

INVASIVE NON- NATIVE SPECIES METHOD STATEMENT

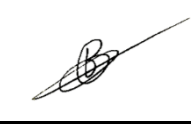
MAY 2025

North Manchester Golf Club
Manchester Old Road
Middleton
M24 4PE

U R B A N
G R E E N



QUALITY MANAGEMENT

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Prepared By:	Siobhan Gandee	Signature:		Qualifications:	Assistant Ecologist, BSc
Reviewed By:	Barnaby Indio Gardner	Signature:		Qualifications:	Ecologist, BSc, MEnvSci, PGCert
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Legend: Red Line Boundary		0.85 Kilometers		N URBAN GREEN A: Ground Floor, The Tower, Deva City Office Park, Trinity Way, Manchester M3 7BF T: +44 (0) 161 312 3131 weareurbangreen.co.uk
Client: North Manchester Golf Club		Issue: 01		
Project: North Manchester Golf Club		Scale @ A4 1:10,000		
Title: Site Context		Approved by: SB	Checked by: TM	
Drawing Ref: UG_284_SITE_CONTEXT		Author: CL	Date: 05/06/2024	

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Legend

Red Line Boundary

Line of Trees

Bramble scrub

Building

Developed land sealed surface

Modified grassland

Other broad-leaved woodland

Other rivers and streams

Sparsely vegetated

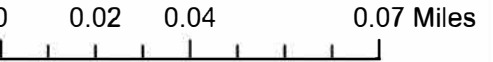
Urban Tree

Target Note

TN1 - Rhododendron

TN2 - Himalayan balsam (widespread across site)

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A: Ground Floor, The Tower,
Deva City Office Park, Trinity Way,
Manchester M3 7BF

T: +44 (0) 161 312 3131

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Client:
North Manchester Golf Club

Project:
North Manchester Golf Club

Title:
UKHAB Habitat Map

Issue:
02

Drawn: CL	Checked: BG	Approved: OS
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1 Introduction

1.1 Scope

- 1.1.1.1 Duchy Homes has instructed Urban Green to produce an Invasive Non-Native Species (INNS) Method Statement for the proposed development at North Manchester Golf Club, Middleton (hereafter referred to as ‘the site’).
- 1.1.1.2 The development proposals involve demolition of the existing clubhouse and residential dwelling; the creation of a residential development comprising 56 dwellings; the erection of a replacement club house (including pro-shop and function room) and greenkeepers store; the relocation of the existing practice area; construction of a replacement park; and associated landscaping and infrastructure.

1.2 Site Context

- 1.2.1.1 The site is located at National Grid Reference SD 85884 05522 and comprises a total area of approximately 4.8ha (see Figure 1).
- 1.2.1.2 The site is located on the outskirts of a densely urban area of Middleton, approximately 7km north of the centre of Manchester. Alkrington Woods Nature Reserve is located immediately south of the site on the southern aspect of the A576. The M62 is present 1.7km north of the site and the M60 is present 500m south of the site. Residential housing bounds the site to the north, east and southwest.

2 Site Assessment

2.1 Site Survey

- 2.1.1.1 The site was first subject to a field survey on 22nd September 2020, by Mark Blacker ACIEEM. Following the lapse in lifespan of that survey's findings, the site was resurveyed on 29th April 2024 by Barnaby Gardner MEnvSci. The weather conditions were 11°C, overcast (7/8 oktas), wind speed 3 Beaufort scale.
- 2.1.1.2 Himalayan balsam was identified during both site visits. The species was identified to be growing extensively throughout the site, with notable strands in the woodland at the northern part of the site and within the area of tall ruderal vegetation east of the amenity grassland practice area in the south of the site. Rhododendron was identified during the 2024 survey in smaller patches within the northern and southern woodlands.
- 2.1.1.3 Both species are listed under the Invasive Alien Species Protection Order 2019, as an invasive, non-native species.

2.2 Himalayan Balsam

- 2.2.1.1 Himalayan Balsam is native to the Himalayan region of Asia. It was introduced to Britain in 1839 as an ornamental garden plant. However, it has now spread rapidly and is widespread throughout the UK in riparian and urban habitats.
- 2.2.1.2 It is a tall, annual plant that can reach up to 3m tall within one growing season. The tall red/purple hollow stems are topped with clusters of pink flowers from June to October followed by seed pods.
- 2.2.1.3 Each plant can produce up to 800 seeds in a year, which can remain viable for between 18 and 36 months without germinating if transported by water. It colonises rapidly and can prevent native plants from growing within that area. It creates dense, monoculture stands predominantly on riverbanks and other areas of damp ground. When the Himalayan balsam dies back in winter, the banks are left bare and liable to erosion. The invasive nature of this plant is accelerated because it has no natural forms of control (i.e.: herbivore grazing) in the UK.

2.3 Rhododendron Information and Identification

- 2.3.1.1 Rhododendron is native to south-west Europe and south-west Asia.
- 2.3.1.2 A large evergreen shrub with leathery leaves, attractive purple to pink flowers and solid stems forming into a trunk when mature. Relatively easy to identify but can be confused with cherry laurel or horticultural varieties of rhododendron. However, horticultural varieties of rhododendron are relatively rarely found in the wild. Spreads by suckers and seed, which are small and carried long distances by wind.
- 2.3.1.3 Introduced by gardeners in the late 18th century into parks and woodlands, where it was also used for game cover. Still widely planted, particularly by gardeners. Often grows in ecologically sensitive habitats, such as heath, broad-leaved woodland and dunes, where dense growth can considerably alter the structure of the habitat.
- 2.3.1.4 Varies little throughout the year as leaves are evergreen and woody stems remain the same. Flowers appear May to June followed by seed pods.

3 Relevant Legislation & Permits

3.1 Overview

- 3.1.1.1 It is an offence under Section 14(2) of the Wildlife and Countryside Act 1981 (as amended) to “plant or otherwise cause to grow in the wild” any plant listed in Schedule 9, Part II, which includes Japanese knotweed, montbretia and cotoneaster. Offences under Section 14 carry a maximum penalty of £5,000 fine and/or 6 months imprisonment on summary conviction (i.e. at Magistrates’ Court) and an unlimited fine (i.e. what the court feels to be commensurate with the offence) and/or 2 years imprisonment on indictment (i.e. at Crown Court).
- 3.1.1.2 Similarly, under the Invasive Alien Species Protection Order 2019 it is illegal to plant invasive species in the wild or cause them to spread.
- 3.1.1.3 Soil and other waste containing viable propagules of invasive non-native plant species is classified as ‘controlled waste’ under the Environmental Protection Act 1990. Subsequently, waste containing invasive species must be disposed of in accordance with official Environment Agency guidance designed to prevent further spread of the species. Any waste being disposed of must be accompanied by appropriate waste transfer documentation.
- 3.1.1.4 Local councils and the police (in most cases the local council) have the power to issue Community Protection Notices against “individuals who are acting unreasonably and who persistently or continually act in a way that has a detrimental effect on the quality of life of those in the locality”. The notice could require an individual or organisation to make reasonable efforts to rectify problems arising from invasive non-native species and/or make it a requirement to take reasonable steps to prevent future occurrence of the problem. For more information see “Reform of anti-social behaviours powers: Japanese knotweed and other invasive non-native plants” (Home Office, n.d.).
- 3.1.1.5 See Property Care Association Guidance Note – Legislation and Policy for Invasive Non-Native Plant Species (PCA, 2014) for further information.
- 3.1.1.6 Failure to comply with the relevant invasive non-native species legislation could lead to prosecution.

3.2 Permits

- 3.2.1.1 An Environment Agency permit will not be required to eradicate the onsite invasive species, providing that the conditions of the Environment Agency Regulatory Position Statement 178 – Treatment and Disposal of Invasive Non-Native Plants (RPS178) are met. The following method has been provided to comply with these conditions. **Note – If at any point the conditions of the RPS178 cannot be met, a permit must be applied for with the Environment Agency.**
- 3.2.1.2 See <https://www.gov.uk/government/publications/treatment-and-disposal-of-invasive-non-native-plants-rps-178> for further details.

4 Method Statement

4.1 Justification

- 4.1.1.1 The scatter of distribution creates a risk that construction activities could cause the plant to spread (unintentionally) into the wild. This could be avoided through direct removal, prior to construction works commencing.

4.2 Site-Specific Method Statement

- 4.2.1.1 All actions involving invasive and non-native species should be conducted under appropriate biosecurity measures as detailed in Section 4.2 for Site Biosecurity.
- 4.2.1.2 The location of the invasive species can be found in Figure 2.
- 4.2.1.3 Two forms of treatment can be applied to control the invasive species on site (non-chemical and chemical).

Option 1: Non-Chemical Control

Hand-Pulling

- 4.2.1.4 Himalayan balsam and rhododendron can be hand-pulled as these species have very shallow roots growing to a depth of 10-15 cm. This method is particularly useful for smaller infestations and in high-ecological value areas where the use of herbicides, or indiscriminate cutting, should be avoided. Repeat treatment will likely be required.
- 4.2.1.5 Hand pulling should occur in May/June when plants can be easily identified and have not yet set seed. Hand-pulling is the less labour-intensive option; however, the effects are less instantaneous; therefore, multiple hand-pulling seasons will likely be required.

Cutting

- 4.2.1.6 Himalayan balsam and rhododendron can be repeatedly cut at the stems. This method requires consistent effort over several years. The stems should be cut close to the ground during the growing season.
- 4.2.1.7 Himalayan balsam should be cut down before it can set seed through flowering, helping reduce its spread. This alone may not be enough to eliminate the plant.

Shading

- 4.2.1.8 Himalayan balsam is a photosensitive species, relying on abundant sunlight for rapid growth. Shading involves cutting down the plant close to the ground, and covering the soil with a tarp, heavy-duty plastic sheets, geotextile membranes, cardboard or mulches. Shading should be carried out in early spring before the balsam germinates, targeting the growing season. The covering should be left in place for the entire season (6-12 months) to suppress growth and deplete the seed bank. Monitoring and maintenance should be carried out throughout the entirety of the shading process and includes checking regularly for gaps or damage to the covering, and monitoring for further growth.

Digging

- 4.2.1.9 Rhododendron can be excavated using machinery to remove the plant and its extensive root system. This method, which may require a small excavator, is particularly effective for mature stands and where herbicide use is undesirable. Due to the plant's ability to resprout from root

fragments and cut stumps, complete removal of the root ball is essential. Although this is a more disruptive approach, it can deliver more immediate results with a reduced need for repeated treatments, provided follow-up monitoring is in place to manage any regrowth from residual roots.

- 4.2.1.10 It is important that all aspects of the plant are dug up and removed, including the root mass and the surrounding soil in which the plant is rooted. This can be done at any time of the year, ideally using hand tools.
- 4.2.1.11 Once all plant materials and surrounding soil are removed, all aspects of the plant must then be burnt on site in open air under a D7 exemption, Note, that the D7 exemption must be registered with the Environment Agency at least one week prior to burning. A D7 waste exemption online application can be completed using the following link: <https://www.gov.uk/guidance/d7-waste-exemption-burning-waste-in-the-open>. It is important to consider local byelaws and prevent causing a nuisance through this burning.
- 4.2.1.12 The ashes and any leftover material must then be buried on the site at a minimum depth of 2m. This will reduce the chance of future regrowth. It is necessary to bury the waste in an area that is unlikely to be disturbed. This area must also be more than 7m away from an adjacent landowner's site.
- 4.2.1.13 On-site burning must comply with the restrictions of RPS 178 (<https://www.gov.uk/government/publications/treatment-and-disposal-of-invasive-non-native-plants-rps-178/treatment-and-disposal-of-invasive-non-native-plants-rps-178>) and the guidance from the local fire service.

Option 2: Chemical Control

- 4.2.1.14 Chemical control is a second option for the control of the species and is less invasive than physical removal. It should be noted that chemical treatment is more suited to larger infestations where non-chemical methods are impractical.
- 4.2.1.15 Herbicide must be used only in accordance with the directions on the product label and with all relevant legislation. Any person involved in the professional application of herbicides should possess the appropriate pesticide certificate of competence for the safe use of herbicides and hand-held herbicide applicators.
- 4.2.1.16 Due to Himalayan balsam's preference for habitats near water or high moisture, a Glyphosate or triclopyr-based product which is approved for use near water should be used.
- 4.2.1.17 Spraying programmes should be required for two to three years to eradicate the plant. Records of herbicide use must be kept in accordance with all relevant legislation, e.g. a record must be made of the type, concentration and quantity of herbicide used, the operative's name, weather conditions and date of application. Records must be retained after each treatment.
- 4.2.1.18 If opted to follow the herbicide treatment route, the restrictions of RPS 178 must be complied with. An herbicide agreement with the Environment Agency is not required, however, reading the product labels of any herbicides used and/or contacting the manufacturer for advice is strongly recommended.
- 4.2.1.19 All use of herbicides including stem injection is to be judged at the discretion of an invasive species specialist.

4.3 Site Biosecurity

4.3.1.1 In accordance with the guidance set out by the GB non-native species secretariat (www.nonnativespecies.org/), measures to prevent the spread of non-native invasive species within or off sites with infestation include:

- All site personnel must be fully briefed to ensure all staff are aware of the presence and locations of the invasive plants on the site and how to identify the species. This can be included during a site induction or through toolbox talks. Everybody working on site must understand the role and authority of the invasive species specialist managing the issue of the non-native species.
- Clearly visible fencing must be erected around the areas of non-native invasive species (including contaminated soil, materials or water) and signs to warn site personnel of presence and identification of species within.
- Ensure that vehicle use is kept to a minimum around infestations. Keep to hardstanding where possible.
- Do not use vehicles with caterpillar tracks within infested areas.
- All clothes, footwear and equipment including site vehicles and tools should be checked for plant material and soil before entering/leaving the site.
- All vehicles leaving the infested area and/or transporting infested soil/materials must be thoroughly pressure-washed in a designated wash-down area before being used for other work.
- All wash facilities including wastewater from washing vehicles, equipment or personnel should be managed in a responsible way so as not to cause spreading of the invasive species or harm to the environment.
- Clothes, footwear and equipment should be thoroughly cleaned and ensure no contaminated material is present. Keep equipment on site where practical and free of contaminated material.
- Equipment used to treat invasive species should be kept separate from unused equipment and identifiable through clear signage or designated areas.
- All chemicals used for the control of non-native species (if applicable) should be stored and used in a responsible manner.
- Where cross-contamination is possible (i.e. from one site to another), designated vehicles or machinery must be used for specific sites where possible to prevent spread.
- All plant material will comply with BS 3936 1: 1992, BS 4043:1989 and BS 8545: 2014 or European equivalents. All planting shall be UK-grown and obtained from a reputable and approved nursery. Plant material should be fully hardy and free from pests and diseases.
- Existing and imported multipurpose topsoil shall be confirmed to BS 3882:2015. A Declaration of Analysis sheet should be supplied if requested. If acceptable, topsoil shall be taken from stockpiles on site or imported from an approved source. Imported soil shall be a loam type, according to BS 3882:2015, be free of contamination and contain a

maximum of 15% clay or silt fines. A topsoil sample shall be provided with topsoil structure analysis for general landscape purposes. Topsoil should be free of any part of invasive plants (as identified by the Wildlife and Countryside Act 1981, as amended).

5 References

Environment Agency (2019a). *Treatment and disposal of invasive non-native plants: RPS 178* [online]. Available from: <<https://www.gov.uk/government/publications/treatment-and-disposal-of-invasive-non-native-plants-rps-178/treatment-and-disposal-of-invasive-non-native-plants-rps-178>>.

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Property Care Association (2014). PCA Guidance Note – Management of Himalayan balsam [online]. Available from: <<https://www.property-care.org/wp-content/uploads/2014/12/PCA-Guidance-Note-on-Himalayan-Balsam-Control.pdf>>.

The National Archives (1990). *Environmental Protection Act 1990* [online]. Available from: <<http://www.legislation.gov.uk/ukpga/1990/43/contents>>.

The National Archives (1981). *Wildlife and Countryside Act 1981* [online]. Available from: <<http://www.legislation.gov.uk/asp/2011/6/section/14#section-14-2-a>>.

Appendix 1 - Timetable of Works

Works	J	F	M	A	M	J	J	A	S	O	N	D
Burning of INNS Species	Can be conducted at any time of the year											
Chemical control: Timing is species dependent.			Initial application March/May, subsequent applications June/August and September/November									
Mechanical removal (inc. cutting, digging, and hand pulling) of Himalayan balsam and rhododendron.			Conducted when plants are in flower for easy identification									