

Ecological Impact Assessment

Unit A Finlan Road, Stakehill
Industrial Estate

Presented to: UBS Triton Property Fund

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About Us

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As part of Lucion's group of companies, we can support you with a broader range of holistic services. Through our pool of multidisciplinary experts, we help you navigate complex regulatory frameworks, saving you time and money.

Being part of your sustainable supply chain is a key goal for our team. As a member of the UN Global Compact and a commitment to sustainability, we are the partner of choice for businesses looking to make informed decisions and mitigate risks across your portfolio.

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Non-Technical Summary

Lucion Delta-Simons Ltd (“Lucion”) was instructed by UBS Triton Property Fund (the ‘Client’) to undertake an Ecological Impact Assessment (EclA) of an area of land at Unit A, Finlan Road, Stakehill Industrial Estate, M24 2SJ (hereafter referred to as the ‘Site’), to inform a planning application for the refurbishment and extension of the existing unit (Use Class B2 / B8 and/or E(g)(iii)), with additional service yard space and car parking (the ‘proposed development’). The Site has previously been assessed by Delta-Simons (now Lucion) in 2023 as part of a previous phase of works.

This EclA addresses the potential effects of the Proposed Development on ecology and nature conservation. The Report describes the methods used to assess the effects; the baseline conditions currently existing at the Site and within the immediate surrounding area; the mitigation measures required to prevent, reduce or offset any significant adverse effects and the likely residual effects after these measures have been adopted, as well as any proposed enhancement measures. A summary of residual effects is provided overleaf.

An ecological desk study undertaken in April 2025 identified one internationally designated statutory site within 6 km of the Site, Rochdale Canal Special Area of Conservation (SAC) located at a distance of 650 m west from the Site, one nationally designated statutory site, Rochdale Canal Site of Special Scientific Interest (SSSI), located at a distance of 650 m from the Site and Hopwood Woodlands Local Nature Reserve (LNR), a locally designated statutory site located 1.01 km from the Site. The Site also falls within two Site of Special Scientific Interest (SSSI) Impact Risk Zones (IRZ), that require the Local Planning Authority (LPA) to consult with Natural England on likely impacts on the statutory designated international and national sites. Ten non-statutory designated sites were identified within 2 km of the Site. The closest, Gerard Wood Site of Biological Importance (SBI) is at a distance of 560 m north-east from the Site.

The habitats on Site were surveyed and assessed for their suitability to support protected/otherwise notable species by Delta-Simons on 24th March 2025. The Site covers an area of 2.72 ha and comprises an existing warehouse, with associated hardstanding including access, car parks, footpaths, and service yard. The hardstanding is bounded by a mix of amenity grassland, scattered trees, and dense native scrub. The north-eastern, south-eastern, and part of the south-western boundaries are defined by broadleaved woodland, with a further section in the north-western extent of the Site. The deciduous woodland is a Habitat of Principal Importance (HPI), although no impacts are anticipated. Japanese knotweed and Himalayan balsam were recorded on and off-Site in the woodland to the north-west and north of the Site.

The habitats present on Site are widespread on both a local and national scale, with none of the habitats being considered rare. The proposals will result in the loss of grassland, shrubs and scattered trees on-Site, whilst the woodland and scrub are to be retained. A Biodiversity Net Gain (BNG) assessment has been undertaken and is reported separate to this EclA (Lucion, 2025). Proposed landscaping on Site including the provision of replacement tree planting and creation of species-rich grassland provides benefits for biodiversity, but does not currently achieve the mandatory 10% gain in Biodiversity Units. Therefore, the Client is exploring options for the purchase of off-site units via the private market. As such, any impact resulting from the loss of habitat on Site will be negligible and of neutral significance.

The Site was found to be suitable for nesting birds, foraging/commuting bats, roosting bats in trees and a building, badgers and hedgehog. No further surveys have been undertaken due to the lack of direct impacts on these species as a result of the Proposed Development. Furthermore, it is anticipated that other adverse impacts on these species can be sufficiently addressed through the application of appropriate avoidance, mitigation and enhancement measures.

In addition, whilst the Site was found to be of limited suitability for amphibians, it falls within both the Great Crested Newt (GCN) Strategic Opportunity Area and District Level Licencing (DLL) Amber Impact Risk Zone (IRZ). As such, whilst no further surveys are required, the Proposed Development will be registered under the Natural England GCN District Level Licensing scheme for Greater Manchester prior to the commencement of Site clearance works.

The construction phase will result in the loss of suitable bird nesting habitat including, shrubs and scattered trees. Suitable habitat will be removed either outside the main nesting bird season, or subsequent to a nesting bird check by a suitably experienced ecologist immediately prior to removal. In the operational phase, a suitable management plan (Landscape and Ecological Management Plan (LEMP) or similar) will be in place to ensure habitats are appropriately managed to ensure a negligible effect for birds nesting on Site that is of neutral significance.

Trees within the woodland both on and immediately off-Site had features suitable for roosting bats, however, no works are anticipated in or near to the trees such that further assessment is not necessary at this time. The Site is considered to be of low value for foraging/commuting bats. The woodland edge, scrub and shrubs habitats are suitable for foraging/commuting bats, although it is expected to experience relatively high levels of artificial illumination from streetlights on and adjacent to the Site. Any bats that do make use of the Site are likely to be relatively light-tolerant species only. During the operational phase there is expected to be neutral effects of non-significance since the lighting strategy that will be in place during operation has been reviewed and lux levels at the Site boundaries fall well below the levels required to cause disturbance to more light-tolerant bats species. As such, significant residual effects on bats are not anticipated.

Badgers and hedgehogs, if present, have the potential to be impacted during the construction phase, in particular, during vegetation clearance or from open trenches. As such, measures to protect these species will be outlined within a Construction Environmental Management Plan (CEMP). Furthermore, the LEMP will ensure retained habitats are managed to support foraging these species. As such, significant residual effects are not anticipated.

Japanese knotweed and Himalayan balsam have both been identified on Site and, therefore, appropriate mitigation is required to prevent spread during the construction phase. Providing this mitigation is put in place, it is anticipated that there will be a negligible effect on ecological receptors that is of neutral significance as the invasive species will be removed during the construction phase.

Summary of Residual Effects

Important Ecological Feature	Geographic Value	Characterisation of Unmitigated Impact	Significance Before Mitigation	Avoidance, Mitigation and Compensation	Residual Effect Significance
Designated Sites	International and National	The Site falls into an IRZ (Impact Risk Zone) for which it is recommended to consult NE for the likely impacts of this development, due to its nature and size.	Moderate adverse Significant	Mitigation in relation to the Rochdale SAC and SSSI will be identified as necessary by Natural England. Follow standard pollution prevention guidance and this to be detailed in and secured through a suitable Construction Environmental Management Plan (CEMP).	Negligible Neutral
Habitats	Local	Habitat loss Damage to structure, roots and health of habitat	Minor adverse Non-significant	Adherence to BS5837:2012 Implementation of landscaping strategy. Purchase of off-site Biodiversity Units to achieve mandatory net gain.	Negligible Neutral
Birds	Local	Habitat loss Nest destruction/ disturbance Noise and vibration	Minor adverse Non-significant	Sensitive timing of works and/or watching brief with regards to the removal of, and works within close proximity to, suitable nesting habitat. Creation of new bird nesting habitat in the form of 15 nest boxes	Negligible Neutral
Amphibians	Local	Habitat loss Risk of killing/injury during Site clearance	Minor adverse Non-significant	Proposed Development will be registered under the Natural England Great Crested Newt District Level Licensing scheme for Greater Manchester. Precautionary approach to clearance.	Negligible Neutral

Important Ecological Feature	Geographic Value	Characterisation of Unmitigated Impact	Significance Before Mitigation	Avoidance, Mitigation and Compensation	Residual Effect Significance
Bats	Local	Increased lighting on Site	Minor adverse Non-significant	Suitable lighting plan required to ensure boundary habitat remains suitable for commuting/ foraging. Six bat boxes to be installed in two clusters of three on trees to be retained at the Site	Negligible Neutral
Badgers	Local	Risk of killing/injury during Site clearance Loss of potential foraging habitat	Minor adverse Non-significant	Precautionary approach to clearance Compensatory foraging habitat	Negligible Neutral
Hedgehogs	Local	Risk of killing/injury during Site clearance Loss of potential foraging habitat	Minor adverse Non-significant	Precautionary approach to clearance Compensatory foraging habitat	Negligible Neutral
Invasive species	N/A	Risk of spread	Minor adverse Non-significant	Suitable eradication strategy	Negligible Neutral

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1.0 Introduction

1.1 Purpose and Scope of the Survey

Lucion Delta-Simons Ltd ("Lucion") was instructed by UBS Triton Property Fund (the 'Client') to undertake an updated Ecological Impact Assessment (EclA) of an area of land at Unit A, Finlan Road, Stakehill Industrial Estate, M24 2SJ (hereafter referred to as the 'Site') which was previously assessed by Lucion in 2023 ahead of planned refurbishment and renovation works to the building and landscaping (Lucion report reference 90720.554772).

The purpose of this report is to:

- Establish baseline ecological conditions at the Site.
- Provide details of ecological mitigation measures incorporated through design evolution as an intrinsic part of the project design.
- Detail any ecological mitigation measures to be implemented during Site clearance and construction.
- Identify any residual ecological effects after avoidance and mitigation measures have been considered.
- Identify any compensation measures required to offset residual effects.
- Provide recommendations for how mitigation and compensation may be secured and monitored.
- Set out details of ecological enhancement measures to be included within the Proposed Development.
- Provide sufficient information to determine whether the project accords with relevant nature conservation policies and legislation and, where appropriate, to allow conditions or obligations to be proposed by the relevant authority.

The Site location and the red line boundary and/or survey area are shown in Figure 1.

1.2 Site Description

The Site is centred at Ordnance Survey (OS) grid reference SD 89228 08023, to the north-east of Middleton in Greater Manchester. The Site covers an area of 2.72 ha and comprises an existing warehouse, with associated hardstanding including car parks, footpaths, and service yard. The hardstanding is bounded by amenity grassland, with some scattered trees, and dense native scrub. The north-eastern, south-eastern, and part of the south-western boundaries are defined by broadleaved woodland, with a further section in the north-western extent of the Site.

The Site is bounded by woodland to the north, east and south, with a continuation of industrial land to the west. There is grassland, scrub, woodland and a mosaic of industrial development in the wider surrounds.

The habitats present on Site are shown in Figure 2.

1.3 Proposed Development

It is understood from the drawing provided (Drawing 1) that the Proposed Development will comprise:

The construction phase will comprise:

- Demolition of the existing single storey office projection and service yard canopy/veranda.
- Erection of an extension and alterations to the existing building; and
- A series of physical works to reconfigure the site with new hard and soft landscaping.

The operational phase will comprise:

- Use of buildings for Use Class B2 / B8 and / or E(g)(iii) purposes;
- Management of retained and created habitats in accordance with the Biodiversity Net Gain (BNG) assessment and Habitat Management and Maintenance Plan (HMMP);

2.0 Legislation & Policy Summary

Planning guidelines, international commitments, legislation and planning policies relevant to the protection, conservation and enhancement of nature conservation interests are detailed below.

2.1 National Policy and Guidance

Specific habitats and species of relevance to the Site receive legal protection in the United Kingdom under various pieces of legislation, including:

- National Planning Policy Framework (NPPF, revised 2024);
- The Conservation of Habitats and Species Regulations 2017 (as amended);
- The Wildlife and Countryside Act (WCA) 1981 (as amended);
- The Countryside and Rights of Way (CROW) Act 2000;
- The Natural Environment and Rural Communities Act (NERC) 2006;
- The Hedgerow Regulations 1997;
- The Environment Act 2021; and
- The Protection of Badgers Act 1992.

Where relevant, this assessment takes account of the legislative and policy protection afforded to specific habitats and species. Lucion do not purport to provide specialist legal advice and where necessary the reader should also consult the original legislation, references to which are included in Appendix A.

2.2 Local Policy and Guidance

Local planning policies relating to ecology are generally based on national planning policy, the conservation of species protected under the above legislation and the protection of designated sites. However, relevant local policy and guidance documents are outlined below.

Rochdale Core Strategy 2016

SO4 – To Promote a Greener Environment

1. *Minimising Rochdale's contribution to climate change and mitigating and adapting to its adverse effects;*
2. *Ensuring in particular that development is energy efficient and contributes to carbon reduction;*
3. *Reducing the likelihood of flooding through appropriate flood risk management, especially in Rochdale town centre and parts of Littleborough and Heywood;*
4. *Improving our urban open spaces and making them more accessible;*
5. *Maximising the value of our green open areas and countryside to provide opportunities for recreation, amenity, biodiversity and flood management;*
6. *Minimising and managing waste and managing minerals resources sustainably; and*
7. *Ensuring no detriment to the conservation interests of European and other protected natural sites.*

G7 - Increasing the value of biodiversity and geodiversity.

We will ensure that sites and features of biodiversity and geodiversity importance are given full and appropriate recognition and protection. Opportunities for enhancing biodiversity and geodiversity, creating new sites and features of interest and improving opportunities for public enjoyment will be supported. No development should result in a net loss of biodiversity or geodiversity interest in the borough and overall development in the borough should result in a net gain.

Opportunities to protect, enhance and create features of biodiversity or geodiversity interest should be informed by the detail of any formal designation of a site or area and supporting plans and guidance such as Local Biodiversity Action Plans, Green Infrastructure Strategies and Action Plans and the Council's Biodiversity and Development SPD.

We will expect development proposals and improvements to:

a. Protect and include existing biodiversity (including established biodiversity interest on brownfield land) within new developments, public realm and open spaces and meet the requirements of the Biodiversity and Development SPD, Greater Manchester and Local Biodiversity Action Plans;

b. Protect and enhance existing features such as peatland, ponds, wetlands, reservoirs, mill lodges, trees, hedges, wooded areas, meadows, flora and fauna;

c. Take opportunities to promote biodiversity and create new habitats through new development using landscaping and building and construction features wherever possible (e.g., ponds, species of vegetation, green roofs and walls, bat boxes, roof space, appropriate nest boxes and landscaping);

d. Enhance strategic wildlife corridors and the most natural areas and ensure that habitats and corridors are not fragmented by development;

e. Improve access where appropriate to new or existing biodiversity interest for public enjoyment; and

f. Protect important geology and take opportunities to increase interest and accessibility.

Greater Manchester Biodiversity Action Plan

There is no local Biodiversity Action Plan (LBAP) for Rochdale, but it is covered by the Greater Manchester Biodiversity Action Plan (GM BAP, 2009), which is a collection of species and habitat specific action plans. The overall aim of the action plan is “To promote the conservation, protection and enhancement of biological diversity in Greater Manchester for current and future generations”, and includes the following action plans:

- *Grasslands*
- *Hedgerows*
- *Lowland mosslands*
- *Reedbeds and bittern*
- *Ponds and lodges*
- *Canals*
- *Native woodlands*
- *Uplands: currently no action plan available to download*
- *Urban managed greenspace*
- *Bats*
- *Black redstart*
- *Farmland birds*
- *Great crested newts*
- *Hares*
- *Native black poplar*
- *Twite*
- *Water vole*
- *Willow tit*

3.0 Methodology

The baseline for the EclA has been established through a combination of desk study and field surveys.

3.1 Scope of the Assessment and Zone of Influence

The features considered for this assessment were designated sites, Habitats and Species of Principal Importance for conservation, and species protected by wildlife legislation.

Given the size and location of the Site, the zone of influence was taken to be the Site boundary and its immediate environs only. The exception for this was for designated sites and great crested newt (GCN) *Triturus cristatus* details of the zone of influence for these features is provided in Section 3.2, below.

3.2 Desk Study

3.2.1 Data Search

In March 2025, available records of protected and notable species were collated from the local record centre, Greater Manchester Ecology Unit (GMEU) along with the non-statutory designated sites from within 2 km of the Site centre.

A search for internationally, nationally and locally designated statutory sites for nature conservation was undertaken using the Multi-Agency Geographic Information for the Countryside (MAGIC) website. The search radius was 6 km from the Site centre for internationally designated statutory sites and 2 km from the Site centre for nationally and locally designated statutory sites. A search for non-statutory ancient woodland was undertaken within 2 km of the Site centre, and an assessment was made regarding the location of Habitats of Principal Importance (HPIs) on or near the Site using MAGIC.

A search for species data available on the MAGIC website was undertaken (i.e. granted European Protected Species Licence applications, GCN Class Survey Licence Returns and Natural England GCN Pond Survey Data 2017-2019).

In addition, free and publicly accessible Ordnance Survey maps and aerial photographs were searched for waterbodies on, or within, 500 m of the Site boundary. This information has been used to assess the Site for its potential to support GCN the results of which are found in Section 4.3.

3.2.2 Previous Reports

The previous reports for the Site were reviewed for any pertinent information that may be relevant to this impact assessment. The reports are:

- Lucion Delta-Simons (2023) Stakehill Industrial Estate - Ecological Impact Assessment 22-1358.05; and
- Lucion Delta-Simons (2023) Stakehill Industrial Estate – Biodiversity Net Gain Assessment 90720.

3.3 Preliminary Ecological Appraisal Survey

The habitats on Site, were surveyed on 24th March 2025 by a Lucion ecologist. Since access was not permitted to the surrounding land, it was visually assessed from the Site boundary.

The following was undertaken during the survey:

- Habitats were classified and mapped using the standard JNCC Phase 1 habitat classification and methodology (JNCC, 2010). Dominant plant species were recorded in each different habitat. The plant species nomenclature followed that of Stace (2019).
- Habitats were classified and mapped using the standard UK Habitat Classification and methodology Version 2.0 (UKHab, 2023). Dominant plant species were recorded in each different habitat. The plant species nomenclature followed that of Stace (2019). The list of plant species was compiled in accordance with methodology required to establish UK Habitat Classification types up to at least level 3, and to levels 4 or 5 wherever possible. Care was taken

to accurately record all habitats of priority importance (if present). Secondary codes were added to polygons where deemed appropriate, taking special care to map mandatory codes for habitat mosaic, complex and origin. Survey was undertaken at the fine scale minimum mapping unit (MMU) of 25m² (polygons) and 1m width and 5m long (lines). Key ecological features below the MMU in either area or length were mapped as points; Habitats were classified and assessed in terms of both their conservation importance and potential to support notable and/or protected species, and widespread invasive plants (based on habitat suitability and/or field signs/evidence).

- Habitats on-Site were surveyed for the presence of, or field signs to indicate the presence of protected or notable birds, amphibians, reptiles, mammals and widespread invasive plants. This included an external visual assessment of any trees/buildings on the Site for potential bat roost features and any evidence of bat activity, and an assessment of the Site's suitability to support commuting and foraging bats (Appendix B), in line with Collins (2023).
- If Habitats of Principal Importance (HPIs) under the NERC Act 2006 were found to be present these were recorded. Further, an assessment of any hedgerows at the Site, which will be adversely affected by the proposed development, was undertaken using the hedgerow criteria outlined in the Hedgerow Regulations 1997. The purpose of the assessment was to ascertain whether the hedgerows are classified as 'nationally important' and, therefore, protected under the Hedgerow Regulations 1997. The assessment involves a scoring system which relies on particular features, number of woody and floral species present within the hedgerow habitat, and the age of the hedgerow.

3.4 Survey Limitations

The baseline conditions described in this report were accurate at the time at which the survey was undertaken. Should at least two years pass by, and/or conditions on Site/Site usage change prior to the commencement of works, an update survey should be undertaken.

3.4.1 PEA Survey

At the time of the survey, Lucion was not able to access certain areas of the Site/and those within areas immediately surrounding the Site due to recently installed fencing. Thus, any observations and results relating to these areas within the Site have been made via observations made from areas within the Site boundary or public highways.

One of the areas which could not be fully accessed was the woodland in the south of the Site. This area was previously accessed in 2023, when a number of trees suitable to support roosting bats were recorded. These trees could not be reassessed in 2025, however, this is not considered to be a significant constraint given that no works are proposed to remove trees within this area.

There were no further limitations to the survey in terms of access, timing and weather conditions.

3.5 Ecological Impact Assessment Methodology

An ecological impact assessment has been carried out following the principles set out within the Guidelines for Ecological Impact Assessment (EclA) in the UK and Ireland; Terrestrial, Freshwater, Coastal and Marine updated by the Chartered Institute of Ecology and Environmental Management (CIEEM) in 2019, the full details of which are provided in Appendix C.

4.0 Baseline Conditions

The following section describes the baseline ecological conditions at the Site, outlining the results of the desk study and field survey findings. Current management is anticipated to remain unchanged up until development and, therefore, baseline conditions at the time of writing this Report are anticipated to reflect those at the commencement of the Proposed Development. The conservation importance of the features identified have been evaluated using the geographical scale outlined in Appendix C.

The pertinent information from the data search is set out in section 5.1 below for designated sites, whilst data search records and any information gathered from previous reports for the species are discussed in the relevant species sections. Full results of the data searches are available to the Client on request.

4.1 Desk Study

4.1.1 Designated Sites

The results of the MAGIC data search and the GMEU desk search indicate:

- One internationally designated statutory site within 6 km of the Site centre;
- One nationally designated statutory site within 2 km of the Site centre;
- One locally designated statutory site within 2 km of the Site centre; and
- Twelve non-statutory designated sites within 2 km of the Site centre. These were all Sites of Biological Importance (SBIs).

Tables 1, 2 and 3 below, set out the statutory and non-statutory designated sites identified and considered relevant to the Site. The designated sites identified are also shown in Figure 3. The full list of locally important non-statutory is not presented below, as due to the Site's size, nature and location, only those shown in Table 3 were screened in for further consideration within this report.

Table 1 - International Statutory Designated Sites within 6 km of the Site

Site Name	Designation	Distance and Direction from Site Boundary	Designation Criteria Summary
Rochdale Canal	Special Area of Conservation (SAC)	650 m west	Annex II species that are a primary reason for selection of this site: Floating water-plantain <i>Luronium natans</i> - Rochdale Canal supports a significant population of floating water-plantain <i>Luronium natans</i> in a botanically diverse waterplant community which also holds a wide range of pondweeds <i>Potamogeton</i> spp. 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.

Table 2 - Local and National Statutory Designated Sites within 2 km of the Site

Site Name	Designation	Distance and Direction from Site Boundary	Designation Criteria Summary
Rochdale Canal	Site of Special Scientific Interest (SSSI)	650 m west	The Rochdale Canal contains important habitats for submerged aquatic plants and emergent vegetation, including extensive colonies of the nationally scarce SAC species floating water plantain. The site also supports a diverse assemblage of aquatic flora, notably its assemblage of pondweeds, <i>Potamogeton</i> sp; the nine species of which found in the canal represent a balanced community which reflects the quality of water.
Hopwood Woodlands	Local Nature Reserve (LNR)	1.01 km west	The reserve is made up of a number of smaller woodland areas around the grounds of Hopwood Hall. The woodland habitats vary and there are also a number of toads and birds.

Table 3 - Non-Statutory Designated Sites within 2 km of the Site

Site Name	Designation	Distance and Direction from Site Boundary	Designation Criteria Summary
Gerrard Wood	Site Biological Importance (SBI)	560 m north-east	No citation provided
A627M by Tandle Hill	SBI	630 m north-east	No citation provided
Rochdale Canal (Scowcroft to Warland)	SBI	650 m west	No citation provided
Tandle Hill Country Park	SBI	900 m east	No citation provided
Lords Wood	SBI	1.01 km west	No citation provided
Hopwood Clough	SBI	1.22 km west	No citation provided
Scowcroft Reservoir	SBI	1.44 km south-west	No citation provided
Rochdale Canal: Lock at Scowcroft Farm to Stott's Lane	SBI	1.4 km south	No citation provided
River Irk Marsh	SBI	1.47 km south-west	No citation provided
Oozewood Flushes	SBI	1.57 km east	No citation provided
Glade & Oaken Bank Woods	SBI	1.64 km west	No citation provided

Higher Clough	Boarshaw	SBI	1.66 km south-west	No citation provided
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4.1.2 SSSI Impact Risk Zones

The Site falls within the SSSI Impact Risk Zones (IRZ) for Rochdale Canal SSSI, located 650 m west of the Site boundary, that requires the Local Planning Authority (LPA) to consult with Natural England and assess planning applications for likely impacts on SSSIs/SACs/SPAs and Ramsar sites due to the following:

Water Supply: Large infrastructure such as warehousing/industry where net additional gross internal floorspace is > 1,000m² or any development needing its own water supply.

Discharges: Any discharge of water or liquid waste of more than 2m³/day to ground (ie to seep away) or to surface water, such as a beck or stream.

4.1.3 Priority Habitats

The MAGIC data search also provided information regarding Priority/HPI habitats on and around the Site. The MAGIC Maps suggests that there are Priority/HPI habitats on Site and immediately off-Site in the form of deciduous woodland.

4.1.4 Review of Previous Surveys

The previous EclA, undertaken by Delta-Simons (now Lucion) in 2023, found the Site to be in a similar condition to how it is currently, with the notable exceptions being the larger building prior to re-cladding and reduction in height of the office unit, as well as the loading bay cover, in addition to the presence of areas of ornamental planting and trees which have since been removed and re-turfed. The recommendations made included further assessment for bats as well as precautionary mitigation measures for nesting birds, amphibians, badgers and hedgehogs. The assessment highlighted several areas of invasive species both on and off-Site with recommendations made for removal.

The BNG assessment undertaken by Delta-Simons (now Lucion) in 2023, using version 4.0 of the Metric, highlighted that the proposed scheme could achieve a net gain of +13.39% (+0.80 units) based on the site development plans and landscaping plans available at the time of the assessment. It was proposed that the net gain could be achieved by enhancing the woodlands through removal of the invasive species.

4.2 Habitats

Figure 2 shows the extent of habitat types and boundary features. Descriptions of the habitat types and dominant plant species found at the Site are provided below. Habitat descriptions and codings are as listed in the UK Habitat Classification: Habitat Definitions Version 2.0 (UKHab Ltd, 2023). A condition assessment is provided for the relevant habitats below.

Photographs of the Site survey are located in Appendix E.

Habitats recorded on Site are:

w1g – Other broadleaved woodland (37, 47, 49, 80)c

The northern boundary of the Site was defined by lowland deciduous woodland, and showed on MAGIC as Deciduous Woodland HPI (Photograph 1). Species included ash *Fraxinus excelsior*, birch *Betula pendula*, oak *Quercus robur*, cherry *Prunus* sp., beech *Fagus sylvatica* and sycamore *Acer pseudoplatanus*, whilst holly *Ilex aquifolium* and hawthorn *Crataegus monogyna* were included within the understorey along with an isolated area of willow *Salix* sp., within an area not able to be fully assessed. The woodland was well developed, with trees ranging from mature to young, and saplings all recorded. The ground flora included bluebells *Hyacinthoides non-scripta*, pink purslane *Calytonia sibirica*, snowdrops *Galanthus* sp., wild garlic *Allium ursinum*, daffodils *Narcissus* sp., and wood speedwell *Veronica montana*. The woodland had standing and fallen deadwood, but did show signs of anthropogenic disturbance.

Also recorded within the understorey was a large stand of Japanese knotweed *Reynoutria japonica*, located in the northern extent of the woodland (Photograph 2), in addition to Himalayan balsam.

The area of woodland was assessed as being of Moderate condition. This was reduced due to the presence of an invasive species.

A continuation of the woodland was recorded down the southern boundary of the Site, with oak, beech and sycamore recorded (Photograph 3). The understorey was dominated by common ivy *Hedera helix*, with occasional ferns *Polystichum* sp. recorded. The woodland contained mature and semi-mature specimens with standing deadwood and young oak saplings. There was no sign of management or disturbance.

The woodland in the southern extent of the Site was previously assessed as being Good condition. However, access was not possible at the time of the walkover due to new fencing associated with the retaining wall, therefore it is assumed there has been no degradation in habitat condition.

h3h – Mixed Scrub (11, 47, 77)

Mixed native scrub defined the western boundary of the Site (Photograph 4). Species included frequent hawthorn *Crataegus monogyna*, dogwood *Cornus sanguinea*, with occasional gorse *Ulex europaeus*, common broom *Cytisus scoparius*, honeysuckle *Lonicera periclymenum*, dog rose *Rosa canina*, and rare cherry laurel *Prunus laurocerasus*. There were scattered mature hawthorn, silver birch and ash within the scrub. The scrub showed little sign of management beyond trimming works on the edges. The scrub had a defined edge bordering the recently installed modified grassland which replaced the previously recorded ornamental shrubs.

The mixed scrub was assessed as being in Moderate condition.

g4 – Modified Grassland (11, 47, 64, 75)

The centre of the Site was defined by a large area of modified grassland, in addition to small pockets bordering areas of the car park, managed for its amenity value (Photograph 5). The species diversity was poor, with abundant perennial ryegrass *Lolium perenne*, red fescue *Festuca rubra*, Yorkshire fog *Holcus lanatus*, with flowering species included white clover *Trifolium repens* and there were extensive mosses *Bryophyte* sp within the grass sublayer. Some areas of the grassland was waterlogged at the time of the survey, and the sward height was < 5 cm.

There were several areas of re-turfed grassland which had replaced the ornamental scrub around the carpark, and had a variation in species composition being dominated by Yorkshire fog and annual meadow grass *Poa annua* however were managed in accordance with the retained grassland.

The modified grassland was assessed as being in Poor Condition.

u1b – Developed Land, Sealed Surface

The majority of the Site was defined by hardstanding, primarily used as car parking (Photograph 6), with a large concrete yard areas in the northern and southern extents of the Site, and paved footpaths around the building.

The hardstanding does not require a condition assessment.

u1b5 – Buildings

A large warehouse dominated the eastern area of the Site (Building 1, Photograph 7), and was a combination of brick and corrugated metal framed walls with a multi-pitched metal sheet roof. A second building was located in the northern extent of the Site, comprising a single storey brick-built plant room, with a flat felt roof and soffit boards (Building 2, Photograph 8). A third structure, a metal storage tank (Building 3, Photograph 9) was located adjacent to Building 2. In addition, a substation was recorded on the north-eastern boundary of the Site (Photograph 10).

The buildings do not require a condition assessment.

Scattered Individual Trees

There were scattered trees within the grassland in the south-western extent of the Site, which included small-leaved lime *Tilia cordata* (Photograph 11) in addition to ash, birch, oak, sycamore and willow *Salix* sp.

Individual condition assessments for the trees/tree groups can be found appended to the BNG report, however all scattered trees on-Site were recorded as Moderate condition.

4.3 Species

4.3.1 Amphibians

There were four records of Great Crested Newt (GCN) *Triturus cristatus* within 2 km of the Site in the past ten years. The closest and most recent of which was 1.1 km west of the Site boundary in 2024, separated by industrial land, the Rochdale Canal and the A664. There were two records of common toad from 2020, 930 m west of the Site boundary. There were no granted EPSLs for GCN or licence return data for the species within 2 km of the Site. The southern extent of the Site falls within a fringe area for GCN Strategic Opportunity Areas, and the Site falls within the Amber Impact Risk Zone (IRZ) for the Natural England led District Level Licencing (DLL) scheme.

There were no waterbodies on-Site, and the terrestrial habitat on-Site suitable for amphibians was limited to the boundaries of the Site with woodland and scrub offering the most suitability, whilst the modified grassland offers reduced suitability due to the current management prescription and fragmentation around the carpark.

There were seven ponds within 500 m of the Site, five of which are recreational angling ponds, limiting opportunities, and located beyond Stakehill Lane to the north-east. The other two ponds were located at distances of 280 m south-east and 65 m west from the Site but are considered fragmented from it by roads and hardstanding industrial building yards. None of the ponds could be accessed at the time of the survey.

Whilst the Site offers limited suitability for amphibians, in addition to low number of records, the placement of the Site within both the GCN Strategic Opportunity Area and DLL Amber IRZ present a constraint during the proposed works.

The Site is considered to be of Local Value to amphibians

4.3.2 Reptiles

There were no records of common reptile species within 2 km of the Site in the past ten years. The Site lacks the overall structural mosaic of habitats required to support reptiles, however, the woodland and scrub at the Site offer suitable foraging/ sheltering habitat for reptiles if present in the local areas, whilst the short-mown grassland may offer basking opportunities, albeit fragmented across the Site.

The lack of records and limited suitable habitat on-Site make it unlikely that reptiles would utilise the Site, and as such are not considered a constraint and are not mentioned further in this report.

4.3.3 Birds

There were several records of protected species of birds within 2 km of the Site in the past ten years. Birds currently listed of the Red List on the Birds of Conservation Concern 5 (BoCC5) (Stanbury *et al.*, 2021) that may utilise the habitats on-Site include, house sparrow *Passer domesticus*, tree sparrow *Passer montanus*, willow tit *Parus montanus*, , song thrush *Turdus philomelos*, and starling *Sturnus vulgaris*. Two species of birds listed on Schedule 1 of the WCA 1981 (as amended) were recorded, kingfisher *Alcedo atthis*, and barn owl *Tyto alba*, neither of which are likely to utilise the habitats on-Site and are not considered further in this Report.

The woodland, scrub and shrubs/ scrub provide suitable nesting habitat for species of birds, whilst the grassland provides foraging habitat. Old nests were observed within the woodland and scattered trees on Site indicating the Site is used by nesting birds.

Bird species recorded at the time of the survey included robin *Erithacus rubecula*, magpie *Pica pica*, and song thrush *Turdus philomelos*. It should be noted that this is not a comprehensive inventory of the bird species which may be present at the Site.

The Site is considered to be of Local Value to nesting birds.

4.3.4 Bats

Data records indicated that at least four species of bats were recorded within 2 km of the Site in the past ten years, including:

- Twenty-four records of common pipistrelle *Pipistrellus pipistrellus* within 2 km of the Site between 2015 and 2022, the closest record was 178 m east of the Site boundary in 2017 and was of an emergence during a nocturnal survey (planning reference 17/00786/HOUS). The most recent record was in 2022 approximately 1.65 km west of the Site boundary relating to two day roosts at Hopwood Hall;
- Three records of brown long-eared bat (BLE) all from 2022 approximately 1.65 km west of the Site boundary at Hopwood Hall, relating to satellite roosts with a peak count of three individuals;
- Five records of a noctule bats, the closest of which was 430 m west of the Site boundary in 2020, whilst the most recent record was located 1.65 km west of the Site boundary in 2022 at Hopwood Hall;
- One record of Daubenton's bat located 1.65 km west of the Site boundary in 2022 at Hopwood Hall; and
- Three records of pipistrelle species *Pipistrellus sp.*, between 2015 and 2020, the closest and most recent of which was 500 m north of the Site boundary.

There was a single granted EPSL within 2 km of the Site, EPSM2010-2397, located 1.53 km west of the Site boundary, which allowed for the destruction of resting and breeding site.

Preliminary Roost Assessment

An updated habitat assessment undertaken on 24th March 2025, identified trees to offer roosting potential for bats, all of which are located within the woodland surrounding the Site, with two trees located immediately off-Site to the north and a single tree, identified in 2023 located within the woodland to the south, however, could not be re-assessed in 2025 due to access restrictions. The trees were previously assessed as offering Low Bat Roost Potential (BRP), which in current BCT guidance would amount to PRF-I.

No buildings on-Site had features suitable for roosting bats, Building 2 was previously assessed to offer Low BRP, including missing mortar in brickwork and gaps into the soffits and through the door. However, refurbishment works since the 2023 survey have removed these features. It is unclear whether the works were done under a precautionary approach.

Preliminary Commuting and Foraging Habitat Assessment

A preliminary habitat assessment undertaken on 24th March 2025, identified that the Site provided suitable foraging and commuting habitats for bats and good connectivity to the wider landscape. The woodland edge on and immediately off-Site will likely function as a commuting corridor for species of bats and is well connected to suitable habitat to the north, east and south of the Site, with multiple foraging opportunities. The grassland and scrub on-Site could offer further foraging opportunities for species of bats. The Unit was not in use and the Site was unlit at the time of the survey however it is likely subject to light spill from the wider area with intermitted light spill.

The Site is considered to be of Local value to foraging, commuting and roosting bats.

4.3.5 Badgers

There were 10 records of badgers *Meles meles* within 2 km of the Site centre in the past ten years, details of which are confidential for welfare reasons, however, the Site falls within an area of increased badger probability.

No evidence of badgers was recorded on-Site at the time of the survey; however, mammal runs were noted across the Site within the shrubs and scrub. Furthermore, access to the north-eastern woodland strip immediately off-Site was not possible due to the retaining wall meaning potential setts could have been missed. The Site is functionally connected to further suitable habitat for badgers in the local area, with a continuation of scrub and woodland off-Site.

The Site is considered to be of Local value for badgers.

4.3.6 Other Protected or Otherwise Notable Species

There were ten records of West European hedgehog *Erinaceus europaeus*, within 2 km of the Site boundary in the past ten years, with the majority coming from residential areas. The habitats on-Site considered suitable for the species, and it is likely that they utilise the habitats across the wider industrial estate for foraging, commuting and nesting.

The Site is considered to be of Local Value to hedgehogs, whilst brown hare are not considered to be a constraint and are not mentioned further in this report.

4.3.7 Invasive Species

No records of invasive species were provided in the data search; however, Japanese knotweed was recorded on the northern and eastern boundary of the Site (TN1). There were several stands in the northern extent of the Site, including the following:

- New growth on-Site located between Building 2 and 3 (Photograph 12), located at Grid Reference SD 89214 08126;
- A stand consisting of 10 stems, to the east of Building 2 on the other side of boundary fence, measuring 4 m² (Photograph 2), located at Grid Reference SD 89225 08132;
- A large off-Site stand in the woodland to the north consisting of 20+ stems, measuring 24 m² (Photograph 13), located at Grid Reference SD 89189 08134; and
- A large stand of knotweed adjacent to the north-eastern boundary, which consisted of 30+ stems, measuring 75 m² (Photograph 14), located at Grid Reference SD 89245 08121.

Furthermore, the basal form of Himalayan balsam *Impatiens glandulifera*, was identified within the woodland to the north of the Site (TN2, Photograph 15), located at Grid Reference SD 89206 08131.

As the woodland in the south of the Site could not be accessed during the 2025 survey, there is a chance that stands of invasive species are present within this area, however, no stands were noted during the 2023 survey.

4.4 Summary of Important Ecological Features and Geographic Value

The species scoped out as important ecological features above due to their likely absence from Site cannot experience effects from the Proposed Development and are not therefore considered below.

The 'important ecological features' identified above with the potential to experience effects as a result of the Proposed Development are listed in Table 4 below, along with their geographic importance. These features will be the subject of the ecological impact assessment in section 5.0.

Table 4 - Identified Important Ecological Features

Important Ecological Feature	Geographic Value
Designated Sites	International, National and Local
Habitats	Local
Amphibians	Local
Bats	Local
Nesting Birds	Local
Badgers	Local
Hedgehogs	Local

Invasive Species	N/A
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5.0 Assessment of Effects

The evaluation in this section is based on the baseline information presented above, review of design proposals, consultation with the design team, knowledge of likely construction practices to be employed, and reasonable assumptions regarding operation.

For purposes of the assessment, it is assumed there has been no change in the condition of the Site since the Site surveys (unless otherwise stated).

5.1 Important Ecological Features for Which No Effect is Anticipated

The development of the Site as an extension to an existing warehouse facility which will not result in increased disturbance to the local/ regional statutory and non-statutory designated sites identified. The closest of these sites, Gerrard Wood SBI, located 560 m north-east of the Site boundary, and is fragmented from the Site by the A627M. As such, designated sites are not considered further within this report.

5.2 Important Ecological Features and Potential Effects

5.2.1 Designated Sites and Adjacent Habitats

Potential Impacts and Effects During Construction and Operation

Rochdale Canal SAC and SSSI is located 650 m west of the Site boundary at its closest point and the Site falls within the SSSI IRZ for the site. There is potential impact on water supply from warehousing/industry where net additional gross internal floorspace is > 1,000m² and also from discharge of water or liquid waste of more than 2m³/day to ground (i.e. to seep away) or to surface water, such as a beck or stream. However, given the proposals are for an extension to the current building/ service area and the use of the Site will remain the same following the proposed works, such that there are not anticipated to be any significant impacts on the designated sites in the zone of influence, furthermore, there will be no increased recreational impacts on them given the Site's continued industrial use.

There is potential for a pollution event on-Site during the construction phase of works to impact upon the Rochdale Canal SAC and SSSI.

Without mitigation in place the impacts are moderate adverse and therefore, significant.

Avoidance and Mitigation

During Construction

To limit the potential for pollution impacts on the Rochdale Canal SAC and SSSI, best practice measures must be put in place. All works will be undertaken in accordance with the UK government's 'Pollution Prevention for Businesses' guidance (www.gov.uk), and regular dampening down practices to reduce the dust deposition. These measures will be detailed in and secured through a suitable Construction Environmental Management Plan (CEMP).

During Operation

The requirement for mitigation due to potential impacts on water supply/ runoff on designated sites will be determined by Natural England.

Necessary mitigation will ensure that any impact is neutral and, therefore, not significant.

Assessment of Residual Effects

Following the implementation of avoidance, mitigation, and compensation, any impacts upon designated sites will be neutral/ minor adverse and non-significant during both the construction and operational phases of the development.

5.2.2 Habitats

Potential Impacts and Effects During Construction and Operation

The habitats present on Site are widespread on both a local and national scale, with none of the habitats being considered rare. The woodland on Site qualifies as HPI for nature conservation and provides habitat for a range of species of mammals, birds, and invertebrates.

The development proposals will result in the permanent loss of the majority of the grassland on-Site habitat during Site clearance, in addition scattered trees, though it is understood that the majority of boundary vegetation, including the woodland and scrub will be retained. This loss of biodiversity on Site is unlikely to be significant in isolation. However, there is the potential for a cumulative loss of biodiversity when taken into consideration with other developments in the area and this could result in a significant negative effect on local biodiversity.

In the absence of protection during construction there is the potential for negative effects upon any retained habitats (e.g. scattered trees) due to physical harm from Site clearance/construction works such as damage from machinery. For example, any construction works within proximity to the retained trees have the potential to cause damage to the structure, roots and health of the trees.

Further, if habitats retained during construction are not managed appropriately during operation, then there is the potential for additional biodiversity loss from the Site. Inappropriate management of the soft landscaping during the operation of the development also has the potential to result in a reduction of biodiversity value, and failure to meet the ecological objectives for the Site.

Without mitigation the habitats may be damaged/contaminated during the construction phase impairing their functionality and value to wildlife.

Given that the habitats to be lost are common in the local area and the likely low scale of the impacts, this is considered to have a minor adverse effect that is not significant.

Avoidance and Mitigation

During Construction

Retained habitats can be adequately protected during the construction phase of works via a suitable CEMP (or similar). Trees to be retained following the development will receive appropriate protection during the construction phase of works through the use of tree root protection zones and barriers in accordance with BS5837: 2012 Trees in relation to design, demolition, and construction, where appropriate.

During Operation

A HMMP will be in place in order to ensure retained habitats are managed for the benefit of biodiversity for at least the next 30 years.

Assessment of Residual Effects

A Biodiversity Net Gain (BNG) assessment has been undertaken and is reported separate to this EclA (Lucion, 2025). Proposed landscaping on Site including the provision of replacement tree planting and creation of species-rich grassland provides benefits for biodiversity, but does not currently achieve the mandatory 10% gain in Biodiversity Units. Therefore, the Client is exploring options for the purchase of off-site units via the private market. As such, any impact resulting from the loss of habitat on Site will be negligible and of neutral significance.

The potential residual effects during construction and operation are considered to be minor adverse and non-significant.

5.2.3 Birds

Potential Impacts and Effects During Construction and Operation

The construction phase will result in the loss of scattered trees and scrub within and adjacent to the grassland. There is, therefore, potential for direct adverse effects on nesting birds that are permanent in nature as a result of such works.

In addition, construction works being carried out within proximity to nesting birds may affect them indirectly, depending on the works being carried out, and the species of bird affected. Noise and vibration disturbance effects may result in birds being repeatedly flushed off nests, causing disruption to feeding activity, or even abandonment of nests. This is considered to be a temporary impact.

Further to the potential direct effects on birds whilst they are actively nesting, the removal of suitable vegetation will result in the direct loss of available bird nesting habitat, as well as a loss of foraging opportunities.

During Operation

During operation, if habitats retained and/or planted during construction are not managed appropriately during operation, then there is the potential for additional biodiversity loss from the Site.

The loss of available bird nesting and foraging habitat on Site is unlikely to be significant in isolation. However, there is the potential for a cumulative loss of biodiversity when taken into consideration with other developments in the area and this could result in a significant negative effect on local biodiversity.

Without mitigation there is considered likely to be a minor adverse non-significant effect on birds at a local level.

Avoidance and Mitigation

During Construction

Where practicable, vegetation clearance at the Site will be undertaken outside of the main nesting bird season (i.e., clearance carried out between September and February inclusive). Conflict with the development can be avoided by managing the land to discourage nesting birds up to the works commencing.

If these works cannot be restricted to within this period, an Ecological Watching Brief will be maintained during the main bird breeding season to ensure that no nesting birds are adversely affected. This will entail checking all suitable habitat for nesting birds due to be removed, and a buffer of at least 10 m beyond that area, by a suitably qualified ecologist prior to the commencement of works. If, during the Ecological Watching Brief, birds are found to be within the area due to be cleared or the buffer zone, measures to prevent any disturbance to breeding birds, including the cessation of tree and vegetation clearance, or construction works in areas close to breeding sites until the birds have completed breeding, will be put in place until the chicks have fledged.

During Operation

A HMMP will be in place in order to ensure retained habitats are managed to maximise foraging opportunities for birds, and to prevent destruction or damage to nests in-use, for at least the next 30 years.

Assessment of Residual Effects

Subsequent to the application of avoidance and mitigation, the residual effects are considered to be neutral and not significant.

Compensation

To reduce the net loss of bird breeding habitat on Site, additional tree, shrub and hedgerow planting at the Site post development should be implemented to provide opportunities for nesting and foraging birds. Furthermore, it is proposed to include bird box provision for species known to occur within the local area that are of conservation concern.

5.2.4 Amphibians

Potential Impacts and Effects During Construction and Operation

During Construction

The Site falls within both the GCN Strategic Opportunity Area and DLL Amber IRZ. The woodland and scrub are to be retained as part of the proposed development, with the construction phase resulting in areas of grassland. However,

there remains a risk of individuals being present within suitable on-Site terrestrial habitats during the construction phase of works, including habitat removal, stockpiling of materials, and movement of machinery in and around suitable terrestrial habitat. Therefore, direct adverse impacts upon GCN are possible during the construction phase of the Proposed Development through the killing/injuring of individuals. Furthermore, there is also the direct risk of harm to GCNs and other amphibian species should they fall into pits or trenches left open overnight during the works. Should GCNs become trapped they may be at greater risk of predation, starvation and susceptibility to adverse weather conditions.

In the absence of mitigation, potential direct impacts and the loss of habitats suitable to support amphibians within the Site is considered likely to result in a minor adverse effect that is non-significant.

During Operation

There exists the direct risk of harm to GCNs and other amphibian species should they access the Site and fall into drains or gullies during the operational phase of the Proposed Development. Should GCNs become trapped they may be at greater risk of predation, starvation and susceptibility to adverse weather conditions.

In the absence of mitigation, potential direct impacts during the operational phase of the Proposed Development is considered likely to result in a minor adverse effect that is non-significant

Avoidance and Mitigation

During Construction

The Proposed Development will be registered under the Natural England GCN District Level Licensing scheme for Greater Manchester prior to the commencement of Site clearance works. As a consequence, no further survey work or mitigation for GCN will be required.

However, as best practice, clearance of any suitable habitat will be undertaken with an awareness for the potential presence of amphibians and any individuals found should be caught with gloved hands and moved to an alternative suitable habitat away from the proposed works.

During the construction phase of works, no open pits or trenches will be left uncovered or alternatively without an escape ramp overnight. This measure will be secured through implementation of a CEMP:Biodiversity.

During Operation

In order to mitigate against amphibian species becoming trapped ACO Wildlife Kerbs, or similar, should be used in conjunction with all new gully pots installed within the Proposed Development.

Assessment of Residual Effects

Subsequent to the application of avoidance and mitigation, the residual effects upon amphibians are considered to be neutral and not significant.

5.2.5 Bats

Potential Impacts and Effects During Construction and Operation

During Construction

The Site provides low quality foraging and commuting habitat for local bat species through the connectivity of the woodland and scrub with further opportunities within adjacent habitats. The Site is currently subjected to low levels of light spill from adjacent habitats, which may deter less light-tolerant bat species.

There are trees on-Site and in close proximity to the Site boundary which could offer roosting opportunities for bats, though no works are proposed on the trees identified within woodland both on and immediately off-Site and given their locations, any disturbance during construction will be minimal, such that the potential to lose roosting sites has not been

considered further. Should plans change and the trees require felling or maintenance works, further surveys will be required.

During Operation

Without mitigation in place there is potential for increased lighting on-Site during the operational phase of works which could deter further bats from utilising the Site.

Without mitigation there is considered likely to be a minor adverse non-significant effect on bats at a local level.

Avoidance and Mitigation

During Construction

The boundary woodland and scrub will be retained and protected during construction which will continue to provide suitable foraging and commuting habitat across the Site and into the wider landscape for bats.

The construction phase of works has the potential to result in temporary disturbance to bats through increased lighting, noise, and vibration, both on foraging and commuting corridors. However, it is anticipated that during the main active bat season (April-October, inclusive), construction works will generally cease, or be winding down before dusk when bats emerge and will not begin before dawn when bats return to roosts. Therefore, generally additional artificial lighting will not be required, and there are not anticipated to be any negative effects upon bat foraging and commuting behaviour from noise across the Site since construction works will not coincide with the timing of bat activity.

In certain circumstances, for example, in late autumn or early spring when daylight hours are limited but weather conditions may be suitable for bats to be active, there may be a brief overlap between bat activity and on-Site construction works. During this period, lighting may be required to enable the construction works to progress, and this along with any associated noise, may temporarily alter bats foraging and commuting activity across an area of the Site. However, the combined effects of lighting and noise from construction works during these occasional circumstances would only be a temporary deterrent to foraging and commuting bats in a concentrated area, and not across the wider Site and this is not anticipated to have any adverse impact upon bats.

During Operation

In order to prevent any impacts to more light tolerant species of bat, the detailed lighting plan on-Site should be functional and directional and in line with current guidance (BCT and ILP, 2018). Habitat retained, enhanced or planted for roosting, foraging and/or commuting bats will need to be considered within a suitable lighting plan in order to be used by bats. Where designing with bats in mind:

- Light emitting diodes (LED) should be used, as these typically feature no UV component and as a result are less attractive to invertebrates and less disturbing to bats;
- Only luminaires with 0 % upward light ratio should be used and fitted on the horizontal to avoid excessive up-lighting, back lighting and light spill onto boundary hedgerows and trees;
- A warm white spectrum (ideally under 2700 Kelvin) should be used in order to reduce blue light component, therefore reducing the number of invertebrates attracted to the lights;
- Internal luminaires can be recessed where installed in proximity to windows to reduce glare and light spill;
- The use of specialist bollard or low-level downward directional luminaires to retain darkness above can be considered, although this has certain drawbacks and should only be used as directed by a lighting professional;
- Column heights should be carefully considered to minimise light spill;
- Any external security lighting should be set on motion-sensors and short (e.g. 1 minute) timers;
- Luminaires should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats;

- As a last resort, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed; and
- Where habitat needs to be unlit (e.g. important foraging and commuting corridors/roost sites), illuminance should be below 0.2 lux on the horizontal plane and below 0.4 lux on the vertical plane.

Assessment of Residual Effects

Subsequent to the application of avoidance and mitigation, the residual effects are considered to be neutral and not significant.

5.2.6 Badgers and Hedgehog

Potential Impacts and Effects During Construction and Operation

During Construction

There is potential for badgers and hedgehog to use the woodland edge and scrub for commuting, whilst the grassland could offer foraging opportunities, in addition to the Site falling within an area of increased badger probability. Whilst no setts were recorded on-Site, badgers could make use of the Site and adjacent woodland for digging setts and, therefore, have potential to be disturbed during Site clearance works and be affected subsequent to Site clearance by a loss of foraging, commuting, and sheltering habitat.

During Operation

During operation if the retained and created habitats are not managed accordingly, there is a risk of further losses of foraging availability for both badgers and hedgehogs.

Without mitigation this would have a minor adverse effect on badgers that is non-significant.

Avoidance and Mitigation

Clearance of any suitable habitats will be undertaken with an awareness for the potential presence of badger setts. Any hedgehogs found should be caught with gloved hands and moved to an alternative suitable habitat away from the proposed works. If badgers are suspected during clearance works, all works must cease, and a suitably qualified ecologist contacted.

During the construction phase of works, no open pits or trenches will be left uncovered or alternatively without a mammal escape ramp overnight. This measure will be secured through implementation of a Construction Environmental Management Plan (CEMP).

During Operation

A HMMP will be in place in order to ensure retained habitats are managed to maximise foraging and sheltering opportunities for badgers and hedgehogs, for at least the next 30 years.

Assessment of Residual Effects

The potential residual effects are expected to be neutral and, therefore, non-significant.

5.2.7 Invasive Plants

Potential Impacts and Effects During Construction and Operation

Japanese knotweed and Himalayan balsam have been recorded at the Site and immediately off-Site, and in the absence of mitigation, could be spread beyond the Site boundary (an offence under WCA 1981) during clearance works. Furthermore, the presence of knotweed in such close proximity to Building 2 and 3 could jeopardise them structurally.

In addition, there is a chance that these species could be present within the woodland in the south of the Site.

Avoidance and Mitigation

During Construction

An eradication plan will need to be put in place to remove all Japanese knotweed and Himalayan balsam as soon as possible, but at least during the Site enabling works. This should involve a competent invasive species contractor undertaking a thorough check of the on-Site woodland, including the area in the south which could not be fully inspected in 2025.

During Operation

Provided the eradication plan is effective there are not expected to be any effects as a result of Japanese knotweed post-construction. A HMMP will be in place to ensure retained and newly created landscapes are managed with an awareness of Japanese knotweed and other invasive species in mind.

Assessment of Residual Effects

Subsequent to the application of mitigation, the residual effects are considered to be negligible and not significant.

5.3 Cumulative Effects

Given the nature of the development and the non-significant residual effects from the Proposed Development, no other schemes have been identified for which the Site may contribute to an in-combination cumulative effect on ecologically important features within the ZOI of the Site.

5.4 Enhancement

The revised National Planning Policy Framework (NPPF 2024), sets out, amongst other points, how *“Planning policies and decisions should contribute to and enhance the natural and local environment by:*

‘Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressure’.

It has been demonstrated in the accompanying BNG assessment (Lucion, 2025) that the development of the Site and provision of new landscaping will not deliver the required 10% net gain in Biodiversity Units, and delivery of off-Site BNG through purchase of Biodiversity Units from the private market is being explored. Further enhancement measures could include new/additional wildlife-friendly habitat creation, active habitat management practices secured over at least 30 years, additional bird and bat boxes, as well as structures such as hedgehog boxes and insect hotels.

- Fifteen bird boxes suitable for range of species including starlings and house sparrow, on trees to be retained across the Site or integrated into the building extension. The boxes will be erected at least 3 m from ground level in a sheltered, shaded location, facing vegetation.
- Six bat boxes. The boxes will be on trees to be retained across the Site or integrated into the building extension. The boxes will be erected at least 3 m from ground level in a south-east, south or south-west facing position, near vegetation, but with a clear flight path to the box. The boxes and flight paths to the box will remain unlit.
- Three hedgehog boxes within the woodland and away from the active areas of the Site.
- Four Insect hotels within the grassland.
- Four log piles created from the felled trees and stacked at the woodland edge or within the scrub.

6.0 Conclusions

The habitats present on Site are widespread, in both a local and national context. Those habitats with the greatest ecological value (i.e. the woodland) are largely to be retained and enhanced within the development. The mandatory requirement for BNG will need to be satisfied through purchase of off-Site Biodiversity Units on the private market. Whilst there is likely to be a temporal delay in achieving the biodiversity objectives for the Site (i.e. whilst new habitats become established), it is anticipated that in the long term there will be no significant residual effects on habitats or protected species resulting from the Proposed Development.

7.0 Disclaimer

The recommendations contained in this report represent Lucion's professional opinions, based upon the information referred to in Section 1.0 of this report, exercising the duty of care required of an experienced Ecology Consultant. Lucion does not warrant or guarantee that the Site is free of bats or other protected species.

The behaviour of animals can be unpredictable and may not conform to characteristics recorded in current scientific literature. This report, therefore, cannot predict with absolute certainty that animal species will or will not occur in apparently suitable locations or habitats or that they will not occur in locations or habitats that appear unsuitable.

No part of the survey included an assessment of the materials and conditions of any buildings. No part of the survey included an asbestos assessment, nor did it represent an appraisal of other deleterious materials or hazardous substances.

This report was prepared by Lucion for the sole and exclusive use of the Client and for the specific purpose for which Lucion was instructed as defined in Section 1.0 of this report. Nothing contained in this report shall be construed to give any rights or benefits to anyone other than the Client and Lucion, and all duties and responsibilities undertaken are for the sole and exclusive benefit of the Client and not for the benefit of any other party. In particular, Lucion does not intend, without its written consent, for this report to be disseminated to anyone other than the Client or to be used or relied upon by anyone other than the Client. Use of the report by any other person is unauthorised and such use is at the sole risk of the user. Anyone using or relying upon this report, other than the Client, agrees by virtue of its use to indemnify and hold harmless Lucion from and against all claims, losses and damages (of whatsoever nature and howsoever or whensoever arising), arising out of or resulting from the performance of the work by the Consultant.

Figure 1 – Site Location Plan



Legend

Site boundary



Figure	Site Location Plan				
Job	Unit A, Finlan Road, Stakehill Industrial Estate				
Client	Savills				
Figure No.	1	Revision	A	Date	24/04/2025
Drawn	BB	Checked	CD	Scale	1:5,000 @ A3
Job No.	120999.649224			Central GR	389233E 408024N



Figure 2 – UK Habitat Survey Plan



- Legend**
- Site boundary
 - g4 - modified grassland
 - h3h - Mixed scrub (11, 47, 77)
 - u1 - built-up areas and gardens (11, 48, 77, 1160)
 - u1b - developed land, sealed surface
 - u1b5 - buildings
 - w1g - other woodland, broadleaved (37, 47, 49, 80)
 - Fence
 - Broadleaved scattered tree



Figure	Baseline Habitats				
Job	Unit A, Finlan Road, Stakehill Industrial Estate				
Client	Savills				
Figure No.	2	Revision	A	Date	24/04/2025
Drawn	BB	Checked	CD	Scale	1:1,000 @ A3
Job No.	120999.649224			Central GR	389233E 408023N



Drawing 1 – Proposed Development Plan



Drawing 2 – Soft Landscape Specification



AREAS OF ADDITIONAL SOFT LANDSCAPING

- 01

479 sqm

Native Wild Planting Area
Species-rich grass planting and scattered trees with some sections of native hedge
- 02

100 sqm

Native Wild Planting Area
Species-rich grass planting and scattered trees with some sections of native hedge
- 03

104 sqm

Grass Picnic Area
Grass to be seeded with hard wearing grass mix
- 04

226 sqm

Native Wild Planting Area with perimeter ornamental hedge
Species-rich grass planting and scattered trees with some sections of native hedge
- 05

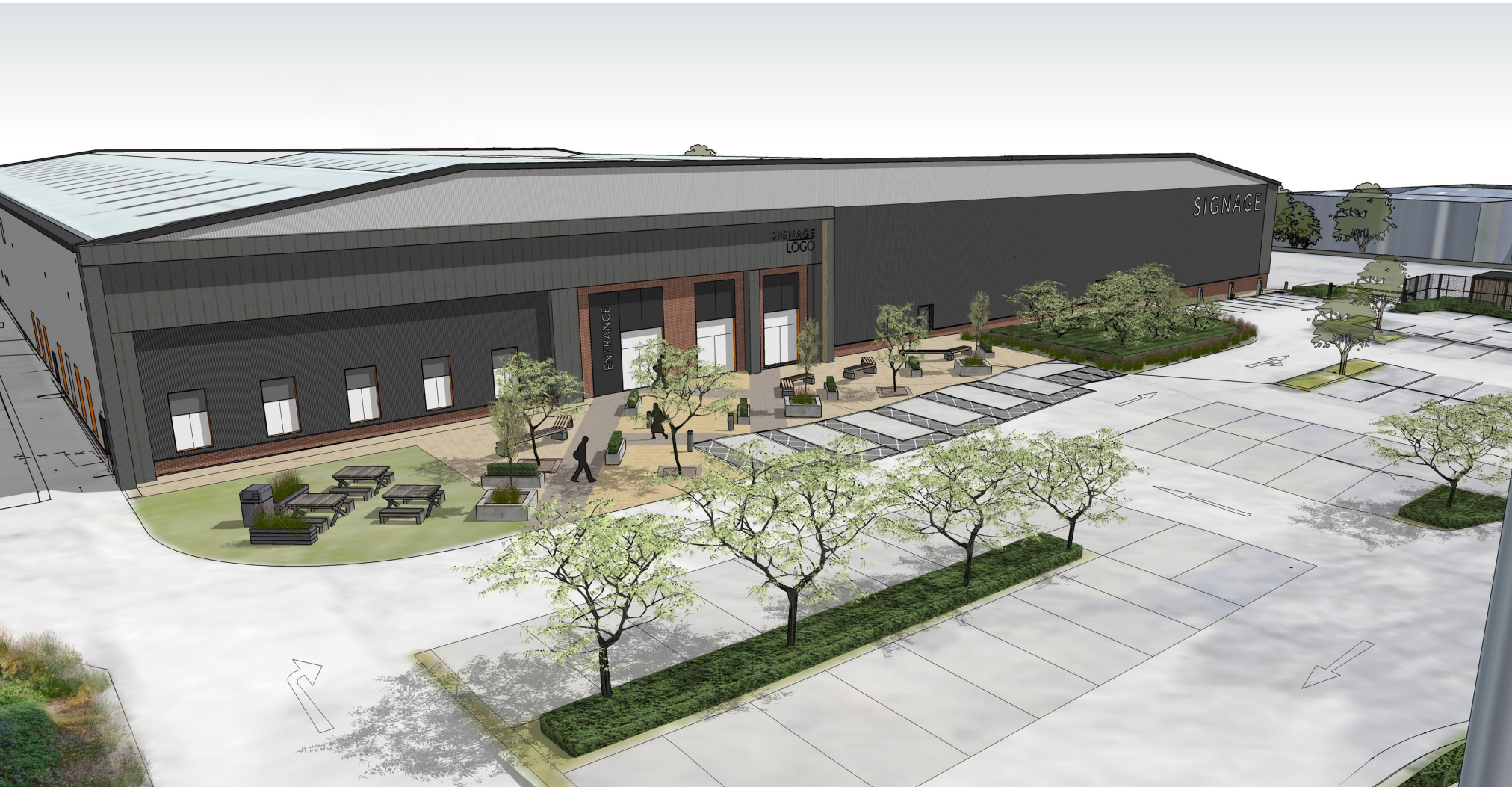
76 sqm

Native Wild Planting Area
Species-rich grass planting and scattered trees with some sections of native hedge
- 06

25 sqm

Native Wild Planting Area
Species-rich grass planting and scattered trees with some sections of native hedge

TOTAL 1010 sqm
Total 97 parking spaces



PERSPECTIVE VIEW SHOWING PROPOSED ENTRANCE AND ASSOCIATED LANDSCAPING

LEGEND

- HARD LANDSCAPE
- Proposed Tarmac Surfacing
- Solid Concrete Hard Standing
- Proposed Concrete Block Paving
Material: Marhalls Saxon, 400x400mm
Colour: Natural , Buff and Charcoal to be used
Laying Bond: Running Bond
- SOFT LANDSCAPE
- Existing Tree and Hedges to be Retained
Trees and hedges to be retained and protected in line with BS5837:2012.
- Proposed Native Wild Planting Area
- Proposed Native Avenue Trees
Advanced Nursery Stock, 18-20cm girth, with 2m clear stem. To be planted with a double timber stakes secured with a rubber tree tie.
- Proposed Native Trees in resin bond treepit
Extra Heavy Standard, 14-16cm girth, 4.5-6.25m high to be planted with a double timber stake secured with a rubber tree tie.
- Smaller Proposed Native Trees
Set in a raised planters, planted with ornamental shrubs and grasses
- Ornamental Shrub Planting
Proposed shrubs and flowering herbaceous plants to be planted as 5-10L pots at 3-5 per sq.m., 10-12L pots.
- Proposed Grass
Grass to be seeded with hard wearing grass mix
- Existing Ornamental Hedges to be retained
To be maintained at 100cm high.
- Proposed Native Semi-Evergreen Woodland Mix
Proposed native woodland mix to be bare root stock, 40-60cm high, planted at 1.5 plants per sq.m.
- Proposed Native Semi-Evergreen Shrub Mix
Proposed native shrub mix to have minimum 3 species. To be bare root stock, 40-60cm high, planted at 2 plants per sq.m.
- Existing Trees to be Retained
- Existing Trees and Hedges to be Removed
- BOUNDARIES
- Existing Fencing to be retained
- Proposed dividing fencing with heavy duty raise barrier arm.
- Armco barrier to protect the proposed retaining wall
- Proposed Benches and srub planters located in front of building entrance
- Proposed Bollards

Notes: Do not scale from this drawing. Use figured dimensions in all cases. Check all dimensions on site. Report any drawing errors or discrepancies to O'Brien & Noël Architects before proceeding. This drawing has been created for the purposes identified in the status and should only be used for this purpose. This is not a construction drawing. To be read in conjunction with all approved documents, permits, drawings and information and drawings from other appointed consultants.

Rev	Description	Date
A		24/02/2023
B	Additional annotations added to drawings	03/04/2023
C	Additional planting added to replace existing car park entrance	18/04/2023
D	Legend updated	19/04/2023
E	Tree annotation updated	20/04/2023

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Stakehill-Industrial-Estate
Middleton
M24 2SJ

PROJECT

UNIT A - Partial Demolition, Proposed Extension
& Site Landscape Alterations.

CLIENT

UBS Triton Property Fund

DRAWING TITLE

Proposed Landscape Plan

PURPOSE OF ISSUE

PLANNING

DRAWN BY

MO

CHECKED BY

PN

DATE

APR 2023

SCALE (@ A1)

AS SHOWN

PROJECT NUMBER

0127

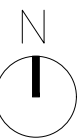
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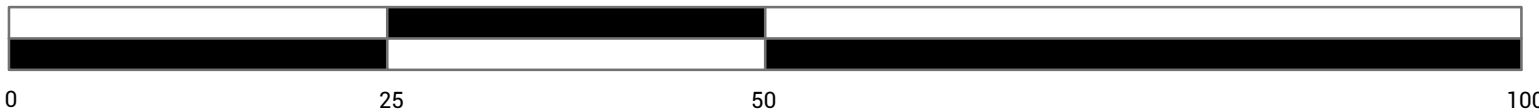
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PROPOSED LANDSCAPE PLAN
Scale 1 : 500 @ A1



Appendix A – References

References

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Appendix B – Guidance on Assessing the Potential Suitability of Development Sites to Support Bats

Guidance on Assessing the Potential Suitability of Development Sites to Support Bats

Suitability	Description	
	Roosting	Commuting and Foraging
None	No habitat features on site likely to be used by any roosting bats at any time of the year.	No habitat features on site likely to be used by any commuting or foraging bats at any time of year.
Negligible	An inspected structure which is considered to have no features likely to be used by roosting bats, however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	No obvious habitat features likely to be used as flightpaths or by foraging bats, however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of year. However, inadequate space, shelter, protection and conditions, and/or the low suitability of surrounding habitats means that it is unlikely to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site but could be used by individual hibernating bats).	Habitat that could be used by small numbers of commuting bats due to its quality and connectivity. For example, a gappy hedgerow or unvegetated stream that is isolated from the surrounding landscape. Alternatively, suitable but isolated habitats that could be used by small numbers of foraging bats such as a lone tree or a patch of scrub.
Moderate	A structure with one or more potential roost sites that are of adequate size, shelter and protection, with suitable conditions and surrounding habitat to support a bat roost but unlikely to support a roost of high conservation status (with respect to roost type not individual species conservation status).	Continuous habitat connected to the wider landscape that could be used by bats for flightpaths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	A structure with one or more potential roost sites that are obviously suitable for use by large numbers of bats on a more regular basis and potentially for long periods of time due to their size, shelter, protection, conditions and the surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.	Continuous high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flightpaths such as flowing waterbodies, hedgerows, lines of trees and woodland edges. High quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats, such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to, and connected to, known roosts.

NB: A structure may be identified to support a confirmed/suspected roost due to the presence of bat(s) and/or evidence such as droppings, staining and feeding remains, but will still be allocated a level of suitability from the table above.

Guidelines for assessing the suitability of trees on proposed development sites for bats.

Suitability	Description
None	Either no Potential Roost Features (PRFs) in the tree or highly unlikely to be any
Further Assessment Required (FAR)	Further Assessment Required to establish if PRFs are present in the tree
Potential Roosting Feature (PRF) PRF – L (Low Roost Suitability) PRF – M (High Roost Suitability)	A tree with at least one PRF present PRF is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats PRF is suitable for multiple bats and may therefore be used by a maternity colony

The above tables have been adapted from Collins, J. (ed). 2023.

Appendix C - Ecological Impact Assessment Methodology

Ecological Impact Assessment Methodology

The methodology for the EcIA follows the principles set out within the Guidelines for Ecological Impact Assessment (EcIA) in the UK and Ireland; Terrestrial, Freshwater, Coastal and Marine updated by the Chartered Institute of Ecology and Environmental Management (CIEEM) in 2019 and comprises a staged approach to assessing the potential impacts resulting from the proposed development on the ecological features within the ZOI.

The EcIA has involved the following stages:

- Determination of baseline conditions;
- Identification of important ecological features;
- Identification of potential impacts and effects;
- Identifying likely significant effects;
- Designing appropriate avoidance and/or mitigation for impacts and effects;
- Assessment of residual effect significance;
- Assessment of cumulative impacts and effects; and
- Identification of compensation and enhancement measures.

Baseline Conditions

Baseline conditions have been established following the methodology outlined in the above sections.

Important Ecological Features

Important ecological features have been identified based on existing statutory, policy and conservation objectives. In accordance with the CIEEM Guidelines the value or potential value of an ecological resource has been determined within a defined geographical context in line with the table below.

Potential Impacts and Effects

The potential impacts on any important ecological features are identified during construction and operation, and prior to any mitigation, based on available baseline data, an assessment of design proposals and construction methods, and available information on the existing conservation status of the features in question.

Impacts are then characterised in terms of the following attributes:

- Positive or negative – i.e. a change that improves or reduces the quality of the environment;
- Magnitude – i.e. the size of an impact in quantitative terms where possible;
- Extent – i.e. the area over which an impact occurs;
- Duration – i.e. the time for which an impact is expected to last;
- Reversibility – i.e. is the impact permanent or temporary; and
- Timing and frequency – e.g. related to breeding seasons.

The likely effects of potential impacts on important ecological features largely depend upon their sensitivity, whilst the level of certainty that an impact will occur as predicted is based on professional judgment. Only the impacts likely to result in significant effects have been described in detail within the report. Impacts that are either unlikely to occur, or if they did occur are unlikely to be significant have been scoped out and justification for scoping out provided.

Geographic Scale	Example Criteria for Classification at each Geographic Scale
International	Habitats meeting the criteria for Wetlands of International Importance (Ramsar), Special Area of Conservation (SAC) or Special Protection Area (SPA) site. A species present in internationally important numbers (>1% of international population). Notable species which is part of the cited interest of an SPA or SAC and which regularly occurs in internationally or nationally important numbers.
National	Habitats meeting the criteria for a Site of Special Scientific Interest, Marine Conservation Zone (MCZ), or National Nature Reserve (NNR). A species present in nationally important numbers (>1% of UK population). A species which is part of the cited interest of a SSSI and which regularly occurs in internationally or nationally important numbers. Rare breeding species (e.g. birds with <300 UK breeding pairs).
Regional	A local site with important regional habitats or significant populations of Species of Principal Importance (SPIs) under the NERC act. Species present in regionally important numbers (>1% of regional population). Species listed as priority species, which are not covered above, and which regularly occur in regionally important numbers. Sustainable populations of a species that is rare or scarce within a region. Species on the Birds of Conservation Concern (BoCC) Red or Amber List and which regularly occur in regionally important numbers.
County	A local site with a habitat that is characteristic of the county or rare on a county scale, or with significant populations of locally important species. Species present in county important numbers (>1% of county population). Species listed as priority species, which are not covered above, and which regularly occur in county important numbers. Sustainable population of a species that is rare or scarce within a county. A site designated for its county important assemblage of species. Species on the BoCC Red or Amber List and which regularly occur in county important numbers.
Local	A site which has wildlife corridors likely to be essential to allow viable movement of species or improve the biodiversity of the area. Species listed as priority species, which are not covered above, and are rare in the locality. Species present in numbers just under county importance (<1% of county population). Sustainable population of a species that is rare or scarce within the locality. A site whose designation is just under for inclusion for its county important assemblage of a particular species on site. Other species on the BoCC Red or Amber List and which are considered to regularly occur in locally important numbers.

Likely Significant Effects

In accordance with the CIEEM guidelines, an ecologically significant effect is 'an effect that either supports or undermines the biodiversity conservation objectives for 'important ecological features' or for biodiversity in general'.

Using an approach to valuing impacts that involves professional judgement and reference to available conservation objectives, neutral and minor effects are considered to be not significant, while moderate and major effects are assessed to be significant. The table below provides a comparison of the terms used.

Effect Significance	Type of Effect	Equivalent CIEEM Assessment
Significant	Major beneficial	Significant positive impact on biodiversity conservation objectives at given geographical context
	Moderate beneficial	Positive impact on biodiversity conservation objectives at given geographical context
Non-significant	Minor beneficial	Limited positive impact on biodiversity conservation objectives at given geographical context
Neutral	Negligible	No significant impact on biodiversity conservation objectives at given geographical context
Non-significant	Minor adverse	Limited adverse impact on biodiversity conservation objectives at given geographical context
Significant	Moderate adverse	Adverse impact on biodiversity conservation objectives at given geographical context
	Major adverse	Significant adverse impact on biodiversity conservation objectives at given geographical context

The evaluation of significant effects has been based on the best available scientific evidence. Where sufficient evidence is not available, the precautionary principle has been applied. Therefore, where it is not possible to robustly justify a conclusion of no significant effect, a significant effect has been assumed. Any uncertainty has been acknowledged within the report.

Avoidance and/or Mitigation

Negative impacts have been avoided and/or mitigated where possible, in line with the mitigation hierarchy as presented within the CIEEM Guidelines.

Assessment of Residual Effect Significance

Once the impacts of the proposed development have been assessed, and all attempts to avoid and mitigate ecological impacts have been finalised, an assessment of the residual impacts is undertaken to determine the significance of their effects upon ecological features.

Cumulative Impact Assessment

The following types of future development within the same zone of influence have been considered as part of the cumulative impact assessment in relation to each important ecological feature:

- Proposals for which consent has been applied which are awaiting determination and are visible on the local planning portal;

- Projects which have been granted planning consent, but which have not yet been started or which have been started but are not yet completed (i.e. under construction); and
- Proposals which have been refused permission but which are subject to appeal and the appeal is undetermined.

Compensation and Enhancement

Compensation measures were taken to offset residual effects resulting in the loss of, or permanent damage to ecological features despite mitigation, where required. Compensation has only been considered as a last resort, in line with the mitigation hierarchy.

Enhancement measures have been agreed over and above any mitigation or compensation measures, in order to provide a biodiversity net gain.

Appendix D – Site Photographs

Site Photographs



Photograph 1 – Woodland



Photograph 2 – Knotweed within woodland



Photograph 3 – Southern woodland (Photo 2023 prior to fence being erected)



Photograph 4 – Mixed scrub on Site boundary



Photograph 5 – Modified grassland



Photograph 6 – Hardstanding



Photograph 7 – Building 1



Photograph 8 – Building 2



b

Photograph 9 – Building 3



Photograph 10 – Substation structure



Photograph 11 – Scattered trees



Photograph 12 - New growth on-Site located between Building 2 and 3



Photograph 13 – Off-Site stand of knotweed in the woodland



Photograph 14 – Off-Site stand of knotweed to the north-east



Photograph 15 – Himalayan balsam