stem (4 no.)
	Pleached Tree (8no.)
	Existing Tree
	Proposed Mixed Native Hedge (236 (m)
	Existing Hedge (213 (m)
	Clay pavers Allaton Alder UWF Tumbled
	Clay pavers Vana WF Warestruck
	Clay pavers Ruston Alder UWF Tumbled
	Natural stone channel
	Grass joint paving Hardscape - Hydro Lineo
	Self binding gravel CEDEC Footpath Gravel - Red
	Resin bound gravel Terrabound Terracotta Resin Bound 6mm
	Asphalt
	Coloured Asphalt (Buff)
	Brick Edging
	2.4m Acoustic weldmesh security fence (Black)
	2.1m Weldmesh security fence (Black)
	Double leaf security gates (Black)
	Double arm rising barrier
	Removable Bollard
	Fixed Bollard
	Fallen Log
	Stepping Logs
	Seating
	Picnic Bench
	Parasol
	Reflective water feature
	Cafe seating and table
	Light Column
	Play equipment
	Green roof cycle shelter

Read in conjunction with:
(425-LST-XX-XX-RP-L-0001-P05-Winners Chapel Landscape Workbook)

P06	14/11/24	Stage 3 Issue	MN	KR
P05	30/10/24	Updated Planting & GP Plan	MN	KR
P04	28/08/24	Planning Issue	MN	KR
P03	08/08/24	Updated layout	MN	SR
P02	29/07/24	Updated Arch Layout	MN	SR

Revision	Date	Description	Drawn	Apprvd.
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Client World Mission Agency –
Winners Chapel
International

Project Winners Chapel Manchester

Drg Title Landscape General
Arrangement

Created on	Created by	Approved by
10-07-24	MN	KR

Scale	Size	Workstage
1:500	A1	Stage 3

Drg No.	Suitability	Revision
425-LST-XX-XX-DR-L-0101	S4	P06

land studio

Appendix 2: Legislation and Planning Policy

Legislation

- A2.1. Specific habitats and species receive legal protection in the UK under various pieces of legislation, including:
- The Environment Act 2021;
 - The Wildlife and Countryside Act (WCA) 1981 (as amended);
 - The Conservation of Habitats and Species Regulations 2017 (as amended);
 - The Countryside and Rights of Way (CROW) Act 2000;
 - The Natural Environment and Rural Communities Act (NERC) 2006;
 - The Hedgerows Regulations 1997; and
 - The Protection of Badgers Act 1992.
- A2.2. The European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, 1992, often referred to as the 'Habitats Directive', provides for the protection of key habitats and species considered of European importance. Annexes II and IV of the Directive list all species considered of community interest. The legal framework to protect the species covered by the Habitats Directive has been enacted under UK law through The Conservation of Habitats and Species Regulations 2017 (as amended).
- A2.3. In Britain, the WCA 1981 (as amended) is the primary legislation protecting habitats and species. SSSIs, representing the best examples of our natural heritage, are notified under the WCA 1981 (as amended) by reason of their flora, fauna, geology or other features. All breeding birds, their nests, eggs and young are protected under the Act, which makes it illegal to knowingly destroy or disturb the nest site during nesting season. Schedules 1, 5 and 8 afford protection to individual birds, other animals and plants.
- A2.4. The CROW Act 2000 strengthens the species enforcement provisions of the WCA 1981 (as amended) and makes it an offence to 'recklessly' disturb a protected animal whilst it is using a place of rest or shelter or breeding/nest site.

Environment Act 2021

- A2.5. The Environment Act gained Royal Assent in November 2022. Whilst the premise of Biodiversity Net Gain (BNG) has been around prior to this, the Assent of the Act sets the Framework for future legislation to be changed. The Town and Country Planning Act (TaCPA), specifically Schedule 14 of the TaCPA, makes Biodiversity Net Gain a condition of planning (not a planning condition). The target 'gain' is currently set at 10% but the Secretary of State has the ability to change this.



National Planning Policy

National Planning Policy Framework (NPPF), December 2023

A2.6. The updated National Planning Policy Framework (NPPF) was published in December 2023 and sets out the Government's planning policies for England and how these should be applied. It replaces the first National Planning Policy Framework published in March 2012.

A2.7. Paragraph 11 states that:

"Plans and decisions should apply a presumption in favour of sustainable development."
Section 11 of the NPPF, paragraph 120, sub-section b states that planning policies and decisions should:

- b) *"encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains such as developments that would enable new habitat creation or improve public access to the countryside;*
- c) *recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production"*

A2.8. Section 15 of the NPPF (paragraphs 174 to 188) considers the conservation and enhancement of the natural environment.

A2.9. Paragraph 180 states that planning and decisions should contribute to and enhance the natural and local environment by:

- a) *"protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) *maintaining the character of the undeveloped coast, while improving public access to it where appropriate; and*
- 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"*

A2.10. Paragraph 181 states that plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

Paragraph 185 states that in order to protect and enhance biodiversity and geodiversity, plans should:

- a) *"Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally*



designated sites of importance for biodiversity⁸; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation⁹; and

- 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.”*

A2.11. When determining planning applications, Paragraph 186 states that 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;*
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons¹⁰ and a suitable compensation strategy exists; and*
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”*

A2.12. As stated in paragraph 187 the following should be given the same protection as habitats sites¹¹:

- a) “potential Special Protection Areas and possible Special Areas of Conservation;*
- b) listed or proposed Ramsar sites¹²; and*

⁸ Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

⁹ Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of development that may be suitable within them.

¹⁰ For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.

¹¹ The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change.

¹² Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which Government has initiated public consultation on the scientific case for designation as a Special Protection Area, candidate Special Area of Conservation or Ramsar site.



- c) *sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.”*

A2.13. Paragraph 182 states that the presumption in favour of sustainable development 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.

Local Planning Policy

Manchester City Council, Manchester Core Strategy 2012-2027¹³

A2.14. Policies and Objectives relating to ecology and nature conservation are summarised as below:

A2.15. Objective 6: Environment

SO6. Protect and enhance both the natural and built environment of the City and ensure the sustainable use of natural resources, in order to mitigate and adapt to climate change, support biodiversity and wildlife, improve air, water and land quality, recreational opportunities and provide networks of high quality green infrastructure, ensuring that the City is inclusive and attractive to residents, workers, investors and visitors.

Development Plans and area-based strategies should use evidence, including green infrastructure strategies, to:

- identify key green infrastructure assets, their function and their potential function*
- identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.*

Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.

A2.16. Policy G5: Urban Greening

Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score

¹³ Website: Manchester City Council, 2024, [Core Strategy 2012-2027](#) | [Core Strategy 2012-2027](#) | [Manchester City Council](#) [ACCESSED 16/10/2024]



of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).

Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.

A2.17. Policy G6: Biodiversity and Access to nature

Sites of Importance for Nature Conservation (SINCs) should be protected.

Boroughs, in developing Development Plans, should:

- use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks.*
- identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them.*
- support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans.*
- seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context.*
- ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.*

Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:

- avoid damaging the significant ecological features of the site*
- minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site*
- deliver off-site compensation of better biodiversity value.*

D Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

Proposals which reduce deficiencies in access to nature should be considered positively.

A2.18. Policy G7: Trees and woodlands

London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.



In their Development Plans, boroughs should:

- *protect ‘veteran’ trees and ancient woodland where these are not already part of a protected site*
- *identify opportunities for tree planting in strategic locations.*

Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

Local Plans, Supplementary Planning Documents, Core Strategies

Places for Everyone (PfE) Joint Development Plan 2024

The PfE Joint Development Plan is relevant for all local authorities within the Greater Manchester Combined Authority and includes the following relevant policies:

- JP-S1: Sustainable Development
- JP-G7: Trees and Wood
- JP-G8: A Net Enhancement of Biodiversity and Geodiversity

Biodiversity Actions Plans¹⁴

A2.19. The Greater Manchester Biodiversity Action Plan includes the following habitats and species that are relevant for the Site:

- Grasslands (including unimproved neutral grasslands)
- Hedgerows
- Urban-managed green space (including private gardens)
- Bats

¹⁴ Website: GM Biodiversity Action Plan, 2009, [GMLRC Projects - Greater Manchester Biodiversity Action Plan](#), [Accessed 16/10/2024]



Appendix 3: Methodology and Results

Data Search

- A3.1. A desk-based study was conducted whereby records of designated sites and records of protected and priority species were purchased and interrogated for the site and the surrounding landscape. The aim of the data search is to collate existing ecological records for the site and adjacent areas. Obtaining existing records is an important part of the assessment process as it provides information on issues that may not be apparent during a single survey, which by its nature provides only a 'snapshot' of the ecology of a given site.
- A3.2. The following resources were consulted/contacted:
- Multi-Agency Geographic Information for the countryside (MAGIC) website¹⁵;
 - Greater Manchester Record Centre (GMEU)¹⁶; (Data received on 16 October 2024);
 - Local Council website¹⁷;
 - Joint Nature Conservation Committee (JNCC) website¹⁸;
 - Natural England (NE) designated sites website¹⁹;
 - Ordnance Survey mapping; and
 - Google Maps, including aerial photography.
- A3.3. The following areas of search around the boundary of the site boundary were applied:
- 2 km for protected and priority species, national statutory designated and non-statutory sites; and
 - 10 km for European statutory sites.

'Extended' Phase I Habitat Survey and UKHabs

- A3.4. An 'extended' Phase 1 survey was carried out on the 12th March 2024 by Amy Haddock-Sherwin ACIEEM of Tyler Grange and followed up by a UKHabs survey on 17th September 2024 by Henry Gunning, a suitably experienced ecologist and Associate member of CIEEM. The methods used during the walkover survey broadly followed methods used in an 'extended' Phase I habitat survey²⁰ and entailed recording the main plant species and classifying and mapping habitat types

¹⁵ <https://magic.defra.gov.uk/> [Accessed 16/10/2024]

¹⁶ [GMLRC About](#) [Accessed: 16/10/2024]

¹⁷ [Manchester City Council Homepage](#) / <https://www.redbridge.gov.uk/planning-and-building/planning-policy/> [Accessed 16/10/2024]

¹⁸ <http://jncc.defra.gov.uk/ProtectedSites/> [Accessed 16/10/2024]

¹⁹ <https://designatedsites.naturalengland.org.uk/> [Accessed 16/10/2024]

²⁰ Joint Nature Conservation Committee (2010). Handbook for Phase 1 habitat survey - a technique for environmental audit. JNCC, Peterborough.



with reference to the Habitat Definitions provided by the UK Habitat Classification Working Group²¹.

- A3.5. Additionally, the habitats identified were evaluated for their potential to support legally protected and notable fauna species. Where access allowed, adjacent habitats were also considered in order to assess the site within the wider landscape and to provide information with which to assess possible impacts within the context of the site boundary.
- A3.6. All habitats were assessed utilising the relevant condition criteria for the relevant habitat type under the statutory metric", which included confirming 'pass' / 'fail' criteria taken from the UK Habitat/Phase 1 methodology where necessary.

Preliminary Bat Surveys

- A3.7. The surveys followed standard methodologies set out in the Bat Mitigation Guidelines²², the Bat Workers Manual²³ and Bat Surveys for Professional Ecologists- Good Practice Guidelines 4th Edition²⁴ and comprised:
- The Preliminary Roost Assessment (PRA) – was carried out by a different ecological consultant and will be addressed in a separate report.
 - Ground Level Tree Assessment (GLTA) – Ground-level inspection of trees to assess potential of trees on site to support roosting bats; and
 - Day-time Bat Walkover (DBW) – Walkover of the sites to assess potential bat activity including foraging areas and potential commuting routes.

Ground Level Tree Assessment (GLTA)

- A3.8. A GLTA was undertaken on all trees within the Site boundary. The assessment was undertaken on 5th August by David Paton. All surveys were daytime inspections and the conditions for all surveys was considered optimal. The location of the trees at the Site are shown on **Plan 16680_P04**. All trees were inspected from the ground using binoculars, high powered torch, digital camera and endoscope for accessible features. Potential Roosting Features (PRFs) of interest include at detailed in Table A3.1 below.

Table A3.1: PRF Types that can be Exploited by Bats and How they Form - adapted from Collins, 2023.

PRFs formed by disease and decay	PRFs formed by damage	PRFs formed by association
woodpecker holes squirrel holes knot holes pruning cuts tear outs	lightning strikes hazard beams subsidence cracks shearing cracks transverse snaps	fluting ivy

²¹ UKHab Ltd. (2023). UK Habitat Classification Version 2.0 (at <https://www.ukhab.org>)

²² Reason, P.F. and Wray, S. (2023). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Chartered Institute of Ecology and Environmental Management, Ampfield.

²³ Mitchell-Jones, A.J. & McLeish, A.P. (eds). (2004) 3rd Edition Bat Workers' Manual., JNCC, Peterborough, ISBN 1 86107 558 8

²⁴ Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition). The Bat Conservation Trust, London. ISBN-978-1-7395126-0-6



PRFs formed by disease and decay	PRFs formed by damage	PRFs formed by association
wounds cankers compression forks butt rots	welds lifting bark desiccation fissures frost cracks	

- A3.9. The potential of trees to support roosting bats was assessed using the criteria shown in **Table A3.2** below.

Table A3.2: Assessment of Tree Suitability Criteria - adapted from Collins, 2023.

Roost Suitability	Description of Roosting Habitat
NONE	Either no PRFs in the tree or highly unlikely to be any
FAR	Further assessment required to establish if PRFs are present in the tree
PRF	A tree with at least one PRF present

Arial inspection

- 5.7. Trees determined to be of moderate or higher (PRF-M) or FAR bat roost potential during the GLTA survey in September 2024 were subject to three aerial inspections using an endoscope and pole camera to further assess their suitability for roosting bats. These inspections were completed by qualified tree climbers holding (or supervised by an ecologist with) a Level 2 Natural England bat licence. Information on the features identified from the ground assessment was gathered from within the tree allowing confirmation on dimensions and exposure to rain. Locations of these trees can be seen on plan **16680/P04** appended to this report.
- 5.8. The tree climbing survey's were conducted following the completion of the GLTA detailed above all by surveyors qualified to safely conduct such surveys and hold CS38 tree climbing and aerial rescue qualifications shown in **Table A3.3**.

Table A3.3: Tree climbing surveys

Visit	Date	Conducted by
V1	17/08/2024	David Marshal level 2 Natural England Class License holder for bats (ref: SMQ-0000017224) and William Walton.
V2	30/08/2024	David Marshall and Andrea Cordon level 2 Natural England Class License holder for bats (ref: SMQ-0000013763)
V3	21/09/2024	David Marshall and Andrea Cordon

- 5.9. Trees were inspected using dual rope technique to gain access to the canopy and to any potential roost features (PRFs) identified during the previous GLTA, as well as any additional features identified during the survey. PRFs were inspected using torches and endoscopes where appropriate, and the presence or absence of bats at time of survey was confirmed.



- 5.10. Following the close inspections of roost features provided by the tree climbing surveys, the PRFs present on the trees were re-evaluated, with their roost potential category either raised or lowered depending on the new information obtained during the survey.

Day-time Bat Walkover (DBW)

- A3.10. A DBW was undertaken on all habitats within the Site boundary. The assessment was undertaken on 12th March by Amy Haddock-Sherwin. All surveys were daytime inspections and the conditions for all surveys were considered optimal. The DBW assessed habitats on-site for the likelihood to be used by foraging and commuting bats as detailed in Table A3.4 below. This combined with desk study records of local bats and bat roosts, and potential for roosting bats on-site is used to determine suitability of the site for bat activity.

Table A3.4: Flight Path and Foraging Habits Assessment Criteria - adapted from Collins, 2023.

Suitability	Description of Roosting Habitats
None	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging bats).
Negligible	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	Habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.



Badger

Legislation and Conservation Status

- A3.11. The Protection of Badgers Act 1992 consolidates the previous Badger Acts of 1973 and 1991. The legislation aims to protect the species from persecution, rather than being a response to an unfavourable conservation status. As well as protecting the animal itself, the 1992 Act also makes the intentional or reckless destruction, damage, or obstruction of a badger sett an offence.
- A3.12. A sett is defined as 'any structure or place which displays signs indicating current use by a badger'. In addition, the intentional elimination of sufficient foraging area to support a known social group of badgers may, in certain circumstances, be construed as an offence by constituting 'cruel ill treatment' of a badger. Badgers are not the subject of conservation action.
- A3.13. Due to the continued persecution of this species, all details relating to the location of badger setts must be kept out of the public domain and not submitted to any public portal as part of the application submission.

Badger Surveys

- A3.14. A badger survey was undertaken at the site, and within 30m, where accessible, on 12th March 2024 by Amy Haddock-Sherwin Mbiol ACIEEM who is an experienced field ecologist. This survey comprised two main elements, the first of these was a thorough search for evidence of badger setts. If any setts were encountered each sett entrance was noted and plotted even if the entrance appeared disused.
- A3.15. The number of holes comprising each sett was recorded and setts classified as disused, partially used or active. Sett descriptions and categories of use are set out in **Tables A4.1** and **A4.2** below.
- A3.16. Sett classification is only possible in relation to the other setts within a clan's territory and if the entire territory range cannot be assessed, classification may not be possible.
- A3.17. The following information was recorded:
- The number and location of well used or very active entrances; these are clear from any debris or vegetation and are obviously in regular use and may, or may not, have been excavated recently;
 - The number and location of partially-active entrances; these are not in regular use and have debris such as leaves and twigs in the entrance or have plants growing in or around the edge of the entrance; and
 - The number of disused entrances; these have not been in use for some time, are partly or completely blocked and cannot be used without considerable clearance. If the entrance has been disused for some time all that may be visible is a depression in the ground where the hole used to be and the remains of the spoil heap.



A3.18. Secondly, the survey area was walked, and signs of badger activity recorded in order to determine the classification of each sett present within proximity of the site. Typical badger field signs include:

- Tracks and mammal pathways;
- Push-throughs (gaps where badgers regularly push their way through fencing or hedgerows);
- Latrines and dung pits;
- Badger hairs;
- Badger prints;
- Foraging activity (e.g. snuffle holes); and
- Additional sett entrances.

A3.19. For any setts recorded, these were examined and assigned to one of four categories of importance to the badger clan, as defined by published guidance^{25 26 27 28 29 30}.

Table A3.5 Classification of Badger Setts

Type of Badger Sett	Description
Main Sett	The continuously used, breeding and over-wintering sett for the social group of badgers (clan). Main setts usually more entrances than the rest of clans setts, with large spoil heaps and the setts generally look well used. There are well-used paths to and from the sett and between sett entrances.
Annex Sett	Annex sets are often close to a main sett, usually less than 150m away, and are often connected to the main sett by one or more obvious well-worn paths. Annex setts usually have several holes, but may not be in use all the time, even if the main sett is very active.
Subsidiary Sett	Subsidiary setts often only have a few holes. They are usually at least 50m from a main sett and do not have an obvious path connecting with another sett. They are not continuously active, with seasonal use.
Outlier Sett	Outlier setts usually have only one or two holes, often have little spoil outside the hole, with no obvious path connecting with another sett and are only used sporadically. When not in use by badgers, they are often taken over by foxes or rabbits. However, they can still be recognised as badger setts by the shape of the tunnel (not the actual entrance hole), which is usually at least 250mm in diameter, and is rounded or a flattened oval shape. Fox and rabbit tunnels are smaller and often taller than broad.

Table A3.5 Indicators of Badger Sett use

²⁵ Harris S., Cresswell, P., Jefferies, D. (1989) *Surveying Badgers*. The Mammal Society, London.

²⁶ Wilson, G., Harris, S., McLaren, G. (1997) *Changes in the British badger population 1988 to 1997*. People's Trust for Endangered Species, London.

²⁷ Cresswell, P., S. Harris, D. J. Jefferies (1990) *The history, distribution, status and habitat requirements of the badger in Britain*. Nature Conservancy Council, Peterborough, England.

²⁸ Natural England (2022) Badgers: surveys and mitigation for development projects, Natural England standing advice, Available at: <https://www.gov.uk/guidance/badgers-surveys-and-mitigation-for-development-projects> [Accessed: 10/10/2014]

²⁹ Andrews, R. (2013). The Classification of Badger (*Meles meles*) Setts in the UK: A Review and Guidance for Surveyors. Chartered Institute of Ecology and Environmental Management - *In Practice* **82**: 27-31

³⁰ Scottish Badgers (2018). *Surveying for Badgers: Good Practice Guidelines*. Version 1. https://www.scottishbadgers.org.uk/wp-content/uploads/2020/12/Surveying-for-Badgers-Good-Practice-Guidelines_V1-2020-2455979.pdf



Classification of Use	Description
Active	Clear of debris and vegetation, obviously in regular use
Partially-active	Not in regular use, with leaves or twigs in entrance or moss and other plants growing around the entrance.
Disused	Partially or completely blocked entrances, unable to be used without a considerable amount of clearance.

A3.20. The survey area was searched systematically, with particular attention paid to areas where the vegetation and/or the topography offered good suitability for sett creation. Areas with dense ground cover (hedges, scrub, woodland, etc) were examined closely; if the vegetation prevented entry, then the perimeter was examined, in order to detect paths suggesting a hidden sett within the area.

Biodiversity Net Gain

A3.21. The Statutory Biodiversity Metric operates by calculating the number of biodiversity units associated with a particular habitat type (both pre-and post-development) – the ‘unit’ value associated with each habitat type is calculated based on the following parameters:

- Size (in hectares)/Length (in km);
- Distinctiveness (i.e. how rare/valuable a given habitat is);
- Condition (i.e. how well the recorded habitat fits [or will fit] the standardised description of that habitat); and
- Strategic significance (i.e. if the existing or proposed habitat is within an area formally adopted in the local plan for green infrastructure or biodiversity improvements).

A3.22. When considering the creation of new habitats in the post-development site, other factors are also considered when calculating the ‘unit’ value of a given habitat and these are:

- Time to reach the target condition of each habitat; and
- Difficulty category for the creation of a given habitat.

A3.23. A calculation has been undertaken using the baseline habitats identified during habitat condition assessment survey, which was carried out on the 17th September 2024, alongside the UKHab survey above. Carried out by Henrey Gunning, a suitably experienced ecologist and Associate member of CIEEM.

A3.24. The UK Habitat Classification was used to identify habitat types. Note that the calculation is completed separately for non-linear and linear habitats. Habitat areas entered into The Statutory Biodiversity Metric in hectares were rounded to two decimal places.



Evaluation

- A3.25. The evaluation of habitats and species is defined in accordance with published guidance³¹. The scale of importance of each ecological feature is assigned within a defined geographical context, namely international and European, national, regional, county, and local. Below these are features considered to be of negligible importance.
- A3.26. Consideration will also be given to legally protected or controlled species which are 'important features' in the context of this assessment, for which mitigation measures are required to ensure legal compliance, regardless of their geographic scale of importance. Thus, it is possible for a feature of negligible ecological importance to be legally protected and hence require mitigation.
- A3.27. Evaluation is based on various characteristics that can be used to identify ecological features likely to be important in terms of biodiversity. These include site designations (such as Sites of Species Scientific Interest (SSSIs), or for undesignated features, the size, conservation status (locally, nationally or internationally), and the quality of the ecological feature. In terms of the latter, quality can refer to habitats (for instance if they are particularly diverse, or a good example of a specific habitat type), other features (such as wildlife corridors or mosaics of habitats) or species populations or assemblages.

Impact Assessment

- A3.28. The assessment of impacts identifies impacts and their effects as a result of the proposed development on important ecological features. This includes consideration of impacts at all relevant stages of the development, including construction and operation/occupation. The assessment includes reference to legislation and policy, and supplementary planning guidance where relevant.

Application of Mitigation Hierarchy

- A3.29. Application of the mitigation hierarchy is fundamental to the ecological impact assessment process. This requires consideration of the following measures, in order of priority, for all potential impacts, to determine the most appropriate mitigation, compensation and enhancement strategy for the project. This is taken into account within **Section 3** of this report and set out below:
- Avoidance – measures to avoid harm to ecological features (set out in 'Design Evolution', Section 3);
 - Mitigation – measures to avoid or minimise potential impacts as part of the design or guaranteed by planning controls;
 - Compensation – measures required to offset significant residual negative effects following avoidance and mitigation; and

³¹ CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management, Winchester.



- Enhancement – measures over and above requirements for avoidance, mitigation and compensation to provide biodiversity net gain.

Limitations and Assumptions

- A3.30. Of the trees that were the subject of the tree climbing assessment, one tree (T123) was deemed unsafe to climb due to the presence of a bee colony. As such, this was unable to be fully inspected or downgraded and remains with PRF-M potential for roosting bats. Pole cameras were used at a safe distance from the tree but features could still not be fully inspected. It was also not possible to complete nocturnal surveys on the tree due to limited viewpoints within the canopy.
- A3.31. Bats use a variety of roosts, ranging from maternity, mating or swarming and hibernation roosts, containing many individuals, to mating or night-time feeding roosts containing few individuals or single animals. Bats also tend to be nomadic (although are faithful to certain favoured roosting sites), spending variable lengths of time in a variety of roosts. As a result, even with the considerable survey effort it is possible that small transient roosts of bats may have been missed, although these tend to be less important to bats and so this should not affect the evaluation and recommendations made.
- A3.32. It should be noted that badger survey information is accurate at the time of survey; badgers are mobile animals and may dig new setts, abandon old setts and change the status of existing setts (e.g. extend an annexe sett to create a main sett), at any time.
- A3.33. The findings of this report are valid at the time of writing. Owing to the dynamic nature of ecological resources, if more than 12 months have elapsed since the report was written, advice should be sought to determine whether update work is required. The findings of the report should not be relied upon without this advice.



Plans:

Plan 1: Habitat Features Plan **16680/P03b**

Plan 2: Tree Retention and Removal Plan **16680/P04**

