

Ecological Impact Assessment



**Tyler
Grange**

Sisters, Manchester
15th November 2024

TG Report No. 14667_R03_NB

Project No:	Report No.	Date	Revision
14667	R03	15th November 2024	-
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Summary

- S.1. This report has been prepared by Tyler Grange Group Ltd on behalf of Bruntwood Sci-Tech Ltd. It sets out the findings of a Preliminary Ecological Appraisal (PEA) Sisters (formerly 'ID Manchester'), centred around OS Grid Reference SJ 84674 97582), hereafter referred to as 'the site'.
- S.2. An Extended Phase 1/ UK Habs survey was conducted 25th August 2022, with an update survey 11th July 2024. The surveys recorded the habitats present on site and included an assessment of the confirmed presence or likely absence of protected and notable fauna. A data search was conducted to establish potential impacts on designated sites within the Zone of Influence.
- S.3. In terms of protected sites, one internationally designated site, Rochdale Canal SAC, is located within 10 km of the site (5.4 km) and two SBI's are located within 2 km. All three sites are designated for their canal/ aquatic habitats and given that there are no hydrological linkages from site to/ from the SAC, Rochdale Canal/ Ducie Basin SBI or Ashton Canal (West) SBI, no adverse direct or indirect effects are anticipated as a result of development
- S.4. *Habitats:* The development will primarily affect habitats of negligible ecological importance. Loss of trees (local ecological importance) should be compensated for by extensive replacement tree planting and enhancement of retained tree-lined areas. Additionally, creation of areas of neutral grassland and native species mixed scrub planting should be proposed.
- S.5. *Species:* All buildings and trees onsite were subject to preliminary bat roost assessment. No suitable bat roosting features were recorded. However, sections of the Sackville Street Building roof were not accessible; the building is due for retention, but recommendations have been made in event of the alterations to the roof being required. The site offers limited value for foraging and commuting bats due to the heavily urbanised context; the site is therefore considered to be of negligible ecological importance for bats.
- S.6. Should vegetation or the buildings on the site be removed/ demolished during the core nesting bird season (March-August, inclusive), a pre-works check by a suitable qualified Ecologist would be required to determine whether active birds' nests are present.
- S.7. In conclusion, in anticipation of the implementation of any necessary mitigation, the proposed development will be compliant with relevant local planning policies, such as PFE JP-G8, as well as legislation with regard to ecology.



Section 1: Introduction and Context

Introduction

- 1.1. This report has been prepared by Tyler Grange Group Ltd on behalf of Bruntwood Sci-Tech Ltd. It sets out the findings of a Preliminary Ecological Appraisal (PEA) at ID Manchester/Sisters, centred around OS Grid Reference SJ 84674 97582), hereafter referred to as 'the site'. See **Figure 1.1** for the red line boundary.

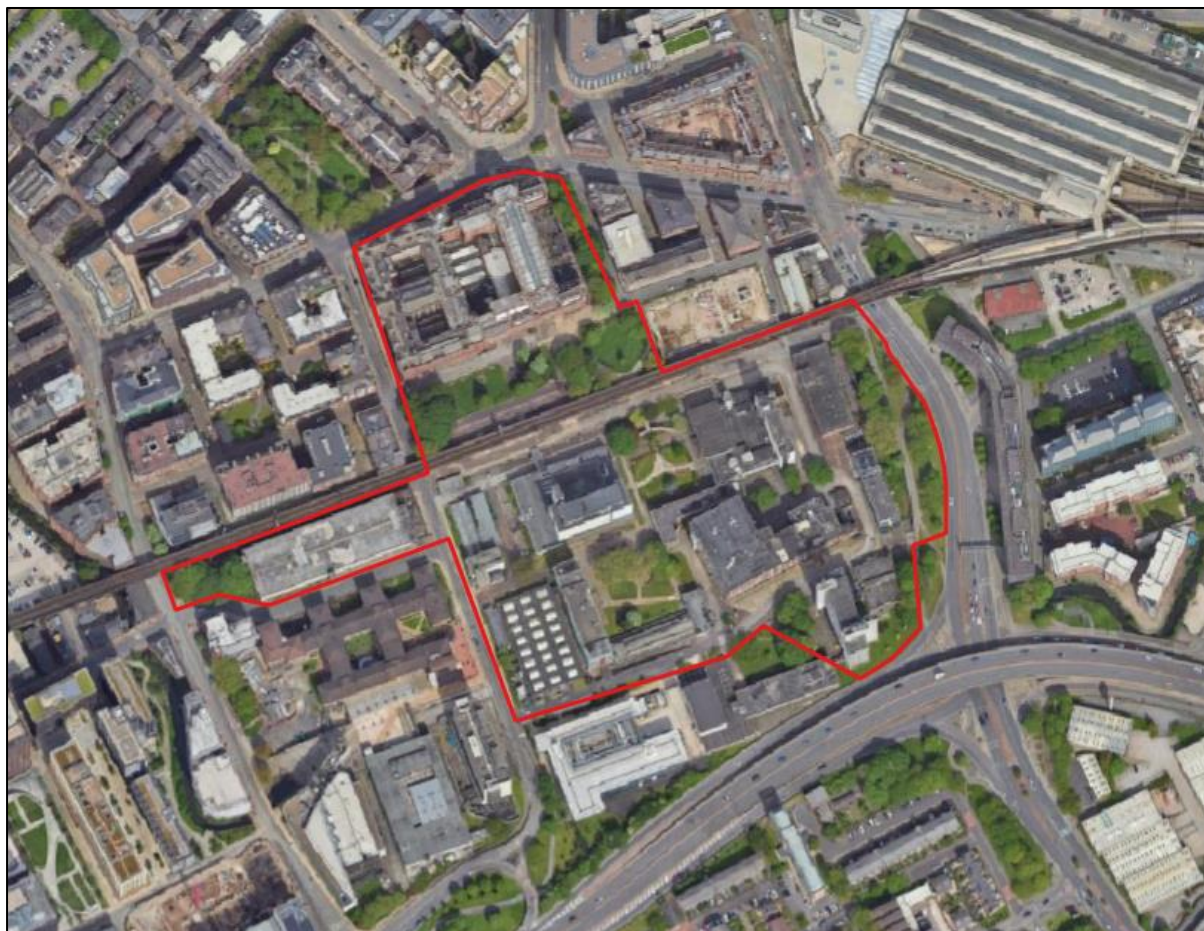


Figure 1.1: Red line boundary (© Google Aerial Imagery)

- 1.2. This assessment has been undertaken to inform a planning application for the redevelopment of numerous buildings, as part of Manchester University, for science, technology and work spaces, with associated access, infrastructure and landscaping. The site proposals are shown in **Appendix 1**.

Site Context

- 1.3. The redevelopment of the wider 'ID Manchester' site shall be coming forward in phases; this report provides a 'site wide' assessment of the ecological baseline, as illustrated in **Figure 1.1** above.
- 1.4. The site is approximately 7.8 ha and comprises a series of University buildings, with amenity spaces comprising modified grassland (amenity grassland), mature trees, introduced shrubs, ornamental hedgerows, bare ground and hardstanding.
- 1.5. The site is set within the heavily urbanised location of central Manchester, with few linking habitats from the site to the wider habitats beyond. Although the newly created Mayfield Park, on the opposite side of the A6 (approximately 200 m to the east) and the River Medlock (culverted underneath the adjacent plots to the south), offer some habitats for flora and fauna within the wider area.

Purpose

- 1.6. 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 (Zoi) 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.
- 1.7. 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

- 1.8. Full methods for the data search, 'extended' phase 1/ UK Habs survey, PRA and BNG work can be found in **Appendix 3**.

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.



Quality Control

- 1.9. 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.

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 Greater Manchester Records Centre (GMRC), as well as data from the Multi-Agency Geographic Information for the Countryside (MAGIC). See **Appendix 3** for full methodology.
- 2.2. The data search returned one internationally designated site within 10 km of the site, no nationally designated site within 2 km and two 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 Special Area of Conservation (SAC, SSSI)	5.4 km northeast at nearest point	Designated for it's populations of floating water plantain <i>L. Natans</i> .	International
Rochdale Canal: Stott's Lane to Ducie Street Basin Site of Biological Important (SBI)	460 m northeast	Comprises the 'downstream' component of the European statutory Rochdale Canal SAC, SSSI.	Local
Ashton Canal (West) (SBI)	665 m west	Comprises the 'downstream' component of the European statutory Rochdale Canal SAC, SSSI.	Local



- 2.3. The site does not fall into the SSSI Impact Risk Zone for the Rochdale Canal SAC, SSSI; as such consultation with Natural England is not considered necessary for habitat regulations assessment and associated further work, and this is **not discussed further within this report**.

Habitats and Flora

- 2.4. 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 and Preliminary Bat Roost Assessment Plan **14667 P13**.



Table 2.2: Habitats and Flora

Habitat	Description and Species	Ecological Importance	Photograph
<u>Primary code:</u> u1 <u>Secondary code(s):</u> Developed land; sealed surface U1b	The majority of the site is composed of hardstanding and buildings, which is described as ‘developed land; sealed surfaces’. This habitat has no intrinsic ecological value.	Negligible ecological importance	
<u>Primary code:</u> Grassland (g) <u>Secondary code(s):</u> Modified grassland (g3a)	There are areas of modified (amenity) grassland located within shared amenity spaces – most notably at the eastern boundary of the site where it meets the A6 (pictured). Although semi-naturalised habitats such as these are fairly uncommon in the wider site context, these habitats are regularly managed through mowing, with little species diversity; <i>Poa</i> species (such as annual meadow <i>Poa annua</i> were recorded throughout), and therefore considered to offer little ecological value.	Negligible ecological importance.	
<u>Primary code:</u> Individual trees <u>Secondary code(s):</u> Urban trees	There are mature scattered trees located throughout the wider site, but most notably to the east of Plot C. Some trees comprise ornamental-non-native specimens, such as the large Atlantic cedar <i>Cedrus atlantica</i> located within the amenity square to the west of the site (pictured); while there are numerous mature native species on the eastern boundary of the site, forming a buffer along A6 (lime pictured). Large mature trees are relatively scarce within central Manchester. These trees therefore provide importance at a local level for flora, amenity value and climate change resilience.	Local ecological importance.	

			
<u>Primary code:</u> Heathland and scrub <u>Secondary code(s):</u> Introduced shrubs	There are areas of ornamental and non-native shrubs, mainly located within the amenity area to the east of the site. The habitats are heavily managed and largely comprise low species diversity of non-native flora. They are therefore considered to provide negligible ecological importance.	Negligible ecological importance	
<u>Primary code:</u> Heathland and scrub <u>Secondary code(s):</u> Hedgerows	There are small, managed hedgerows of mixed native and non-native species located throughout the site. These hedgerows comprise privet <i>Ligustrum-vulgare.sp.</i>, laurel <i>prunus.sp</i> and yew <i>Taxus baccata</i> and are cut to approximately 50 cm in height. These hedgerows provide negligible ecological importance due to the lack of species diversity, size and heavily maintained and managed nature.	Negligible ecological importance	

Protected and Notable Species

- 2.5. 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, are not discussed.

Bats

- 2.6. The data search returned 78 bat roost records within 2 km of the site; the closest being a Pipistrelle sp. roost approximately 465 m east of the site from 20/05/2008. The GMLRC also returned 173 other bat records, of these the closest were signs of Pipistrelle sp. 141 m southwest of the site from 03/02/2018; this record related to a sighting only and not a bat roost.

Bat Activity

- 2.7. The site lies within an urban context, with assumed high levels of 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, but only occasionally. The habitats on site, such as urban trees, don't provide significant commuting and foraging opportunities for bats due to their small size and low diversity.

Preliminary Bat Roost Assessment

- 2.8. A Preliminary Bat Roost Assessment (PBRA) was conducted alongside the 'extended' Phase 1 Habitat survey. This assessment was carried out on the buildings and trees on and directly adjacent to site, which may be impacted by the development. See **Appendix 3** for methodology, **Table 2.3** below for results, and the Habitat Features and Preliminary Bat Roost Assessment Plan **14667 P13** for locations.
- 2.9. As described in **Table 2.3**, all buildings and trees on site were graded as providing **negligible bat roosting suitability**.



Table 2.3: PBRA Results

Structure/tree and Suitability	Potential Roost Feature (PRF)	Photograph
Building B1 – Wright Robinson / Barnes Wallis Negligible suitability	The building comprises two different, interconnected structures; one being a high-rise, former student accommodation block to the east (Wright Robinson), with the second being the Barnes Wallis two/three storey former student hub. Both structures are largely concrete and brick construction. B1 was not accessed internally. However, no discernible bat roosting features were recorded. It is therefore considered unlikely that building B1 would be suitable for roosting bats, and has been graded as providing negligible bat roosting suitability.	
Building B2 – Moffat Negligible suitability	The building is composed of redbrick, with large glass windows and a flat roof. No discernible bat roosting features were recorded. B2 was not accessed internally, however, due to the largely unsuitable surrounding habitat for bats, absence of a loft void and no recorded external bat roosting features, internal access was not deemed necessary and the building has been graded as providing negligible bat roosting suitability.	

Building B3 – Morton Laboratory. Negligible suitability	Building B3 partially comprises brick to the south, with the northern section being largely glass-panelled. As with B2, there is no loft void due to the flat roof. B3 was not accessed internally, however, due to the largely unsuitable surrounding habitat for bats, absence of a loft void and no recorded external bat roosting features, internal access was not deemed necessary and the building has been graded as providing negligible bat roosting suitability.	
Building B4 – Staff House Negligible suitability	B4 is a large three storey building largely comprising concrete and glass panelling, of which the glass panelling accounts for the majority of the façade. The building has a flat roof, with no loft void. No discernible bat roosting features were recorded. Internal access was not necessary due to the absence of a loft void the building was therefore graded as having negligible bat roosting suitability.	
Building B5 – The Mill Negligible suitability	B5 is a large redbrick mill building. It has a flat roof, with numerous uPVC windows around all facades. Although an older building in comparison to the other buildings around the wider site, the brickwork was in good condition with no visible cracks or crevices, there were no discernible cracks or gaps on or around window lintels. Due to the size of the building, the ground level assessment using binoculars, may have limitations; but considering the site context (heavily urbanised, central Manchester), and no PRF's observed, building B5 was graded as having negligible bat roosting suitability.	

Building B6 – Maths and Social Science building	A high-rise building composed of concrete with a flat roof and no loft voids. The building was in good condition with no visible cracks or crevices, there were no discernible cracks or gaps on or around window lintels. The building was therefore graded as having negligible bat roosting suitability	
Building B7 – Pariser Building	This building comprises three inter-connected structures; with the eastern and western portions being single-storey, with the central structure being a multi-storey, high-rise building. The single-storey buildings were essentially vaulted, with no loft void, with the brickwork in good condition with no discernible gaps, cracks and crevices which would otherwise provide suitable roosting features. The high-rise portion has a flat roof, with no loft void and is capped with copper cladding. The lower floors of the building comprises brick and window panels. No potential bat roosting features were observed. Building 7 was therefore graded as having negligible bat roosting suitability.	

Building B8 – Renold	The Renold building largely comprises concrete and glass panels, with a two-storey base supporting a six-storey tower, there is a large glass-sided stair tower on the northern elevation. The building houses lecture theatres and other office and classrooms. It has a flat roof, with no loft void. The building is in good condition with no discernible gaps, cracks and crevices which would otherwise provide suitable roosting features. It was therefore graded as having negligible bat roosting suitability.	
Building B9 – James Lighthill / Paper Sciences Building	B9 is located on Sackville Street and comprises two interconnected structures; one single-storey, long building largely comprising glass, with another four-storey brick building. The brickwork on the four-storey building was found to have some chips and some areas where small sections of mortar was missing; however these were found to be largely cosmetic and did not provide crevices suitable enough for roosting bats. It was therefore graded as having negligible bat roosting suitability.	



Building B10 – Gatehouse	The Gatehouse is composed of brick, with a wooden capping. There was no loft void, with the building essentially being vaulted on the inside. The brickwork was in good condition with no discernible gaps, cracks and crevices which would otherwise provide suitable roosting features. There was a section on the south-eastern corner of the building where the roofing felt was lifted slightly; however viewing this with a high-powered torch and binoculars, the gap did not extend inwards more than a few millimetres and therefore did not provide a suitable size crevice for roosting bats. It was therefore graded as having negligible bat roosting suitability.	
Building B11 – Car Park	B11 comprises a large concrete built car park with a brick stairwell. Despite the relatively poor appearance of the car park, with evidence of vandalism and mdf/ wooden boarding erected in some locations, the concrete structure itself was found to be in good condition with no discernible cracks and crevices and the temporary boarding did not offer suitable roosting features. It was therefore graded as having negligible bat roosting suitability.	

Building B12 – Sackville Street Building Low suitability	The building is composed of ornate redbrick and terracotta. Despite its age, the brickwork on the facades was found to be in good condition with no discernible cracks and crevices. However, access onto the roof was not permitted; from aerial imagery it appears that there are numerous different tiled-roof structures which could provide bat roosting potential. All aspects of the building are well-lit with street lighting on Sackville, Whitworth and Cobourg street, with street and security lighting on the southern aspect (Granby Row/ Vimto Park); as the surrounding habitat has been assessed as providing negligible potential for foraging and commuting bats, due to disturbance levels being extremely high and only tolerable by light-tolerant species on a very occasional basis; it is considered unlikely that the roof of the building would support a substantial bat roost(s). The building as a whole has therefore been graded as providing low bat roosting suitability. As the building is listed; Sackville Street Building will not be demolished and therefore impacts to bats will be avoided. However, recommendations are made further within this report in case alterations to the roof(s) are required.	
Onsite Trees Negligible suitability	All trees onsite were assessed for their potential to support bat roosting features. The mature trees on site were found to be in good condition with no cracks, crevices, woodpecker holes etc., as were the young and semi-mature trees across the site. All trees onsite were there graded as having negligible bat roosting suitability. (Photograph showing a group of Norway maple <i>Acer platanoides</i> to the south of Wright Robinson building).	

Birds

- 2.10. The data search returned a number of records of protected and notable birds species within 2 km of the site. Most notably are the 99 records of Manchester Biodiversity Action Plan (BAP) species black redstart *Phoenicurus ochruros*, with the closest record being 456 m West.
- 2.11. Other notable bird species (in context to the site) include peregrine falcon *Falco peregrinus* (151 records), bullfinch *Pyrrhula pyrrhula* (20 records) and house sparrow *Passer domesticus* (43 records).
- 2.12. None of the notable species listed above were observed during visits to the site.. The habitats on site are considered to be largely unsuitable for peregrine (see comment below), black redstart (have preference to more 'brownfield' habitat) and bullfinch, although it is possible that peregrine could nest on the roofs of some of the taller buildings. Recommendations have therefore been made in Section 3 to safeguard birds during construction.
- 2.13. Habitats on site, such as the buildings, urban trees and ornamental/ introduced shrubs have the potential to support common and widespread nesting birds. It is considered the assemblage of birds that may use the site for foraging and breeding is of **negligible ecological importance**, nevertheless, as mentioned above consideration for nesting birds to avoid a breach of legislation is discussed in **Section 3** of this report.

Invasive species

- 2.14. Invasive species such as Himalayan balsam *Impatiens glandulifera* were not found on site during the Extended Phase 1. However, invasive species can readily colonise unmanaged urban areas, and due to the long-term timescales of the proposed phased works, measures to reassess/ monitor and where necessary, control and eradicate are recommended within this report.



Section 3: Ecological Impacts, Mitigation, and Enhancement

Proposed Development

- 3.1. The proposals are for the redevelopment of the site, to create an ‘innovation district’, composed of a series of newly created office and laboratory buildings, following the demolition of existing buildings. The proposals also include extensive soft landscaping and tree planting. 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:
- Although some trees are required for removal, to facilitate new access and building footprint, where possible trees have been avoided and retained and provided with a buffer to safeguard from the proposed development;
 - In compensation for habitats lost, extensive tree planting has been proposed.

Designated Sites

Statutory Sites

- 3.3. Given the nature of the site proposals and the distances involved between the site and Rochdale Canal SAC, with no linking habitats from the proposed development to the designated site, no adverse direct or indirect effects are anticipated, and no specific mitigation is required.

Non-statutory Sites

- 3.4. Similarly with Rochdale Canal SAC, the two SBI’s within 2 km of the site are designated for their canal/ aquatic habitats; there are no hydrological linkages from site to/ from Rochdale Canal/ Ducie Basin SBI or Ashton Canal (West) SBI. It is therefore considered that no adverse direct effects are anticipated. It is possible however that the SBI’s could be impacted by airborne particles in the construction/ demolition phase of the development, and therefore best practice pollution prevention measures should be included in the condition discharge.



Habitats and Flora

- 3.5. Most of the habitats onsite to be impacted by the proposals are of negligible ecological importance (all but scattered trees) and as such no specific mitigation is required.
- 3.6. The scattered trees across the site are of local ecological importance. Some tree coverage will be lost to provide access to the proposed development, provide a developable footprint and facilitate infrastructure works.
- 3.7. There will be extensive native tree planting and the creation of areas of neutral grassland and native species mixed scrub. The planting of these native species trees, scrub, and grassland is expected to improve the site overall for biodiversity, in-line with Places for Everyone (PfE) Policy JP-G8⁵ (A Net Enhancement of Biodiversity).

Protected and Notable Species

Bats

- 3.8. No bat roosting features were not recorded on the buildings and trees onsite. However, the roof of Sackville Street Building was not accessed and therefore (given the site context) has been graded as offering low bat roosting potential. All other buildings and trees on site were found to provide negligible bat roosting potential.
- 3.9. It is therefore recommended that all buildings, *other than Sackville Street Building*, can be demolished without further survey and mitigation in relation to bats.
- 3.10. The Sackville Street Building is due for retention. However, should any alterations to the roof be required, further survey would be required. This would be in the form of accessing the roof and undertaking a detailed preliminary bat roost assessment (PBRA), with potential further bat roost survey should there be suitable roosting features.
- 3.11. The site was also considered to be of negligible importance for foraging and commuting bats due to the heavily urbanised context of the site. Although there are pockets of naturalised habitat, light pollution and disturbance levels will be extremely high and only tolerable by light-tolerant species on a very occasional basis.
- 3.12. Although considered to be largely unsuitable for bats, indirect impacts associated with dust and noise during the construction phase should be minimised by the implementation of a Construction and Environmental Management Plan (CEMP). No lighting during construction should be proposed. It is anticipated that lighting levels post-construction will not be greater than current levels. However, any outside lighting should avoid spilling onto retained habitats include retained and newly planted trees.
- 3.13. To enhance the site for roosting bats, bat boxes are recommended to be incorporated within scheme by either using integrated bat boxes or externally erected bat boxes (expected to be secured via a suitably worded planning condition). These could be located within, or adjacent

⁵ Places for Everyone: Joint Development Plan Document 2022 to 2039, Adopted 21st March 2024.

to newly created habitat areas, particularly on the eastern boundary where proposals include a city-centre-woodland type habitat.

Birds

- 3.14. 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.
- 3.15. 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/ demolition works 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.
- 3.16. Habitat creation such as native scrub and tree planting is expected to increase nesting opportunities on site. Additionally, bird boxes are recommended to be incorporated within scheme, targeting species of conservation concern known to be present such as swift *Apus apus*, black redstart *Phoenicurus ochruros* and house sparrow *Passer domesticus* (expected to be secured via a suitably worded planning condition).



Section 4: Conclusions

- 4.1. **Designated sites:** One internationally designated site, Rochdale Canal SAC, is located within 10 km of the site (5.4 km) and two SBI's are located within 2 km. All three sites are designated for their canal/ aquatic habitats and given that there are no hydrological linkages from site to/ from the SAC, Rochdale Canal/ Ducie Basin SBI or Ashton Canal (West) SBI, no adverse direct or indirect effects 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.
- 4.2. **Habitats:** The development will primarily affect habitats of negligible ecological importance. Loss of trees (local ecological importance) will be compensated for by extensive replacement tree planting and enhancement of retained tree-lined areas. Additionally, creation of areas of neutral grassland and native species mixed scrub planting has been proposed.
- 4.3. **Species:** All buildings and trees onsite were subject to preliminary bat roost assessment. No suitable bat roosting features were recorded. The site offers limited value for foraging and commuting bats due to the heavily urbanised context; the site is therefore considered to be of negligible ecological importance for bats.
- 4.4. Should vegetation or the buildings on the site be removed/ demolished during the core nesting bird season (March-August, inclusive), a pre-works check by a suitable qualified ECoW would be required to determine whether active birds' nests are present.
- 4.5. **Conditions:** An appropriately worded planning condition is expected to secure a Construction and Environmental Management Plan (CEMP) to safeguard the retained habitats onsite and adjacent to the site throughout the construction phases. A Landscape and Ecological Management Plan (LEMP) can be secured through planning conditions once detailed post-development planting plans are available, as and when each phase of development comes forward; the LEMP will secure the long-term management of the proposed habitat enhancements, including proposed tree, grassland and scrub planting, as well as provision of enhancements for specific species groups such as bird and bat boxes.
- 4.6. In conclusion, in anticipation of the implementation of any necessary mitigation, the proposed development will be compliant with relevant local planning policies, such as PfE JP-G8, as well as legislation with regard to ecology.



Appendix 1: Legislation and Planning Policy

Legislation

- A1.1. 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.
- A1.2. 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).
- A1.3. 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.
- A1.4. 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: Upcoming Town and Country Planning Act

- A1.5. 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. This will be in the form of the Town and Country Planning Act (TaCPA), specifically Schedule 14 of the TaCPA, which will make 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.



- A1.6. The timescales for changes to the wording of the TaCPA are that it will be legally mandated and enforceable from January 2024.

National Planning Policy

National Planning Policy Framework (NPPF), December 2023

- A1.7. 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.

- A1.8. 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"*

- A1.9. Section 15 of the NPPF (paragraphs 174 to 188) considers the conservation and enhancement of the natural environment.

- A1.10. 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"*

- A1.11. 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 biodiversity⁶; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation⁷; 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."*

A1.12. 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 reasons⁸ 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."*

A1.13. As stated in paragraph 187 the following should be given the same protection as habitats sites⁹:

- a) *"potential Special Protection Areas and possible Special Areas of Conservation;*

⁶ Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

⁷ 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.

⁸ 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.

⁹ 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.



- b) *listed or proposed Ramsar sites¹⁰; and*
- 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."*

A1.14. 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 Core Strategy

A1.15. Local Policy EN 15 'Biodiversity and Geological Conservation' states:

A1.16. The council will seek to maintain or enhance sites of biodiversity and geological value throughout the City. Particular consideration will be given to:

- Sites with international or national designations for their biodiversity value and other sites of biodiversity value (SBIs, LNRs);
- Protected and priority species, as listed in the Manchester Biodiversity Strategy and included in the Greater Manchester Biodiversity Action Plan (GM BAP);
- Sites that are recognised for their geological importance;

A1.17. The council's objective to protect and conserve the City's existing trees and woodlands and aim for a net increase in trees across the City.

A1.18. Developers will be expected to identify and implement reasonable opportunities to enhance, restore or create new biodiversity, either on-site or adjacent to the site, contributing to linkages between valuable habitat areas where appropriate, with reference to the Manchester Biodiversity Strategy and the Green Infrastructure Framework for Manchester'

¹⁰ 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.



Places for Everyone (PfE)

A1.19. Policy JP-G8 A Net Enhancement of Biodiversity and Geodiversity.

A1.20. Through local planning and associated activities a net enhancement of biodiversity resources will be sought, including, where relevant, by

- Increasing the quality, quantity, extent and diversity of habitats, particularly priority habitats identified in national or local biodiversity action plans and those that support priority species;
- Improving connections between habitats, to protect and enhance the provision of corridors, ecological networks (including Nature Recovery Networks) and steppingstones that enable the movement of species, especially as the climate changes;
- Enhancing the management of existing habitats, including through habitat restoration, avoiding habitat fragmentation and combating invasive species;
- Protecting sites designated for their nature conservation and/or geological importance, with the highest level of protection given to international and then national designations;
- Facilitating greater access to nature, particularly within urban areas;
- Supporting the development and implementation of the Great Manchester Wetlands Nature Recovery Network; and
- Safeguarding, restoring and sustainably managing our most valuable soil resources, tackling soil degradation/erosion and recovering soil fertility, particularly to ensure protection of peat-based soils and safeguard 'best and most versatile' agricultural land.

Biodiversity Action Plans

A1.21. The UK Post-2010 Biodiversity Framework succeeded the UK BAP partnership in 2011 and covers the period 2011 to 2020. However, the lists of Priority Species and Habitats agreed under the UKBAP still form the basis of much biodiversity work in the UK. The current strategy for England is 'Biodiversity 2020: A Strategy for England's wildlife and ecosystem services' published under the UK Post-2010 UK Biodiversity Framework. Although the UK BAP has been succeeded, Species Action Plans (SAPs) developed for the UK BAP remain valuable resources for background information on priority species under the UK Post-2010 Biodiversity Framework.

A1.22. Priority Species and Habitats identified under the UKBAP are also referred to as Species and Habitats of Principal Importance for the conservation of biodiversity in England and Wales within Sections 41 (England) and 42 (Wales) of the Natural Environment and Rural Communities (NERC) Act 2006. The commitment to preserving, restoring or enhancing biodiversity is further emphasised for England and Wales in Section 40 of the NERC Act 2006.



Local Biodiversity Action Plan

A1.23. The Greater Manchester Biodiversity Action Plan lists the following species relevant to the site:

- All UK bat species;
- Black redstart



Appendix 2: Methodology

Data Search

- A2.1. 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.
- A2.2. The following resources were consulted/contacted:
- Multi-Agency Geographic Information for the countryside (MAGIC) website¹¹;
 - Greater Manchester Ecology Unit (GMEU)¹²; (Received on 11th September 2024);
 - Greater Manchester Combined Authority¹³;
 - Joint Nature Conservation Committee (JNCC) website¹⁴;
 - Natural England (NE) designated sites website¹⁵;
 - Ordnance Survey mapping; and
 - Google Maps, including aerial photography.
- A2.3. 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

- A2.4. An 'extended' Phase 1 survey was carried out on the 25th August 2022 and again on 11th July 2024 by Nick Bell, a suitably experienced ecologist and Full Member of CIEEM. The methods used during the walkover survey broadly followed methods used in an 'extended' Phase I habitat survey¹⁶ and

¹¹ <https://magic.defra.gov.uk/> [Accessed 12/10/2024]

¹² <https://gmlrc.org/>

¹³ <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/> [Accessed 12/10/2024]

¹⁴ <http://jncc.defra.gov.uk/ProtectedSites/> [Accessed 12/10/2024]

¹⁵ <https://designatedsites.naturalengland.org.uk/> [Accessed 12/10/2024]

¹⁶ Joint Nature Conservation Committee (2010). Handbook for Phase 1 habitat survey - a technique for environmental audit. JNCC, Peterborough.



entailed recording the main plant species and classifying and mapping habitat types with reference to the Habitat Definitions provided by the UK Habitat Classification Working Group¹⁷.

- A2.5. 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.
- A2.6. 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. However, the Biodiversity Net Gain Assessment does not form part of this assessment.

Preliminary Bat Surveys

- A2.7. The surveys followed standard methodologies set out in the Bat Mitigation Guidelines¹⁸, the Bat Workers Manual¹⁹ and Bat Surveys for Professional Ecologists- Good Practice Guidelines 4th Edition²⁰ and comprised:
- Preliminary Roost Assessment (PRA) – External and internal building inspection survey to assess potential of buildings on site to support roosting bats;
 - 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.

Preliminary Bat Roost Assessment (PBRA)

- A2.8. A PBRA was undertaken on all buildings and trees within the Site boundary. The assessment was undertaken on 25th August 2022 and again on 11th July 2024 by Nick Bell MCIEEM (Level 1 Natural England Bat Licence holder: 2018-37985-CLS-CLS), alongside Elliot Grundy. All surveys were daytime inspections and the conditions for all surveys was considered optimal. The location of the buildings and trees at the Site are shown on **Plan 14667 P13**. All buildings were inspected from the ground using binoculars, high powered torch, digital camera. In relation to buildings, such signs may include bat droppings, urine splashes, staining and features suitable for allowing bats access to roost (e.g. gaps behind soffits / hanging tiles / ridge tiles, lifted slates / flashing). The internal inspection of the buildings comprised a thorough search for evidence of roosting bats in accessible loft spaces (i.e. droppings, urine stains) and an assessment of the presence of potential roosting features internally.

¹⁷ UKHab Ltd. (2023). UK Habitat Classification Version 2.0 (at <https://www.ukhab.org>)

¹⁸ 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.

¹⁹ Mitchell-Jones, A.J., & McLeish, A.P. (eds). (2004) 3rd Edition Bat Workers' Manual., JNCC, Peterborough, ISBN 1 86107 558 8

²⁰ 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



A2.9. The potential of the buildings and trees to support roosting bats was assessed using the criteria shown in **Table A3.1** below.

Table A3.1 Building / Structure Assessment Criteria - adapted from Collins, 2023.

Suitability	Description of Roosting Habitats
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/under-ground levels).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions ^b and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats ^c).
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions ^b and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed)
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions ^b and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.
^a Negligible is defined as ‘so small or unimportant as to be not worth considering, insignificant’. This category may be used where there are places that a bat could roost or forage (due to one attribute) but it is unlikely that they actually would (due to another attribute). ^b For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance. ^c Evidence from the Netherlands shows mass swarming events of common pipistrelle bats in the autumn followed by mass hibernation in a diverse range of building types in urban environments. Common pipistrelle swarming has been observed in the UK and winter hibernation of numbers of this species has been detected at Seaton Delaval Hall in Northumberland. This phenomenon requires some research in the UK, but ecologists should be aware of the potential for larger numbers of this species to be present during the autumn and winter in prominent buildings in the landscape, urban or otherwise.	



Ground Level Tree Assessment (GLTA)

A2.10. A GLTA was undertaken on all trees within the Site boundary. The assessment was undertaken on 25th August 2022 and again on 11th July 2024 by Nick Bell MCIEEM (Level 1 Natural England Bat Licence holder: 2018-37985-CLS-CLS), alongside Elliot Grundy. 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 14667 P13** 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 A3.2** below.

Table A3.2: 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 wounds cankers compression forks butt rots	lightning strikes hazard beams subsidence cracks shearing cracks transverse snaps welds lifting bark desiccation fissures frost cracks	fluting ivy

A2.11. The potential of trees to support roosting bats was assessed using the criteria shown in **Table A3.3** below.

Table A3.3: 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

Day-time Bat Walkover (DBW)

A2.12. A DBW was undertaken on all habitats within the Site boundary. The assessment was undertaken on 25th August 2022 and again on 11th July 2024 by Nick Bell MCIEEM (Level 1 Natural England Bat Licence holder: 2018-37985-CLS-CLS), alongside Elliot Grundy. 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.



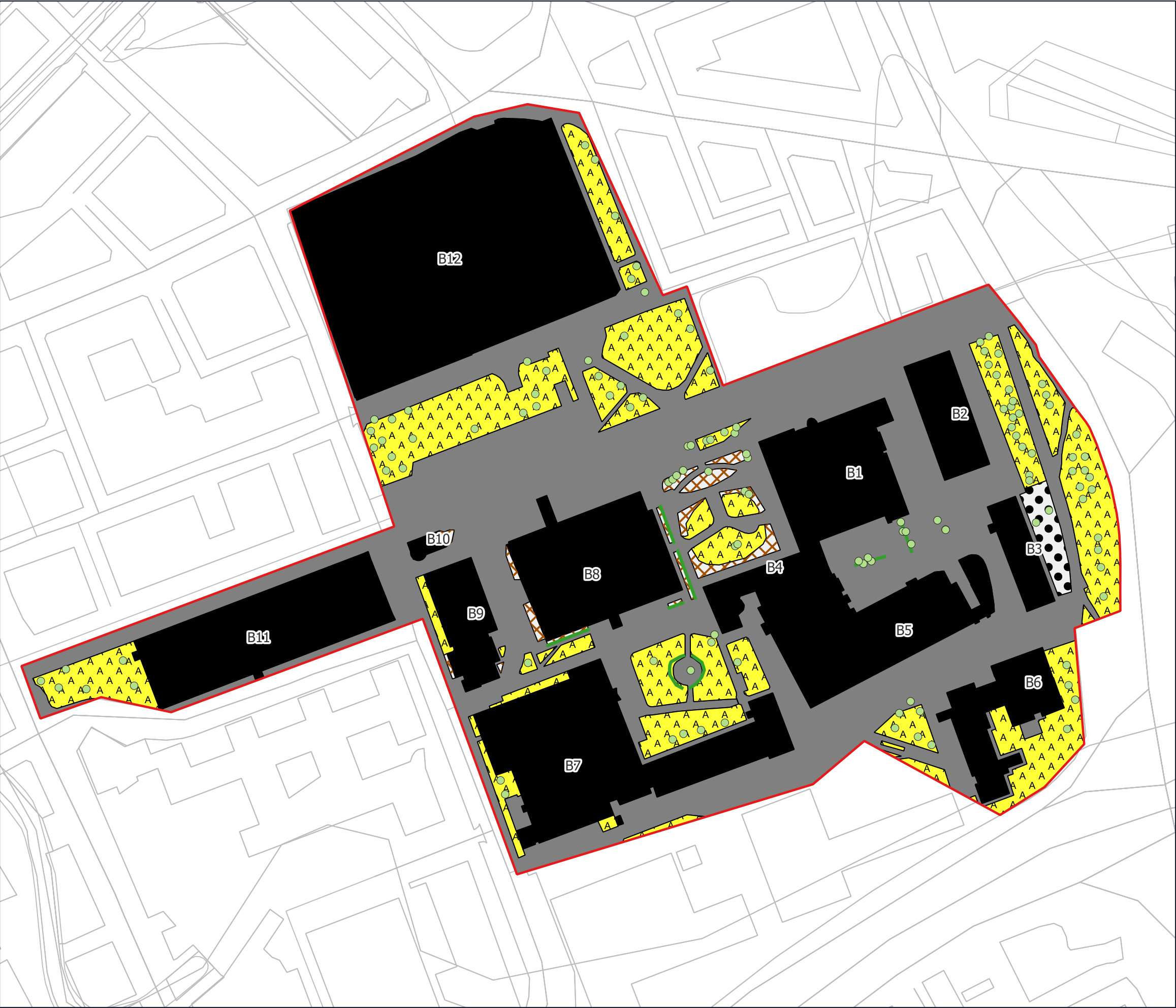
Suitability	Description of Roosting Habitats
None	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging 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.



Plans:

Plan 1: Habitat Features and Preliminary Bat Roost Assessment Plan **14667 P13**





- Redline Boundary
- Bare ground
- Buildings
- Introduced shrub
- Cultivated/disturbed land - amenity grassland
- Hardstanding
- Introduced Hedge
- Trees



Project	Sisters, Manchester
Drawing Title	Habitat Features Plan, Site-wide
Scale	As Shown (Approximate)
Drawing No.	14667
Date	November 2024
Checked	NB



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