

Habitat Regulations Assessment – Stage 1 Screening Report and Stage 2: Appropriate Assessment

Trubs Farm, Rochdale
Reference: 81-734-R3-1
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EXECUTIVE SUMMARY

Site Address	Trubs Farm, Trub Road, Rochdale, OL11 2QH
Coordinates	E 388218 N 410069
Site Area	Approximately 5 ha
Current Site Use and Adjacent Site Use	The site comprised a modified grassland field that was being grazed by sheep. Rochdale Canal lies adjacent to the east boundary, a railway line lies adjacent to the west boundary, the M62 runs adjacent to the southern boundary while an area of broadleaved woodlands binds the northern boundary.
Development Proposals	Development proposals comprise the construction of residential housing, with associated roads and landscaping.
Conclusions	Stage 1: The proposed development is located within the Zone of Influence of the Rochdale Canal Special Area of Conservation (SAC). The potential for significant and limited effects as a result of the development include: - Impacts on the designated site as a result of pollution incidents such as dust, spills, and improper disposal of waste materials during the proposed construction works and operational phase. - Impact of atmospheric nitrogen deposition during the proposed construction works and operational phase. Stage 2: The following mitigation was deemed sufficient in mitigating the impacts outlined in Stage 1: - Pollution prevention measures during the proposed works to protect the Rochdale Canal SAC. - Fugitive dust emission mitigation measures during the construction phase to protect the Rochdale Canal SAC. Following consideration of the relevant factors, air quality impacts as a result of the operation of the development were predicted to be not significant, in accordance with the IAQM guidance (2017). The above will be implemented through the planning process and will be secured by appropriately worded conditions. As a result of the aforementioned mitigation, no significant effects on the SAC will be seen as a result of development, both during and post-construction. It is therefore considered that a Stage 3 – Assessment of Alternative Solutions is not necessary for the current scheme.



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1. INTRODUCTION

1.1. BACKGROUND

E3P was commissioned by MCI Developments to produce a Habitats Regulations Assessment (HRA) – Stage 1 and Stage 2 Assessment Report at Land West of Trubs Farm, Rochdale, hereafter referred to as “the site”. Development proposals comprise the construction of residential housing, with associated roads and landscaping.

The current statement has been prepared by Consultant Ecologist Carlin Jones, BSc (Hons) who holds a qualifying CIEEM membership and has over three years of professional experience as an ecologist. Carlin holds Class 1 bat and Class 1 Great Crested Newt Natural England Licences and holds a Level 3 Field Identification Skills Certificate (FISC). Carlin has experience undertaking Preliminary Ecological Appraisals, Preliminary Roost Assessments, protected species surveys and ecological mitigation for a wide variety of projects across the UK. Carlin has undertaken in-house training courses regarding Habitat Regulations Assessments.

1.2. SITE DESCRIPTION

The site is located in the south west of Rochdale. Rochdale Canal lies adjacent to the east of the site, the M62 borders the south of the site, Castleton Railway binds the west of the site, and a woodland area borders the north of the site. Residential housing extends to the north and west of the site, while agricultural land extends to the south and west of the site. St Martins Church and associated graveyard is located approximately 140 m east of the site. Castle Hawk Golf Club is located approximately 240 m west of the site. Please refer to Figure 1 for the approximate site location.

Figure 1 **Approximate Site Location**





1.3. SCOPE OF REPORT

1.3.1. SCREENING

The scope of this report is to present an HRA screening assessment to document and establish whether the proposed works will have 'likely significant effects' on Natura 2000 sites. New residential developments can have 'likely significant effects' on, or affect the integrity of, designated sites and likely significant effects can result from the development itself, or in combination with other plans or projects.

In accordance with the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, all competent authorities must undertake a formal assessment of the implications of any new plans or projects that may be capable of affecting the designated interest of designated sites before deciding whether to undertake, permit or authorise such a plan or project.

The designated sites subject to screening include the following:

-  Special Protection Areas (SPAs), and potential SPAs (pSPAs).
-  Special Areas of Conservation (SACs), and candidate (cSAC) or potential (pSAC) sites.
-  Ramsar sites.

This report will identify the Zone of Influence (Zoi) and indicate any designated sites within the zone of influence. Any potential impacts of the proposed development, either alone or in combination with other developments, and any significant likely impacts on ecological features associated with designated sites will be stated.

1.3.2. APPROPRIATE ASSESSMENT

The scope of this report is also to present an HRA Appropriate Assessment to document and establish whether the 'likely significant effects' on Natura 2000 sites detailed in the Stage 1 Screening section can be mitigated for.



2. METHODOLOGY

2.1. HABITAT REGULATION ASSESSMENT

An HRA process is separated into four stages, set out in the European Commission guidance “Assessment of plans and projects significantly affecting Natura 2000 sites – Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC” (November 2001). Article 6(3) of the Habitats Directive relates to Stages 1 to 3 and Article 6(4) to Stage 4.

This report challenges Stage 1 and Stage 2. The stages are as follows:

Stage 1 – Screening

The screening process involves consideration of the proximity of designated sites to the proposed works; the features of the designated sites, including primary reasons for selection and the Conservation Status of the qualifying interest; and the vulnerability of the designated site and conservation objectives. The process takes into consideration the nature of the proposed works, project design; and the cumulative impacts that could arise from the project in combination with other plans and projects.

Stage 2 – Appropriate Assessment

The consideration of the impact on the designated sites, either independently or in combination with other developments or proposed, with respect to the site’s citation and conservation targets. Mitigation for substantial impact may also be assessed.

Stage 3 – Assessment of Alternative Solutions

The examination of alternative procedures of achieving the objectives of the proposed development that will avoid significant impacts on the designated sites.

Stage 4 – Compensatory Measures

An assessment of compensatory measures where, in the light of an assessment of Imperative Reasons of Overriding Public Interest (IROPI), it is deemed that the plan should proceed.

2.2. DATA COLLECTION

2.2.1. DESK STUDY DATA

The following sources of information and ecological records were consulted:

-  MAGIC – A web-based interactive mapping system, on which geographic information regarding key environmental schemes and designations are collated, including details of statutory conservation sites. A 5 km search area was utilised, with this being deemed an appropriate distance for the zone of influence of the site.

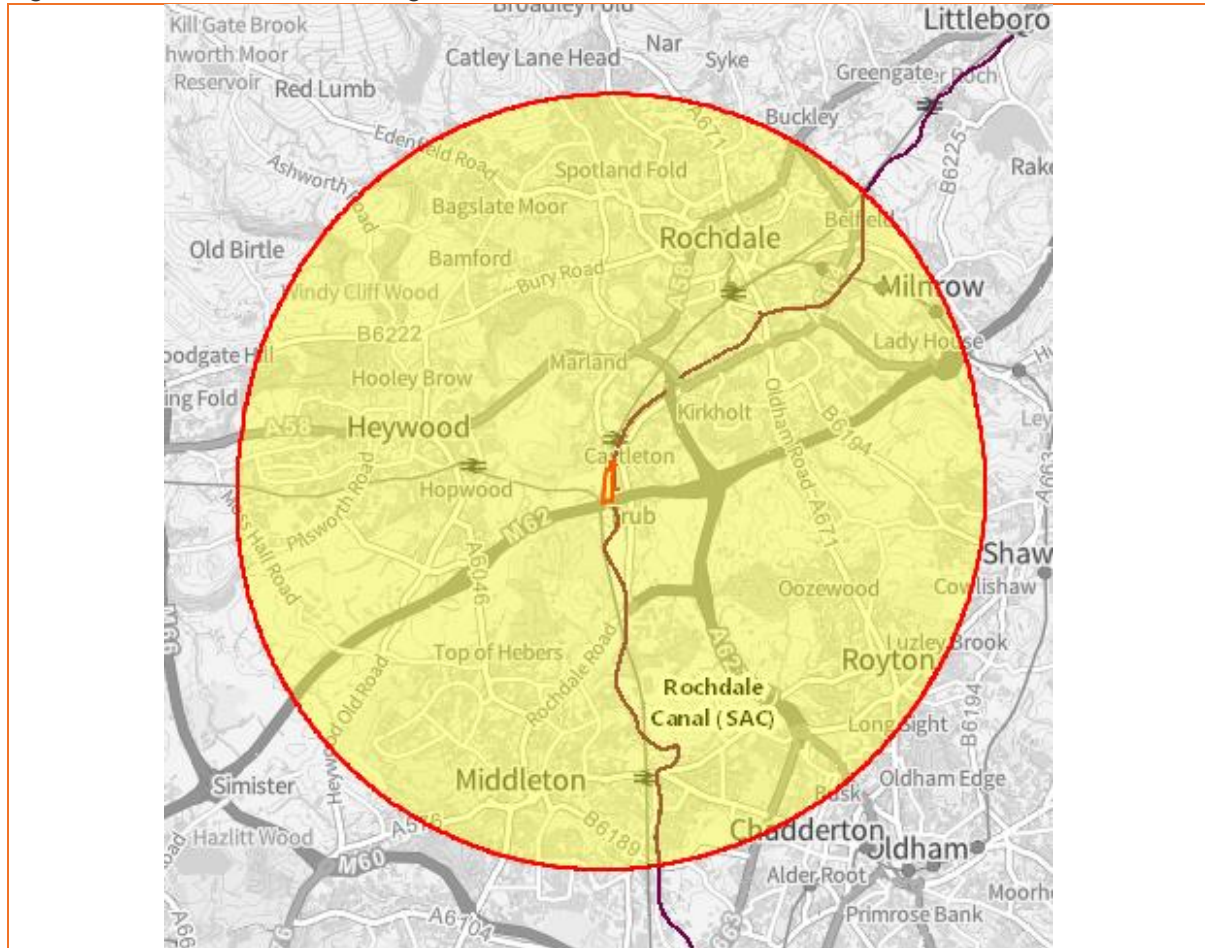
2.3. IMPACT ASSESSMENT

An assessment was undertaken to identify whether the proposed works will or will not have a likely significant adverse effect on the interest features of the designated sites identified within the zone of influence. The potential impacts considered include, but are not limited to, the following:

-  Reduction and/or fragmentation of species and habitat.



-  Disturbance.
-  Loss of individuals.
-  Changes to key elements of the sites (e.g. water quality); and,
-  Cumulative impacts.





3.2. IMPACT ASSESSMENT

Table 1 Rochdale Canal SAC Assessment of Potential Impacts

CONSERVATION OBJECTIVES	
Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:	
	The extent and distribution of the habitats of the qualifying features.
	The structure and function of the habitats of the qualifying features.
	The supporting processes on which the habitats of the qualifying features rely.
	The population of each of the qualifying features.
	The distribution of the qualifying features within the site.
QUALIFYING FEATURES	
	Annex II Species that are a primary reason for the selection of the site: Floating water plantain (<i>Luronium natans</i>). Rochdale Canal supports a significant population of floating water-plantain in a botanically diverse water plant community which also holds a wide range of pondweeds <i>Potamogeton spp.</i> The canal has predominantly mesotrophic water. This population of <i>Luronium</i> is representative of the formerly more widespread canal populations of north west England.



CONSTRUCTION	USE/ OPERATIONAL/ ACTIVITY
REDUCTION AND/OR FRAGMENTATION OF SPECIES AND HABITAT The SAC is located directly adjacent to the eastern boundary of the proposed site, and approximately 5 m east of the proposed working area. No areas of functionally linked land from the SAC, or land directly adjacent to the SAC will be lost/taken as a result of the development. The reduction in species at the SAC would be highly unlikely. No likely significant effects. DISTURBANCE Due to the nature of the designated site and the qualifying flora species present, no disturbance of the flora is deemed likely due to no works being proposed to be undertaken directly adjacent to the site. No likely significant effects. LOSS OF INDIVIDUALS It is extremely unlikely that any individual flora would be lost as a result of construction activities. No qualifying species of the SAC are located within the boundary of the proposed site. No likely significant effects. CHANGES TO KEY ELEMENTS OF THE SITES (E.G. WATER QUALITY) Physical modification to the site is deemed highly unlikely due to the nature of the designation and no proposed construction works being undertaken directly adjacent to the site.	REDUCTION AND/OR FRAGMENTATION OF SPECIES AND HABITAT The SAC is located directly adjacent to the eastern boundary of the proposed site, and approximately 5 m east of the proposed working area. No areas of functionally linked land from the SAC, or land directly adjacent to the SAC will be lost/taken as a result of the development. The reduction in species at the SAC would be highly unlikely. No likely significant effects. DISTURBANCE The provision of residential units has the potential to produce increased visitor numbers to the designated site. Potential impacts include an increase in disturbance and pollution due to pressures such as dog walking (dogs entering the canal) and littering. However, no increased visitor effect is anticipated, as it is required for homeowner packs to be provided to future residents. The homeowner packs will outline Suitable Alternative Natural Green Spaces (SANGS) and how to access these from the site. The packs will also detail responsible use of the site, such as keeping dogs on leads. No likely significant effects. LOSS OF INDIVIDUALS It is extremely unlikely that any individual flora would be lost as a result of the development. No qualifying species of the SAC are located within the site. As detailed above it is required for homeowner packs to be provided to future residents, which will detail the responsible use of the SAC and the reasons for its designation. No likely significant effects.



CONSTRUCTION	USE/ OPERATIONAL/ ACTIVITY
However, during the construction works, in the absence of standard pollution prevention guidance and precautionary working methods, the proposed works could have a significant impact on the key elements of the SAC. This could be by reducing the overall water quality of the site through dust, spills, and improper disposal of waste materials during construction works. This could in turn reduce the flora composition of the site. The impact of atmospheric nitrogen deposition on the SAC is identified as a threat within the SAC Site Improvement Plan (SIP) due to the emissions released from the machinery present during the development. During construction works, pollution prevention measures will be followed as standard to reduce any pollution effects on the local area. An Air Quality Assessment is required to determine any potential nitrogen deposition as a result of construction workings. Further assessment is required and likely significant affected are anticipated.	CHANGES TO KEY ELEMENTS OF THE SITES (E.G. WATER QUALITY) Physical modification to the site is deemed highly unlikely due to the nature of the designation. As detailed above, the provision of residential units has the potential to produce increased visitor numbers to designated sites, which may in turn cause physical modifications. Potential physical modifications include an increase in disturbance and pollution due to pressures such as dog walking (dogs entering the canal) and littering. However, no increased visitor effect is anticipated, as it is required for homeowner packs to be provided to future residents. The homeowner packs will outline Suitable Alternative Natural Green Space (SANGS) and how to access these from the site. the packs will also detail responsible use of the site, such as keeping dogs on leads. No ongoing maintenance is anticipated after the proposed works; as such, pollution from machinery is not anticipated. The impact of atmospheric nitrogen deposition on the SAC is identified as a threat within the SAC Site Improvement Plan (SIP) due to an increase in traffic resulting in an increase in road vehicle exhaust emissions. Further air quality assessments are required to determine any potential nitrogen deposition as a result of occupation. Further assessment is required and likely significant affected are anticipated.

CUMULATIVE IMPACTS

Residential areas are located north and west of the site, no developments are currently under construction. However, there is a hybrid planning application (23/00650/HYBR) located south east that has full permission for 233 dwellings and outline permission for up to an additional 1147 dwellings, all with associated infrastructure, access, and landscaping. A scoping opinion (24/00329/SCO) was also located to the south-east, regarding outline permission for 350 dwellings.

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CONSTRUCTION	USE/ OPERATIONAL/ ACTIVITY
These cumulative impacts would be during the construction phases regarding the reduction of the water quality through dust, spills, improper disposal of waste materials and the impact of atmospheric nitrogen deposition. During the operational phase of all of the developments, potential impacts include an increase in disturbance and pollution due to pressures such as dog walking (dogs entering the canal) and littering. Furthermore, the impact of atmospheric nitrogen deposition due to the increase in traffic results in an increase in road vehicle exhaust emissions.	

It is anticipated that there will be cumulative impacts in combination with the above developments within the local area.



4. CONCLUSIONS

One designated site has been identified within the Zol of the site. It is located adjacent to the eastern site boundary, and approximately 5 m east of the proposed working area and comprises the Rochdale Canal SAC and SSSI. The site has been designated due to the presence of Annex II species floating water plantain.

The HRA screening has concluded that there are potential impacts on the Rochdale Canal SAC as a result of pollution incidents such as dust, spills, and improper disposal of waste materials during the construction phase of the residential development.

The impact of atmospheric nitrogen deposition on the SAC is identified as a threat within the SAC Site Improvement Plan (SIP). Further air quality assessments are required to determine any potential nitrogen deposition as a result of development before any likely significant effects can be determined.



5. APPROPRIATE ASSESSMENT

5.1. MITIGATION

5.1.1. AIR QUALITY

An Air Quality Assessment was undertaken by E3P in April 2024 (Report Reference: 17-524-R1). The assessment concluded that during the construction phase of the development, there is the potential for air quality impacts as a result of fugitive dust emissions from the site. These were assessed in accordance with the IAQM methodology (2024). Assuming the good practice dust control measures shown below in Table 2 are implemented, the residual significance of potential air quality impacts from dust generated by earthworks, construction and trackout activities was predicted to be **not significant** in accordance with the IAQM guidance (2024).

Table 2 Fugitive dust emission mitigation measures

ISSUE	CONTROL MEASURE
Communications	- Develop and implement a stakeholder communications plan that includes community engagement before work commences on site. - Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. - Display the head or regional office contact information. - Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the LA.
Site Management	- Record all dust complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken. - Make the complaints log available to the LA upon request. - Record any exceptional incidents that cause dust and/or air emissions, either on- or off-site, and the action taken to resolve the situation in the logbook. - Hold regular liaison meetings with other high-risk construction sites within 250m of the site boundary.
Monitoring	- Undertake daily on-site and off-site inspections, where receptors are nearby, to monitor dust, record inspection results, and make the log available to the local authority when asked. - Carry out regular site inspections, record inspection results, and make an inspection log available to the LA on request. - Increase the frequency of site inspections when activities with a high potential to produce dust emissions are being carried out and during prolonged dry or windy conditions.



ISSUE	CONTROL MEASURE
Site Preparation	- Plan site layout so that machinery and dust-causing activities are located away from receptors, as far as is possible. - Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site. - Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period. - Avoid site runoff of water or mud. - Keep site fencing, barriers and scaffolding clean using wet methods. - Remove materials that have the potential to produce dust from the site as soon as possible unless being reused on site. - Cover, seed or fence stockpiles to prevent wind whipping.
Operating vehicle/machinery and sustainable travel	- Ensure all vehicles switch off engines when stationary. - Avoid the use of diesel or petrol-powered generators by using mains electricity as a power source as far as practicable. - Implement a Construction Logistics Plan to manage the sustainable delivery of goods.
Operations	- Only use cutting, grinding, or sawing equipment fitted or in conjunction with suitable dust suppression techniques. - Ensure an adequate water supply on the site for effective dust suppression, using non-potable water where possible and appropriate. - Use enclosed chutes and conveyors and covered skips where possible. - Minimise drop heights and use fine water sprays wherever appropriate. - Ensure equipment is readily available on-site to clean any dry spillages.
Waste management	Avoid bonfires or burning of waste materials.
Earthworks	- Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable. - Use Hessian, mulches or trackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as practicable. - Only remove the cover in small areas during work and not all at once.
Construction	- Avoid scabbling (roughening of concrete surfaces) if possible. - Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out.



ISSUE	CONTROL MEASURE
	Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.
Trackout	- Use a water-assisted dust sweeper on access and local roads, if required. - Avoid dry sweeping of large areas. - Ensure vehicles entering and leaving the site are covered to prevent the escape of materials. - Implement a wheel washing system, if required. - Ensure there is an adequate area of hard-surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits. - Access gates to be located at least 10m from receptors where possible.

The assessment concluded that during the operational phase of the development, there is the potential for air quality impacts as a result of road traffic exhaust emissions associated with vehicles travelling to and from the site. An assessment was therefore undertaken using detailed dispersion modelling to quantify NO₂, PM₁₀ and PM_{2.5} concentrations both with and without the proposals. A review of the dispersion modelling results indicated that impacts as a result of traffic generated by the development were predicted to be **negligible** at all sensitive receptor locations. Following consideration of the relevant factors, air quality impacts as a result of the operation of the development were predicted to be **not significant**, in accordance with the IAQM guidance (2017).

5.1.2. POLLUTION PREVENTION

The screening assessment has identified potential pollution impacts of the Rochdale Canal SAC and SSSI which may impact the water quality through dust, spills, and improper disposal of waste materials during the proposed construction works and during the operational phase. The pollution impacts may subsequently impact the qualifying flora species and its habitat. As such, all best practice guidance relating to pollution will be adhered to in order to protect the Rochdale Canal SAC. This will include best practice use of refuelling machinery to avoid fuel spills. Site drainage will need to be considered to ensure that no highly silted or polluted run-off from the site workings will enter the designated site. Stockpiles will be sheeted to prevent silted run-off into the designated site. Works within the access routes will be covered as soon as practicable. All site operatives will undergo a site induction which will brief them as to their working limits and legal responsibilities.

Best practice protection measures as detailed within PPG5 Pollution Prevention Guidelines (2007) are to be put in place to protect the Rochdale Canal SAC. The following control measures would be required during any ground works to ensure there are no impacts on the statutory site:

- All operational plant will be kept well-maintained.
- Turning off plant when not in use.



- ✿ Dampening of the operational areas will be regularly undertaken during dry weather conditions to avoid dust. Dust management will be extended to cover the plant and all operational areas and will be compiled with throughout the period of development.
- ✿ Measures to prevent pollutants from entering ground and surface water are standard construction practice through the use of a bunded fuel storage and refuelling area at a discrete distance from any watercourses. These measures should be underwritten by spill management equipment being kept on-site and capable of being effectively utilised by trained operatives to contain any accidental spillage within any part of the operational area.
- ✿ A toolbox talk should be completed by a qualified ecologist to ensure contractors are aware of the designated site and its ecological importance.
- ✿ A 'Site Tidy' protocol is to be put in place on-site. All litter is to be appropriately controlled, whilst on-site materials are to be adequately stored overnight.
- ✿ All excavations will be battered at a 45-degree angle, or a ramp installed to allow escape should animals become trapped.

5.2. RESIDUAL EFFECTS

The above will be implemented through the planning process and will be secured by appropriately worded conditions. As a result of the aforementioned mitigation, no significant effects on the designated site will be seen as a result of development, both during and post-construction. It is therefore considered that a Stage 3 – Assessment of Alternative Solutions is not necessary for the current scheme.



6. REFERENCES

- 📍 DEFRA, 2024. Magic Map. [Online] Available at: <http://magic.defra.gov.uk/MagicMap.aspx> [Accessed May 2024].
- 📍 E3P (2024). Air Quality Assessment – Trubs Farm, Rochdale (Report Reference: 17-524-R1).
- 📍 European Site Conservation Objectives for Rochdale Canal SAC Site Code: UK0030266 [Online]. Available at: <http://publications.naturalengland.org.uk/publication/6015060228964352> [Accessed May 2024].
- 📍 IAQM, 2017. Land-Use Planning & Development Control: Planning for Air Quality.
- 📍 IAQM, 2024. Guidance on the Assessment of Dust from Demolition and Construction V2.2.
- 📍 Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC" (November 2001). Article 6(3) of the Habitats Directive relates to Stages 1 to 3 and Article 6(4) to Stage 4.

END OF REPORT