

27th September 2022

Saleem Khalid
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Dear Saleem,

Subject: Norwich Mill, Rochdale – Ecology Walkover Survey, Inc. Nocturnal Bat Survey

Introduction and background information

On 10th August 2022, Middleton Bell Ecology were commissioned by Richard Storah of Storah Architecture Ltd, on behalf of the client Saleem Khalid of Sartex Quilts & Textiles Limited, to undertake an update ecological walkover survey of the Norwich Mill site in Rochdale (Ordnance Survey Grid Reference: SD 90239 12398)(Figure 1). A single further nocturnal survey was commissioned on 10th September 2022.

Figure 1. Location plan



Planning permission (Application Reference: 19/00041/FUL) has been obtained from Rochdale Borough Council to permit partial demolition of an existing fire damaged building and full demolition of an adjacent industrial unit in order to build a new industrial building and create car parking. A Listed Building Consent (Application Reference:19/00042/LB) has also been obtained for the same application.

The primary purpose of the commissioned work was to inform Condition 5 of the planning permission which states:

5 No development shall take place (including any site clearance or preparation works) until the submitted ecological survey (JCA Ltd, Bat Survey & Report, 16.11.2020) is reviewed and, where necessary, amended and updated. The review shall be submitted to and approved in writing by the Local Planning Authority and shall be informed by further ecological surveys which shall be commissioned to:

- i) establish if there have been any changes in the presence and/or absence of bat species; and,*
- ii) identify any likely new ecological impacts that might arise from any changes.*

Where the survey results indicate that changes have occurred that will result in ecological impacts, new measures and a timetable for their implementation will be submitted to and agreed by the local planning authority prior to the recommencement of the development.

The development will be carried out in complete accordance with the agreed ecological measures.

As commented upon in Condition 5, a Preliminary Ecological Appraisal (PEA) (JCA, 2019) and further Bat Survey (JCA, 2020) have been undertaken to inform the planning application.

The PEA recorded that the west of the site comprised an intact industrial unit used as a shop, whilst car parking was present to the east and rear of the site. The majority of the site, outside the areas mentioned, comprised the remains of a burnt out factory (subject to a fire in 2011), with vegetation establishing in the footprint of this former factory. The PEA recorded the need for further bat survey, highlighted the potential of the site for use by nesting birds and hedgehog *Erinaceus europaeus*, and highlighted the need for an ecologically sensitive lighting plan. The invasive plant species Himalayan balsam *Impatiens glandulifera*, included on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) was recorded from the site. One or more species of cotoneaster *Cotoneaster* sp. were also recorded from the site with some *Cotoneaster* species also included on Schedule 9,.

The PEA highlighted that the Norwich Mill site was located directly adjacent to the Rochdale Canal, a Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC), designated on account of the presence of the nationally scarce aquatic species, floating water plantain *Luronium natans*. Rochdale Canal is considered to be of European level importance to nature conservation.

The Bat Survey comprised a more detailed examination of buildings present in order to determine their bat roosting potential. The bat survey highlighted that a former engine house, present at the southern corner of the burnt out mill (see Figure 2), displayed a low level of bat roost suitability. It was recommended that a dusk emergence or dawn return survey of this building would be required in order to confidently determine bat roost presence/absence.

Figure 2. Location and extent of former engine house



This letter report details the results of an update ecological walkover survey, undertaken on 23rd August 2022 and a single further nocturnal survey of the engine house, carried out on 12th September 2022.

Methodology

Ecological walkover survey

On 23rd August 2022 Robert Bell (MCIEEM; Bat Survey Class license WML-A34-Level 4, 2016-25236-CLS-CLS) of Middleton Bell Ecology carried an update ecological walkover survey of the proposed Norwich Mill development site. The key focus of this survey was to identify changes in habitats present relative to those recorded in the PEA, to map invasive plant species and to re-assess the bat roosting potential of built structures present on the site.

Nocturnal survey

A single dusk emergence survey of the former engine house was undertaken on 12th September 2022. The survey was carried out by Robert Bell, with an unmanned infra-red camera position also used. Two Canon XA10 video cameras were used during the survey, with one in the unmanned position and the second located adjacent to the surveyor (Figure 3). Each camera position was lit with additional infrared lighting and all equipment (cameras and lights) was mounted on separate tripods. Footage from the unmanned detector was watched back in its entirety by John Pearse (Plate 1). The surveyor was equipped with a Wildlife Acoustics EM Touch bat detector and iPad recorder, with a heterodyne Batbox Duet bat detector and Anabat SD1 static detector positioned adjacent to the camera.

The dusk emergence surveys continued from 15 minutes prior to sunset until 1.5 hours after sunset.

Figure 3. nocturnal survey plan

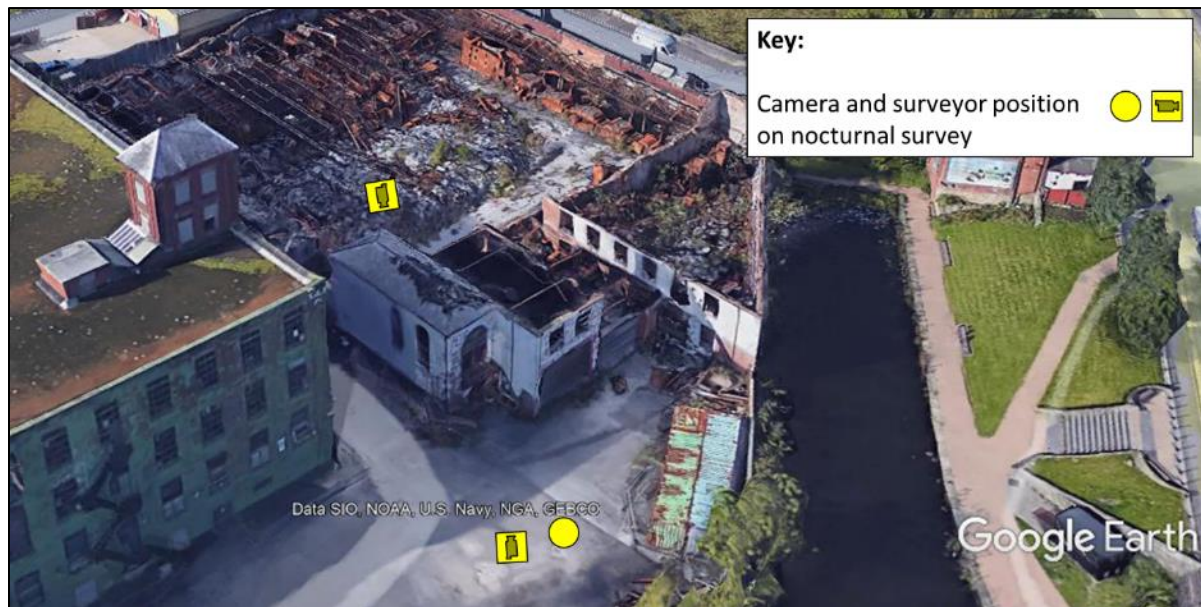


Plate 1. Image from video camera in unmanned survey position at end of survey



Limitations

The single nocturnal bat survey was undertaken outside the peak bat activity survey season (mid-May to August), at a time when bat maternity roosts can be expected to have dispersed. In this instance, the survey date is considered to be acceptable as the building lacked significant potential for use by maternity roosts. It is also noted that more individual day roosts are typically present in September than during the peak maternity season (when many bats roost in larger aggregations), so the likelihood of recording a roost in any given building is higher, providing the weather is suitable for survey.

Results

Habitats

Generally the site vegetation appeared to have developed as would have been expected on an unmanaged site of this type. The colonisation of bare ground, including the burnt remains of stored fabrics by species such as frequently occurring goat willow *Salix caprea*, silver birch *Betula pendula*, buddleia *Buddleja davidii*, rosebay willowherb *Chamaenerion angustifolium*, herb Robert *Geranium robertianum* and creeping bent *Agrostis stolonifera* has continued, with saplings growing into small trees in places. Whilst the vegetation has continued to develop, the habitats present are fundamentally the same as those recorded in 2019.

Plate 1. Looking across the fire damaged interior of the burnt out factory



Plate 2. Area of car parking at southern end of site



Plate 3. Looking across eastern boundary of site from Rochdale Canal



Plate 4. Intact factory shop at northern corner of site



Species

The walkover survey did not record any new ecological impacts likely to arise as a result of a change in the site's condition relative to that recorded during the 2019 PEA. This section of the report will refer only to those species groups for which further survey or mitigation work was either undertaken or is required.

Bats

Building and tree inspections - The entirety of site's built structures were subject to a ground based external visual inspection, with the former engine house also subject to a partial internal inspection. The survey findings concurred with the 2020 Bat Survey report (JCA, 2020), in finding that the only section of the site displaying more than a negligible level of bat roost suitability comprised the former engine house (Figure 2; Plate 5).

The former engine house comprised a two-storey brick built section of the former factory with the partial remnants of a pitched and hipped Welsh slate covered roof with clay ridge tiles and a uPVC plastic fascia board. Bats may potentially access the wall top of this building, with potential roosting gaps also present below ridge and hip tiles. Bats may also access crevices between the two skins of the solid brick wall for roosting. This section of the building was considered to display a low level of bat roost suitability.

The intact factory shop (Plate 4) comprises a single c.1980s brick-built unit with a pitched corrugated metal sheet roof. The verges were covered with metal coverings and wall top capping, together with some corrugated metal sheet cladding. The building was found to lack potential roost features and was considered to display a negligible level of bat roost suitability.

The remnant walls around the site boundary (i.e. Plate 3) were found to be well pointed, supporting no more than very superficial and almost universally damp crevices. These walls were not considered to display more than a negligible level of bat roost suitability.

None of the trees on site displayed more than a negligible level of bat roost suitability.

Nocturnal survey – The temperature at the start of the dusk emergence survey, undertaken on 12th September 2022, was 15°C, with a light air (Beaufort Scale Force 1) and 20% cloud. There was no rain and the weather conditions remained the same throughout the survey.

No evidence of roosting bats was recorded during the nocturnal survey. The only bat recorded comprised a common pipistrelle *Pipistrellus pipistrellus* feeding to the north of the engine house at 20:13. No other bat activity was recorded.

Plate 5. The former engine house



Birds

The vegetation and buildings on site, as well as the remnant walls, displayed good potential for use by nesting birds of a variety of species. This situation is unchanged from the 2019 PEA survey.

Hedgehog

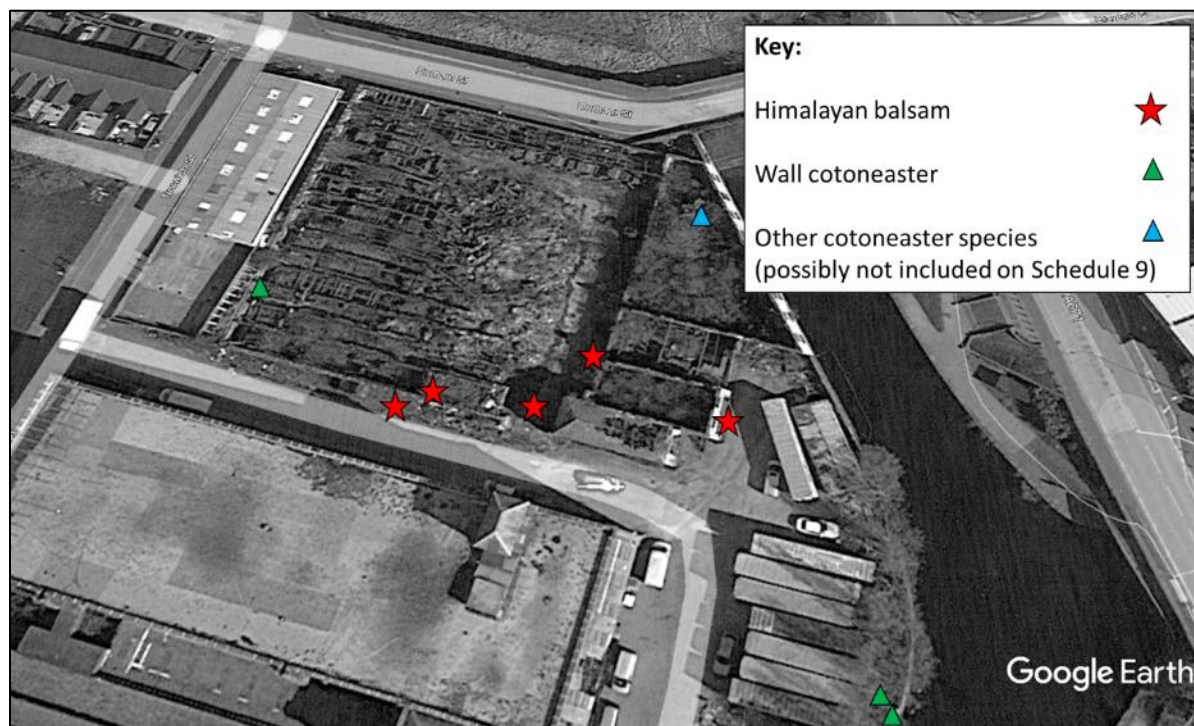
No evidence of hedgehog was recorded during the survey and there is not considered to have been any change in the site habitats' potential to support hedgehog relative to that recorded during the 2019 PEA.

Invasive species

The invasive plant species Himalayan balsam was recorded in five stands across the site with four stands of cotoneaster. Three of the cotoneaster stands comprised wall cotoneaster *Cotoneaster horizontalis*, a species included on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). There are many species of cotoneaster present in the UK and identification can be difficult to confirm. The fourth stand of cotoneaster comprised an unidentified species, and it may not be a species included on Schedule 9. It is however recommended that all cotoneaster on site should be treated as if it is on Schedule 9.

Stands of Himalayan balsam and cotoneaster recorded during the survey were mapped, with these stands shown in Figure 4. The maximum extent of an individual stand of Himalayan balsam was 7m², with no more than three cotoneaster plants recorded in a single stand.

Figure 4. Stands of invasive plant species on site



Assessment

Designated sites

The site is located immediately adjacent to the Rochdale Canal, designated as a SAC and SSSI. Site clearance works and future operation of the new factory both have potential to result in pollution incidents which may impact on this key receptor. It is understood from the Officer's Report and their communication of comments received from Natural England, Greater Manchester Ecology Unit, the Environment Agency and The Canal and River Trust, that a shadow Habitat Regulations Assessment (HRA) has been produced for the development and that its findings have been accepted. This HRA was not available to the author at the time this report was written. Measures to prevent pollution incidents are to be detailed within a Construction and Environmental Management Plan (CEMP) (required under Condition 3 of the planning permission). Condition 4 also stipulates that stores of spoil or waste are not to be located within 10m of the Rochdale Canal (required under Condition 4). No further consideration of the presence of the Rochdale Canal is given within this document.

Species

Bats

No bats, or signs of bat occupation were found in buildings during the preliminary daytime assessment. In addition, no evidence of bat roosting was recorded during the single nocturnal survey. This demonstrates the probable absence of roosting bats.

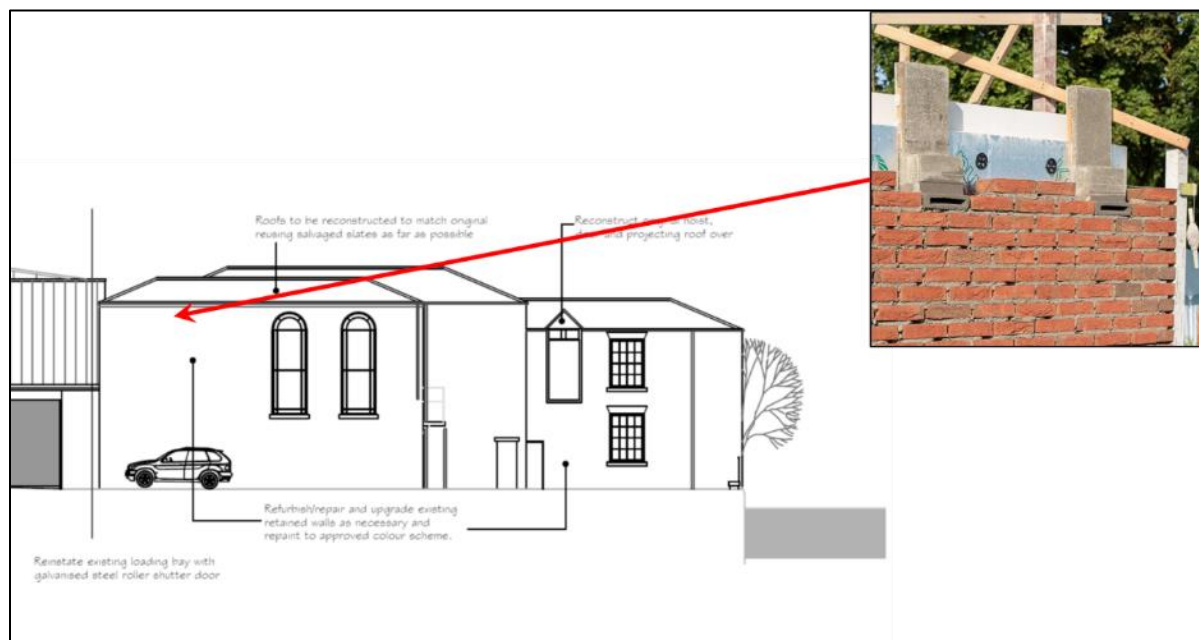
No further bat survey is considered necessary providing works commence within 24 months of the survey date. If works commence after this time, then Middleton Bell Ecology should be

contacted to determine the requirement for update survey works to be undertaken.

The 2019 PEA highlighted the need for an ecologically sensitive lighting plan to be developed for the site, with the key focus being on the avoidance of new sources of light spill across the Rochdale Canal. This measure will be developed through the creation of ecologically sensitive lighting scheme to inform the discharge of Condition 22 of the planning permission.

No bats were recorded roosting on site during the survey works and consequently there is no compulsory requirement for mitigation. However, in order to enhance the ecological value of the site and in accordance with the aims of the National Planning Policy Framework (2021), it is suggested that two new bat roosting features be incorporated into the new factory. The features could comprise integrated bat boxes, of a design such as the Vivara Pro Build-in WoodStone Bat Box, to be fitted in the south elevation of the renovated former boiler house, close to wall top height (Figure 5).

Figure 5. Proposed integrated bat box locations



Birds

As stipulated in Condition 6 of the planning permission, no works to trees or shrubs should occur between the 1st March and 31st August unless a nesting bird check has first been undertaken by a suitably experienced ecologist.

In accordance with the aims of the National Planning Policy Framework, it is recommended that one new integrated swift *Apus apus* box (i.e. Manthorpe Swift Brick) be installed within the new factory. This box could be fitted at wall top height in the east facing elevation of the former engine house. Studies have shown that swift boxes are used by other bird species that utilise buildings and consequently this measure will provide potential nesting space for house sparrows *Passer domesticus* and starlings *Sturnus vulgaris*, in addition to potentially providing future nest space for swift.

Hedgehog

As detailed in the 2019 PEA report, hedgehog holes (13cm x 13cm in size) should be cut at the base of new fences to allow movement of hedgehogs onto and off the site. These holes should be created at fence junctions or corners.

Invasive species

It is an offence to spread in the wild those plant species included on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). The invasive plant species Himalayan balsam and two species of cotoneaster (including wall cotoneaster) are present on site, with Himalayan balsam and wall cotoneaster included on Schedule 9. Himalayan balsam comprises an annual plant which spreads quickly by seed, with the seeds remaining viable for two years. Cotoneaster species are perennial and also spread by seed.

The clearance of rubble, soils and other waste from the site risks spreading the invasive plant species, most notably Himalayan balsam. If time allows (over two years would be required) then these species could be eradicated prior to site clearance. If that is not possible then materials from the infested areas and the surrounding 7m would need to be disposed of as controlled waste and transported to a permitted landfill by a registered waste carrier.

Site workers involved in clearance of the site should receive a toolbox talk on the identification of Himalayan balsam and cotoneaster, and the methods of spread of each plant. In order to reduce the chance of spreading these species during the works, cotoneaster plants should be physically removed at the outset of the works (as perennials these plants are always visible). If works are undertaken during the growing season, then it is recommended that all Himalayan balsam plants present are pulled and appropriately disposed of prior to works commencing. This measure will reduce the chance of spreading the plant but will not deal with seeds present in the soil or rubble. Biosecurity measures should be enacted with all machinery, tools and footwear to be cleaned on site prior to leaving the area, in order to prevent the spread of seeds off-site at the end of the working period

Specialist invasive species companies can advise further on the most effective approaches to site clearance.

If you require any further information on any topic discussed in this letter report, please do not hesitate to get in contact.

Yours sincerely,



Mr R Bell MCIEEM
Principal Ecologist

References

Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines. The Bat Conservation Trust.

JCA (2019) Preliminary Ecological Appraisal at Sartex Mill, Norwich Road. JCA Ltd.

JCA (2020) Bat Survey and Report at Sartex, Norwich Mill. JCA Ltd.