

**Extended Preliminary Ecological Assessment
for a garden plot at Lister Road,
Rhodes, Middleton, Rochdale District
Greater Manchester**

By

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Updated in red in line with GMEU comments

1 INTRODUCTION

- 1.1 A garden plot at 1 Lister Road, Rhodes, Middleton, Rochdale District (SD 8475 0499) was surveyed to the CIEEM Guidelines for Preliminary Ecological Appraisals Second Edition 2017 and for Biodiversity Net Gain by Dave Bentley Entomology and Ecology Services on 18th June 2024. The large end-terrace garden plot is being considered for a planning application to construct an additional detached house. This is a “small site” in BNG terms. The plot for the new house measures 254 square metres (all as revised by the architect Nov 2024) and this is all bare earth at the moment. At the assessable time for BNG the plot was 254 square metres, the paved and concrete pad area and shed area was 85.8 square metres and the rough vegetated garden was 156.8 square metres, and an area of permanently bare soil under the abandoned rear caravan of 11.4 square metres. The proposal is to create a house of 74 square metres, and hard but permeable yard areas of 84 square metres, with a front garden of 16 square metres, a rear garden of 66.1 square metres and some shrubbery at the front totalling 9.9 square metres (total 254 square metres).
- 1.2 The GMEU has correctly advised given the updated BNG Guidance from HM.gov that gardens cannot contribute to BNG (despite alternative guidance from HM.gov still to be found there). And also that a recently cleared garden, even if it was cleared for legitimate reasons unconnected with the planning application (in this case the whole garden was flytipped or filled with abandoned junk) cannot be assessed as bare soil and must be cited as Vegetated Garden etc. To this end we have re-examined the site (11/11/2024) and site photographs dating to the land purchase and to images found on Google Earth (using clock function) to plot the paving and shed, the boat and the two caravans, all of which lay in situ for many years. This allows us to measure hard developed surfaces and actual vegetated garden with confidence. Thus this report has been updated in red here and below. Additional photos at the end of the report.
- 1.3 The revised government guidance on BNG issued late July 2024 is here:
https://assets.publishing.service.gov.uk/media/669e45fba3c2a28abb50d426/The_Statutory_Biodiversity_Metric_-_User_Guide__23.07.24_.pdf
“The post-development private garden has no public access, and biodiversity net gains cannot be legally secured. As these gains cannot be secured you should only record created private gardens as either:
- ‘urban – vegetated garden’; or
 - ‘urban - unvegetated garden’
- You should not:
- record the creation of any other new habitats within private gardens
 - record enhancement of any habitat within private gardens
- However, habitats which are recorded in the baseline and remain within a private garden may be recorded as retained. Guidance on retention should still be followed.”
- 1.4 David Bentley conducted the survey. He has been in conservation since 1983 and has been a professional ecologist since 1992.

- 1.5 The CIEEM Guidelines are explicit in what is required to be assessed and provided:
- * A Habitat Survey Map.
 - * A desk study. In this case the NBN Atlas and iRecord were consulted.
 - * An assessment of the possible presence and likely importance of the following:
 - Plants
 - Fungi
 - Terrestrial and aquatic invertebrates
 - Fish (where relevant, based on an assessment of any watercourses and water bodies present);
 - Amphibians (including both breeding and terrestrial habitat)
 - Reptiles
 - Breeding, wintering and migratory birds
 - Bats (including potential roost sites, and foraging and commuting habitats/features)
 - Other protected or priority mammal species, as relevant.
 - * Mapping of any stands of non-native invasive plant species
 - * Recording of any incidental sightings of priority or protected species, or field signs of such species.
 - * Box 1 of the PEA Guidelines discusses Protected and Priority Species information and this is stated to include Protected and Section 41 Priority Species and Priority Habitats and also Red Data listed taxa and indeed Nationally Scarce taxa, as well as Birds of Conservation Concern Red (most declining) and Amber listed taxa. The JNCC Taxon List names the plethora of higher plants, bryophytes, fungi and wild animals, including invertebrates that are considered scarce.

2 METHODS

- 2.1 The survey morning was on 18th June 2024. All PPE was cleaned beforehand to meet biosecurity needs. The site is ringed by security fencing and a screen. The site had been cleared by machine and other methods to remove the huge amount of items in the garden (which can be seen on online satellite images) and to facilitate the work on the refurbishment. **A revisit was made on 11/11/2024 to look for Schedule 9 alien invasive species notably Himalayan Balsam**
- 2.2 The days were a still and sunny summer morning, and a sunny dry November morning
- 2.3 Plants and moss fringing the bare earth were examined and noted to DAFOR rating. The treeline beyond the site boundary was examined for tree and shrub species
- 2.4 A paving slab was lifted to look beneath and examine.

- 2.5 There was no call for an invertebrate assessment of this empty bare soil habitat.
- 2.6 The River Irk lies 80m to the south from the southern boundary and there is a cut-off section of the river which remains as a free standing linear pond (the river was diverted when the motorway was built). This necessitated a visit to check if the habitat was suitable for amphibians, notably Great Crested Newts (legally Protected) and Common Toad (a Priority Species). A very long handled pond net was used given the satellite image showed a tall stone revetted bank on its southern edge. The cut-off section lies adjacent the modern weir on the river. Amphibians breeding in these waterbodies live on the surrounding land.

3 DESK STUDY

- 3.1 Online satellite images show this garden was derelict in the 2020s with vehicles and a boat occupying the street frontage area and with bramble scrub immediately behind the rear door of Number 1, and scrub and secondary woodland colonising the rest and enveloping the boat and vehicle storage area. The old OS maps on National Library of Scotland website show the whole of the adjacent river valley has been a developed area within living memory. MAGIC map was consulted.
- 3.2 A search of NBN Atlas and iRecord revealed no records for the site itself. A lot of records on NBN appeared to be placed nearby in eastern Rhodes on the River Irk until it is worked out that the centre of OS80 square is in that spot. Ergo apart from those records transferred to NBN from iRecord there are only SD80 10Km square records available, which is unhelpful to list.
- 3.3 There is no data for the cut-off river section.
- 3.4 The Desk Study provided:

The only relevant bird is the House Sparrow (Red List Priority Species), whilst the other birds listed are waterside species found along the River Irk. IRecord lists some common Butterflies and Dragonflies and Damselflies.

4 RESULTS OF FIELD SURVEY

- 4.1 A Habitat Survey Map is appended below.
- 4.2 15 higher plant species and 2 moss were recorded along the inner edges of the shuttered building site, alongside the fencelines. Most of these were outside the actual ownership area. All of the species are common in England and Greater Manchester. None of the species inside the shutter fencing are alien species - none are Schedule 9 Alien Invasives. As the ground has been machine-scraped it is not possible to say what may be in the seed bank. The species lists are given below (D = Dominant, A = Abundant, F = Frequent, O = Occasional, R = Rare, V = Very, L = Locally):

Stinging Nettle	O
Cow Parsley	R
Herb Robert	O
Broad Buckler Fern	R
Common Male Fern	R
Bindweed (non-flowering)	O
Field Horsetail	O
Bramble	O
Cleavers	R
Common Hogweed	R
Bittersweet	R
Holly sapling	R
Hawthorn sapling	R
Sycamore sapling	VO
Privet sapling	R
<i>Brachythecium rutabulum</i>	O
<i>Kindbergia praelonga</i>	VLF

The treeline/hedge outside the site has:

Sycamore (large tree at south west corner of site which may or may not be in site).
Sycamore (several)
Ash (large multi-stemmed) and another
Elder (c2)
Holly
Garden Privet
Hawthorn (c2)
Rhododendron ponticum (Schedule 9 Invasive Alien)
Hornbeam sapling
Ivy
Bramble
Raspberry
Stinging Nettle
Himalayan Balsam VLO near the farm gate SD 84759 04982

- 4.3 The site does not contain any Priority Habitats. The adjacent treeline/hedge could be classed as a Priority Habitat hedgerow. The presence of a Schedule 9 Alien Invasive *Rhododendron ponticum* shows the condition of this habitat is compromised. As the tree/line hedge is outside the site and not on the actual site boundary it should not be affected adversely by the development of this derelict garden plot for a house.
- 4.4 Watercourses and Ponds are Priority Habitats and the River Irk and its cut-off section lie just over 100m to the south of the site. The development of this derelict garden for a house will not adversely affect these Priority Habitats.
- 4.5 Fungi – none were found and the bare soil will not be of interest for grassland or woodland fungi. No fungi were found on 11/11/2024.

- 4.6 Invertebrates – Whilst this site lies adjacent a wildlife corridor and might readily be colonised by a multitude of invertebrate species, the totally bare soil site and regular disturbance show the site is currently of minimal value to invertebrates. There were some common soil invertebrates such as centipedes and woodlice under a broken paving slab.
- 4.7 1) Fish and amphibians – There are no waterbodies on site and no amphibians were found under debris. However site staff report a Common Frog was seen in the garden when clearing and carried carefully to the site edge. The nearest Great Crested Newt record is 479m away to the north across the village and main roads in the Baguley Brow area.
- 2) The cut-off section of river lies 107m from the site boundary to the south west. This was surveyed and found to be 95% covered in emergent Crack Willow. The southern tip remains open near the modern weir and here a Palmate Newt male and a Common Frog tadpole were caught, along with Three-spined Sticklebacks. The water was about 30cm deep over deep silt and the banks about 1.3m tall. The only vegetation in the pool was Marsh yellow-cress, growing on a dumped tyre, and fringing Nettle. Great Pond Snail and Lake Orb Mussel recorded.
- 3) The river valley location, the presence of fish, the young age of the habitat as standing water, and the near total domination by emergent Crack Willow show this is not, and cannot be, a Great Crested Newt habitat. We expect to find Frog tadpoles in most waterbodies and Palmate Newts are often found in river valleys. The habitat did not support Common Toad tadpoles and looks too eutrophic for them. Great Crested Newts are creatures of the plains and pond clusters to the north in the open countryside but not this area.
- 4) As for other area is noted that 90m to the south west of the site boundary is the remains of a drained and somewhat landfilled reservoir. But the area ceased to be shown as a waterbody on OS maps decades ago. If the area has wet hollows they may part of the Palmate Newt and Common Frog habitat mosaic. But a look at online satellite images that every bit of open land between the site and the hollow of the former reservoir has been thoroughly bulldozed in recent years, this being a former industrial estate.
- 5) There are some reservoirs 875m and more away from the site on the east side of Rhodes and these are likely to be Common Toad breeding sites. Toads wander far outside the breeding season and may turn up anywhere in the wildlife corridor or in gardens adjacent. Some might even have successful breeding in the River Irk above the weir but there is a strong flow there, as can be seen from the stretched out growth of Fennel Pondweed (*Potamogeton pectinatus*) (examined under microscope) above the weir (108m due south of the site).
- 4.8 Reptiles – Nothing seen under debris and the habitat structure needed is not present. This in an old suburban garden and though the adjacent valley is green today, it has been completely developed in the past with mills, sewage works and reservoirs (as can be seen on old OS maps). Reptiles (other than dumped Terrapins) are virtually unknown in this part of Greater Manchester's lowlands (and are unconfirmed where such vague records exist).
- 4.9 Breeding, wintering and migratory birds. As there is no vegetation on site and it is an active building site then the value to breeding birds and roosting birds is nil. The mixed tree line outside the site will provide some opportunities for bird nesting, roosting and feeding.

- 4.10 Bats. There are no trees or structures on site that could be used by hibernating or roosting Bats. The insects that rise above the treeline bordering just outside the site of an evening will be part of the local Bat population's feeding resource. The plot is part of the local feeding mosaic available to Bats although the wildlife corridor along the Irk is an extensive potential bat feeding resource.
- 4.11 Mammals. The NBN Atlas has records of Hedgehogs in the wider area. Hedgehogs are a Red Data Near Threatened Section 41 Priority Species of Principal Importance and the Local Planning authority has a legal Biodiversity Duty to seek to conserve the species. Wood Mouse, Voles, Shrews and Brown Rat may occur locally. Fox seems likely in the adjacent Valley
- 4.12 There were no Schedule 9 alien invasive plants in the site to be found. That said wildlife corridors along rivers could host numerous alien invasive species so the advice is to herbicide the garden area before laying it out as a new garden. **We have examined the Google Streetview images which are dated /9/2020 and /6/2023 and have noted that there is indeed, as spotted by the GMEU, a Himalayan Balsam flower on the front driveway in front of the front caravan (9/2020). The drive at this point is a cracked concrete pad. Other photographs, including the property portfolio photographs, do not show the plant. As this is the only point at which Himalayan Balsam has been seen it is inappropriate to draw a plan.**
- 4.13 **This is what the GMEU has requested: "Prior to any earthworks a method statement detailing biosecurity measures for Himalayan Balsam should be supplied to and agreed in writing to the LPA. The agreed method statement shall be adhered to and implemented in full unless otherwise agreed in writing by the LPA." This is dealt with below:**

5 DEVELOPMENT CONSTRAINTS

- 5.1 **We have provided a revised Full BNG metric which accompanies this report.**
- 5.2 No planning condition relating to breeding birds **and land clearance** is needed.
- 5.3 There needs to be a duty of care relating to Protected and Priority animals that may enter the site. Thus for example trenches dug for foundations and services need to have one sloping sides to ensure any animal (Hedgehogs, amphibians notably Toads) falling in can get out.
- 5.4 Boltonandburyswifts@outlook.com are happy to advise regarding the new British Standard BS42021 which recommends 1 Swift Brick (universal brick to be used by Sparrows too) per 1 residential property (north facing walls). Some local planning authorities seek new builds to install these via planning conditions. **The GMEU response has suggested the LPA should condition this as a requirement.**
- 5.5 It is suggested that the developers cut down and dig out the Rhododendron from the adjacent treeline/hedge as it is an alien invasive. It should be burned on site.
- 5.6 The new house plot already has large Sycamore and Ash trees just outside the boundary. The key for the landscaping on this site is to provide a measure of native mixed shrub habitat and some attractive small trees. The suitable small and attractive trees are Wild Cherry *Prunus avium*, Rowan *Sorbus aucuparia*, Holly *Ilex aquilinum*, Aspen *Populus tremula* and Silver Birch *Betula pendula*. A belt of shrub habitat can be provided around the garden margins and this

can be maintained at a low height or allowed to grow to provide a screen. Suitable species are Hawthorn *Crataegus monogyna*, Holly *Ilex aquilinum*, Hazel *Corylus avellana*, Common Gorse *Ulex europaeus*, Guelder-rose *Viburnum opulus* and Native Dogwood *Cornus sanguinea*. The planting can be supplemented with Black Currant *Ribes nigrum* Red Currant *Ribes rubrum* etc. Such a landscaping scheme will in time become a place where wild birds and Hedgehogs might find shelter and food and will attract native invertebrates. The planting of this new hedge will help compensate for the loss of any potential bird nesting sites in the abandoned garden, and such is suggested by the GMEU response, for conditioning.

- 5.7 Any new fencing constructed on the south and west sides should incorporate a hedgehog passage. If timber fencing is planned this is simply removing a small piece of wood from the fence base about the size of CD box. For concrete based fencing this company (and others) offer a solution <https://www.garden-fence-panels.co.uk/concrete-posts-bases/concrete-gravel-boards/hedgehog-friendly-concrete-base-panel-plain/n>
- 5.8 Himalayan Balsam. As the site had been cleared to bare earth before the ecologist arrived in on 22 June 2024 a revisit was carried out on 11 November 2024 by the ecologist to examine the site and margins once again for Himalayan Balsam. There is a digger kept on site and it is very clear from bare soil and track imprints that the soil surface is scraped and relevelled very regularly. This means that since June at least the actual site and all the land on the plot side of the treebelt has been mechanically kept clear of Himalayan Balsam. If there was any Himalayan Balsam growing on the site before it was cleared it will have long since gone to the tip with the fly tipping. It seems appropriate to note that whenever anyone walk or works in our river valleys in late summer and autumn they may bring back Himalayan Balsam seeds on their boots or clothes. It can even arrive in bags of wood chip mulch from garden centres. Without a catchment wide scheme we cannot hope to suppress it. Here the plant has most likely moved up or down the adjacent river valley and, given the plant is currently growing in a neighbour's property, tackling it at source cannot be conditioned.
- 5.9 Given the location of Himalayan Balsam on the other side of the treebelt by the southern (lower) farmyard gate, the advice to the applicant is therefore to continue scraping the soil surface until the garden is landscaped. It will be quite simple to walk down the adjacent lane in the summer (annually) and uproot the plant before it seeds. People involved should wear gloves and eye protection as necessary (to protect from thorns and twigs – Balsam is not poisonous) and should pick clean boot treads and scrub the whole boot and bleach them afterwards. The plant can be twisted to break the stem once uprooted, and then hung in the tree adjacent to dry out and wither and must not left on ground or composted or put in a waste container. Best practice will require the digger is cleaned with a pressure washer before leaving the site. There are many information sheets to be found online but this one from Wales shows the seeds, seed pods, flowering plants and seedlings and young plants:

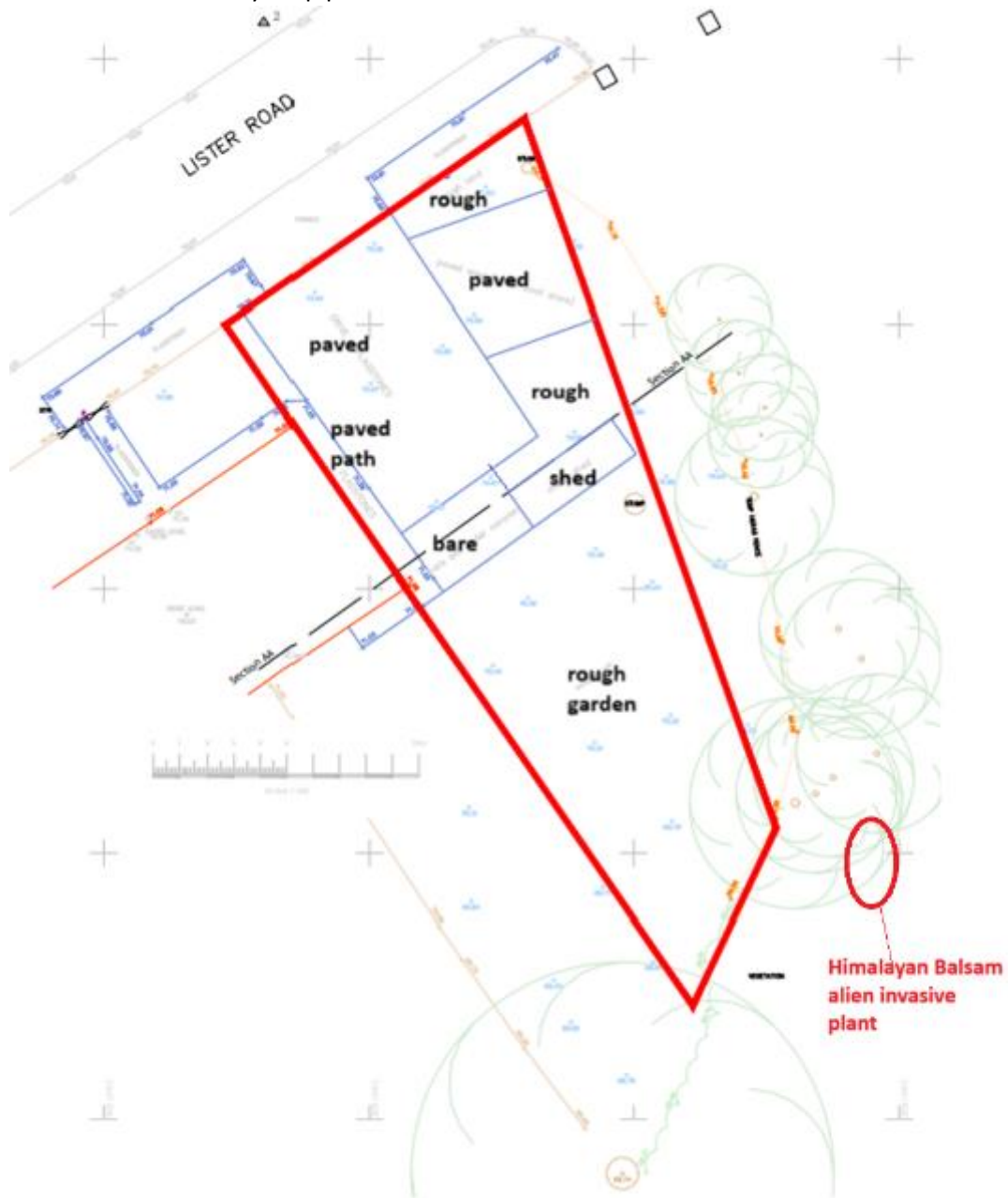
<https://www.gov.wales/sites/default/files/publications/2022-03/himalayan-balsam-public-information-controlling-invasive-species-wales.pdf>

This information should be printed out by the builders, laminated and kept on site.

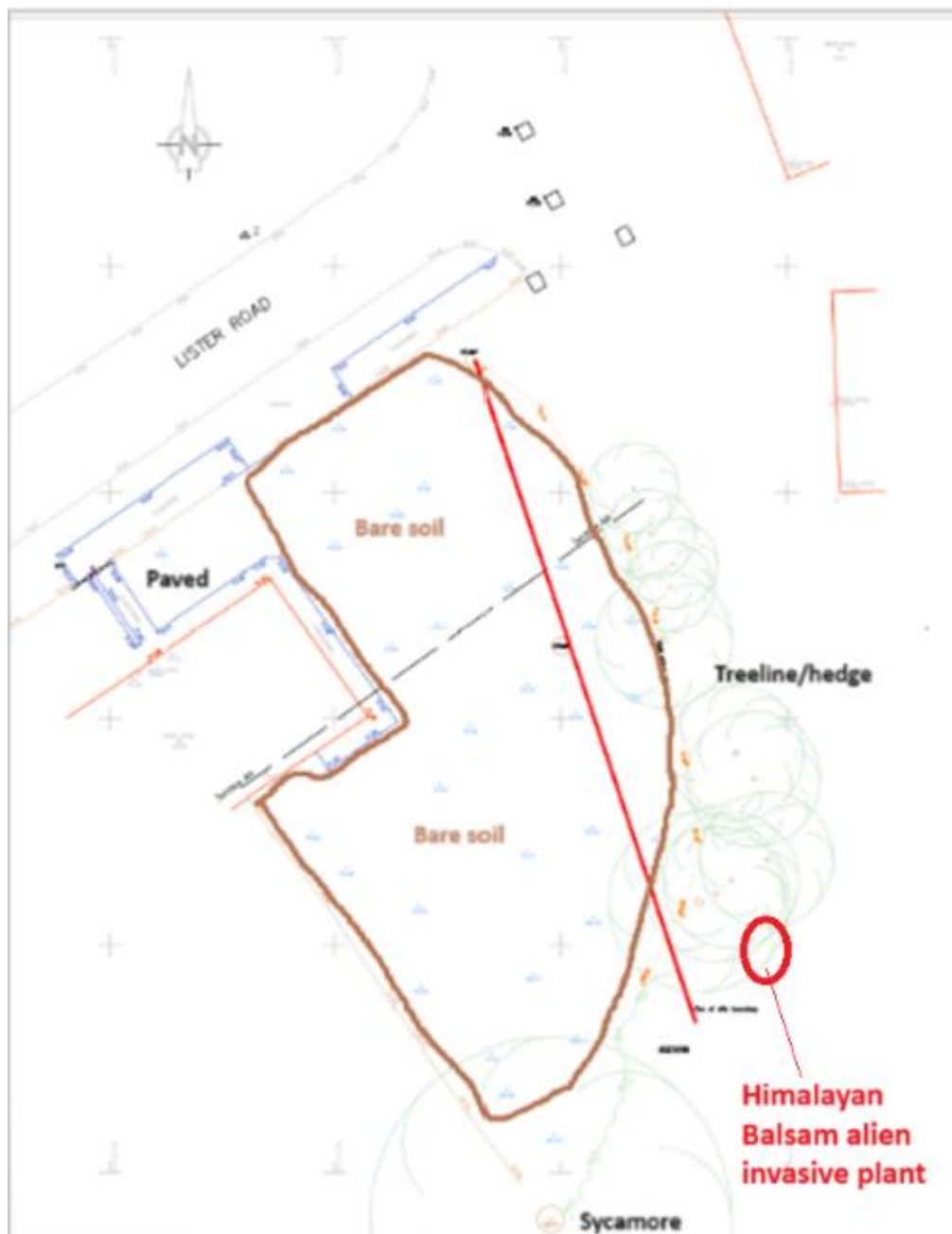
6 Statement of Mitigation Hierarchy and Biodiversity Net Gain

- 6.1 There are no area-based Priority Habitats and no Sites of Biological Importance on or adjacent the site, the site is not in a wildlife corridor though is adjacent one (whether designated or not), and there are no Irreplaceable Habitats.
- 6.2 We have included some native tree and shrub planting. "Gardens are non-significant enhancement that should still be included in your metric calculation" <https://www.gov.uk/guidance/make-on-site-biodiversity-gains-as-a-developer>.
- 6.3 This is still to be found on the government website but is contradicted by the July BNG update.
- 6.4 The GMCA document of Mitigation Hierarchy Feb 2024 states this is to 1) avoid 2) mitigate, 3) compensate - plus avoid damaging connectivity, achieve net-gain and make appropriate provision of the habitats connected to the development:
- 6.5 It is not possible to avoid without scrapping the development. To mitigate the impact on biodiversity we have proposed measures for birds and Hedgehogs the LPA may condition what is set out in this Ecology Report. We have suggested a Swift Box and Hedgehog passes are used and the LPA will need to condition them if they require them.
- 6.6 To compensate we have proposed a new perimeter of native shrubs, a turfed area and Swift Nest Bricks. The destruction of Japanese Knotweed and fly tipping blight and the repair of the revetment wall is admirable compensation.
- 6.7 A BNG Plan only needs to be submitted on the award of planning consent. Completion of the Statutory Matrix attached has shown a DEFICIT OF 0.1 UNIT OF VEGETATED GARDEN LOST which when adding the 10% net gain is elevated to **0.2 Habitat Units** required of equal or greater value. As no land can be surrendered for public open space/amenity/nature then the applicant will have to purchase units from a BNG supplier. If Rochdale cannot recommend a supplier then the open market will be used.
- 6.8 All the information is entered on one page of the metric. The loss in vegetated garden and bare earth is set out, and the retained column on the same row shows what is being put back in terms of vegetated garden. The figures are updated from them previous metric.

Habitat Survey Map prior to clearance



Habitat Survey Map post-clearance





Planning Proposal (above)

Below is a photograph of the bare site in relation to the house refurbishment and photographs of the river cut-off section and the pool above the weir on the River Irk



The site (above)



River Irk Cut-off section (above)



River Irk Cut-off section (above)



River Irk pool above modern weir



River Irk modern weir

Additional photographs of garden area (below) showing, if examined carefully, paving and concrete pad. The front caravan was removed but is visible on Google Streetview.









Himalayan Balsam locations (above) red arrows



Himalayan Balam (above) red arrows

END