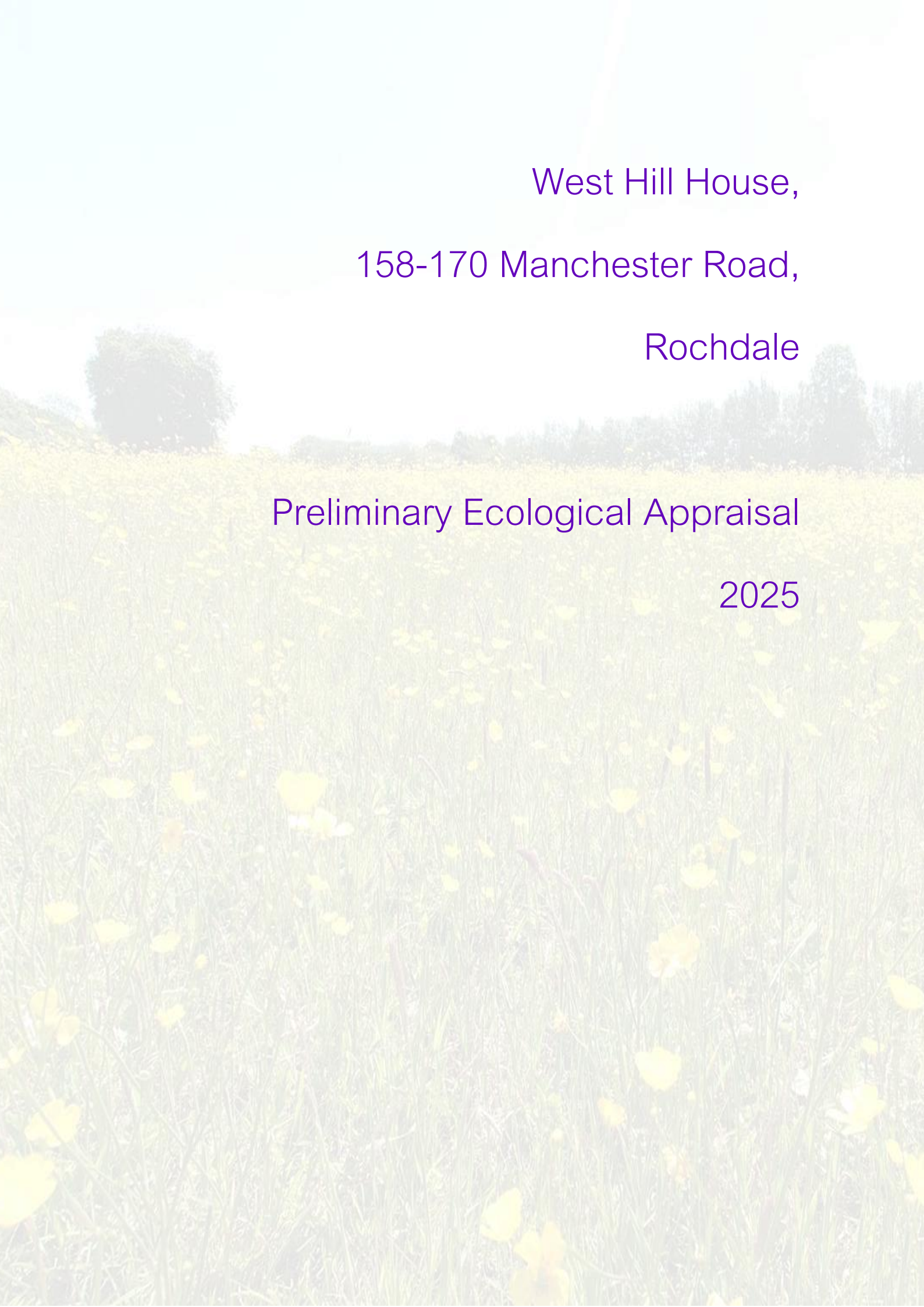


The background of the page is a photograph of a field filled with yellow wildflowers, possibly buttercups, under a bright sky. A single, dark, rounded tree stands on the left side of the horizon. The overall image is faded to serve as a background for the text.

West Hill House,
158-170 Manchester Road,
Rochdale

Preliminary Ecological Appraisal

2025

Client Bluechip Architecture Ltd

Project Title West Hill House, 158-170 Manchester Road, Rochdale

Project Reference RHE.4450.01

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Executive Summary

Development Details

The client is proposing residential development at West Hill House, 158-170 Manchester Road, Rochdale, hereafter referred to as the 'site'.

This report describes the ecological features of the site and its surroundings and assesses the potential impacts of the development on the ecological interest. Recommendations are provided so that the development is compliant with biodiversity policy and legislation.

Ecological Interest

The site has a low level of ecological interest. Habitats on site comprise introduced scrub, modified grassland and a small number of individual trees.

Outcomes

No further surveys are required at the site.



1. Introduction

1.1 Project Brief

- 1.1.1 Rachel Hacking Ecology Limited was commissioned in 2024 by Bluechip Architecture to carry out an Ecological Appraisal of land at West Hill House, 158-170 Manchester Road, Rochdale (the 'site'). The site is located at O.S. grid reference: SK 62360 02326 (see Figure 1).



Figure 1. Map showing the location of the site courtesy of OpenStreetMap

- 1.1.2 The proposed development site comprises a former funeral parlour with associated hardstanding and ornamental shrub planting.

- 1.1.3 The site is adjacent to a public park consisting of modified grassland and a large area of woodland.

Description of Development

- 1.1.4 The site will be the subject of a planning application for the construction of new dwellings with associated landscaping and parking areas.

1.2 Scope of Work

- 1.2.1 The Client commissioned Rachel Hacking Ecology to carry out the following works:
- Desk-based study to obtain details of designated sites within a specified search area.
 - Record the extent, type, and condition of habitats within and next to the site.
 - Calculate the baseline and post-development biodiversity units.
 - Search for signs of protected species and assessment of the potential of habitats and features to support protected and notable species.
 - Carry out targeted surveys to record assemblages of species and/or protected and notable species.

2. Methods

2.1 Desk Study

- 2.1.1 The Magic website (Multi-Agency Geographical Information for the Countryside) was interrogated for the presence of Statutory Designated Sites within a 1km radius of the site.
- 2.1.2 The site was checked to determine if it is located within an Impact Risk Zone for any Site of Special Scientific Interest (SSSI) and if so, whether the Local Planning Authority will need to consult Natural England.
- 2.1.3 Local Planning Authority Policy maps were interrogated for the locations of non-statutory designated sites within a 1km radius of the site.

2.2 Field Survey

Extended Phase 1 Habitat Survey

- 2.2.1 In accordance with JNCC guidelines¹ the site was walked over and the habitats and features of ecological interest were mapped and described. Habitats and features of particular interest were target noted.
- 2.2.2 During the walkover habitat and features were assessed for their suitability to support protected and notable species in accordance with CIEEM guidelines². Field signs of protected, notable, and invasive non-native species, if encountered, were mapped, and described.
- 2.2.3 The survey data was assessed by reference to the criteria set out in the Hedgerow Regulations 1997 to confirm whether a hedgerow was classified as Important.
- 2.2.4 Megan Johnson (Ecologist) visited the site on the 22nd of January 2025.

Bats

- 2.2.5 The exterior of the site was surveyed from the ground using binoculars and a high-powered torch. Features offering potential access to roosting bats were recorded. Such features may include suitable gaps in roof coverings, gaps behind external cladding/facia and gaps in masonry.

¹ JNCC (2010). *Handbook for Phase 1 Habitat Survey: A Technique for Environmental Audit*. Joint Nature Conservation Committee, Peterborough

² CIEEM (2017). *Guidelines for Preliminary Ecological Appraisal*. Chartered Institute of Ecology and Environmental Management, Winchester.

- 2.2.6 Evidence indicating the presence of roosting bats was also searched for. This may include bat droppings on walls, windows or on the ground below roost entrances or staining from fur oil around roost entry points.
- 2.2.7 The interior of the site, including the roof void, was surveyed to identify any evidence indicating use by roosting bats. Such evidence may include bat droppings, feeding remains, urine splashes, live or dead bats and staining from fur oil on timbers.
- 2.2.8 Any trees on the site that are to be affected by the proposals were given a ground-level assessment, searching for Potential Roosting Features (PRFs), such as flaking bark, woodpecker holes, knot holes and limb splits.

2.3 Biodiversity Net Gain

- 2.3.1 During the site walkover the ecological condition of each habitat was assessed in accordance with the Defra (2024) guidelines³. Habitat types recorded and mapped during the field survey were converted from the JNCC system to the UK Habitat Classification system⁴.
- 2.3.2 Habitat data including type, area (or length), condition and strategic location were uploaded to the Defra Statutory Biodiversity Metric Calculator spreadsheet to determine the baseline value of the site. The extent of any habitats to be retained or enhanced was also entered into baseline worksheets.
- 2.3.3 The post-development masterplan was interrogated to determine areas of hard standing, buildings, and associated infrastructure. New, retained and enhanced habitats were classified and allocated a target condition, based on habitat type, location and management input. This information was uploaded to the metric spreadsheet to obtain a post-development value.
- 2.3.4 The pre- and post-development values were compared to determine whether the yield of biodiversity units achieved a deficit or gain.

2.4 Mitigation Hierarchy

- 2.4.1 Mitigation measures should be embedded within the masterplan design and planning application process. Measures during the construction phases should be included in a Construction Environmental Management Plan: Biodiversity (CEMP). This process from proposal to implementation needs to consider the 'mitigation hierarchy' of avoid, reduce, compensate, and enhance:
- Aim to avoid negative effects through the design process.
 - Mitigate if negative effects cannot be avoided.

³ The_Statutory_Biodiversity_Metric_-_User_Guide_.pdf (publishing.service.gov.uk)

⁴ Butcher, B., Carey, P., et al. (2020). UK Habitat Classification – Habitat Definitions V1.1. at <http://UKhab.org>

- Use compensation measures to offset residual impacts.
- Identify and implement opportunities to enhance biodiversity.



3. Results

3.1 Survey Constraints

- 3.1.1 Field survey results are valid for a limited duration and no investigation can provide a complete description and characterisation of a site. The composition of habitats and species can change depending on environmental variables and the mobility of species, so the results of a study become less reliable over time. In some cases, surveys that are 3 years old may be acceptable for a project assuming that habitats have not significantly changed in the intervening period, but for protected species it is likely that survey data will need to be no more than 18 months old.

3.2 Designated Sites

- 3.2.1 Rochdale Canal Special Area for Conservation (SAC) and Site of Special Scientific Interest (SSSI) is located approximately 1km southeast. This site is designated for its aquatic plants including the nationally scarce species Floating Plantain *Luronium natans*.
- 3.2.2 The desk study identified that the site was located within an Impact Risk Zone of a Special Scientific Interest. The proposed development will not require the Local Planning Authority to consult with Natural England.
- 3.2.3 No non-statutory designated sites were identified within the study area.

3.3 Baseline Habitats

- 3.3.1 Target Notes and photographs are contained in Appendix and the habitats survey plan is contained in Appendix 2. Condition Assessments are supplied as a separate spreadsheet.

Modified Grassland

- 3.3.2 Parcels of modified grassland exist in various parts of the site. The grassland is in poor condition (less than six species per square metre), is of low distinctiveness and low strategic significance. This habitat covers 0.044 ha of site, delivering 0.09 habitat units.

Developed Land; Sealed Surface

- 3.3.3 The majority of land on site is categorised as developed land; sealed surface and includes building footprints and hardstanding covering 0.117ha. This habitat requires no condition assessment, is of low distinctiveness and delivers zero habitat units.

Introduced Shrub

- 3.3.4 Introduced shrub exists in small parcels around the site, this habitat covers 0.0051ha, requires no condition assessment, is of low distinctiveness and low strategic significance. It delivers 0.01 habitat units.

Individual Trees

- 3.3.5 Multiple individual trees exist on site, ranging in size and condition. This habitat is of medium distinctiveness and moderate strategic significance. Combined, they deliver 0.1253 habitat units.

3.4 Post Development Habitats

Developed Land; Sealed Surface

- 3.4.1 Building footprints and hardstanding associated with the proposed development will extend to 0.1586ha of the site. This habitat delivers zero habitat units.

Modified Grassland

- 3.4.2 Parcels of amenity grassland will be included in the landscaping of the proposed development, which will cover 0.0277ha of the site. This habitat will have a target condition of poor, is of low distinctiveness and low strategic significance. It will deliver 0.05 habitat units.

Other Neutral Grassland

- 3.4.3 Wildflower grassland is to be included in the landscaping scheme for the proposed development, which will extend to 0.00165ha. This habitat is of medium distinctiveness and will have a target condition of moderate. This habitat will deliver 0.01 habitat units.

Introduced Shrub

- 3.4.4 Introduced shrub will be planted within the post-development plans. This habitat is of low distinctiveness, and low strategic significance and delivers 0.02 habitat units

Native Mixed Scrub

- 3.4.5 A small parcel of mixed scrub will be planted within the new development site. This habitat will cover 0.0007ha of the site, it is of low distinctiveness, low strategic significance and delivers zero habitat units.

3.5 Preliminary Roost Assessment

External Survey

	The building on site is a single-storey, flat roofed building constructed from brick. The brickwork appears to be in good condition with no gaps identified. Window fittings are UPVC and appear to fit flush with the brickwork. The roof covering consists of bitumen roofing felt.
	A separate part of the building features a conical roof, covered with bitumen roofing felt. The edges of the roofing material appear to be well sealed.
	The roof edges appeared to be well-sealed around the flat-roofed section of the building, with no obvious gaps.
	The roof edges of the conical roof section are of a similar composition and condition. No gaps providing potential access into the roof void were identified by the surveyor.

	Two hipped roof sections are also present on site. Roofing materials consist of clay roof tiles appearing to be in good condition. A large portion of the brickwork and roof edge on the building is obscured with climbing vegetation.
	A garage building exists on site. It comprises a mostly brick structure with fascia boarding at the front of the building above the garage doors. The building has a flat roof, covered with bitumen roofing felt. The roof appears to be in good condition, it is unlikely that this building contains features that could potentially support roosting bats.

Internal Survey

	The chapel section of the building is open to the roof, no void exists. The interior of the room is well sealed, it is likely a small gap is present between the roofing materials and wooden panelling; however, no potential access points were present.
	No roof void was present in other sections of the building, the room appeared to be well sealed with no potential roosting features.

	A small area of broken plasterboard revealed a small gap between the roofing material and internal ceiling. All roofing materials were well sealed with the brickwork with no patches of daylight indicating potential access points from the exterior of the building.
	A suspended ceiling was present in another section of the building. No access points or roosting features were identified here.

3.6 Other Mammals

- 3.6.1 No evidence of other protected mammal species, such as Badger *Meles meles*. No other mammal species are considered further in this report.

3.7 Invasive Species

Plants

- 3.7.1 Multiple shrubs of Wall Cotoneaster *Cotoneaster horizontalis* were identified on site.

4. Assessment

4.1 Development Context

- 4.1.1 The following assessment assumes that the site will be the subject of a planning application for the demolition of the current buildings on site and subsequent construction of new dwellings with associated landscaping and parking areas.

4.2 Impacts on Designated Sites

- 4.2.1 No impacts to designated sites are anticipated as a result of the proposed development. The Rochdale Canal is hydrologically separate from the site, therefore it is unlikely that the proposed works will have direct or indirect impacts to the designated sites.

4.3 Impacts on Habitats

- 4.3.1 All current habitats on site are to be lost as a result of the proposed development. None of the habitats on site are of significant ecological value aside from the individual trees.
- 4.3.2 The loss of these habitat is likely to have impacts at the site-level only.

4.4 Biodiversity Net Gain

- 4.4.1 The baseline habitat value within the redline development is 1.56 area units.
- 4.4.2 The post-development habitats deliver 0.08 habitat units, the development is currently in Biodiversity Net Loss of (-94.67%)
- 4.4.3 Using the Mitigation Hierarchy, it can be demonstrated that on-site BNG habitat delivery is not feasible or will be insufficient to achieve 10% net gain, given the small size of the site and the need to deliver a viable development.
- 4.4.4 It will be necessary to seek mitigation or compensation for the shortfall in units either by direct management of land owned by the applicant or the purchase of biodiversity units from a third party. To achieve 10% BNG and satisfy The Trading Rules, it will be necessary to secure 1.62 habitat units. This could be via The Environment Bank, an organisation such as a Wildlife Trust (Nature Recovery Network) or Rochdale Council.

4.5 Impacts on Species

Bats

- 4.5.1 The buildings and trees on site offer negligible potential to support roosting bats. No impacts to bats are anticipated as a result of the proposed development.

4.6 Invasive Species

Plants

- 4.6.1 Wall Cotoneaster is listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). Whilst it is not an offence to have Wall Cotoneaster growing on your land, it is an offence to allow it to spread to the wider site area or further afield.

5. Recommendations

5.1 Further Surveys

- 5.1.1 No further surveys are required.

5.2 Mitigation and Enhancement Measures

- 5.2.1 Protection of ecological features (habitats and species) during the construction phase will be described in a Construction Environmental Management Plan (CEMP). Mitigation measures to protect, maintain and enhance ecological features during the operational phase of development will be described in a Biodiversity Management Plan (BMP). Management Plans will contain Operational Aims and Objectives, Rationale for management, Prescriptions and schedules detailing the timing and responsibility for delivering the prescriptions. It is anticipated that the CEMP and BMP will be provided as a planning condition in advance of the commencement of the proposed development.

Nesting Birds

- 5.2.2 Impacts on nesting birds should be avoided by carrying out site clearance and similar operations outside of the bird breeding season (March- August). If vegetation has to be cleared during the bird breeding season checks immediately before clearance by a suitably qualified ecologist will be required. If nesting activity is detected work in that area will need to stop until the ecologist considers that nesting activity is finished.

Habitats

- 5.2.3 Native planting should be included in landscaping plans. Native flowering species should be planted to provide food for pollinators.



Appendix 1: Planning Policy & Legislation

National Policy

The National Planning Policy Framework (NPPF 2025) describes the Government's planning policy for England and how it should be applied. Within this framework, the requirements in relation to biodiversity are included within several policies. The two most relevant to individual planning decisions are Paragraphs 187 and 193, shown below:

- 187. Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
 - c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;
 - e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
 - f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- 193. When determining planning applications, local planning authorities should apply the following principles:
 - a) 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;



- b) 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;
- c) 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 reasons⁷⁰ and a suitable compensation strategy exists; and
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Legislation

The Wildlife and Countryside Act 1981 (as amended by the CROW Act 2000) includes the notification and confirmation of Sites of Special Scientific Interest (SSSIs). SSSIs can be notified for their floral, faunal, geological, or physiographical features. Protection against damaging operations and management of SSSIs is also included within the Act. Impact Risk Zones (IRZs) are zones around an SSSI account for the particular sensitivities of the features for which it is notified and identify development proposal which could have adverse impacts.

The Wildlife and Countryside Act 1981 (as amended by the CROW Act 2000) protects native animals, plants and habitats. Under the Act it is an offence to intentionally kill, injure or take any wild animal listed on Schedule 5 and it is an offence to interfere with places used for shelter or protection, or intentionally disturb animals occupying such places. The Act prohibits picking, uprooting or destroy any wild plant (or any attached seed or spore) listed in Schedule 8.

European Protected Species (EPS) such as bats, Hazel Dormouse, Otter, Natterjack Toad, Smooth Snake, Sand Lizard and Great Crested Newt are protected by the Wildlife and Countryside Act 1981 (as amended by the CROW Act 2000) and the Conservation of Habitats and Species Regulations 2017. The Acts make it an offence to:

- a) Deliberately capture, injure or kill an EPS;
- b) Deliberately impair an EPS's ability to survive, breed, reproduce, rear or nurture young; to hibernate or migrate; or significantly affect the local distribution or abundance of the EPS.
- c) Possess or control live or dead EPS or any part of, or anything derived from a EPS;



- d) Damage or destroy a breeding site or resting place of an EPS;
- e) Intentionally or recklessly obstruct access to any place that is used for shelter or protection by an EPS;
- f) Intentionally or recklessly disturb a structure or place that it uses for shelter or protection that is occupied by an EPS.

All common herptiles are protected under the Wildlife and Countryside Act 1981 (as amended by the CROW Act 2000). Grass Snake, Slow Worm, Common Lizard, Adder are protected against intentional killing or injury. Common Frog, Common Toad, Smooth Newt and Palmate Newt is protected against sale. In addition, all British reptiles, Common toad and Great Crested Newt are listed as Species of Principal Importance.

All nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended). It is an offence to intentionally kill, injure or take any wild bird or take, damage, or destroy its nest whilst in use or being built, or take or destroy its eggs. It is an offence to intentionally or recklessly disturb a species listed on Schedule 1 of the Act while they are nest building or at or near a nest with eggs or young, or to disturb the dependent young.

The Protection of Badgers Act 1992 makes it an offence to wilfully, or to attempt to kill, injure, take, possess or cruelly ill-treat a Badger, or intentionally or recklessly interfere with a sett. Interference of a sett includes disturbing badgers during occupation of a sett, or damaging or destroying a sett, or obstructing access to the sett.

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 places a duty on every public authority to have regard to conserving biodiversity. Section 41 of the same Act requires the Secretary of State to publish a list of the living organisms and types of habitats that are of 'Principal Importance' for the purpose of conserving biodiversity. The Secretary of State must take steps, as appear reasonably practicable, to further the conservation of those living organisms and habitats in any list published under this section. The list of species and habitats of principal importance currently includes 943 species and 56 habitats. These are the species and habitats found in England which are regarded as conservation priorities under the UK Post-2010 Biodiversity Framework

The Hedgerows Regulations 1997 protect 'important' hedgerows from destruction or damage. A hedgerow is 'important' if it (a) has existed for 30 years or more; and (b) satisfies at least one of the criteria listed in Part II of Schedule 1 of the Regulations. Under the Regulations, it is against the law to remove or destroy 'important' hedgerows unless permitted by the local planning authority.



The Environment Act 2021 makes it mandatory for housing and development, subject to some narrow exemptions, to achieve at least a 10% net gain in value for biodiversity – a requirement that habitats for wildlife must be left in a measurably better state than before the development. Developers must submit a 'biodiversity gain plan' alongside usual planning application documents. The local authority must assess whether the 10% net gain requirement is met in order to approve the biodiversity gain plan.

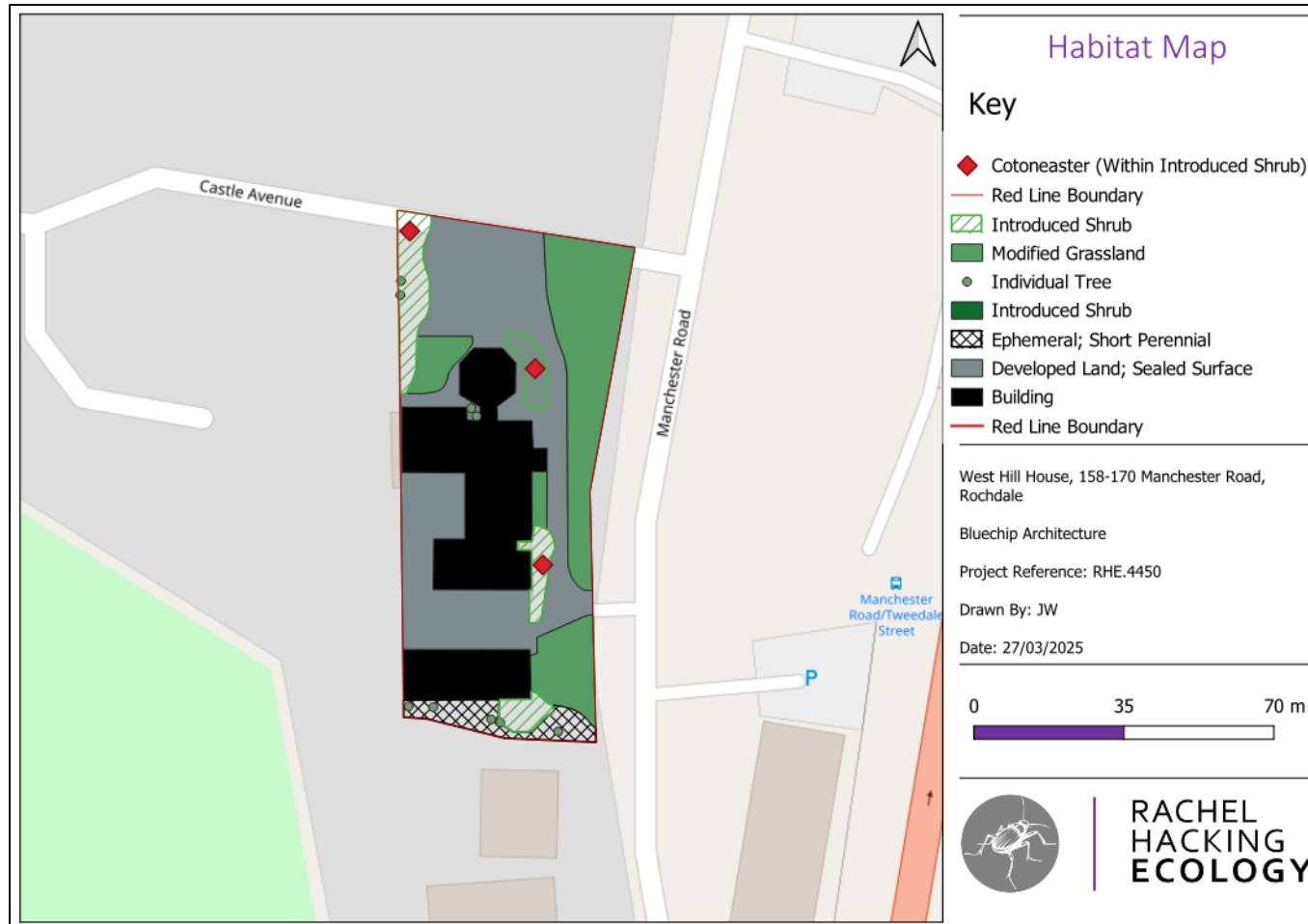
The Environment Act 2021 strengthens the duty on public authorities (NERC Act, 2006) to have regard to the conservation of biodiversity.

The Environment Act 2021 amends the Wildlife and Countryside Act 1981 to introduce an additional purpose for granting a protected species licence in relation to development, 'for reasons of overriding public interest', and two additional tests for the granting of such licences: that there is 'no other satisfactory solution' and that granting the licence is 'not detrimental to the survival of any the population of the species concerned'. These changes will reduce the scope for unlicensed activities to provide clear safeguards before licences can be granted, providing legal certainty and clarity to developers about their environmental obligations.

Appendix 3: Target Notes

Reference No.	Habitat	Photograph
1	Modified grassland	
2	Ornamental shrubs.	
3	Individual trees	
4	Wall Cotoneaster	

Appendix 4: Habitat Map



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