



**Delta**Simons

# Ecological Impact Assessment

**Reliance Street, Manchester**

Presented  
to: **Lipton Plant Architects**

Issued: September 2022

Delta-Simons Project No: 22-1496.02

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## Report Details

|                             |                                                                                                    |
|-----------------------------|----------------------------------------------------------------------------------------------------|
| <b>Client</b>               | Lipton Plant Architects                                                                            |
| <b>Report Title</b>         | Ecological Impact Assessment                                                                       |
| <b>Site Address</b>         | Reliance Street, Manchester                                                                        |
| <b>Project No.</b>          | 22-1496.02                                                                                         |
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## Quality Assurance

| Issue No. | Status | Issue Date                            | Comments | Author                                                                             | Technical Review                                                                     | Authorised                                                                           |
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## About us

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As part of Lucion Services, our combined team of 500 in the UK has a range of specialist skill sets in over 50 environmental consultancy specialisms including asbestos, hazardous materials, ecology, air and water services, geo-environmental and sustainability amongst others.

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## Non-Technical Summary

Delta-Simons Ltd was instructed by Lipton Plant Architects (the 'Client') to undertake an Ecological Impact Assessment (EclA) of an area of land at Reliance Street, Oldham, Greater Manchester (hereafter referred to as the 'Site') to inform a planning application for an Electric Vehicle (EV) charging station (the 'Proposed Development') at the Site.

This EclA addresses the potential effects of the Proposed Development on ecology and nature conservation. The Report describes the methods used to assess the effects; the baseline conditions currently existing at the Site and within the immediate surrounding area; the mitigation measures required to prevent, reduce, or offset any significant adverse effects and the likely residual effects after these measures have been adopted, as well as any proposed enhancement measures.

An ecological desk study undertaken in August 2022 identified one internationally designated statutory site within 6 km of the Site, one nationally designated statutory site and two locally designated statutory sites within 2 km of the Site. Furthermore, eight non-statutory designated sites were identified within 2 km of the Site. The Site also falls within a Site of Special Scientific Interest (SSSI) Impact Risk Zones (IRZ); however, the listed criteria do not match the proposed development. As the Proposed Development does not meet any of the criteria for which the LPA would need to consult with Natural England over risks posed by development (for internationally and nationally designated statutory sites), and due to the development's type, small scale and distance from all these designated sites, it is considered unlikely that the Proposed Development would have a significant adverse impact on designated sites.

The habitats on Site were surveyed and assessed for their suitability to support protected/otherwise notable species by Delta-Simons on 10<sup>th</sup> August 2022. The Site covers an area of 0.30 ha and comprises an area of hardstanding, with scattered immature trees and scrub, in addition to a narrow strip of tussocky grass on the northern boundary and a small section of ephemeral vegetation in the south. The Site did not support standing water at the time of the survey. There are no Habitats of Principal Importance present on Site and the habitats present on Site are widespread on both a local and national scale, with none of the habitats being considered rare. The proposals will result in the loss of all habitats on-Site habitat. This loss of habitat will be in part compensated for through the provision of new native/wildlife-friendly planting within the landscaping strategy, which incorporates a green roof canopy and heavy standard tree planting. As such, any impact resulting from the loss of habitat on Site will be negligible and of neutral significance.

The Site was found to be suitable only for nesting birds, and as such, no further surveys were considered to be necessary.

The construction phase will result in the loss of suitable bird nesting habitat. Suitable habitat will be removed either outside the main nesting bird season, or subsequent to a nesting bird check by a suitably experienced ecologist immediately prior to removal. Further, appropriate mitigation through the implementation of a landscaping strategy is anticipated to result in a negligible effect for birds in the local area that is of neutral significance. In the operational phase, a suitable management plan (Landscape and Ecological Management Plan or similar) will be in place to ensure habitats are appropriately managed to ensure a negligible effect for birds nesting on Site that is of neutral significance.

Invasive plant species have been identified on Site and therefore appropriate mitigation is required to prevent their spread during the construction phase. Providing this mitigation is put in place it is anticipated that there will be a negligible effect on ecological receptors that is of neutral significance as the invasive species will be removed during the construction phase, and therefore not be present to have any effects during the operational phase.

It is concluded that provided the Proposed Development is built as proposed and all relevant mitigations implemented during construction and operation, with appropriate landscaping and offsetting where required, it can achieve a net gain in biodiversity.

## Summary of Residual Effects

| Important Ecological Feature | Geographic Value | Characterisation of Unmitigated Impact                                     | Significance Before Mitigation   | Avoidance, Mitigation and Compensation                                                                                                        | Residual Effect Significance |
|------------------------------|------------------|----------------------------------------------------------------------------|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| Habitats                     | Local            | Habitat loss                                                               | Minor adverse<br>Non-significant | New landscaping<br>Offsetting where required                                                                                                  | Negligible<br>Neutral        |
| Birds                        | Local            | Habitat loss<br>Nest destruction/<br>disturbance<br>Noise and<br>vibration | Minor adverse<br>Non-significant | Sensitive timing of works and/or watching brief with regards to the removal of, and works within close proximity to, suitable nesting habitat | Negligible<br>Neutral        |
| Invasive species             | n/a              | Risk of spread                                                             | Minor adverse<br>Non-significant | Suitable eradication strategy                                                                                                                 | Neutral<br>Negligible        |

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# 1.0 Introduction

## 1.1 Purpose and Scope of the Survey

Delta-Simons Ltd was instructed by Lipton Plant Architects (the 'Client') to undertake an Ecological Impact Assessment (EclA) of an area of brownfield land off Reliance Street, in Newton Heath, Greater Manchester (hereafter referred to as the 'Site') to inform a planning application for an Electric Vehicle (EV) charging station at the Site.

The purpose of this report is to:

- Establish baseline ecological conditions at the Site.
- Provide details of ecological mitigation measures incorporated through design evolution as an intrinsic part of the project design.
- Detail any ecological mitigation measures to be implemented during Site clearance and construction.
- Identify any residual ecological effects after avoidance and mitigation measures have been considered.
- Identify any compensation measures required to offset residual effects.
- Provide recommendations for how mitigation and compensation may be secured and monitored.
- Set out details of ecological enhancement measures to be included within the Proposed Development.
- Provide sufficient information to determine whether the project accords with relevant nature conservation policies and legislation and, where appropriate, to allow conditions or obligations to be proposed by the relevant authority.

The Site location and the red line boundary are shown in Figure 1.

## 1.2 Site Description

The Site is centred at Ordnance Survey (OS) grid reference SD 8807 0073, to the east of Reliance Street, in Newton Heath, Greater Manchester. The Site covers an area of approximately 0.30 ha and comprises an area of hardstanding, with scattered immature trees and scrub, in addition to a narrow strip of tussocky grass on the northern boundary and a small section of ephemeral vegetation in the south. The Site did not support standing water at the time of the survey.

The Site is bounded by hardstanding on all aspects, separated by fencing, with street trees along Oldham Road to the south, set within a heavily developed area with industry, residential and commercial uses all noted and an area of Public Open Space (POS) to the south, defined by amenity grassland and scattered trees.

The habitats present on Site are shown in Figure 2.

## 1.3 Proposed Development

It is understood from the drawing provided (Drawing 1) that the Proposed Development will comprise an EV charging station with associated retail unit and parking. The design will incorporate boundary planting and a green roof canopy with trees planted within using ArborSystem infrastructure.

The construction phase will comprise:

- Clearance and remediation of the previously demolished petrol station; and
- Construction of EV charging station with green roof canopy and heavy standard trees.

The operational phase will comprise:

- Use of the Site for charging EV vehicles, as well as commercial and leisure uses;
- Management of the proposed habitats in accordance with a Landscape and Ecological Management Plan (LEMP);

## 2.0 Legislation & Policy Summary

Planning guidelines, international commitments, legislation and planning policies relevant to the protection, conservation and enhancement of nature conservation interests are detailed below.

### 2.1 National Policy and Guidance

Specific habitats and species of relevance to the Site receive legal protection in the United Kingdom under various pieces of legislation, including:

- National Planning Policy Framework (NPPF, revised 2021);
- The Conservation of Habitats and Species Regulations 2017 (as amended);
- The Wildlife and Countryside Act (WCA) 1981 (as amended);
- The Countryside and Rights of Way (CRoW) Act 2000;
- The Natural Environment and Rural Communities Act (NERC) 2006;
- The Hedgerow Regulations 1997; and
- The Protection of Badgers Act 1992.

Where relevant, this assessment takes account of the legislative and policy protection afforded to specific habitats and species. Delta-Simons do not purport to provide specialist legal advice and where necessary the reader should also consult the original legislation, references to which are included in Appendix A.

### 2.2 Local Policy and Guidance

Local planning policies relating to ecology are generally based national planning policy, the conservation of species protected under the above legislation and the protection of designated sites. However, relevant local policy and guidance documents are outlined below.

Within the Oldham Local Development Framework (Oldham Council - Environment Statement - Joint Core Strategy and Development Management Policies Development Plan Document - Adopted 9 November 2011), the principal planning policies relating to nature conservation are as follows:

- ENV1 - To ensure the effective and efficient use of all types of land and buildings in the most sustainable locations
- ENV2 - To promote high quality design and sustainable construction
- ENV7 - To protect and improve the borough's green infrastructure, biodiversity, and geodiversity
- ENV8 - To contribute to reducing the effects of climate change.

There is no local Biodiversity Action Plan (LBAP) for Oldham, but it is covered by the Greater Manchester Biodiversity Action Plan (GM BAP, 2009), which is a collection of species and habitat specific action plans. The overall aim of the action plan is *"To promote the conservation, protection and enhancement of biological diversity in Greater Manchester for current and future generations"*, and includes the following action plans:

- Grasslands
- Hedgerows
- Lowland mosslands
- Reedbeds and bittern

- Ponds and lodges
- Canals
- Native woodlands
- Uplands: currently no action plan available to download
- Urban managed greenspace
- Bats
- Black redstart
- Farmland Birds
- Great crested newts
- Hares
- Native Black Poplar
- Twite
- Water Vole
- Willow tit

## 3.0 Methodology

The baseline for the EclA has been established through a combination of desk study and field surveys.

### 3.1 Scope of the Assessment and Zone of Influence

The features considered for this assessment were designated sites, Habitats and Species of Principal Importance for conservation, and species protected by wildlife legislation.

Given the size and location of the Site, the zone of influence was taken to be the Site boundary and its immediate environs only. The exception for this was for designated sites and great crested newt (GCN) *Triturus cristatus* details of the zone of influence for these features is provided in Section 3.2, below.

### 3.2 Desk Study

#### 3.2.1 Data Search

In August 2022, available records of protected and notable species were collated from the local record centre, the Greater Manchester Local Records Centre (GMLRC) along with the non-statutory designated sites from within 2 km of the Site centre.

A search for internationally, nationally, and locally designated statutory sites for nature conservation was undertaken using the Multi-Agency Geographic Information for the Countryside (MAGIC) website. The search radius was 6 km from the Site centre for internationally designated statutory sites and 2 km from the Site centre for nationally and locally designated statutory sites. An assessment was made regarding the location of Habitats of Principal Importance (HPIs) on or near the Site using MAGIC.

A search for species data available on the MAGIC website was undertaken (i.e. granted European Protected Species Licence applications, GCN Class Survey Licence Returns and Natural England GCN Pond Survey Data 2017-2019).

In addition, free and publicly accessible Ordnance Survey maps and aerial photographs were searched for waterbodies on, or within, 500 m of the Site boundary. This information has been used to assess the Site for its potential to support GCN the results of which are found in Section 4.3.

### 3.3 Preliminary Ecological Appraisal Survey

The habitats on Site, were surveyed on 10<sup>th</sup> August 2022 by a Delta-Simons ecologist.

The following was undertaken during the survey:

- Habitats were classified and mapped using the standard JNCC Phase 1 habitat classification and methodology (JNCC, 2010). Dominant plant species were recorded in each different habitat. The plant species nomenclature followed that of Stace (2010);
- Habitats on-Site were surveyed for the presence of, or field signs to indicate the presence of protected or notable birds, amphibians, reptiles, mammals, and widespread invasive plants. This included an external visual assessment of any trees/buildings on the Site for potential bat roost features and any evidence of bat activity, and an assessment of the Site's suitability to support commuting and foraging bats (Appendix B), in line with Collins (2016).

### 3.4 Survey Limitations

The baseline conditions described in this report were accurate at the time at which the survey was undertaken. Should at least two years pass by, and/or conditions on Site/Site usage change prior to the commencement of works, an update survey should be undertaken.

There were no further limitations to the survey in terms of access, timing, and weather conditions.

### 3.5 Ecological Impact Assessment Methodology

An ecological impact assessment has been carried out following the principles set out within the Guidelines for Ecological Impact Assessment (EclA) in the UK and Ireland; Terrestrial, Freshwater, Coastal and Marine updated by the Chartered Institute of Ecology and Environmental Management (CIEEM) in 2019, the full details of which are provided in Appendix C.

## 4.0 Baseline Conditions

The following section describes the baseline ecological conditions at the Site, outlining the results of the desk study and field survey findings. Current management is anticipated to remain unchanged up until development and, therefore, baseline conditions at the time of writing this Report are anticipated to reflect those at the commencement of the Proposed Development. The conservation importance of the features identified have been evaluated using the geographical scale outlined in the previous section.

The pertinent information from the data search is set out in section 4.1 below for designated sites, whilst data search records for the species are discussed in the relevant species sections.

### 4.1 Desk Study

#### 4.1.1 Designated Sites

The results of the MAGIC data search and the GMLRC desk search indicate:

- One internationally designated statutory site within 6 km of the Site centre;
- One nationally designated statutory site within 2 km of the Site centre;
- Two locally designated statutory sites within 2 km of the Site centre; and
- Eight non-statutory designated sites within 2 km of the Site centre, all of which are Sites of Biological Importance (SBI).

Tables 1, 2 and 3 below set out the statutory and non-statutory designated sites identified and considered relevant to the Site. The full list of locally important non-statutory is not presented below, as due to the Site's size, nature, and location, only those shown in Table 3 were screened in for further consideration within this report.

**Table 1 - International Statutory Designated Sites within 6 km of the Site**

| Site Name      | Designation                        | Distance and Direction from Site Boundary | Designation Criteria Summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------|------------------------------------|-------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Rochdale Canal | Special Area of Conservation (SAC) | 980 m east                                | <p>Rochdale Canal SAC consists of inland water bodies, and it's associated banks.</p> <p>The canal supports a significant population of floating water-plantain <i>Luronium natans</i> in a botanically diverse waterplant community which also holds a wide range of pondweeds <i>Potamogeton</i> spp.</p> <p>The canal has predominantly mesotrophic water. This population of <i>Luronium</i> is representative of the formerly more widespread canal populations of north-west England.</p> |

**Table 2 - Local and National Statutory Designated Sites within 2 km of the Site**

| Site Name           | Designation                                | Distance and Direction from Site Boundary | Designation Criteria Summary                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------------|--------------------------------------------|-------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Rochdale Canal      | Site of Special Scientific Interest (SSSI) | 980 m east                                | The Rochdale Canal contains important habitats for submerged aquatic plants and emergent vegetation, including extensive colonies of the nationally scarce SAC species floating water plantain.<br><br>The site also supports a diverse assemblage of aquatic flora, notably its assemblage of pondweeds, the nine species of which found in the canal represent a balanced community which reflects the quality of water. |
| Clayton Vale        | Local Nature Reserve (LNR)                 | 1.18 km south                             | The site was reclaimed from landfill by Manchester City Council in the early 1980's and forms a valley with the river Medlock running along its base.                                                                                                                                                                                                                                                                      |
| Boggart Hole Clough | LNR                                        | 1.83 km north-west                        | The site is the largest woodland clough in Manchester and part is ancient woodland, also designated as an SBI.                                                                                                                                                                                                                                                                                                             |

**Table 3 - Non-Statutory Designated Sites within 2 km of the Site relevant to the Site**

| Site Name                                               | Designation | Distance and Direction from Site Boundary | Designation Criteria Summary                                                                                   |
|---------------------------------------------------------|-------------|-------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| Rochdale Canal - Lock at Scowcroft Farm to Stott's Lane | SBI         | 145 m south                               | A continuation of the Rochdale Canal SSSI, though lacking some of the aforementioned criteria.                 |
| Boggart Hole Clough                                     | SBI         | 1.83 km north-west                        | The site is the largest woodland clough in Manchester and part is ancient woodland, also designated as an LNR. |

#### 4.1.2 SSSI Impact Risk Zones

The Site falls within the SSSI Impact Risk Zones (IRZ) for Rochdale Canal SSSI, which require the Local Planning Authority (LPA) to consult with Natural England and assess planning applications for likely impacts on SSSIs/SACs/SPAs and Ramsar sites.

As the criteria listed are not relevant to the development proposals, there is no requirement for the LPA to consult Natural England and the potential impact it is not considered further within this report.

#### 4.1.3 Priority Habitats

The MAGIC data search does not suggest that there are any Priority/HPI habitats on Site or within 50 m of the Site.

## 4.2 Habitats

Figure 2 shows the extent of habitat types identified during the survey and boundary features. Descriptions of the habitat types and dominant plant species found at the Site are provided below. Habitat descriptions are by broad habitat type, as listed in the Phase 1 Habitat Survey Manual (JNCC, 2010).

Figure 2 shows the extent of habitat types and boundary features. Descriptions of the habitat types and dominant plant species found at the Site are provided below. Habitat descriptions and codings are as listed in the UK Habitat Classification: Habitat Definitions Version 1.1 (Butcher et al., 2020b). A condition assessment is provided for the relevant habitats below.

Photographs of the Site survey are located in Appendix D.

Habitats recorded on Site are:

### Hardstanding

The majority of the Site was hardstanding, consisting of the foundations of the previously demolished petrol station and forecourt, with associated access points and service entrances (Photograph 1).

This habitat is not considered to meet the description of any HPLs and is not considered to qualify as an important ecological feature.

### Dense and Scattered Scrub

A small area of dense bramble *Rubus fruticosus* agg. Scrub was located on the western boundary of the Site, associated with some stands of butterfly bush *Buddleja davidii*. There was subsequent butterfly-bush scrub across the Site (Photograph 2).

This habitat is widespread within the local area and does not meet the description of any HPLs. However, it is still of some biodiversity value and is therefore considered to be of local value.

### Scattered Trees

There were several young and immature trees associated with the boundaries of the Site (Photograph 3), including silver birch *Betula pendula*, sycamore *Acer pseudoplatanus*, rowan *Sorbus aucuparia*, ash *Fraxinus excelsior*, and goat willow *Salix caprea*.

This habitat is widespread within the local area and does not meet the description of any HPLs. However, it is still of some biodiversity value and is therefore considered to be of local value.

### Poor semi-Improved Grassland

The northern boundary of the Site was defined by a narrow strip of poor semi-improved grassland, which was also present on the eastern and southern boundaries (Photograph 4). Grass species included abundant false oatgrass *Arrhenatherum elatius*, with occasional cock's-foot grass *Dactylis glomerata*, and red fescue *Festuca rubra*. Herb species include yarrow *Achillea millefolium*, ribwort plantain *Plantago lanceolata*, groundsel *Senecio vulgaris*, common horsetail *Equisetum arvense* (location shown as Target Note 1 on Figure 2), Michaelmas daisy *Symphyotrichum novae-angliae*, and common ragwort *Jacobaea vulgaris*. These species were also recorded across the Site, associated with breaks in the hardstanding.

This habitat is widespread within the local area and does not meet the description of any HPLs. However, it is still of some biodiversity value and is therefore considered to be of local value.

### Tall Ruderals

An area of common nettle *Urtica dioica*, was associated with a stand of buddleia and goat willow on the eastern boundary. There was a second area of ruderals in the south-western corner, dominated by rosebay willowherb *Chamaenerion angustifolium* (Photograph 5).

This habitat is widespread within the local area and does not meet the description of any HPis. However, it is still of some biodiversity value and is therefore considered to be of local value.

### **Ephemeral/short Perennial**

An area of ephemeral / short perennial vegetation was associated with the southern extent of the Site. Species included yarrow and ribwort plantain which were recorded within the grassland; however, this area lacked extensive grass species and had a rockier substrate (Photograph 6).

This habitat is widespread within the local area and does not meet the description of any HPis. However, it is still of some biodiversity value and is therefore considered to be of local value.

## **4.3 Species**

Due to lack of records and suitable habitat on-Site or immediately off-Site, amphibians, reptiles, otter, and water vole have been scoped out of the baseline assessment. Species groups relevant to the Site include the following:

### **Birds**

There were 13 records of notable birds returned by the records centre within 2 km of the Site centre and within the last 10 years. This includes the following species listed on Schedule 1 of the WCA (1981, as amended): barn owl *Tyto alba*, kingfisher *Alcedo atthis*, little ringed plover *Charadrius dubius*, and peregrine *Falco peregrinus*, however, none of these species are relevant to the habitats found on Site.

The record search results also include the following species listed on the Red List of BoCC (Stanbury *et al.*, 2021): Curlew *Numenius arquata*, herring gull *Larus argentatus*, house sparrow *Passer domesticus*, lapwing *Vanellus vanellus*, song thrush *Turdus philomelos*, starling *Sturnus vulgaris*, and wood warbler *Phylloscopus sibilatrix*, of which, house sparrow, song thrush and starling are the only species considered likely to utilise the habitats found on-Site.

Habitats featured on the Site suitable for nesting birds, include the scattered trees and scrub. No nests were observed on Site and a fox *Vulpes vulpes* was recorded on-Site which would heighten predation risk to nesting birds.

Pied wagtail *Motacilla alba* was the only bird species recorded on-Site at the time of the survey. It should be noted that this is not a comprehensive inventory of the bird species which may be present at the Site.

For the purposes of this assessment, nesting birds are considered to be important at the local level.

### **Bats**

The data search indicated that two species of bats have been recorded within 2 km of the Site in the past ten years, common pipistrelle *Pipistrellus pipistrellus*, and soprano pipistrelle *Pipistrellus pygmaeus*. The closest record was a soprano pipistrelle, 190 m south-west of the Site boundary in 2013, associated with the Rochdale Canal. The majority of the records were associated with the aforementioned designated sites, and residential properties in the wider area.

There was a single granted EPSL within 2 km of the Site relating to bats (2014-487-EPS-MIT), which was granted to allow the destruction of a resting place, with common pipistrelle listed as the sole species on the licence. The location of the licence is 1.4 km west of the Site centre, associated with a residential area adjacent to the Rochdale Canal, which is not functionally connected to the Site.

There were no buildings on Site, and none of the trees on Site supported any potential roost features that could be utilised by bats. The scrub could offer small amounts of foraging habitat for bats in the local area, however, there were no suitable buildings for roosting bats adjacent to the Site, there is very little connectivity with nearby suitable habitat and the Site is subjected to excessive light spill from both Reliance

Street and Oldham Road, which in addition to the general lack of records, means that bats are not considered further in this report.

### Badgers

There were 15 records of badgers within 2 km of the Site boundary in the past ten years (specific location details are confidential due to welfare issues). It is likely that the badgers present in the wider area are adapted to the urban landscape. Oldham Road and Rochdale Canal likely function as distribution barriers to the south of the Site, whilst the railway infrastructure to the north and west of the Site could act as a dispersal corridor for the species. However, given the lack of connectivity to the Site, and high-quality foraging habitat within the wider area, it is unlikely that the species would utilise the Site, and is therefore not considered further in this report.

### Other Protected or Otherwise Notable Species

There are nine records of west European hedgehogs *Erinaceus europaeus* within 2 km of the Site centre within the last 10 years. The closest record is 790 m north-west, from 2020, all of the records were associated with residential areas. The scrub on-Site could offer suitable cover for hedgehogs; however, the Site is set within an extensively developed area, with more suitable habitat found across Oldham Road to the south and within residential properties to the north-west. This, in addition to lack of functionally connected records makes it unlikely that hedgehogs would utilise the Site for foraging/commuting, such that they are not deemed to be a constraint at the Site and are not mentioned further in this report.

A fox was disturbed resting on-Site during the walkover and fled the Site before heading to the north. A fox scat was recorded on the hardstanding, but no evidence of a fox den was recorded on-Site. Foxes are not a protected species and could easily escape the Site if resting on-Site during clearance works, such that they are not considered to be a constraint at the Site and are not mentioned further in this report.

### Invasive Species

No records of invasive species were found within 2 km of the Site centre within the last 10 years. Common horsetail was recorded on-Site (location shown as Target Note 1 on Figure 2), and whilst not an invasive species listed on Schedule 9 of the Wildlife and Countryside Act, is a voraciously growing plant which spreads by rhizomes and could persist on-Site if not removed during the construction/remediation phase of the works.

## 4.4 Summary of Important Ecological Features and Geographic Value

The species scoped out as important ecological features above due to their likely absence from Site cannot experience effects from the Proposed Development and are not therefore considered below.

The 'important ecological features' identified above with the potential to experience effects because of the Proposed Development are listed in Table 4 below, along with their geographic importance. These features will be the subject of the ecological impact assessment in section 5.0.

**Table 4 - Identified Important Ecological Features**

| Important Ecological Feature | Geographic Value                  |
|------------------------------|-----------------------------------|
| Designated Sites             | International, National and Local |
| Habitats                     | Local                             |
| Nesting Birds                | Local                             |

## 5.0 Assessment of Effects

The evaluation in this section is based on the baseline information presented above, review of design proposals, consultation with the design team, knowledge of likely construction practices to be employed, and reasonable assumptions regarding operation.

For purposes of the assessment, it is assumed there has been no change in the condition of the Site since the Site survey (unless otherwise stated).

### 5.1 Important Ecological Features for Which No Effect is Anticipated

No significant adverse effects on any statutory or non-statutory designated sites are anticipated, owing to the size of the development, the type of development (an EV charging station with extensive green infrastructure), the urban location and the relative separation of the Site from these designated sites.

### 5.2 Important Ecological Features and Potential Effects

#### 5.2.1 Habitats

The habitats present on Site are widespread on both a local and national scale, with none of the habitats being considered rare and with all considered of relatively low ecological value.

The Development Proposals will result in the loss of most of the on-Site habitat during Site clearance and remediation.

This loss of biodiversity on Site is unlikely to be significant in isolation. However, there is the potential for a cumulative loss of biodiversity when taken into consideration with other developments in the area and this could result in a significant negative effect on local biodiversity.

Without mitigation, the proposed development has the potential to have a minor adverse effect that is non-significant.

#### Avoidance and Mitigation

##### During Operation

The development will feature a green roof with trees growing through the canopy, with further planting included as part of the proposed development and will be of native species or of those known to be of benefit to wildlife. A Landscape and Ecological Management Plan (LEMP) or similar will be in place in order to ensure retained habitats are managed for the benefit of biodiversity.

A Biodiversity Net Gain Assessment will be undertaken for the Site once final landscaping plans are available. This assessment will either confirm that the Site can achieve a net gain in biodiversity, or will recommend that off-Site mechanisms, including the purchasing of additional biodiversity units are utilised to ensure a net gain.

#### Assessment of Residual Effects

Provided the above mitigation is completed, the potential residual effects are considered to have a negligible effect, of neutral significance.

#### 5.2.2 Birds

##### Potential Impacts and Effects During Construction and Operation

##### During Construction

The construction phase will result in the loss of suitable nesting habitat. There is, therefore, potential for direct adverse effects on nesting birds that are permanent in nature as a result of such clearance.

In addition, construction works being carried out within proximity to nesting birds may affect them indirectly, depending on the works being carried out, and the species of bird affected. Noise and vibration disturbance effects may result in birds being repeatedly flushed off nests, causing disruption to feeding activity, or even abandonment of nests. This is considered to be a temporary impact.

Further to the potential direct effects on birds whilst they are actively nesting, the removal of suitable vegetation will result in the direct loss of available bird nesting habitat, as well as a loss of foraging opportunities.

The loss of available bird nesting and foraging habitat on Site is unlikely to be significant in isolation.

#### During Operation

During operation, if habitats retained and/or planted during construction are not managed appropriately during operation, then there is the potential for additional biodiversity loss from the Site.

The loss of available bird nesting and foraging habitat on Site is unlikely to be significant in isolation. However, there is the potential for a cumulative loss of biodiversity when taken into consideration with other developments in the area and this could result in a significant negative effect on local biodiversity.

Without mitigation, this is considered likely to have a minor adverse effect that is non-significant.

### **Avoidance and Mitigation**

#### During Construction

Where practicable, the works at the Site will be undertaken outside of the main nesting bird season (i.e. clearance carried out between September and February inclusive). Conflict with the development can be avoided by managing the land to discourage nesting birds up to the works commencing.

If these works cannot be restricted to within this period, an Ecological Watching Brief will be maintained during the main bird breeding season to ensure that no nesting birds are adversely affected. This will entail checking all suitable habitat for nesting birds due to be affected, and a buffer of at least 10 m beyond that area, by a suitably qualified ecologist prior to the commencement of works. If, during the Ecological Watching Brief, birds are found to be within the area due to be cleared or the buffer zone, measures to prevent any disturbance to breeding birds, including the cessation of construction works in areas close to breeding sites until the birds have completed breeding, will be put in place until the chicks have fledged.

Providing the above mitigation is followed there will be no significant effects on nesting birds.

#### During Operation

The development will feature a green roof with trees growing through the canopy, with further planting included as part of the proposed development which will provide nesting and foraging opportunities for species of birds.

### **Assessment of Residual Effects**

Provided the above mitigation is completed, the potential residual effects during construction and operation are considered to be negligible and of neutral significance.

#### **5.2.3 Invasive Plants**

### **Potential Impacts and Effects During Construction and Operation**

Common horsetail has been recorded on-Site, and whilst not listed on Schedule 9 of the WCA 1981 (as amended), in the absence of mitigation, it could be spread on-Site and reduce the effectiveness of any proposed landscaping by outcompeting beneficial species to wildlife.

## Avoidance and Mitigation

### During Construction

An eradication plan will be put in place to control and remove during the Site remediation works. It is anticipated that due to the Sites previous history as a petrol station, the majority of the Site will be dug out to remove any potential contamination.

### During Operation

Provided the eradication plan is effective there are not expected to be any effects as a result of horsetail post-construction.

## Assessment of Residual Effects

Provided the eradication plan is successful, there will be no significant residual effects.

## 5.3 Cumulative Effects

As the Proposed Development will result in no significant residual effects on any of the identified important ecological features and will deliver a green EV charging station with extensive landscaping, it is considered unlikely to contribute to a cumulative effect in combination with other nearby developments.

## 5.4 Enhancement

The revised National Planning Policy Framework (NPPF), sets out, amongst other points, how *“Planning policies and decisions should contribute to and enhance the natural and local environment by:*

*‘Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressure’.*

The following enhancements could be incorporated into the design to provide opportunities for wildlife:

- Bird boxes integrated into new buildings or trees on Site. The boxes should be erected at least 3 m from ground level in a sheltered, shaded location, facing vegetation;
- Bat boxes integrated into new buildings or trees on Site. The boxes should be erected at least 3 m from ground level in a south-east, south or south-west facing position, near vegetation, but with a clear flight path to the box. The boxes and flight paths to the box will remain unlit; and
- Insect hotels associated with the green roof canopy.

## 6.0 Conclusions

The habitats present on Site are widespread, in both a local and national context and their loss will be compensated for by new landscaping, and where necessary off-Site replacement. Whilst there is likely to be a temporal delay in achieving the biodiversity objectives for the Site (i.e. whilst new habitats become established), it is anticipated that in the long term there will be no significant residual effects on habitats or protected species resulting from the Proposed Development.

## 7.0 Disclaimer

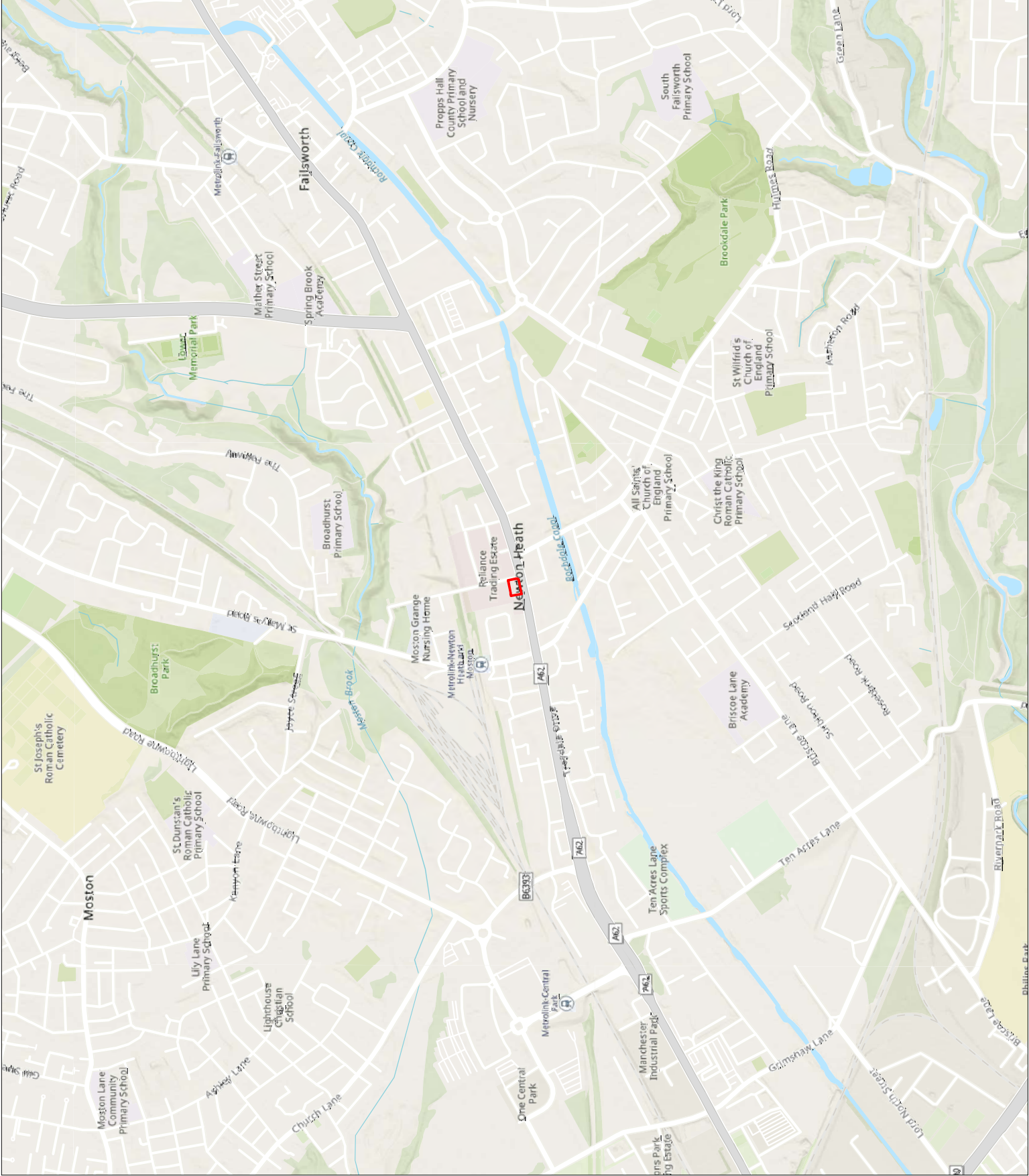
The recommendations contained in this report represent Delta-Simons' professional opinions, based upon the information referred to in Section 1.0 of this report, exercising the duty of care required of an experienced Ecology Consultant. Delta-Simons does not warrant or guarantee that the Site is free of bats or other protected species.

The behaviour of animals can be unpredictable and may not conform to characteristics recorded in current scientific literature. This report, therefore, cannot predict with absolute certainty that animal species will or will not occur in apparently suitable locations or habitats or that they will not occur in locations or habitats that appear unsuitable.

No part of the survey included an assessment of the materials and conditions of any buildings. No part of the survey included an asbestos assessment, nor did it represent an appraisal of other deleterious materials or hazardous substances.

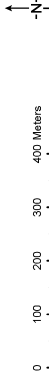
This report was prepared by Delta-Simons for the sole and exclusive use of the Client and for the specific purpose for which Delta-Simons was instructed as defined in Section 1.0 of this report. Nothing contained in this report shall be construed to give any rights or benefits to anyone other than the Client and Delta-Simons, and all duties and responsibilities undertaken are for the sole and exclusive benefit of the Client and not for the benefit of any other party. In particular, Delta-Simons does not intend, without its written consent, for this report to be disseminated to anyone other than the Client or to be used or relied upon by anyone other than the Client. Use of the report by any other person is unauthorised and such use is at the sole risk of the user. Anyone using or relying upon this report, other than the Client, agrees by virtue of its use to indemnify and hold harmless Delta-Simons from and against all claims, losses and damages (of whatsoever nature and howsoever or whensoever arising), arising out of or resulting from the performance of the work by the Consultant.

## Figure 1 – Site Location Plan



Legend

Site boundary

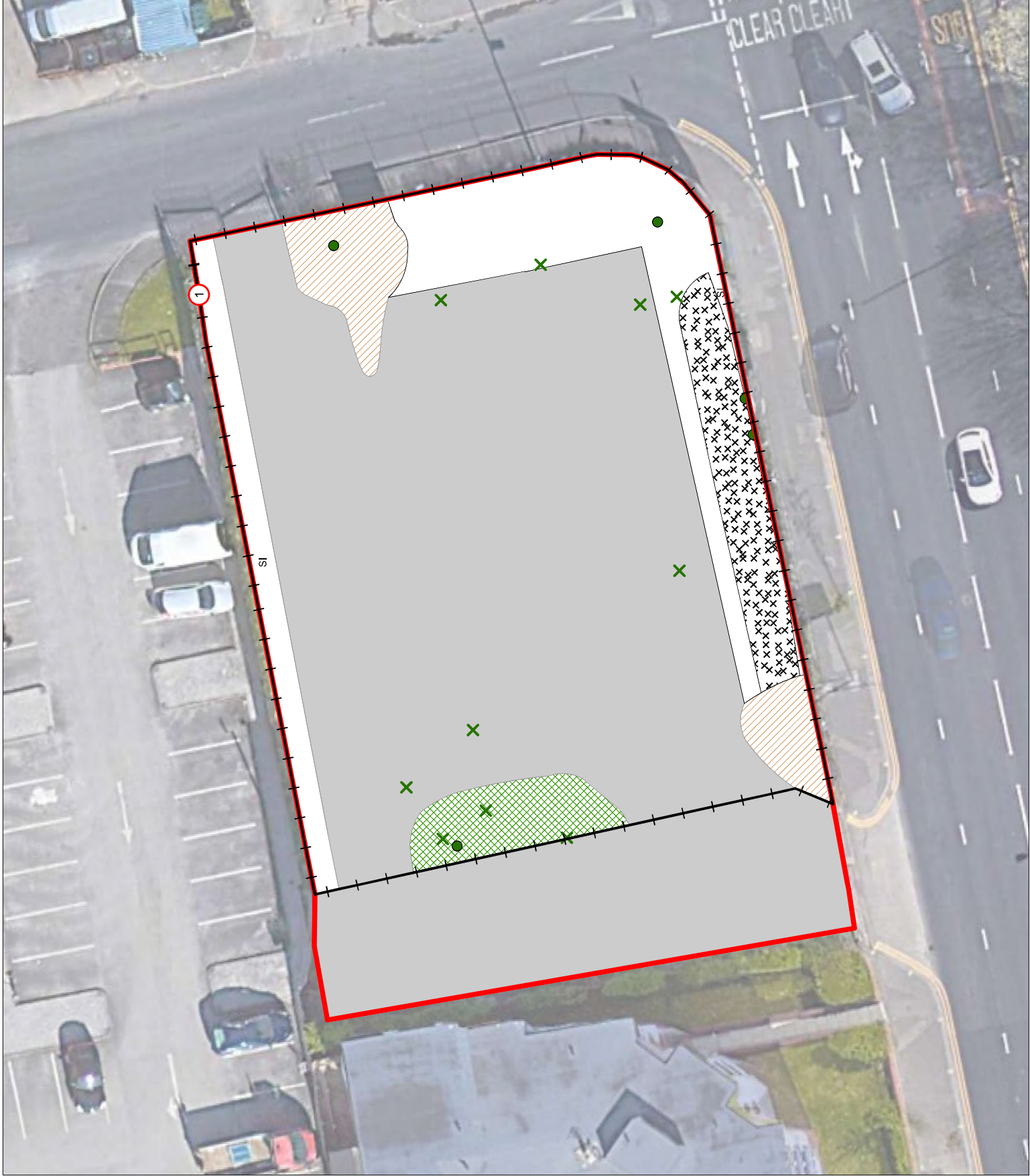


|            |                             |          |                 |       |
|------------|-----------------------------|----------|-----------------|-------|
| Figure     | Site Location Plan          |          |                 |       |
| Job        | Reliance Street, Manchester |          |                 |       |
| Client     | Lipton Plant Architects     |          |                 |       |
| Figure No. | 1                           | Revision | A               | Date  |
| Drawn      | KH                          | Checked  | CD              | Scale |
| Job No.    | 22-1496.02                  |          | Central GR      |       |
|            |                             |          | 389089E 400732N |       |
|            |                             |          | 1:10,000 @ A3   |       |
|            |                             |          | 16/09/2022      |       |



DO NOT SCALE.  
NOT FOR CONSTRUCTION.

## Figure 2 – Site Layout Plan

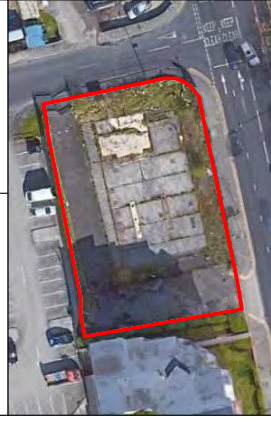


**Legend**

- Site boundary
- Scrub - dense/continuous
- SI
- Poor semi-improved grassland
- Tall ruderal
- Ephemeral / short perennial
- Hardstanding
- Fence
- Target note
- Scattered broadleaved tree
- Scattered scrub



|            |                             |          |                            |                  |
|------------|-----------------------------|----------|----------------------------|------------------|
| Figure     | Site Layout Plan            |          |                            |                  |
| Job        | Reliance Street, Manchester |          |                            |                  |
| Client     | Lipton Plant Architects     |          |                            |                  |
| Figure No. | 2                           | Revision | A                          | Date 16/09/2022  |
| Drawn      | KH                          | Checked  | CD                         | Scale 1:200 @ A3 |
| Job No.    | 22-1496.02                  |          | Central GR 388068E 400732N |                  |

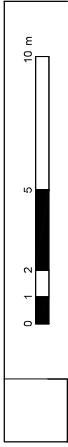


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# Drawing 1 - Proposed Development Plan



Key:

Commercial Space

Structural:

- Structure
- Foundations
- Canopy Overhead

Landscape:

- Soft landscaping/rain gardens
- Green roof
- Brown Roof
- Tree
- Tree grate
- Tree root space
- Attenuation Tank
- Site Slope 1:60 towards Slot Drain

Electrical:

- Satellite Charger
- Sub station, Meter Power Units (IXCPU C501/C801, 2XCPU C503/C803)
- 800mm cable duct
- 50mm cabling between power unit and satellite
- Charging Spaces

Energy/Sustainability:

- Battery Storage
- Air Handling Unit

Lighting:

Details to be included

Security:

Awaiting any info to incorporate

Ecology:

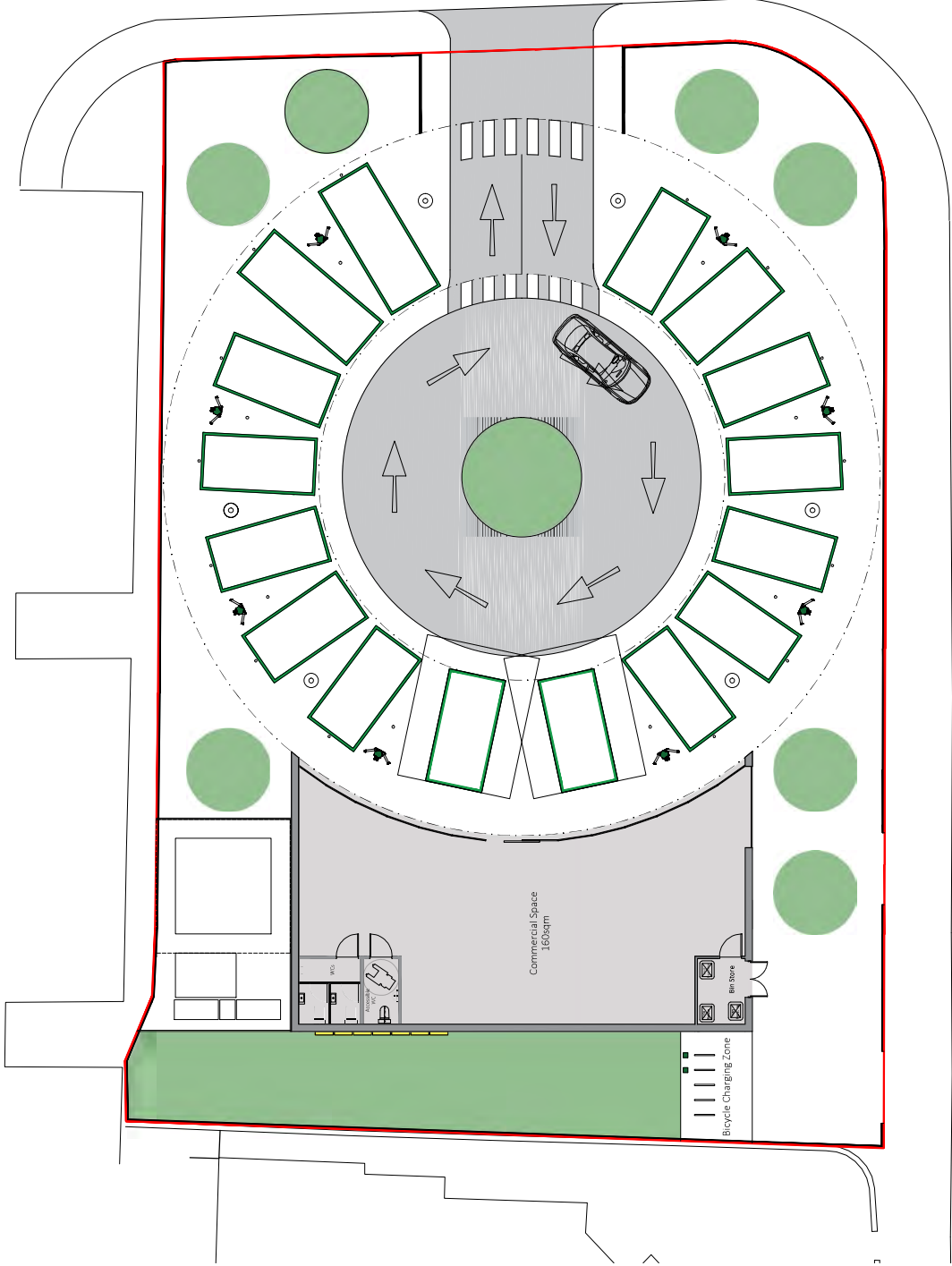
Awaiting any info to incorporate

Ground Contamination:

Awaiting site investigation to understand below ground conditions

Planning Consultant:

Awaiting information on separation distances



| rev                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | date       | description        | prepared by | checked by |
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| CONTRACTORS ARE TO FOLLOW DIMENSIONS AND NOT DIMENSIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |            |                    |             |            |
| LIPTON PLANT ARCHITECTS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |            |                    |             |            |
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# Appendix A - References

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## Appendix B - Assessment of Structures, Trees and Habitats for Bats

## Assessment of Structures, Trees and Habitats for Bats

| Suitability       | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                   | Roosting                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Commuting and Foraging                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Negligible</b> | <p>An inspected structure or tree which is considered to have no features of importance for roosting bats.</p> <p>No further constraints apply to the method or timing of proposed works.</p>                                                                                                                                                                                                                                                                                         | <p>Negligible habitat features on-Site to support commuting or foraging bats.</p>                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Low</b>        | <p>A structure with at least one or more features suitable to support opportunistic individual bats. However, inadequate space, shelter, protection and conditions, and the low suitability of surrounding habitats means that it is unlikely to be used as a maternity or hibernation roost site.</p> <p>A tree of adequate age and stature to support potential roosting features, however, either no features, or only features of limited potential recorded from the ground.</p> | <p>Habitat with potential to support low numbers of commuting bats due to its quality and connectivity. For example, a gappy hedgerow or unvegetated stream that is isolated from the surrounding landscape.</p> <p>Alternatively, suitable but isolated habitats suitable to support low numbers of foraging bats such as a lone tree or a patch of scrub.</p>                                                                                                                                             |
| <b>Moderate</b>   | <p>A structure or tree with one or more potential roost sites that are of adequate size, shelter and protection, with suitable conditions and surrounding habitat to support a bat roost not of high conservation status (with respect to roost type not individual species conservation status).</p>                                                                                                                                                                                 | <p>Linear habitat continuity connecting to the wider landscape offering potential to support commuting bats, such as rows of trees and scrub or linked back gardens.</p> <p>Habitat such as trees, scrub, grassland or a waterbody with connectivity to the wider landscape offering foraging opportunities for bats.</p>                                                                                                                                                                                   |
| <b>High</b>       | <p>A structure or tree with one or more potential roost sites that are suitable for use by large numbers of bats on a regular basis and for long periods of time due to their size, shelter, protection, conditions and the surrounding habitat.</p>                                                                                                                                                                                                                                  | <p>Continuous high-quality habitat with strong connectivity to the wider landscape that is likely to be used by commuting bats on a regular basis, such as flowing waterbodies, hedgerows, rows of trees and woodland edges.</p> <p>High quality habitat with strong connectivity to the wider landscape that is likely to be regularly used by foraging bats, such as broadleaved woodland, tree-lined watercourses and grazed parkland.</p> <p>Site is close to, and connected to, known roost sites.</p> |

Guidance on Assessing the Potential Suitability of Development Sites to Support Bats (adapted from Collins, J. (ed)).

# Appendix C - Ecological Impact Assessment Methodology

# Ecological Impact Assessment Methodology

The methodology for the EclA follows the principles set out within the Guidelines for Ecological Impact Assessment (EclA) in the UK and Ireland; Terrestrial, Freshwater, Coastal and Marine updated by the Chartered Institute of Ecology and Environmental Management (CIEEM) in 2019 and comprises a staged approach to assessing the potential impacts resulting from the proposed development on the ecological features within the ZOI.

The EclA has involved the following stages:

- Determination of baseline conditions;
- Identification of important ecological features;
- Identification of potential impacts and effects;
- Identifying likely significant effects;
- Designing appropriate avoidance and/or mitigation for impacts and effects;
- Assessment of residual effect significance;
- Assessment of cumulative impacts and effects; and
- Identification of compensation and enhancement measures.

## Baseline Conditions

Baseline conditions have been established following the methodology outlined in the above sections.

## Important Ecological Features

Important ecological features have been identified based on existing statutory, policy and conservation objectives. In accordance with the CIEEM Guidelines the value or potential value of an ecological resource has been determined within a defined geographical context in line with the table below.

## Potential Impacts and Effects

The potential impacts on any important ecological features are identified during construction and operation, and prior to any mitigation, based on available baseline data, an assessment of design proposals and construction methods, and available information on the existing conservation status of the features in question.

Impacts are then characterised in terms of the following attributes:

- Positive or negative – i.e. a change that improves or reduces the quality of the environment;
- Magnitude – i.e. the size of an impact in quantitative terms where possible;
- Extent – i.e. the area over which an impact occurs;
- Duration – i.e. the time for which an impact is expected to last;
- Reversibility – i.e. is the impact permanent or temporary; and
- Timing and frequency – e.g. related to breeding seasons.

The likely effects of potential impacts on important ecological features largely depend upon their sensitivity, whilst the level of certainty that an impact will occur as predicted is based on professional judgment. Only the impacts likely to result in significant effects have been described in detail within the report. Impacts that are either unlikely to occur, or if they did occur are unlikely to be significant have been scoped out and justification for scoping out provided.

| <b>Geographic Scale</b> | <b>Example Criteria for Classification at each Geographic Scale</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| International           | <p>Habitats meeting the criteria for Wetlands of International Importance (Ramsar), Special Area of Conservation (SAC) or Special Protection Area (SPA) site.</p> <p>A species present in internationally important numbers (&gt;1% of international population).</p> <p>Notable species which is part of the cited interest of an SPA or SAC and which regularly occurs in internationally or nationally important numbers.</p>                                                                                                                                                                                                                                                                        |
| National                | <p>Habitats meeting the criteria for a Site of Special Scientific Interest, Marine Conservation Zone (MCZ), or National Nature Reserve (NNR).</p> <p>A species present in nationally important numbers (&gt;1% of UK population).</p> <p>A species which is part of the cited interest of a SSSI and which regularly occurs in internationally or nationally important numbers.</p> <p>Rare breeding species (e.g. birds with &lt;300 UK breeding pairs).</p>                                                                                                                                                                                                                                           |
| Regional                | <p>A local site with important regional habitats or significant populations of Species of Principal Importance (SPIs) under the NERC act.</p> <p>Species present in regionally important numbers (&gt;1% of regional population).</p> <p>Species listed as priority species, which are not covered above, and which regularly occur in regionally important numbers.</p> <p>Sustainable populations of a species that is rare or scarce within a region.</p> <p>Species on the Birds of Conservation Concern (BoCC) Red or Amber List and which regularly occur in regionally important numbers.</p>                                                                                                    |
| County                  | <p>A local site with a habitat that is characteristic of the county or rare on a county scale, or with significant populations of locally important species.</p> <p>Species present in county important numbers (&gt;1% of county population).</p> <p>Species listed as priority species, which are not covered above, and which regularly occur in county important numbers.</p> <p>Sustainable population of a species that is rare or scarce within a county.</p> <p>A site designated for its county important assemblage of species.</p> <p>Species on the BoCC Red or Amber List and which regularly occur in county important numbers.</p>                                                       |
| Local                   | <p>A site which has wildlife corridors likely to be essential to allow viable movement of species or improve the biodiversity of the area.</p> <p>Species listed as priority species, which are not covered above, and are rare in the locality.</p> <p>Species present in numbers just under county importance (&lt;1% of county population).</p> <p>Sustainable population of a species that is rare or scarce within the locality.</p> <p>A site whose designation is just under for inclusion for its county important assemblage of a particular species on site.</p> <p>Other species on the BoCC Red or Amber List and which are considered to regularly occur in locally important numbers.</p> |

## Likely Significant Effects

In accordance with the CIEEM guidelines, an ecologically significant effect is 'an effect that either supports or undermines the biodiversity conservation objectives for 'important ecological features' or for biodiversity in general'.

Using an approach to valuing impacts that involves professional judgement and reference to available conservation objectives, neutral and minor effects are considered to be not significant, while moderate and major effects are assessed to be significant. The table below provides a comparison of the terms used.

| Effect Significance | Type of Effect      | Equivalent CIEEM Assessment                                                                       |
|---------------------|---------------------|---------------------------------------------------------------------------------------------------|
| Significant         | Major beneficial    | Significant positive impact on biodiversity conservation objectives at given geographical context |
|                     | Moderate beneficial | Positive impact on biodiversity conservation objectives at given geographical context             |
| Non-significant     | Minor beneficial    | Limited positive impact on biodiversity conservation objectives at given geographical context     |
| Neutral             | Negligible          | No significant impact on biodiversity conservation objectives at given geographical context       |
| Non-significant     | Minor adverse       | Limited adverse impact on biodiversity conservation objectives at given geographical context      |
| Significant         | Moderate adverse    | Adverse impact on biodiversity conservation objectives at given geographical context              |
|                     | Major adverse       | Significant adverse impact on biodiversity conservation objectives at given geographical context  |

The evaluation of significant effects has been based on the best available scientific evidence. Where sufficient evidence is not available, the precautionary principle has been applied. Therefore, where it is not possible to robustly justify a conclusion of no significant effect, a significant effect has been assumed. Any uncertainty has been acknowledged within the report.

## Avoidance and/or Mitigation

Negative impacts have been avoided and/or mitigated where possible, in line with the mitigation hierarchy as presented within the CIEEM Guidelines.

## Assessment of Residual Effect Significance

Once the impacts of the proposed development have been assessed, and all attempts to avoid and mitigate ecological impacts have been finalised, an assessment of the residual impacts is undertaken to determine the significance of their effects upon ecological features.

## Cumulative Impact Assessment

The following types of future development within the same zone of influence have been considered as part of the cumulative impact assessment in relation to each important ecological feature:

- Proposals for which consent has been applied which are awaiting determination and are visible on the local planning portal;

- Projects which have been granted planning consent, but which have not yet been started or which have been started but are not yet completed (i.e. under construction); and
- Proposals which have been refused permission but which are subject to appeal and the appeal is undetermined.

### **Compensation and Enhancement**

Compensation measures were taken to offset residual effects resulting in the loss of, or permanent damage to ecological features despite mitigation, where required. Compensation has only been considered as a last resort, in line with the mitigation hierarchy.

Enhancement measures have been agreed over and above any mitigation or compensation measures, in order to provide a biodiversity net gain.

## Appendix D - Site Photographs

## Site Photographs



**Photograph 1 - Hardstanding**



**Photograph 2 - Butterfly-bush scrub**



**DeltaSimons**  
Protecting people and planet





**Photograph 3 - Scattered broadleaved trees**



**Photograph 4 - Strip of poor semi-improved grassland on northern boundary**



**Photograph 5 - Tall ruderals**



**Photograph 6 - Area of shorter ephemeral vegetation**