15th April 2026

CRABTREE LANE, MANCHESTER – REASONABLE AVOIDANCE MEASURES METHOD LETTER STATEMENT

Collington Winter Environmental Ltd has been instructed to produce a Wildlife Reasonable Avoidance Measures Method Letter Statement for the site at Crabtree Lane, Manchester, in order to facilitate the commencement of site clearance works within the site prior to development. The proposed clearance works pertain within the redline boundary in Figure 1, below, in which some unmanaged vegetation has overtaken formerly hardstanding habitats, The woodland on site is also to be removed apart from the section outlined in blue.

During the Preliminary Ecological Appraisal (March 2025) the site habitat features were identified as Developed Land; sealed surface, Vacant or derelict land, Mixed scrub, Bramble, scrub, Other woodland; broadleaved and Urban tree. The buildings previously located on the site have since been demolished.

This letter statement has been produced to satisfy planning condition 26. The precautionary working methods are closely aligned with those in the CEMP produced alongside this letter statement. The table below demonstrates the ecological constraints and potential risks on site, outlining the aims of this letter statement.

Table 2.1 Ecological Constraints and Potential Risk Summary

Ecological Constraint	Potential Risk	Relevant Legislation and Planning Policy
Designated Sites		
The site is located within the Impact Risk Zone for Hollinwood Branch Canal SSSI, Huddersfield Narrrow Canal SSSI and Rochdale Canal SAC and SSSI. Ashton Canal (West) SBI is adjacent to the northern boundary of the site and Ashton Canal (East) SBI is located approximately 213m east of the site.	There is potential for the direct and indirect impact of Ashton Canal (West) SBI during the construction phase through accidental pollution events, dust deposition, mud and spoil from excavations.	Wildlife and Countryside Act (1981) (as amended).
Habitats and Flora		
Retained woodland	There is potential for damage to occur to the retained woodland flora and fauna, trees and roots during the construction phase.	Wildlife and Countryside Act (1981) (as amended).

Invasive Non-Native Species	There is a risk of invasive non-native species becoming established on site, with the potential to spread and result in the degradation and displacement of existing habitats.	Wildlife and Countryside Act (1981) (as amended).
Fauna		
Reptiles	There is limited suitable habitat on site for reptiles, due to the predominance of hardstanding. However, the site offers some sheltering habitat in the form of woodland edge and rubble piles which cannot be discounted. There is potential risk of injury or death to individuals during the construction phase.	Wildlife and Countryside Act 1981 (as amended). Section 41 of the Natural Environment and Rural Communities Act (2006).
Amphibians	The scrub and woodland around the site may offer some value as terrestrial habitat for common amphibians. There is potential for the species to be present, therefore there is risk of injury or death to individuals during the construction phase.	Great crested newts are protected under the Wildlife and Countryside Act (1981) and the Conservation of Habitats and Species Regulations (2017) Common toad are listed as species of Principal Importance in England, as defined by Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006).
Bats (roosting)	No roosting bats were identified during the surveys; however, a residual risk of bat roosting cannot be fully discounted due to limited visibility within parts of the buildings caused by dense vegetation. The majority of trees on site were self-set and did not provide roosting features for bats. However, if any mature trees are identified on site, a ground level tree assessment is required prior to the removal of the trees. Due to the proposed removal of buildings and trees, there is a risk of killing and/or injuring individual bats, and/or destruction of a bat roost.	The Conservation of Habitats and Species Regulations 2017 (as amended) and by UK law by the Wildlife and Countryside Act 1981.
Bats (activity)	Slow-flying species such as brown long-eared, are sensitive to lighting and may be impacted by the proposed development, should no mitigation for lighting be considered. Risk of negatively impacting foraging and commuting bats and associated commuting/foraging	The Conservation of Habitats and Species Regulations 2017 (as amended) and by UK law by the Wildlife and Countryside Act 1981.

	corridors, due to an increase of construction lighting.	
Breeding birds	Nesting birds are anticipated to utilise the woodland, scrub habitats, scattered trees and line of trees on site, therefore may be susceptible to disturbance in the construction phase of development.	With certain exceptions, all wild birds, their nests and eggs are protected by Section 1 of the Wildlife and Countryside Act 1981 (as amended) and bird species listed on Schedule 1 of the Act receive further protection.
Badger (*Meles meles)*	No badgers identified onsite. The site provides suitable conditions for sett building within the woodland and scrub habitats. Therefore, it is considered that badgers may be present on site, therefore there is a potential risk of injury or death to individuals during the construction phase.	Protection of Badgers Act 1992
Hedgehog (*Erinaceus europaeus*)	Given the habitats present within the site including woodland and scrub, it is anticipated that hedgehog could be present within the site, and other mammal species typical of rural environments. Therefore there is a potential risk of injury or death to individuals during the construction phase.	Listed on the UK BAP species in 2007 and is on the Biodiversity Lists for England and Wales.
Otter (*Lutra lutra)*	The section of the Ashton Canal to the north of the Site provides suitable habitat for riparian mammals such as otter which are inhabitants of freshwater habitats. It is anticipated that otter may commute through or adjacent to the site boundary, therefore should be considered during development, as there is a potential risk of injury or death to individuals during the construction phase.	Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 2 of The Conservation of Habitats and Species Regulations 2017.
Water vole *(Arvicola amphibius)*	The section of the Ashton Canal to the north of the Site provides suitable habitat for riparian mammals such as water vole which are inhabitants of freshwater habitats. It is anticipated that water vole may commute through or adjacent to the site boundary, therefore should be considered during development, as there is a potential risk of injury or death to individuals during the construction phase.	Schedule 5 of the Wildlife and Countryside Act 1981 (as amended)

Figure 1: Proposed areas to be cleared



It is anticipated that the habitats could be utilised by species such as bats, badgers, reptiles, common amphibians, nesting birds, hedgehogs, otters and water vole. Therefore, the vegetation must be managed and removed under the following Precautionary Working Methods (PWMs), where applicable.

Bats

The following PWMs are to be implemented under the supervision of a licenced bat ecologist to reduce the risk of killing or injuring any bats that may be affected during construction:

- All contractors working on the site will be briefed with a Toolbox Talk by the licenced ecologist, on the legal protection afforded to bats and their roosts, and on how to proceed if a bat is discovered during the work.
- The licenced ecologist will undertake a daylight inspection to assess the status of the site for bats prior to works commencing on site. This will be conducted using an elevated platform, scaffolding, or ladders where necessary to inspect the wall for field signs of bats.
- All potential roosting features identified on the buildings within the initial Preliminary Roost Assessment (as part of a Preliminary Ecological Appraisal) completed by Collington Winter (2025; Ref: 20-2148 PEA RPT 001) will be inspected with a torch and /or endoscope, if no evidence of bats is found, works may proceed unsupervised at the discretion of the appointed ecologist.
- If any bats are discovered during the proposed works, all works will cease, and Natural England is to be contacted immediately and a licence to be obtained before any further work can continue.

- Construction noise should be kept to a minimum, where feasible to minimise risk of noise disturbance.
- Timings of the construction working hours should be constrained to between 08:00-18:00, where possible, so as not to disturb the bats emerging or returning to the roost during the dusk and dawn periods with temporary additional lighting

The following lighting recommendations are to be considered, to minimise impacts of lighting on the retained woodland habitat. The recommendations are as follows:

- Keep site lighting to minimum levels.
- Luminaries should lack UV elements and preferably LED lighting with a warm white light should be used over cool white light (ideally <2700Kelvin).
- Lighting should feature peak wavelengths greater than 550nm.
- Light placement should be downward facing to prevent excess horizontal or vertical light spill.
- The use of integrated fittings such as cowls, shields, louvres and hoods, that effectively contain light spill from unintended areas.
- The use of hard landscaping features to block light and create dark corridors.
- Avoid illuminating habitats of value.
- Use of timed security lights should be set on motion-sensors and using short, 1-minute timers, to minimise light use.
- Column heights of lighting can be considered to minimise light spill

Badger

No badger setts or pathways were identified during the survey; however, they may be within the local area. Badgers are transitory and may turn up on-site at any time. The following Precautionary Working Methods will be adhered to ensure that no badgers are impacted by the proposed development (Badger Trust, 2023):

- An updated badger walkover is required immediately prior to construction commencing, undertaken by a suitably qualified ecologist
- Ensure excavations or trenches left overnight are covered or have an escape route such as a shallow gradient at one or both ends.
- Ensure excavations or trenches are inspected each morning and evening to ensure no badgers have become trapped.
- Open pipework with a diameter of more than 120mm should be properly covered or capped at the end of the working day to prevent badgers from entering and becoming trapped.
- During the work, the storage of any chemicals should be contained in such a way that they cannot be accessed or knocked over by any roaming badgers.
- The storage of topsoil or other “soft” building materials within the site should be given careful consideration. Badgers will readily adopt such mounds and dig setts which would then be afforded the same protection as established setts. To avoid the adoption of such mounds, they should be subject to daily inspections before work commences or alternative measures put in place, such as being fenced off for higher-risk areas.

- Litter, tools and potentially dangerous materials on site should be cleared at the end of the working day. Care should be taken that there are no sharp metal objects or pointed protrusions on the ground which could seriously injure a badger due to their poor eyesight.
- Ensure no dogs are brought to the work site.
- Security lighting should be kept to a minimum and away from setts to avoid disturbance to any badgers on site.
- Fires should be lit only in secure compounds away from areas of badger activity and should be fully extinguished at the end of the working day.
- Use of noisy plant or machinery should cease at least one hour before sunset and not commence until an hour after sunrise to avoid causing a disturbance to badgers or preventing access or egress to setts.
- Badger paths must not be blocked to ensure access to foraging areas is maintained

Breeding Birds

Any vegetation management should be undertaken outside of the breeding bird season (March to September, inclusive). If this is not possible, a suitably qualified ecologist should undertake a nesting bird check no more than 48 hours prior to removal. If nesting activity is observed, the nest(s) should be left in situ until the young have fledged. A suitable buffer will be maintained and determined by the ecologist.

Reptiles

- An experienced Ecological Clerk of Works (ECoW) shall be appointed to ensure RAM's are enforced;
- A copy of this method statement must be kept on site (we suggest having a laminated copy in the site office/ compound);
- A walkover of the area should be undertaken by the ECoW to determine any change in status of the habitats/structures on site prior to the initiation of any works;
- A toolbox talk by the appointed ECoW will be given to the site manager and all contractors working on site with respect to the surrounding habitats and potential for protected/notable species. A copy of species factsheets relating to reptiles and breeding birds will be provided for display within the site office.
- Suitable vegetation is to be strimmed under ECoW to approximately 15cm in a northern to southern direction. It is to be checked by the ECoW following strimming to identify individuals. If discovered, they will be removed from the working area and covered. Once the areas are deemed reptile free, they are to be strimmed to ground level and maintained at this length for the remaining works.
- No piles of loose construction materials are to be created during works – all material will be kept on hardstanding, stored on pallets, removed immediately from the site or checked by an ECoW prior to being removed;
- In the event reptiles are discovered, works will halt immediately and the ECoW will be contacted for advice. Contractors are not to handle reptiles unless informed to do so by the ECoW.

Amphibians

It is recommended that the presence of amphibians is considered during vegetation removal and site clearance. Any common amphibians encountered should be carefully moved by hand to areas outside of the impacted zone.

Precautionary working methods (PWMs), typically implemented for reptiles, are also recommended as good practice to help ensure the protection of amphibians during construction works.

Terrestrial Mammal

European Hedgehog are anticipated to be present within the site and are a Species of Principal Importance. During habitat management, any areas of dense vegetation should first be carefully hand searched to check for the species. If identified during management, hedgehogs should be relocated carefully by hand to a location away from the working area. If any injured either species are located, they should be taken to a local vet.

Otter

The PWMs for badger will minimise potential risk of killing or injuring of otter during the construction phase. Additional PWMs which are to be completed throughout the construction phase include:

- All excavations will be battened at a 45-degree angle, or a ramp will be placed within the excavation, to allow escape should animals become trapped.
- All site machinery and materials will be appropriately stored to avoid harm to the species.
- No works within 30m of the Ashton Canal will be undertaken after dusk or before dawn.
- Any temporarily exposed open pipe system will be capped in such a way as to prevent otters gaining access, as this may happen when contractors are off-site.
- Commuting otters may lie-up in stacked pipes or beneath pallets. These features, where they are within 30m of the canal, are to be inspected daily before the start of works.

Water vole

During construction the following PWMs should be adhered to:

- A precautionary buffer of approximately 5 m from the canal edge should be maintained where practicable, within which machinery, materials, fuels, and chemicals will not be used or stored.
- Pollution prevention measures should be implemented to prevent sediment, fuels, or other contaminants entering the watercourse.
- Heavy machinery and vibration-generating activities should be kept to a minimum within 5 m of the canal bank, as excessive vibration or excavation could destabilise banks and potentially collapse water vole burrows within more suitable sections of the canal.
- Where works are required close to the canal edge, the reconstruction of the wall should be undertaken by hand from the site side where possible, and excavation undertaken carefully to minimise disturbance.
- Contractors should receive a toolbox talk on protected species, and any excavations left open overnight should be covered or fitted with escape ramps to prevent animals becoming trapped.

Yours sincerely,

Max Robinson BSc
Ecologist