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Ecological Impact Assessment

Land off Gipsy Lane, Rochdale
for:

Arlington Energy Ltd

CRM.348.003.EC.R.001

'Experience and expertise working in union'

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Ecological Impact Assessment

Project:	Land off Gipsy Lane, Rochdale
For:	Arlington Energy Ltd
Status:	Final - Rev C
Date:	14th October 2019
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Non-Technical Summary

i. In September 2019 Enzygo Ltd was commissioned by Arlington Energy Ltd to provide an Ecological Impact Assessment (EcIA) of the land off Gipsy Lane, Rochdale, OL11 3HA (central grid reference: SD 88264 11260), located within the Greater Manchester, Rochdale Metropolitan Borough Council (Bamford Ward) planning authority. This assessment represents an update of the 2018 Preliminary Ecological Appraisal (PEA) (Enzygo, 2018) following confirmation of the development proposals. The study will inform an application for development of a battery energy storage facility.

ii. The following ecological constraints and associated recommendations to avoid/ mitigate/ compensate for potential impacts have been identified:

- Deciduous Woodland HPI & TPOs (HPI immediately north of the site boundary, row of trees at the north of the site form part of the wider TPO covering the woodland to the north) – Number of trees to be felled/requiring surgery is to be minimised as much as is feasible to permit development. All retained and protected trees to be protected in accordance with arboricultural best practice. Native tree planting to compensate for the unavoidable loss;
- Bats (low risk of roosting bats in trees, woodland to north provides suitable foraging habitat) – Precautions during tree-felling/surgery works and protocol provided in the unlikely event roosting bats are discovered. Sensitive lighting scheme to be implemented at the construction site and at the completed development to avoid any lighting impacts; and
- Birds (general nesting opportunities within trees and scrub) – Clearance outside of nesting period or ECoW to conduct a nesting bird check prior to clearance.

iii. This report has demonstrated that, if the outlined mitigation measures are implemented in full then no significant residual impact could be expected, and the proposed application will result in 'no net loss in biodiversity,' whilst also providing opportunities for 'biodiversity net gain' in accordance with NPPF and Local Planning Policy.

1 Introduction

1.1 Commission

1.1.1 In September 2019 Enzygo Ltd was commissioned by Arlington Energy Ltd to provide an Ecological Impact Assessment (EcIA) of the land off Gipsy Lane, Rochdale, OL11 3HA (central grid reference: SD 88264 11260), located within the Greater Manchester, Rochdale Metropolitan Borough Council (Bamford Ward) planning authority. This assessment represents an update of the 2018 Preliminary Ecological Appraisal (PEA) (Enzygo, 2018) following confirmation of the development proposals. The study will inform an application for development of a battery energy storage facility.

1.1.2 Enzygo Ltd are not considered to act as a Principal Designer for any mitigation/enhancement strategies identified within this document in accordance with the Construction (Design and Management) Regulations 2015 (CITB, 2016).

1.2 Proposed Development/Identification of Impacts

1.2.1 The proposed works will involve development of a battery storage facility, including battery containers, transformer modules and a substation, with use of a temporary construction compound. The facility will be connected via underground cables to an existing substation to the north of Gipsy Lane, and an access route to the facility will be established from the A664 (Manchester Road) to the west, with an existing access road to be utilised. The development footprint is limited in extent, and there will be no significant increase in noise or lighting during the construction phase or operation of the site, with only sporadic visits to maintain the facility. There will be no use of any additional surrounding land/adjacent buildings during the construction phase i.e. for further material storage. Refer to Appendix A for Proposed Site Layout.

1.3 Aims and Objectives

1.3.1 The purpose of this report is to provide biodiversity information which succinctly identifies ecological features on site and within the corresponding zone of influence, identify impacts resulting from the proposed application, associated effect to identified ecological features, recommend proportionate avoidance/mitigation/compensation strategies, and identify enhancements that will be implemented in accordance with the British Standard for Biodiversity BS42020:2013 (BSI, 2013) to demonstrate 'no net loss in biodiversity' and a 'biodiversity net gain' in accordance with NPPF and Local Planning Policy.

1.3.2 This report has been produced with reference to current Guidelines for Preliminary Ecological Appraisal (CIEEM, 2017a), Guidelines for Ecological Impact Assessment in the UK and Ireland, Terrestrial, Freshwater, Coastal and Marine (CIEEM, 2018) and Guidelines for Ecological Report Writing (CIEEM, 2017b).

1.4 Background

1.4.1 An October 2018 application (reference 18/01106/FUL) for "*construction of a battery energy storage facility including 2.4m high boundary fencing and 6 x 4m high floodlights/cctv cameras*" was subsequently withdrawn and was supported by the previous 2018 Preliminary Ecological Appraisal (Enzygo, 2018). No known consultation responses in relation to ecology and nature conservation were produced.

1.4.2 A search of the Rochdale Metropolitan Borough Council has revealed several further historic planning applications associated with the site and adjacent land. None of these historic applications were supported by any ecological report information or are pertinent to this assessment.

1.4.3 There have been no known discussions in relation to Ecology with the LPA/County Ecologist/third party consultees (i.e. EA) regarding this proposed development.

1.5 Site Context

1.5.1 The approximately 0.8Ha site comprises unmanaged poor semi-improved grassland, tall ruderal-herb vegetation, scrub and shrubs, and a row of planted mature Poplar sp. trees. A proposed access route extends west of the site through the car park of the adjacent hotel, and the proposed route of an underground cable extends east between adjacent industrial buildings and a transformer station. The immediate surrounding landscape is dominated by residential housing and industrial development.

1.5.2 The site boundaries are undefined, with broadleaf woodland immediately beyond the northern boundary, industrial buildings beyond the eastern boundary, dense scrub and unmanaged grassland beyond the southern boundary and the car park of the adjacent hotel to the west of the site.

1.5.3 The site lies within the Manchester Pennine Fringe National Character Area (Natural England, 2018) which is characterised as occupying "*the traditional zone between the open moorlands of the Dark Peak and Southern Pennines, and the densely populated urban conurbation of Manchester*".

Figure 1.1: Surveyed Area



Image courtesy of Google Image Pro 7.3.2.5491, [Grid Ref: SD 88264 11260 and 138m Elevation]. Imagery date 19th April 2018. Image accessed 24th September 2019.

2 Methodology

2.1 Desk Study

2.1.1 Desk study details were obtained from the following sources on the associated dates to provide background on ecological features in the vicinity of the site. In each case the search included the site and the specified area beyond the site boundary based on the expected zone of influence. Candidate and potential designations are considered too as these are also legally protected. Records obtained included:

- Statutory sites designated or classified under international conventions or European legislation within a 5km radius, statutory sites designated under national legislation (including Marine), existing EPS Licence applications within a 2km radius, and Priority Habitat & Ancient Woodland Inventory within a 0.5km radius [Magic Map, 24th September 2019] (DEFRA, 2019);
- Tree Preservation Orders (TPOs) and Biodiversity Conservation Areas within the immediate zone of influence [Rochdale Metropolitan Borough Council, 24th September 2019];
- Waterbodies within a 0.5km radius (Online mapping sources including: Google Maps; Magic Map; and Ordnance Survey Street View, 24th September 2019); and
- Locally designated wildlife sites & any notified Local Biodiversity Action Plan (BAP) Habitats, Legally protected species, any Priority species (which includes: National Biodiversity Species, Local BAP Species, Species of conservation concern and Red Data Book (RDB) species, Birds of Conservation Concern (BOCC), nationally rare and nationally scarce species, and OSPAR Commission list of threatened/declining species) and Invasive species (listed under section 14 of Schedule 9 only) within a 2km radius, and any important hedgerows/veteran trees within the immediate zone of influence [Greater Manchester Local Record Centre (GMLRC), 13th February 2018].

2.2 Field Survey

2.2.1 Field Surveys were undertaken on the following dates by the identified staff, all of whom satisfy necessary field survey competencies as stipulated by the Chartered Institute for Ecology and Environmental Management (CIEEM). Weather conditions on the day of survey have been included and where relevant survey/class licence numbers referred to.

Table 2.1 – Survey Dates and Conditions

Survey	Date	Staff/Licence	Environmental Conditions
Phase I Habitat Survey and preliminary ground-level assessment of trees for roosting bats	14/02/2018	Chris Schofield ACIEEM MSc. BSc. (Hons) [Senior Ecologist at Enzygo] under the guidance of Derek Allan MCIEEM MSc BSc [Hons] [Director of Ecology at Enzygo and a licensed bat surveyor (Natural England licence Level 2, 2015-14659-CLS-CLS)]	100% overcast with occasional sleet, moderate wind and a temperature of 1°C.

Phase I Habitat Survey

2.2.2 In accordance with Guidelines for Preliminary Ecological Appraisal 2nd Edition (CIEEM, 2017a) the Phase I Habitat Survey and assessment included the following.

Mapping of Habitat Types

2.2.3 Phase I Habitat Survey (JNCC, 2010) is the most recognised published method of habitat classification. It has been used to categorise & map the main vegetation types present within the survey area using a standard set of habitat categories. Each of the main habitats has been described; including details of component plant species abundances (recorded using the DAFOR scale: D=Dominant, A=Abundant, F=Frequent, O=Occasional, R=Rare). Additionally, any stands of non-native invasive plant species were recorded. Habitat extents have been visually mapped onto a topographic plan, with approximate location/areas recorded only (a GPS unit has not been utilised to accurately recorded these).

Assessment of possible presence/likely importance for Protected & Priority Species

2.2.4 An assessment of the possible presence of protected or priority species, and the likely importance of habitat features present for such species has also been undertaken, particularly where uncommon or specialised habitats are present in accordance with current PEA guidelines (CIEEM, 2017a). However, no specific protected species survey has been undertaken unless listed under additional surveys as below. Any incidental sightings of protected or priority species, or field signs of such species has also been recorded. Species assessed include: Plants & Fungi; Terrestrial/aquatic invertebrates; Fish; Amphibians; Reptiles; Breeding, wintering and migratory birds; Bats (including potential roost sites, foraging and commuting habitats/features), Badger, and Other mammal species.

Preliminary Ground-level Assessment of Trees for Roosting Bats

Scoping (non-specialist) survey for roosts: individual trees and groups of trees

2.2.5 With reference to current survey guidelines BS8596:2015 (BSI, 2015), a scoping (non-specialist) survey for roosts of individual trees and groups of trees, was undertaken. Each tree was visually inspected from the ground (with the aid of binoculars and a high-powered torch) to identify Potential Roosting Features (PRFs), including checks for the presence of the following features that bats might be able to use:

- Natural holes (e.g. knot holes) arising from naturally shed branches, or branches previously pruned back to the branch collar;
- Man-made holes (e.g. cavities that have developed from flush cuts) or cavities created by branches tearing out from parent stems;
- Woodpecker holes;
- Cracks/splits in stems or branches (both vertical and horizontal);
- Partially detached or loose, platy bark;
- Cankers (caused by localised bark death) in which cavities have developed;
- Other hollows or cavities, including butt rots;
- Compression forks with included bark, forming potential cavities;
- Crossing stems or branches with suitable space between for roosting;
- Ivy stems with diameters in excess of 50mm with suitable roosting space behind (or where a roosting space can be seen where a mat of thinner stems has left a gap between the mat and the trunk);
- Bird and Bat boxes on trees; or

- Other features that offer a place of shelter.

Secondary (non-specialist) survey for roosts: individual trees and groups of trees

2.2.6 At the same time, a secondary (non-specialist) survey for roosts: individual trees and groups of trees was undertaken from the ground only where potential PRFs were identified. No at height survey was undertaken, nor use of an endoscope. Any signs of bat use or bat presence was recorded, such as:

- The presence of bats (live or dead);
- Open cavities which extend above the opening, and that have sections which are smooth and free of debris;
- Bat droppings in, around or below the entrance (especially caught on horizontal branches below the entrance or surrounding leaves);
- Staining immediately around the opening;
- Smoothing of surfaces around the opening;
- The distinctive smell of bats or ammonia;
- Audible chattering at dusk or in warm weather for some species; and
- Accumulation of prey debris such as insect wings.

2.3 Assessment

2.3.1 Following the preliminary assessment of trees, based on the signs present, each tree was classified as one of the following categories in accordance with current guidance BS8596:2015 (BSI, 2015):

- Known or confirmed roost – Trees with evidence of bat use or bat presence;
- High/medium risk – Trees with a suitable PRF, or with several features with some bat roost potential;
- Low risk – Trees of sufficient size and age to contain bat roosts but with no obvious PRFs seen during the scoping survey, or features seen with limited roosting potential only, e.g. small amounts of Ivy; or
- Negligible/no risk – Trees with apparently no potential to support bats.

2.3.2 A level of importance has been assigned to each ecological feature, where sufficient baseline data is available to do so, in accordance with current guidance (CIEEM, 2018). This is defined within a geographical context as follows: International and European; National; Regional; Metropolitan, County, vice-county or other local authority-wide area; River Basin District; Estuarine system/Coastal cell; and Local (plus Negligible where no associated value has been identified). For example, importance of designated sites reflects the geographical context of the designation (where designated sites no longer meet designation criteria and those formally 'de-notified' or where an undesignated site meets published selection criteria must also be considered). When considering habitats and species contextual information about distribution and abundance of that habitat/species in the area must be considered (if the habitat/species status is currently in a degraded or unfavourable condition its potential value should be considered).

2.3.3 The assessment then considers potential impacts (both positive and negative) generated during the construction and operational phase of the proposed application. Only impacts that are likely

to be significant are considered. Impacts that are either unlikely to occur, or if they did occur are unlikely to be significant, are not considered.

2.3.4 Cumulative impacts are then considered where the application meets criteria in accordance with national EIA screening guidance (GOV.UK, 2019), and where agreed with the competent authority during scoping. This takes into consideration existing background levels of threat or pressure, looks at critical thresholds, and assess both additive/incremental and associated/connected impacts and effects.

2.3.5 Relevant aspects of ecological structure and function are then considered when determining if identified impacts will have a significant effect upon ecological features. Where necessary, this assessment utilises information from other specialists i.e. air quality, hydrology etc, to determine the level of impact. In accordance with current guidance (CIEEM, 2018) these are described using the following characteristics, where relevant: positive or negative; extent; magnitude; duration; frequency and timing; and reversibility.

2.3.6 The mitigation hierarchy is then explored in accordance with BS42020:2013 (BSI, 2013). This seeks as a preference to avoid impacts, then to mitigate unavoidable impacts, and as a last resort, to compensate for unavoidable residual impacts that remain after avoidance and mitigation measures. Justification has been provided by the client/their planner where the mitigation hierarchy cannot be followed, or for example where compensation is a preferred approach where the competent authority has adopted a County wide strategy i.e. District Level Licensing Schemes (GOV.UK, 2019). In this instance current national Biodiversity Offsetting guidance has also been consulted (GOV.UK, 2019). Additional information has also been provided by the client/their planner where the applicant wishes to demonstrate exceptional circumstances or where they wish to pursue alternative strategies. Any residual impacts following mitigation measures etc are then identified.

2.3.7 All mitigation measures follow species specific current best practice guidance and the source has been identified accordingly. Deviation from guidance has been explained by the ecologist and is proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed works.

2.3.8 It is important that planning decisions are based on up-to-date ecological data, and the specific timeframe over which survey data is considered valid follows general advice (CIEEM, 2019). Additionally, it should be noted that the presence/absence and status of protected species can change seasonally/annually. The age of data should also be assessed separately when considering the submission of an EPS Licence (i.e. Natural England may require data to be from the current season).

2.3.9 Local Environmental Records Centres (LERC) issue a licence for use of provided biodiversity data for 1 year only, after which time this should be renewed to validate an application (and reports updated accordingly to incorporate any new records). Following completion of surveys all relevant biodiversity data will be submitted to the relevant LERC and other groups as appropriate.

2.4 Limitations

2.4.1 This document does not contain a comprehensive list of botanical species on site. Only plant species characteristic of each habitat and incidental observations of notable plant species were recorded. In addition, many plant species are only evident at certain times of the year and so some plant species may have gone undetected.

2.4.2 Data held by consultees may not be exhaustive. The absence of evidence, does not indicate evidence of absence. Enzygo cannot take responsibility for the accuracy of external data sources and as such discrepancies and inaccuracies may occur.

2.4.3 Data was received in February 2018 and is there older than the one year of validity recommended by local records centres. However, in this instance, due to the site conditions, location of the site and its surroundings and the extent of the ecological features identified, it is considered unnecessary to update the data search and the existing data continues to serve its purpose.

2.4.4 Natural England do not hold information of Ancient Woodland less than 2ha in size.

2.4.5 Greater Manchester Ecology Unit records include the following caveat, "*Aside from the species shown on the maps and tabular data the Ecology Unit has no other records for protected and priority species within the area of search. You should note, however, that our records are not comprehensive, and a negative result does not indicate the absence of species from the area of search. We advise that all suitable habitats and structures impacted by the proposals are surveyed for protected species*".

2.4.6 In February, many plant species are in a state of senescence and are not readily identifiable. However, the surveyor is experienced in plant identification through vegetative characteristics, and the habitats within the site are common and typical of the conditions present. It is considered that sufficient survey to inform the assessment (and identify common Phase I habitats) was feasible and appropriate, and the timing of the survey does not represent a significant survey limitation.

2.4.7 In addition, due to the site conditions, habitats present and the findings of the 2018 survey, it is considered this February 2018 survey information remains valid to inform this assessment as conditions are unlikely to have significantly changed in the interim such as to alter the assessments made.

3 Results and Evaluation

3.1 Sites and Habitats Identified by the Desk Study

3.1.1 Sites and habitats identified by the desk study are presented below, along with the reason(s) for their designation and associated ecological value. Potential direct or indirect constraints resulting from the construction phase or operation of the site, and the associated ecological effect have been identified, including details of any Impact Risk Zone (IRZ) within which the proposed works fall. Where potential impacts/effects to ecological features have been identified, the site/habitat is shown on Drawing CRM.348.003.EC.D.001.

Table 3-1: Sites and Habitats Identified by the Desk Study

Name (distance/direction from works)	Details and Ecological Value	Potential Impact/Effect
Statutory sites designated or classified under international conventions or European legislation		
Rochdale Canal Special Area of Conservation (SAC) 290m East at its closest point	Supports a significant population of Floating Water-plantain (*Luronium natans*), an Annex II species which is the primary reason for selection of this site. International value. The application site lies within an Impact Risk Zone (IRZ) of Rochdale Canal SAC. It is confirmed that the development proposals, of a battery storage facility, do not meet any of the criteria for which further consultation with Natural England by the LPA is required.	No – No direct or indirect construction or operational impacts predicted. The application proposals are of a type, scale and distance that any construction or operational impacts can be discounted.
Statutory sites designated under national legislation		
Rochdale Canal Site of Special Scientific Interest (SSSI) 290m East at its closest point	Supports important habitats for submerged aquatic plants and emergent vegetation, including Floating Water-plantain and a diverse assemblage of Pondweed (*Potamogeton* spp.) species. National value. The application site lies within an Impact Risk Zone (IRZ) of Rochdale Canal SSSI. It is confirmed that the development proposals, of a battery storage facility, do not meet any of the criteria for which further consultation with Natural England by the LPA is required.	No - No direct or indirect construction or operational impacts predicted. The application proposals are of a type, scale and distance that any construction or operational impacts can be discounted.

Name (distance/direction from works)	Details and Ecological Value	Potential Impact/Effect
Locally designated wildlife sites		
Rochdale Canal (Scowcroft to Warland) Site of Biological Importance (SBI) 290m East at its closest point	Watercourse noted for its aquatic and emergent vegetation. County value.	No – No direct or indirect impacts predicted. The application proposals are of a type, scale and distance that any construction or operational impacts on the SBI can be discounted.
A627M by Tandle Hill SBI 1.2km South-east	Noted for its grassland habitat. County value.	No – No direct or indirect impacts predicted. The application proposals are of a type, scale and distance that any construction or operational impacts on the SBI can be discounted.
Meadow by Heywood Cemetery SBI 1.3km North-west	Species-rich grassland and marshy grassland. County value.	No – No direct or indirect impacts predicted. The application proposals are of a type, scale and distance that any construction or operational impacts on the SBI can be discounted.
Springfield Wood SBI 1.4km North-west	Noted for its Ancient Woodland habitat. County value.	No – No direct or indirect impacts predicted. The application proposals are of a type, scale and distance that any construction or operational impacts on the SBI can be discounted.
Meadowcroft Woods SBI 1.5km North-west	Noted for its Ancient Woodland habitat. County value.	No – No direct or indirect impacts predicted. The application proposals are of a type, scale and distance that any construction or operational impacts on the SBI can be discounted.
Plumpton Wood SBI 1.7km West	Noted for its woodland habitats, including plantation woodland, and for its grassland habitat. County value.	No – No direct or indirect impacts predicted. The application proposals are of a type, scale and distance that any construction or operational impacts on the SBI can be discounted.
England HPI, Local BAP Habitats, Ancient Woodland, Important Hedgerows, Veteran Trees, TPOs and Conservation Areas		
Lowland Deciduous Woodland HPI Immediately adjacent to the northern boundary of the site	0.5Ha area adjoining the northern boundary of the site. Further 0.6Ha and 0.2Ha areas within a 500m radius of the site boundary. Local value.	Yes – a) felling/surgery of trees, b) potential direct impact on root systems during construction (significant, adverse, irreversible impact), and c) potential degradation of the habitat both during construction and operation of the site through increase in artificial lighting (minor, adverse, reversible impact).
Tree Preservation Orders (TPOs)	The row of mature planted Poplar (*Populus* sp.) at the northern boundary of the site, are part of a Tree Preservation Order which extends to cover the woodland north of the site boundary.	Yes – a) felling/surgery of trees within the TPO area (minor, adverse, permanent, irreversible impact)

Name (distance/direction from works)	Details and Ecological Value	Potential Impact/Effect
	Individual trees within the land to the west of the site adjacent to the proposed access route are also covered by TPOs Local value.	b) potential direct impact on root systems of retained trees during construction (significant, adverse, irreversible impact). (no impacts anticipated on the trees associated with the hotel to the west of the site; access route is already clear and established and no tree removal and/or surgery works anticipated as required)
Lowland Fen HPI 290m East	1.5Ha area of the Rochdale Canal within a 500m radius of the site boundary. Local value.	No - No direct or indirect impacts predicted. The application proposals are of a type, scale and distance that any construction or operational impacts on the HPI can be discounted.
Green/Blue & Aquatic Infrastructure, Dark Zones, and Local Policy		
Green Infrastructure	The site is an isolated parcel of land within a wider landscape dominated by industrial and residential development. The row of mature trees at the northern boundary provide connectivity around the site and contribute to an isolated area of green infrastructure resource provided by the woodland to the north of the site. However, it is considered the loss of the row of mature trees within the site boundary will not have any significant impact on any wider green infrastructure resource.	No
Blue Infrastructure	No blue/aquatic connectivity across the site, hence no significant impacts have been identified.	No
Dark Zones	There are no known dark zones across the site. In accordance with the standard guidance specified in the Guidance Notes for Reduction of Obtrusive Lighting (Institution of Lighting Professionals, 2011), the application site likely falls under Environmental Zone E3 (Medium district brightness).	No

3.2 Habitats Identified on Site

3.2.1 Habitats identified on site during the field survey are presented below, along with their associated ecological value. The distribution of these habitats is shown on Drawing CRM.348.003.EC.D.001. Potential direct or indirect impacts resulting from the construction phase or operation of the site, and the associated ecological effect have been identified.

Table 3-2: Habitat Identified on Site

Habitat Type (code)	Details and Ecological Value	Potential Constraint
Poor semi-improved Grassland (B2.2) and Tall-ruderal Vegetation (C3.1)  	The main central area of the site support a combination of unmanaged poor semi-improved grassland and tall ruderal herb vegetation. The grassland vegetation is relatively species-poor and dominated by grasses, characterised by abundant Yorkshire-fog (*Holcus lanatus*) and Cock's-foot (*Dactylis glomerata*), with frequent Perennial Rye-grass (*Lolium perenne*), False Oat-grass (*Arrhenatherum elatius*) and Common Bent (*Agrostis capillaris*). Occasional occurrences of Common Ragwort (*Senecio jacobaea*), Ribwort Plantain (*Plantago lanceolata*) and Common Nettle (*Urtica dioica*) are present. The areas of tall ruderal herb vegetation comprise abundant Rosebay Willowherb (*Chamerion angustifolium*) and Common Nettle, with frequent Bramble (*Rubus fruticosus* agg.), False Oat-grass, Cock's-foot and Yorkshire-fog. These habitats do not represent England HPI or Local BAP Habitat. Negligible value.	No - loss of this habitat alone is not perceived to be significant.
Scattered Trees (A3.1) and Scattered Scrub (A2.2) 	Along the northern boundary of the site is a row of mature planted Poplar (*Populus* sp.) and occasional Lombardy Poplar (*Populus nigra 'italica'*). It is confirmed none of these trees are native Black Poplar. The site also supports localised areas of scattered scrub vegetation which is characterised by dominant Bramble, and young shrubs and saplings of Ash (*Fraxinus excelsior*), Sycamore (*Acer pseudoplatanus*), Norway Maple (*Acer platanoides*), Wild Cherry (*Prunus avium*), Hawthorn (*Crataegus monogyna*) and Willow (*Salix* sp.). These habitats do not represent England HPI or Local BAP Habitat. Negligible value.	Yes – a) felling/surgery of trees within the TPO area (minor, adverse, permanent, irreversible impact) b) potential direct impact on root systems of retained trees during construction (significant, adverse, irreversible impact), and c) potential degradation of the habitat both during construction and operation of the site through increase in artificial lighting (minor, adverse, reversible impact).

Habitat Type (code)	Details and Ecological Value	Potential Constraint
Hardstanding, Bare Earth (J4) and Fence (J2.4) 	The proposed access route to the main area of the site from the west routes across the car park and existing access road of the hotel to the west of the site. No significant stands of vegetation are associated with this area. The route of the proposed underground cable to the east of the site lies across and area of recently cleared bare earth again with no notable assemblage of vegetation associated with it. Palisade security fence demarcates the boundaries of the proposed working area in several locations, notably delineating to boundary of the existing transformer station to the east of the site which the proposed underground cable will route around; no vegetation is associated with the fencing. These habitats do not represent England HPI or Local BAP Habitat. Negligible value.	No - loss of this habitat alone is not perceived to be significant.

3.3 Protected and Notable Species

3.3.1 Legally protected species, England SPI/Local BAP Species, any Notable species (which includes: Species of conservation concern and RDB species; BOCC; and nationally rare and nationally scarce species), and Invasive species identified by the desk study and field survey are presented below, along with their associated ecological value. Potential direct or indirect impacts resulting from the construction phase or operation of the site, and the associated ecological effect have been identified. This is based on an assessment of habitat suitability and other relevant factors, such as: national distribution of each species/group; previous records of species occurrence obtained through the desk study; connectivity to suitable habitats in the surrounding landscape; and any field signs suggesting presence of species within or near to the site. Given the large number of England SPI /Local BAP Species, and Notable species (which includes: Species of conservation concern and RDB species; BOCC; and nationally rare and nationally scarce species), these have only been included if identified from the desk study and/or observed on site during the field survey.

Table 3-3: Species Identified from the Desk Study and Field Survey

Species/Group	Desk Study Record (distance/direction from works)	Field Survey Habitat/Evidence	Ecological Value	Potential Impact/Effect
Bats (*Chiroptera spp.*)	Records of roosts of Common Pipistrelle (*Pipistrellus pipistrellus*), Pipistrelle species (*Pipistrellus* sp.), Whiskered Bat (*Myotis mystacinus)* and Brown Long-eared Bat (*Plecotus auritus*) within a 2km radius. The	None of the mature Poplar, or any of the other scattered young trees, were observed to support any features with potential to support roosting bats. However, the Poplar are of a size and age where potential roosting features (PRFs) may not be visible from the ground during the scoping survey. These	Local	Yes – a) low risk of killing/injury of roosting bats IF roosts present during tree felling/surgery works. Low risk of significant, adverse, permanent, irreversible impact.

Species/Group	Desk Study Record (distance/direction from works)	Field Survey Habitat/Evidence	Ecological Value	Potential Impact/Effect
	closest record of a roost is of a Pipistrelle species 160m SW. Records of other signs of Common Pipistrelle, Soprano Pipistrelle (*Pipistrellus pygmaeus*), Pipistrelle species, Brown Long-eared, Noctule (*Nyctalus noctula*), Daubenton's Bat (*Myotis daubentonii*) and Whiskered Bat within a 2km radius. The closest record is of a Common Pipistrelle 220m W.	seven mature trees are therefore assessed as *Low* risk in accordance with current assessment guidelines (BSI, 2015). All other trees are assessed as negligible/no risk. The site provides low-quality isolated foraging and commuting habitat for bats in a landscape dominated by industrial and residential development. It is considered the site will likely only attract low numbers of common edge-feeding species, such as Pipistrelle species. Woodland to the north provides higher quality foraging habitat for bats.		b) degradation of foraging habitat through construction and operational stage through increase in artificial lighting. Minor, adverse, reversible impact.
Badger (*Meles meles*)	Three records of badger within a 2km radius of the site. The closest record over 1.5km from the site boundary.	Observations during the Phase 1 survey did not detect any evidence of badger within site boundary or the immediate surrounds. The site is isolated within a landscape dominated by industrial and residential development and is not connected to any habitats from which it is considered likely Badger may colonise the site.	Negligible	No
Dormouse (*Muscardinus avellanarius*)	None	The site is isolated within a developed landscape and is located in an area of Northern England where this species is significantly rare.	Negligible	No
Otter (*Lutra lutra*)	Two records within a 2km radius. The closest record is from Rochdale Canal 600m South of the site from 2014.	No habitats within or adjacent to the site with the potential for Otter.	-	No
Water Vole (*Arvicola amphibious*)	None	No habitats within or adjacent to the site with the potential for Water Vole.	-	No
Other Protected Mammals	None	None	-	No
Specially Protected Birds	Records of Kingfisher (*Alcedo atthis*), Barn Owl (*Tyto alba*), and Peregrine within a 2km radius of the site.	There are negligible opportunities for foraging Peregrine and Barn Owl at the site, with no breeding opportunities present for these species.	Negligible	No

Species/Group	Desk Study Record (distance/direction from works)	Field Survey Habitat/Evidence	Ecological Value	Potential Impact/Effect
		Habitats within the site are entirely unsuitable for Kingfisher.		
All Other Birds	Records of England SPI within a 2km radius. Namely Bullfinch (*Pyrrhula pyrrhula*), Cuckoo (*Cuculus canorus*), Curlew (*Numenius* arquata), Dunnock (*Prunella modularis*), Herring Gull (*Larus argentatus*), House Sparrow (*Passer domesticus*), Lapwing (*Vanellus vanellus*), Lesser Redpoll (*Acanthis cabaret*), Lesser Spotted Woodpecker (*Dendrocopos minor*), Linnet (*Linaria cannabina*), Reed Bunting (*Emberiza schoeniclus*), Skylark (*Alauda arvensis*), Song Thrush (*Turdus philomelos*), Starling (*Sturnus vulgaris*), Tree Sparrow (*Passer montanus*) and Willow Tit (*Poecile montanus*).	Mature trees and scrub provide a limited extent of suitable habitat for a restricted range of common nesting birds which are likely to be present in the local area.	Local	Yes – a) potential disturbance of active nesting birds during works. Minor adverse, temporary, irreversible impact. (no significant loss of habitat)
Common Reptiles	None	Scrub and grassland provide isolated poor-quality habitat for sheltering, foraging and basking reptiles, and the site is surrounded on all sides by industrial and residential development and is not connected to any favourable habitat for reptiles such as heathland or wetlands.	Negligible	No
Great Crested Newt (*Triturus cristatus*)	One record from 2014 1.7km North of the site.	Grassland and scrub provide suitable terrestrial habitat, however there is no potential breeding habitat within the site or within an unobstructed 500m radius. Terrestrial habitats are surrounded on all sides by industrial and residential development.	Negligible	No
Other Protected Herpetofauna	None	None	-	No
White-clawed Crayfish	Two records 1.3km South from 2011.	No suitable habitat for White-clawed Crayfish within, adjacent or connected to the site.	-	No

Species/Group	Desk Study Record (distance/direction from works)	Field Survey Habitat/Evidence	Ecological Value	Potential Impact/Effect
(*Austropotamobius pallipes*)				
Protected Fish/Marine species	None	None	-	No
Protected Invertebrates	None	Only widespread and common habitats typical of the landscape are present. No habitats present which are likely to support a range or diversity of invertebrates or likely to support any protected invertebrate species.	-	No
Protected Flora	Total of 19 records of Floating Water-plantain all associated with Rochdale Canal, with the closest record 400m South. One record of Bee Orchid (*Ophrys apifera*) from 2017 1.2km South.	No suitable habitat for Floating Water-plantain within, adjacent or connected to the site. Only common and widespread habitats present, and unlikely to support any protected flora species. No protected flora species detected during the Phase 1 survey.	Negligible	No
England SPI/Local BAP & Notable species	Records of Brown Hare (*Lepus* europaeus), Hedeghog (*Erinaceus europaeus*), Cinnabar (*Tyria jacobaeae*), Small Heath (*Coenonympha pamphilus*), White-letter Hairstreak (Satyrium w-album) and Olive Earthtongue (*Microglossum olivaceum*) within a 2km radius.	Trees, scrub and grassland provide isolated limited extent of foraging and sheltering opportunities for Hedgehog.	Negligible	No
Invasive Flora	None	No invasive species detected during the survey	-	No
Invasive Fauna	None	No invasive species detected during the survey	-	No

4 Relevant Legislation and Policy

4.1 Legislation

4.1.1 Wildlife legislation and policy relevant (or potentially relevant pending further survey) to the proposed works, based on the findings of the desk study and field survey are set out below. This legal information is a summary only, and the original legal documents should be consulted for definitive information.

Table 4-1: Legislation Protection Afforded to Sites/Habitats that could Potentially be Affected by the Proposed Works

Designated Site/Habitat	Legal Status
None	-

Table 4-2: Legislation Protection Afforded to Species that could Potentially be Affected by the Proposed Works

Species	Legal Status
European Protected	
Bats	These animal species and their breeding sites or resting places are protected under Regulation 41 of the Conservation of Habitats and Species (Amendment) Regulations 2012, which makes it illegal to: • Deliberately capture, injure or kill any such animal or to deliberately take or destroy their eggs; • Deliberately disturb such an animal; • Damage or destroy a breeding site or resting place of such an animal. European Protected Species (EPS) licences can be granted by Natural England in respect of development to permit activities that would otherwise be unlawful under the Conservation Regulations, providing that the following 3 tests (set out in the EC Habitats Directive) are passed: • The development is for reasons of overriding public interest; • There is no satisfactory alternative; and • The favourable conservation status of the species concerned will be maintained and/or enhanced. Under Regulation 9(5) of the Conservation Regulations, Planning Authorities have a legal duty to 'have regard to the requirements of the EC Habitats Directive in the exercise of their functions'. This means that they must consider the above 3 tests when determining whether Planning Permission should be granted for developments likely to cause an offence under the Conservation Regulations. As a consequence, Planning Applications for such developments must demonstrate that the 3 tests will be passed.
Nationally Protected	
Bats	These animals receive full protection under the Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000), which makes it illegal (subject to exceptions) to: • Intentionally kill, injure or take any such animal; • Intentionally or recklessly damage, destroy or obstruct any place used for shelter or protection by any such animal; and • Intentionally or recklessly disturb such animals while they occupy a place used for shelter or protection.
Birds	All wild birds are protected under the Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000), which makes it illegal (subject to exceptions) to:

Species	Legal Status
	• Intentionally kill, injure or take any wild bird; • Take, damage or destroy the nest (whilst being built or in use) or eggs of any wild bird.
Invasive Species	
None	-

4.1.2 Section 40 of the Natural Environment and Rural Communities Act 2006 (the NERC Act) places a legal duty on public bodies, including planning authorities, to 'have regard' to the conservation of biodiversity when carrying out their normal functions, which includes consideration of planning applications.

4.1.3 In compliance with Section 41 of the NERC Act, the Secretary of State has published a list of species and habitats considered to be of principal importance for conserving biodiversity in England under the UK Post-2010 Biodiversity Framework. This is known as the list of Habitats and Species of Principal Importance (HPI/SPI), of which there are 56 habitats and 943 species. The HPI/SPI list is used to guide planning authorities in implementing their duty under the NERC Act.

4.2 National Planning Policy

4.2.1 The NPPF (2019) set out the Government's planning policies for England and how these are expected to be applied. At the heart of the NPPF is a presumption in favour of sustainable development. This presumption does not apply where development requiring Appropriate Assessment under the Birds or Habitats Directives is being considered, planned or determined.

4.2.2 The NPPF states that:

'When determining planning applications, local planning authorities should apply the following principles:

- if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;
- development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity;
- the following wildlife sites should be given the same protection as European sites: potential Special Protection Areas (SPA) and possible Special Areas of Conservation (SAC); listed or proposed Ramsar sites; and sites identified, or required, as

compensatory measures for adverse effects on European sites, potential SPAs, possible SACs, and listed or proposed Ramsar sites.'

4.2.3 Under the NPPF, the Planning Authority has a responsibility to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

4.2.4 Also, under the NPPF, the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and sites of biodiversity (in a manner commensurate with their statutory status or identified quality in the development plan) and to minimise impacts on, and provide net gains for biodiversity, including by establishing a coherent ecological network that are more resilient to current and future pressures.

4.3 Local Planning Policy

4.3.1 The following policies of the Rochdale Borough Council Core Strategy (Rochdale Borough Council, 2016) are applicable:

- Policy SO4 – To promote a greener environment;
- Policy G6 – Enhancing green infrastructure;
- Policy G7 – Increasing the value of biodiversity and geodiversity; and
- Policy G9 – Reducing the impact of pollution, contamination and land instability.

4.3.2 The Rochdale Metropolitan Borough Council Biodiversity and Development Planning Supplementary Planning Document (Rochdale Council, 2008 (updated February 2017)) is also applicable.

5 Discussions and Recommendations

5.1 Overview of Ecological Constraints

5.1.1 In the absence of mitigation, the following ecological features have been identified as potential constraints to the proposed works:

- Lowland Mixed Deciduous Woodland HPI and TPOs;
- Bats; and
- Birds (general nesting).

5.2 Mitigation Measures

5.2.1 For each potential impact/effect identified, all mitigation options provided follow the established mitigation hierarchy as set out in BS42020:2013 (BSI, 2013). This seeks as a preference to avoid impacts, then to mitigate unavoidable impacts, and as a last resort, to compensate for unavoidable residual impacts that remain after avoidance and mitigation measures. All recommended surveys and mitigation measures follow current best practice guidance as identified by CIEEM (CIEEM, 2014) and is proportionate to the level of impact identified and to the nature and scale of the proposed works. A clear and valid justification of methods has been provided where necessary.

Lowland Mixed Deciduous Woodland HPI and ***TPOs***

5.2.2 *Avoidance*: All trees within the Deciduous Woodland HPI area to the north of the site boundary are to be retained and protected in accordance with best practice tree protection measures. This vegetation will be protected throughout the construction phase in accordance with BS5837:2012 Trees in Relation to Design, Demolition and Construction: Recommendations (BSI, 2012). The number of trees to be felled or requiring surgery works in association with the development is to be minimised as much as is feasible to permit development.

5.2.3 Mitigation: None proposed.

5.2.4 Compensation: To compensate for the unavoidable loss of the row of mature Poplar sp. at the northern boundary and other scattered trees and shrubs, the scheme is to incorporate native tree planting (22 no. extra heavy standard trees rather than young whips) across the southern portion of the site.

Bats

5.2.5 Avoidance: To avoid lighting impacts to adjacent bat foraging habitat during the construction phase there will be no night working or night lighting. Additionally, to avoid lighting impacts during the operational phase a sensitive lighting scheme with the use of appropriate products will be incorporated in which no excessive artificial lighting will shine over the adjacent woodland and scrub habitats.

5.2.6 Mitigation: In accordance with current guidance BS8596:2015 (BSI, 2015), no further assessment is required of 'Negligible/no risk' or of 'Low risk' trees, unless sufficient new evidence is found to upgrade the category. As such, the proposed felling of trees and other required tree works, can proceed with no further ecological constraint in regard to roosting bats.

5.2.7 However, due to the transient nature of bat roosts and as bats are known to sometimes roost in unexpected locations, the contractor(s) are advised to carry out works with care and vigilance

for bats when undertaking tree works. When removing trees or undertaking tree surgery works the following procedures should be employed in the unlikely event any bats are discovered:

- If the roost is still on/in the tree and bats are not injured, seek advice from Natural England or a suitably experienced ecologist. If help is not available, allow bats to fly out of harm's way;
- If the timber is felled, the roost is not exposed, and the bats are not injured, seek advice from Natural England or a suitably experienced ecologist. If advice is not readily available, position the roost off the ground, and allow bats to relocate of their own accord;
- If the roost has been exposed, contact Natural England or a suitably experienced ecologist; and
- Note the date, locality, type of tree, situation in tree and bat species if known.

5.2.8 Compensation: None proposed.

Birds (general nesting)

5.2.9 *Avoidance*: To avoid an offence being committed in respect of nesting birds, clearance of any suitable bird nesting habitats, including felling of trees and removal of scrub, will be conducted outside of the bird nesting season (March to August inclusive). If it is necessary to remove suitable nesting habitat during the bird nesting season, a nesting bird survey will be conducted by a suitably trained Ecological Clerk of Works (ECoW) to determine the presence or absence of nesting birds in the areas to be affected. If any active nests are detected, an appropriate protection area around the nest(s) will be established until it can be determined that the nest is longer active. These further nesting bird surveys can be subject of a suitably worded planning condition.

5.2.10 *Mitigation*: None proposed.

5.2.11 *Compensation*: None proposed.

5.2.12 To comply with guidance set out in BS42020:2013, a Construction Environment Management Plan (CEMP) would normally be produced prior to the commencement of construction activities, including site clearance works. However, due to the limited number of ecological features identified, this PEA report (specifically the mitigation details outlined within section 5.2) will sufficiently serve to advise site contractors of any measures necessary to avoid/mitigate impacts to any protected species and habitats. A Landscape and Ecological Management Plan (LEMP) would also normally be produced prior to operation of the site. Again, due to the limited features that will be incorporated into the landscape, this will not be produced.

5.3 Programme of Works

5.3.1 No programme of works has been included, as no further surveys are recommended. The timing of works to avoid/mitigate for impacts to associated ecological features have been identified above.

5.4 Opportunities for Biodiversity Enhancement

5.4.1 Opportunities for biodiversity enhancement (above and beyond those required to mitigate for any identified impacts) have been determined through consideration of: Ecological Features identified on site and within the zone of influence; Historical records of protected species/habitats present within the locality; National and Local planning policy including UK BAP

SPI/HPI and Local BAP species/habitats; Local Development Plan including consideration of Green/Blue Infrastructure Resource; Consultation with third parties/stakeholders where applicable; and Other influencing factors such a Geology/Hydrology, intended operational activities, and existing disturbance activities within the locality. Where necessary, proposed enhancements should refer to the Construction (Design and Management) Regulations 2015 (CITB, 2016):

- Incorporation of native fruiting tree/shrub species of local provenance in any planting scheme;
- Informal deadwood hibernacula will be created and located at the site boundaries, providing enhanced opportunities for sheltering, refuge and hibernating wildlife, including Hedgehog and common amphibians. The arisings from the proposed tree and shrub clearance will provide a suitable material for these informal hibernacula; and
- Installation of two general bird boxes (Schwegler 1MR Bird Box or similar), located at suitable locations on retained mature trees. Note: bird boxes should be located at least 3m high and not face southwards where excessive sunlight can cause chicks to overheat in the nest.

6 Conclusion

6.1.1 This assessment has confirmed suitable mitigation measures can be incorporated into the proposed application to avoid/ mitigate/ compensate any potential impacts to ecological features and to demonstrate 'no biodiversity net loss' in accordance with NPPF and local planning policy. As such, no significant residual impact can be expected which would prevent determination of a planning application or development of this site.

6.1.2 Additionally, the development presents opportunity to provide enhancements to demonstrate a 'biodiversity net gain'.

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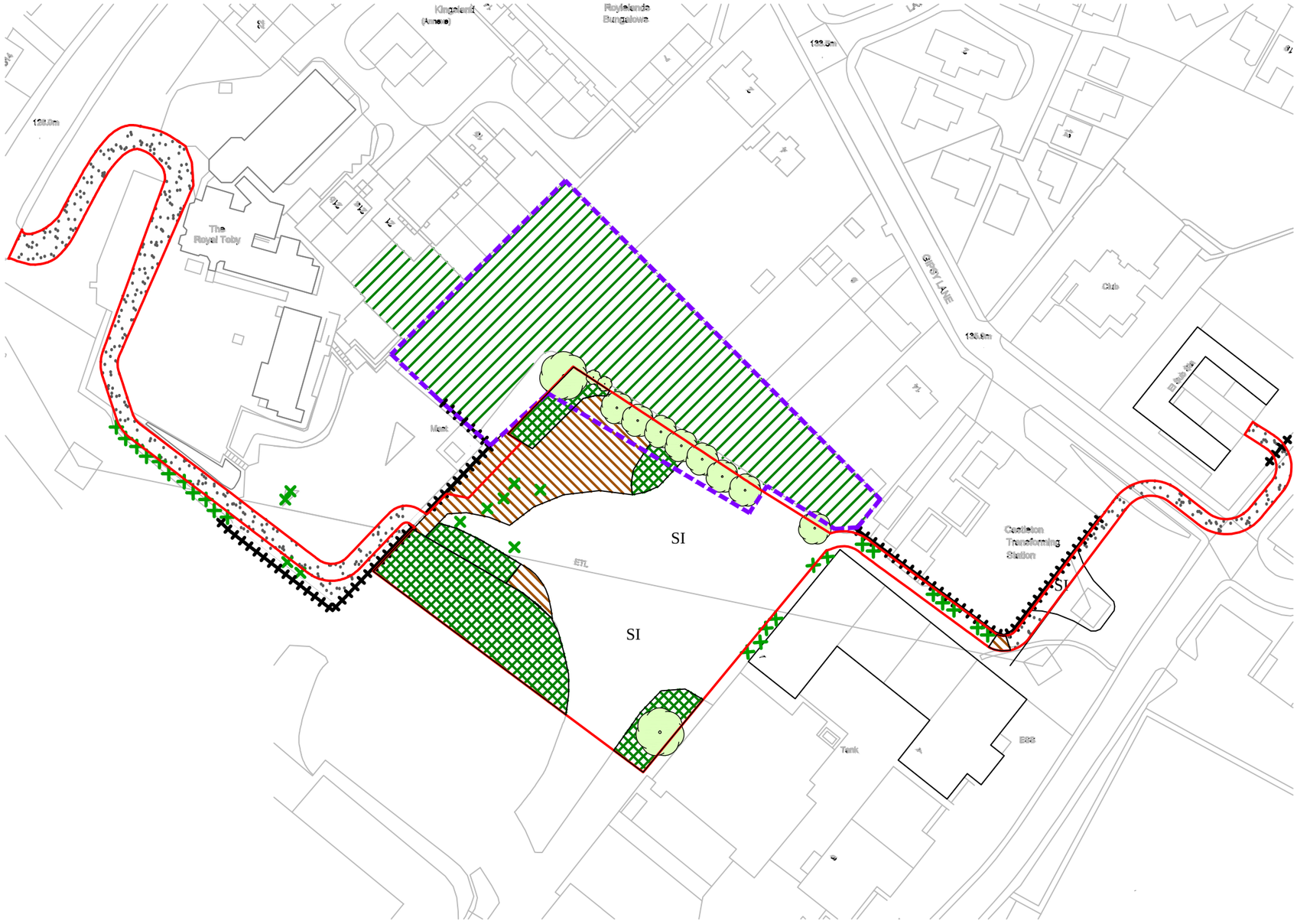
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Drawing CRM.348.003.EC.D.001 – Phase I Habitat Map



Key

- Site Boundary
- Broad-leaved Woodland (A1.1.2) and Lowland Deciduous Woodland HPI
- Dense Scrub (A2.1)
- Scrub Scattered (A2.2)
- Broadleaved Tree (A3.1)
- SI — Poor Semi-Improved Grassland (B6)
- Tall Ruderal Vegetation (C3.1)
- Fence (J2.4)
- Bareground (J4)
- Tree Preservation Order

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CLIENT: Arlington Energy Ltd

SCALE: 1:1,250@A3

PROJECT REF: CRM.348.003

DRAWN: MG

CHECKED: CS

DATE: Sept 2019

PROJECT: Gipsy Lane, Rochdale

TITLE: Phase I Habitat Map

DRAWING NO: CRM.348.003.EC.D.001

Appendix A – Proposed Site Layout

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ORIGINAL DRAWING SIZE - A1

N

W E

S

Shelter

Kingsland
(Annexe)

Roylelands
Bungalows

LAWNSWOOD

GIPSY LANE

133.5m

135.9m

128.0m

The
Royal Toby

Club

El Sub Sta

Castleton
Transforming
Station

ESS

Tank

Astra
Centre

El
Sub Sta

W19
Mast

ETL

ELE HV

32 Car Parking Spaces

3No. ACE CAM xhs14

4No. BET NIG xhs14

5No. Pop tre xhs14

4No. ACE CAM xhs14

2No. BET NIG xhs14

4No. ALN GLU xhs14

0 10m 20m 30m 40m 50m 60m 70m 80m 90m 100m

SCALE 1:500

LANDLORDS PROPERTY

PROPSED SITE

DNO ACCESS / MAINTENANCE

CAR PARKING SURFACE /ACCESS

2.4m HIGH PALISADE FENCE

4m CONCRETE ACOUSTIC FENCE

GAS PROPSED GAS PIPE GAS GAS

ELE HV 33kV CONNECTION ELE HV

TEMP CONSTRUCION COMPOUND

33kV CABLING

4MW BATTERY STORAGE SYSTEM (1x 4.2MW TX & 6x INVERTERS WITH 4x 1MW BATTERY CONTAINER)

DNO / CUSTOMER SUBSTATION

VERSION	DRAWN BY	CHECKED BY	APPROVED BY	DATE
P10	AMENDED FENCE LINE BACK TO PALISADE			
	RN	MH	CN	10/10/2019
P9	ADDED TREES / AMENDED FENCE LINE TO WOODEN HYBRID			
	RN	MH	CN	01/10/2019
P8	AMENDED FRONT FENCELINE FROM PALISADE TO WOODEN ACOUSTIC			
	RN	MH	CN	01/10/2019
P7	AMENDED BACK, LEFT AND RIGHT FENCE TO CONCRETE ACOUSTIC TO REDUCE SOUND LEVELS			
	RN	MH	CN	26/09/2019
P6	AMENDED CAR PARKING AREA			
	RN	MH	CN	20/09/2019
P5	REMOVED LANDSCAPING EASEMENT			
	RN	MH	CN	19/09/2019
P4	AMENDED RED LINE / REMOVED YELLOW CONSTRUCTION AREA & TREE CENTER POINTS / CHANGED EXTERNAL WOODEN FENCE TO PALISADE			
	RN	MH	CN	19/09/2019
P3	AMENDED CAR PARK LOCATION NORTH WEST / REMOVED TREES NORTH WEST OF ACCESS			
	RN	MH	CN	19/09/2019
P2	AMENDED RED LINE TO MATCH BLUE ROAD / AMENDED PUBLIC PATHWAY			
	RN	MH	CN	17/09/2019
P1	FIRST ISSUE			
	RN	MH	CN	17/09/2019

DRAWING STATUS
FOR TENDER

Arlington Energy Ltd

CLIENT
ARLINGTON ENERGY

CLIENT PROJECT REF.
MAN006

SMITH brothers
CONTRACTING LIMITED

Smith Brothers (Contracting) Limited
Unit G8, Navigation Close, Lowfields Business Park, Elland, West Yorkshire, HX5 9HB

SITE ADDRESS
GIPSY LANE
ROCHDALE
OL11 3HA

DRAWING TITLE
GIPSY LANE
PLANNING ARRANGEMENT
1:500

DNO
ENWL

VOLTAGE CONNECTION
33kV

SMITH BROTHERS REFERENCE NUMBER
21225

SCALE
1:500
Original Size A1

PROJECTION
N/A

DRAWN BY
RN

DRAWING NUMBER
21225-0201

REVISION
P10



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