

## **Land at Kelbrook Road – Sheldon’s Bakery (143634/FO/2025)**

### **Reasonable Avoidance Measures**

#### Introduction

The Land at Kelbrook Road, Manchester is subject to a planning application for the construction of a new bakery facility for Sheldon’s Bakery. As part of the planning application, a Preliminary Ecological Appraisal (PEA) site survey was carried out by SESS in 2023.

The PEA identified suitable habitat for common/widespread species of amphibians such as common frog, common toad and smooth newt, as well as for hedgehogs (A UK Priority Species). All of these species have been recorded within 1km of the site and therefore are considered to be potentially present within the application site boundary.

A pre-commencement condition has been drafted by Manchester City Council which states:

*“Prior to any earthworks, vegetation clearance or site clearance, a reasonable avoidance measures method statement for hedgehogs and common amphibians, for both the site clearance and the construction phase of development shall be submitted to and approved in writing by the City Council as local planning authority. The development shall be implemented in accordance with the approved avoidance measures.”*

*Reason - To ensure the protection of wildlife habitats in the locality, pursuant to policy EN15 of the Manchester Core Strategy (2012) and National Planning Policy Framework.*

Etive Ecology Ltd were instructed to prepare the RAMs in accordance with the PEA Report and this pre-commencement condition.

#### Reasonable Avoidance Measures

The proposed scheme will require vegetation clearance of much of the site area. The development footprint itself will be stripped entirely, and other areas of retained vegetation will be partially cut-back to allow for appropriate ongoing management.

It is anticipated that site clearance will be undertaken by a specialist landscape or ecological contractor, removing trees and woody material first, then reducing ground vegetation before undertaking a topsoil strip. Works are anticipated to include the use of power-tools and small tracked excavators. Material will be chipped and removed from site. Site clearance is likely to take around 2 weeks. The anticipated start date is February/March 2026 (to avoid the core nesting bird season), depending on suitable ground and weather conditions.

This scheme of RAMs has been prepared to ensure that no amphibians or hedgehogs are present within the working area at the commencement of works. The RAMs will also ensure that the site is kept in an unsuitable condition for these species during construction and provides measures to ensure that any incidental finds are dealt with appropriately.

The low risk of disturbing or harming any amphibians or hedgehogs during the proposed development works will be mitigated through the implementation of the following:

#### *Site Clearance Stage*

- A pre-commencement Toolbox Talk will be delivered to the site personnel working on the scheme. This will provide information relation to amphibian and small mammal identification, ecology and legal status, as well as the details and requirements of these RAMs.
- The working area will be clearly demarcated to identify areas within the development footprint and those where vegetation is to be retained.
- All above ground woody vegetation (trees/scrub) will be cut back using hand tools and/or a tree-shear. This work will take place prior to the start of March to avoid the nesting bird season. Any such works taking place after the 1<sup>st</sup> March must be preceded by a nesting bird search by a suitably experienced ecologist.
- Woody brash and logs will be moved to a designated processing area on site where they can be chipped or stacked, ready for removal.
- Area of ruderals, low scrub and grassland will be subject to a 2-stage cut, undertaken in a directional fashion. The initial cut will take vegetation down to 100mm, cutting towards an area of vegetation that will be retained, i.e. directing any animals towards retained habitat.
- After a minimum of 24 hours, the area will be checked by an ecologist and then cut again, this time down to ground level.
- After a minimum of 24 hours, the area can be subject to a top-sol strip under the direct supervision of a suitably experienced ecologist.
- During the course of clearance activities, any detritus or potentially suitable refugia for amphibians or small mammal (such as any piles of logs, brash, bricks or stones) will be removed with care and by hand under the supervision of a suitably experienced ecologist.
- If any common/widespread amphibians or hedgehogs are encountered, then they should be identified, recorded, photographed and then safely moved to suitable habitat outside of the working area. The most suitable place is likely to be around the southwest boundary of the site. A suitable receptacle with adequate vegetation and cover will be kept on site and used to transport any animals to the receptor area.
- If any great crested newts are recorded, or any other unexpected species, are encountered within the working area at any time during the course of the development, all works within the location of the find should pause immediately and a suitably licensed ecologist called for advice. A review of the impacts on any legally protected species will be made and if necessary, a licence will be obtained for the works to continue.

#### *Construction Phase*

- All materials will be stored in designated storage areas, on made-ground. Where this is not possible, materials will be stored off-ground on stillages or pallets.
- All rubble/spoil/earth arising from works will be stockpiled according to best practise and 'sealed' using the back of an excavator bucket to deter any amphibians from entering the

stockpile to take refuge.

- Any excavations left overnight will either be back-filled and compacted or else covered by plastic sheeting and secured by plywood batons (or similar) to prevent amphibians or small mammals from gaining access.
- Pre-start checks of the working area will be undertaken each morning, looking for any amphibians or small mammal.
- All site workers will be made aware of the potential presence of amphibians and small mammals and an identified sheet will be kept on site in case any of these animals are encountered.

The above RAMs have been designed such that the site can be carefully cleared without harming amphibians or hedgehogs and that subsequently the site is kept tidy and unsuitable for these species to utilise, so that they do not take refuge within the working area.

Provided this scheme of RAMs is followed in full, the risk of encountering, disturbing or harming herpetofauna is considered to be very low. It is noted that if any legally protected species (such as great crested newts) are encountered, then works in the area of the find will cease until the risk posed to protected species is re-assessed by a suitably licensed ecologist. If the risk posed is considered to be significant, then a license *may* be required in order for works to recommence.

### Timing of Works

A precise works programme has not been prepared at the time of writing but they are likely to be implemented from February/March 2026 onwards, when ground conditions are assessed to be appropriate.

At this time of year, amphibians and small mammals will be emerging from hibernation and be seeking aquatic breeding site. However, these animals will be susceptible to particularly cold or inclement weather conditions. Therefore, when overnight temperatures drop below 5°C, works should not be undertaken as individual animals would be at a greater risk of harm if disturbed.

Consideration will also be given to the nesting bird season, which runs from March to August inclusive. Taller vegetation should be prioritised at the start of clearance works, to remove nest sites. However, many bird will nest in low-growing vegetation so nesting bird check will be required for any works undertaken within the nesting season.

### Roles and Responsibilities

The following roles and responsibilities are defined:

#### *Suitably Experienced Ecologist*

- Preparing and delivering a pre-commencement Toolbox Talk to all site workers.
- Undertaking pre-commencement hand-searches of the working area.
- Supervision of topsoil stripping.
- Being available on-call to respond to any incidental herpetofauna finds.

*Developer / Contractor*

- Marking out the required working area.
- Ensuring all site workers either attend the Toolbox Talk or cascade the Toolbox Talk to them at a later date.
- Record the attendance at Toolbox Talk(s).
- Appoint a suitably experienced contractor to undertake site clearance.
- Ensure that their Principal Contractor and all sub-contractors follows the 'tidy-site' measures described herein.
- To stop works if any legally protected species (such as GCN) are found and to record/report any other amphibians or hedgehogs that are found.

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