



Elite Ecology

Passionate about Ecology

**Todmorden Road,
Littleborough**



Invasive Non-Native Species Removal Plan

June 2026



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INNS Removal Plan

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1. Introduction

1.1 Report Rationale

This report has been prepared at the request of Corrosion Resistant Products Ltd. It relates to the removal of Invasive and Non-Native Species (INNS) at the proposed re-development works at Corrosion Resistant Products Ltd, Todmorden Road, Littleborough, Greater Manchester, OL15 9EG (OS Grid Reference: SD 94077 16734).

The Invasive Non-Native Species field survey was undertaken following the INNAS Code of Practice (2017).

1.2 Site Description and Works

The site is located in an urban setting in the town of Littleborough, Greater Manchester, which lies three miles to the north-east of Rochdale.

The site measures approximately 0.97ha and contains a number of habitats. These include buildings, fence, hard standing ground, hedgerow, lines of trees, modified grassland, scattered trees, scrub, tall forbs, unsealed surface, and wall. The habitats on site could have the potential to support a number of herptiles.

Within the wider landscape, further habitats are present. These come in the form of amenity grassland, canal, hard standing ground, hedgerows, improved grassland, industrial buildings, residential dwellings (and their associated gardens/yards), scattered trees, stream, and woodland. The habitats that surround the site also have the potential to be utilised by herptiles.

Figure 1: Aerial map of the site of Todmorden Road, Littleborough shown by the red outline.



Figure 2: An aerial map showing the location of Todmorden Road, Littleborough, (yellow star) in relation to the local landscape.

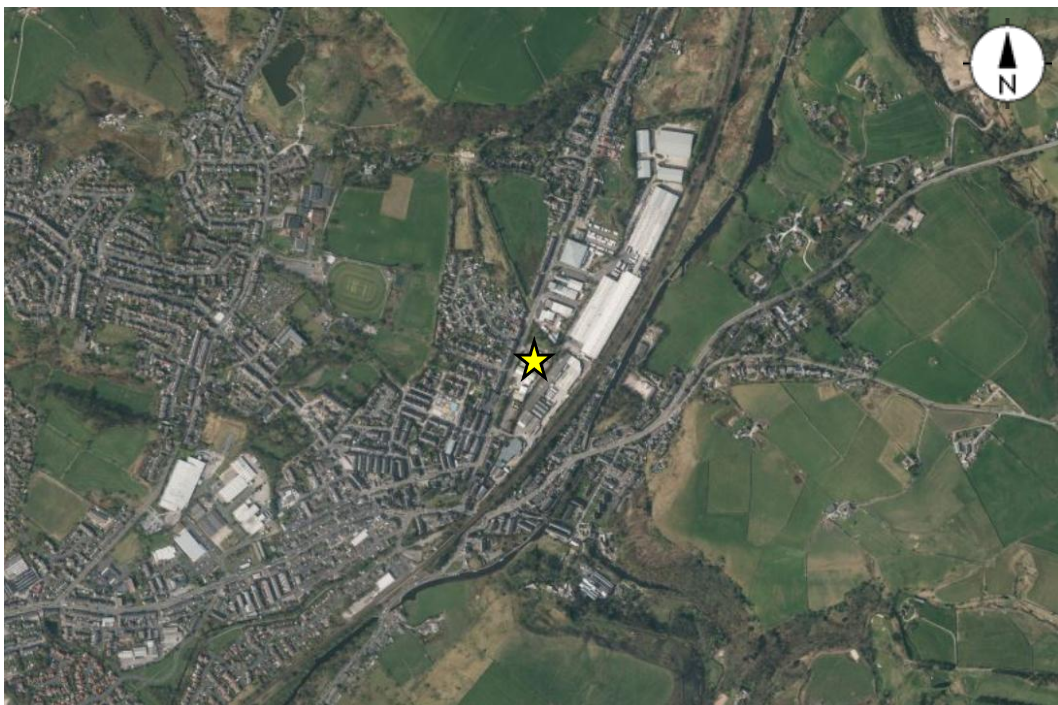
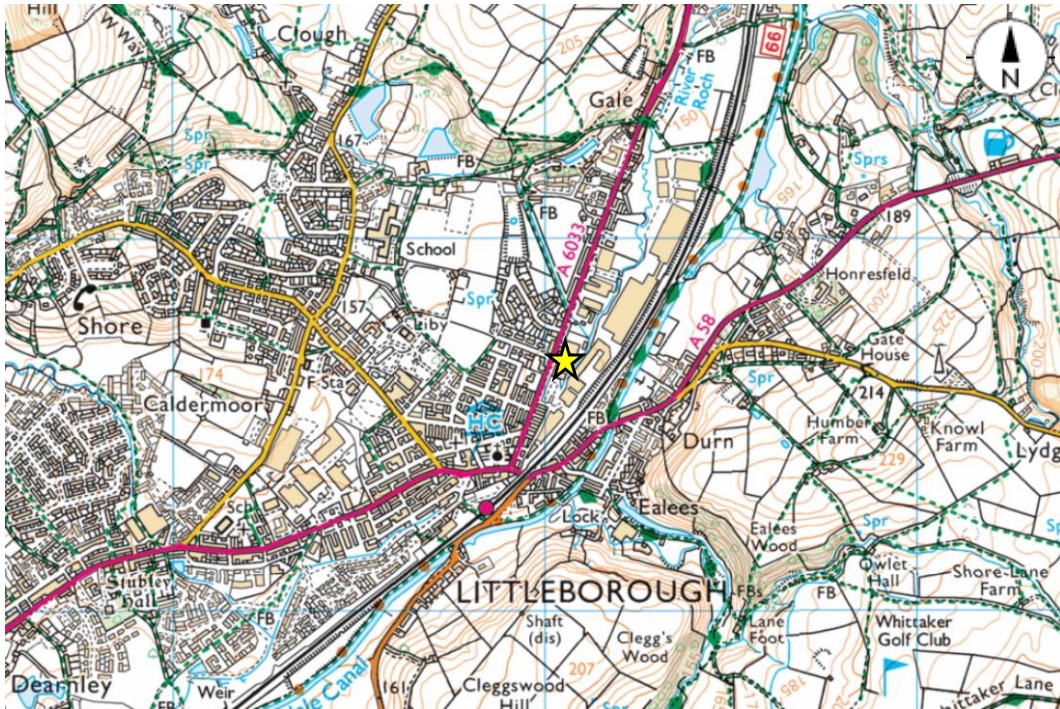


Figure 3: An OS map obtained from Bing Maps showing the survey site at Todmorden Road, Littleborough (yellow star) and the surrounding area.



1.3 **Proposals**

Under the current proposals, the existing site will be redeveloped in three phases. The first and second phase includes the extension of the manufacturing plant, followed by the extension of storage units in phase 3. Overall, this will result in both the permanent and temporary loss and/or alteration of some of the habitats located on the proposed re-development site.

2. Methodology

2.1 Field Survey

A preliminary ecological assessment of the site was undertaken by Elite Ecology in September 2023, with an updated walkover for invasive species conducted in September 2025. This method aims to map the locations of Invasive and Non-native species (INNS) present on the surveyed site. Once all INNS are mapped, a plan for removal of will be devised in accordance with the Invasive Non-Native Specialists Association (INNSA) Code of Practice (2017).

2.2 Survey Limitations

The survey was carried out in September 2025, which is during the optimal time period for flora surveys.

3. Field Results

3.1 Invasive Species

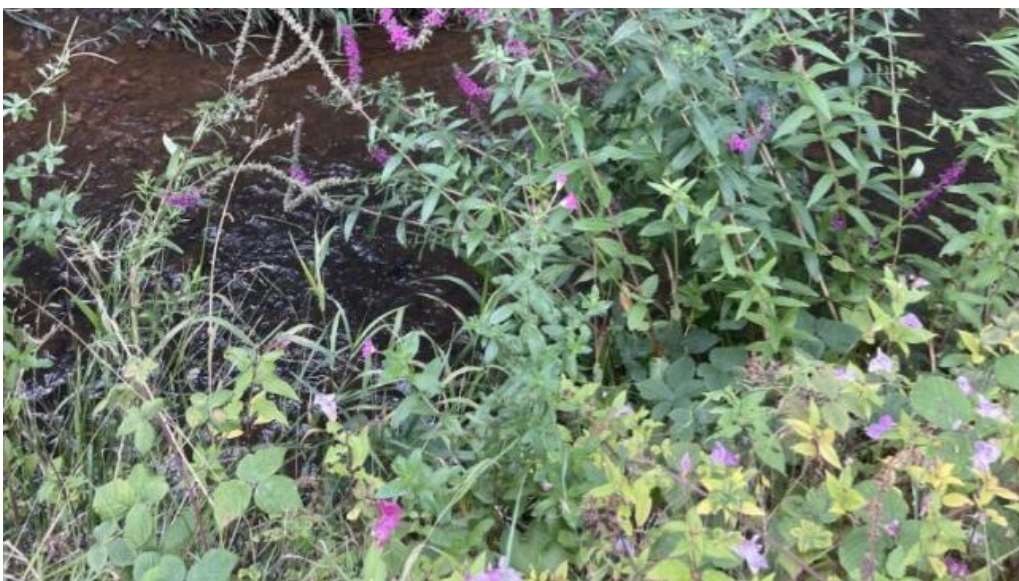
3.1.1 Himalayan Balsam (*Impatiens glandulifera*)

During the walkover, it was noted that a dense stand of Himalayan balsam was found on the northern fringe of the site, on the banks of the Town House Brook to the north. Himalayan balsam can also be found sporadically along the western bank of the River Roch which forms the eastern border of the site. See **Figures 4 and 5**.

Figure 4: Evidence of the Himalayan balsam found on the north of the site at Todmorden Road, Littleborough, during the site walkover conducted by Elite Ecology in 2025.



Figure 5: Evidence of the Himalayan balsam found on the western bank of the River Roch during the site walkover conducted by Elite Ecology in 2025.



Himalayan balsam is a Schedule 9 plant species under the Wildlife and Countryside Act 1981. It is an offence under section 14(2) of the Act to “plant(s) or otherwise causes to grow in the wild any plant which is included in Part II of Schedule 9”. Therefore, compulsory measures are required to remove this species from the site to prevent the further growth and spread of invasive species.

3.1.2 **Montbretia (*Crocasmia x crocosmiiflora*)**

Also found during the site walkover was a small patch of montbretia found on site, on the western bank of the River Roch.

Figure 6: Evidence of the Himalayan balsam found on the east of the site at Todmorden Road, Littleborough, during the site walkover conducted by Elite Ecology in 2025.



Montbretia is a Schedule 9 plant species under the Wildlife and Countryside Act 1981. It is an offence under section 14(2) of the Act to “plant(s) or otherwise causes to grow in the wild any plant which is included in Part II of Schedule 9”. Therefore, compulsory measures are required to remove this species from the site to prevent the further growth and spread of invasive species.

3.1.3 Japanese Knotweed (*Reynoutria japonica*)

An updated site walkover of the site was undertaken by Elite Ecology in May 2026. During this survey, Japanese knotweed was discovered in a single patch on the east of the proposed development site. Specimens present included immature individuals established onsite, see **Figure 7**.

Figure 7: Evidence of the Japanese knotweed found at Todmorden Road, Littleborough during the site walkover conducted by Elite Ecology in 2026.



Japanese knotweed is Schedule 9 plant species under the Wildlife and Countryside Act 1981. It is an offence under section 14(2) of the Act to “plant(s) or otherwise causes to grow in the wild any plant which is included in Part II of Schedule 9”. Therefore, compulsory measures are required to remove this species from the site to prevent the further growth and spread of invasive species.

3.2 Locations of INNS Specimens

The locations of the INNS specimens found can be seen on the map provided below.

Figure 8: Location of Himalayan Balsam, Montbretia and Japanese knotweed specimens found at Todmorden Road, Littleborough.



4. Risk and Method Assessment

4.1 Management Category

Following the guidance set out by RICS (2022) – Japanese Knotweed and Residential Property, Management Category B: Action has been chosen. This is due to the Japanese Knotweed being on site but not causing any visible damage to a structure however, it will likely prevent the use of amenity areas during the operational phase.

4.2 Priority Actions

Action Type	High	Medium	Low	Action to be undertaken
	Removal	Treatment	Monitoring	
Isolation/Exclusion	Y			All Japanese knotweed areas to be isolated. Isolation zone should be to at least seven metres laterally from any visible knotweed growth to ensure rhizomes close to surface are not disturbed.
Monitoring		Y		A scheme for monitoring will be agreed with the Site Manager, who will ultimately be responsible for overseeing the control of Japanese knotweed on site.
Management		Y		This Management Plan will be reviewed on a regular basis and in any case every twelve months from site acquisition to completion of works.
Japanese Knotweed	Y			Excavation and eradication of all known specimens on site.

4.3 Feasibility of Eradication Methods

Treatment Type	Disposal Type	Method Used	Justification
Full Excavation (total lateral and vertical extent of rhizome within site)	Off-Site in Landfill	Y	The knotweed on site is undesirable or impractical to retain on site and will need to be fully excavated (to remove all rhizome). All specimens are to be chemically treated and burned on site. All resulting matter is to be taken off site for disposal at landfill site specially licensed to handle and dispose of knotweed waste. The Environment Agency deem that any ground containing dead knotweed is to be classified as controlled waste if removed from site.
	On-Site Sifted and Buried	X	No area on site is suitable for burial due to the close proximity to the new structure.
	On-Site Buried as Cell-Burial	X	No area on site is suitable for burial due to the close proximity to the new structure.
	On-Site Relocated for Treatment	X	All samples of Japanese knotweed will be treated on site to prevent accidental spread during transportation.
Reduced Level Excavation (remaining rhizome contaminated ground is capped with root barrier)	Off-Site in Landfill	X	This method has not been chosen as Japanese knotweed would remain on site and may potentially lead to re-growth.
	On-Site Sifted and Buried	X	This method has not been chosen as Japanese knotweed would remain on site and may potentially lead to re-growth.
	On-Site Buried as Cell-Burial	X	This method has not been chosen as Japanese knotweed would remain on site and may potentially lead to re-growth.
	On-Site Relocated for Treatment	X	This method has not been chosen as Japanese knotweed would remain on site and may potentially lead to re-growth.
Herbicide Treatment Programme	In-situ	Y	Herbicide application can render the plant unable to produce new growth (deemed as eradication), however there is no guarantee that rhizomes underground will be eradicated. Therefore, disturbance of ground containing herbicide treated knotweed is likely to produce re-growth

5. Recommendations

5.1 INNS Removal

Once INNS have been identified and mapped, their removal is imperative to prevent the further spread of invasive species. All invasive species removal shall be undertaken prior to any construction.

5.1.1 Himalayan Balsam (*Impatiens glandulifera*)

Decontamination of Equipment and Prevention of Spread

Implementing biosecurity measures are essential in preventing INNS from leaving the site. This involves removing the pathways for INNS to spread on or off site. INNS can be spread via clothing, footwear, building equipment, and vehicles travelling between sites. Therefore, measures should be in place when any land affected is being altered in order to prevent INNS from being inadvertently spread.

The following measures are required to be implemented:

- It is advised that no vehicles enter the contaminated areas. However, if this cannot be avoided, vehicles leaving the site must be decontaminated on each occasion before they leave the contaminated area. Decontamination involves a thorough visual inspection and washdown of any plant material or soil on the affected vehicle.
- Clothing and shoes worn onsite should be decontaminated before the person leaves the site. These can be disinfected with any anti-bacterial spray.
- The designated decontamination area is shown in **Figure 9**.

Initial Vegetation Removal and Potential Species Avoidance Measures

- On day one of the works, a toolbox talk will be undertaken by a suitably qualified ecologist. This will educate contractors on how to identify the INNS species on site and how to apply designated removal techniques. Associated documentation will be left with the site manager/project manager. This documentation will include contact details for Elite Ecology and the licenced ecologist appointed to the project.
- All workers at the site will be inducted into the ecology constraints. This will include protocols to be adhered to should any hedgehogs, reptiles, or protected species be found during the works. It will also include how to identify the INNS species on site that need designated removal techniques applied. This report and contact details will be left in the site office for the duration of the works.
- Himalayan balsam (*Impatiens glandulifera*) will be removed by hand-pulling. The plant should be grabbed at its base and pulled out in its entirety, making sure all roots are removed. The stem should then be crushed to prevent nutrient transfer to the flowers once it has been pulled. This is to be done three times a year over a three year period.

- All arisings from vegetation clearance must be removed from the working area immediately with cuttings taken to dedicated disposal site (**Appendix C**) and disposed of in accordance with **Section 4.2**.

5.1.2 **Montbretia (*Crocasmia x crocosmiiflora*)**

Decontamination of Equipment and Prevention of Spread

Implementing biosecurity measures are essential in preventing INNS from leaving the site. This involves removing the pathways for INNS to spread on or off site. INNS can be spread via clothing, footwear, building equipment, and vehicles travelling between sites. Therefore, measures should be in place when any land affected is being altered in order to prevent INNS from being inadvertently spread.

The following measures are required to be implemented:

- Vehicles leaving the site must be decontaminated on each occasion before they leave the contaminated area.
- Clothing and shoes worn onsite should be decontaminated before the person leaves the site. These can be disinfected with any anti-bacterial spray.

Physiochemical Control

A number of effective agents can be used (e.g. glyphosate; Roundup ProBio). An initial spraying of this herbicide on all plants in the relevant area as a pre-treatment is recommended. An Environmental Agency permit will be required to use chemicals (AqHerb01).

Once a correct concentration of herbicide has been achieved (too high a concentration can cause unnecessary damage, too low a concentration can result in little or no effect), this is to be sprayed onto the leaves of the Montbretia plants that are found to ensure that the stem, leaves, and corms are affected. This should be undertaken during the optimal time of June – July while the plants are in their growing phase and repeated seasonally (if necessary) until there are two full consecutive seasons where no Montbretia growth is observed. Remains of the plants still present after these two seasons can then be disposed of via excavation. With an additional two years of post-monitoring to review the re-growth.

5.1.3 Japanese Knotweed (*Reynoutria japonica*)

Decontamination of Equipment and Prevention of Spread

Implementing biosecurity measures are essential in preventing INNS from leaving the site. This involves removing the pathways for INNS to spread on or off site. INNS can be spread via clothing, footwear, building equipment, and vehicles travelling between sites. Therefore, measures should be in place when any land affected is being altered in order to prevent INNS from being inadvertently spread.

The following measures are required to be implemented:

- Vehicles leaving the site must be decontaminated on each occasion before they leave the contaminated area.
- Clothing and shoes worn onsite should be decontaminated before the person leaves the site. These can be disinfected with any anti-bacterial spray.
- A controlled fence or gate at the entrance of the site should be erected such that proper decontamination protocols are adhered to.

Physiochemical Control

Once all above ground vegetation in the relevant area is cut to 50mm, herbicide treatment can begin. This cutting should be done via a method that does not fragment the stem, and should be done with a single, clean cut at the base of the stem. A number of effective agents can be used (e.g. glyphosate; Roundup ProBio). An initial spraying of this herbicide on all plants in the relevant area as a pre-treatment is recommended.

Once a correct concentration of herbicide has been achieved (too high a concentration can cause unnecessary damage, too low a concentration can result in little or no effect), this is to be injected into the stem of any Japanese knotweed plants that are found to ensure that the stem, leaves, and rhizomes are affected. This should be undertaken during the optimal time of June – July and repeated seasonally until there are two full consecutive seasons where no Japanese knotweed growth is observed. Remains of the plants still present after these two seasons can then be disposed of via excavation.

Figure 9: aerial image showing the site boundary and locations of invasive species, as well as the proposed drying raft and decontamination zones.



5.2 Invasive Non-native Species Disposal

5.2.1 Himalayan Balsam

Step One: Initial Vegetation Removal

Uprooted plants are to have their stems crushed and are to be placed on wooden rafts measuring $2 \times 3 \text{m}^2$, to prevent further contact with soil plants should be left on the raft to dry out so that they can be safely disposed of. It is important that the physical removal of the plants in the ground does not take place when the plants have produced seed (July-October), as this is likely to cause the inadvertent spread of the plant due to the explosive nature of the seed pods. Cuttings must then be disposed of as controlled waste.

Step Two: Mechanical Control Removal

No soil is to be removed from site as part of the proposed application. Therefore, no mechanical control removal will take place.

5.3 **Post Monitoring**

Control

Any new specimens of INNS and plants which grow on site and are thought to be aggressive and pose a threat to the success of new vegetation and should be eradicated as soon as possible. These will be identified within a plant identification survey undertaken twice yearly; one in March and one in July, over a three-year period.

It will be necessary to remove all weeds found on site by hand during the first three years of the project.

Eradication

Any invasive species that appear on site will require eradication as soon as possible. The identification of any invasive species will take place within a plant identification survey undertaken twice yearly; one in March and one in July, over a three-year period.

This is due to the seeds having the potential to survive in the seed bank for approximately three years.

5.3.1 **Himalayan Balsam**

Step One: Initial Vegetation Cutting Removal

The area is to be excavated to the extent of the Japanese Knotweed infestation under the supervision of a suitably qualified ecologist to ensure the rhizomes and roots are correctly and wholly removed.

Cuttings are to be placed on wooden rafts measuring 2x3m², to prevent further contacts with soil, and taken to the disposal site (shown in **Appendix C**). The disposal site has been chosen based on three factors:

- Disposal sites are over 6m from any vegetation or flammable materials.
- To prevent cuttings coming into further contact with soil.
- Prevent reptiles from using the cuttings as refugia.

Cuttings must then be prepared for burning and this must be undertaken on the same day of collection to prevent use as refugia. This will involve placing cuttings on wood planks set on top of breeze block and burning till the cuttings are destroyed. Japanese knotweed can be burnt onsite without the worry of toxic fumes being released.

Before any material is burned, a [D7 exemption](#) must be acquired, and the local fire department should be notified as a precaution.

The Japanese Knotweed remains are not recommended to be buried on site due to the potential of further renovations and extensions on the building. As such, the disposal of the remains should be carried out off site, adhering to a Duty of Care: waste transfer note (see **Appendix D**).

A root barrier membrane can then be subsequently placed over the area of interest under the supervision of a suitably qualified ecologist to ensure that no further Japanese Knotweed can root in the area.

Step Two: Mechanical Control Removal

All excavated soil is to be collected in rubble refuse bags and taken off site by a registered waste carrier to be disposed of at a licensed landfill.

Step Three: Final Herbicide Treatment

After herbicide treatments, excavation, and vegetation removal, a final spraying of glyphosate herbicide is to be administered to the area of interest, such as to ensure that the site is fully clear of Japanese Knotweed.

Control

Any new specimens of INNS and plants which grow on site and are thought to be aggressive and pose a threat to the success of new vegetation and should be eradicated as soon as possible. These will be identified within a plant identification survey undertaken twice yearly; one in March and one in July, over a three-year period.

It will be necessary to remove all weeds found on site by hand during the first three years of the project.

Eradication

Any invasive species that appear on site will require eradication as soon as possible. The identification of any invasive species will take place within a plant identification survey undertaken twice yearly; one in March and one in July, over a three-year period.

This is due to the seeds having the potential to survive in the seed bank for approximately three years.

6. Project Roles, Responsibilities, and Contacts

6.1 Project Roles

Everybody working on site has the responsibility to ensure that ecological impacts are kept to a minimum. In addition to this, everyone has a base level Duty of Care to prevent Environmental Harm as described in the Environmental Protection Act 1986.

The project roles outlined in the table below may be amended in a revised document once contractors have been appointed to the project.

POSITION	NAME(s)	Contact Details
Project Manager	Mr. Jonathan Mitchinson	Tel: 01706 756442 Email: JonathanM@crp.co.uk
Site Supervisor	Mr. Jonathan Mitchinson	Tel: 01706 756442 Email: JonathanM@crp.co.uk
Ecological Advisor	Mr. Connor Wild	Tel: 01782 308418 Email: connor@eliteecology.co.uk

Project Manager:

The project manager is responsible for:

- Ensuring that the removal of INNS plan that has been developed is held on site and that it is implemented throughout every stage of the project.
- Maintaining the removal of INNS plan and ensuring that all contractors and any site visitors comply implicitly with it.
- Any ecological issues identified within pre-construction information and the pre-construction site surveys are addressed.
- Producing a project-specific control to address all significant risks identified and implementing appropriate control measures.
- Communicating the removal of INNS plan and other related documents to employees, contractors, sub-contractors, client representatives, and visitors to the site.

Site Supervisor:

The site supervisor is responsible for:

- Ensure that all site and stored materials and chemicals are safe and secure to ensure no fauna can gain access to them.
- Ensure the avoidance measures outlined within the removal of INNS plan is undertaken by site staff on a daily basis.
- Inducting all employees, contractors, and visitors to make them aware of the removal of INNS plan and to guarantee that they will abide by the details outlined within the document at all times on the site.
- Ensuring that project specific ecological toolbox talks are undertaken by all employees, contractors and visitors to the site prior to gaining access to the site itself.

Ecological Advisor:

Elite Ecology staff members will be available to address and advise on any ecological issues which may arise during the project, in addition to those covered within the removal of INNS plan. The role of the advisor is to:

- Ensure the works comply with all relevant legislation regarding flora, fauna, and habitats.
- Undertaking inspections, audits and non-conformance checks to ensure the site works are abiding by the measures outlined within the removal of INNS plan.
- Updating the INNS as and when relevant information is provided by the stakeholders associated with each section of the removal of INNS plan.
- Liaising with the project manager and site supervisors to ensure that any issues are addressed and amended within the working constraints.

7. Ecological Risk Management

There is limited ecological potential for protected species to be harmed during the removal of invasive species, as no mechanical removal methods such as strimming have been proposed. The hand pulling of Himalayan balsam (*Impatiens glandulifera*) will allow any organisms found within this area to escape.

8. References

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Kirby, P. (2013). Habitat Management for Invertebrates. Exeter: Pelagic Publishing.

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9. Appendices

Appendix A: Site Plans

Appendix B: Site Photographs

Appendix C: Vegetation Removal Strategy

Appendix D: Legislation

Appendix B: Site Photographs

Plate 1: Evidence of the Himalayan balsam (*Impatiens glandulifera*) found at the north of the site.



Plate 2: Evidence of the Himalayan balsam found to the east of the site.



Plate 3: Evidence of the Montbretia (*Crocasmia x crocosmiiflora*) found to the east of the site.



Plate 4: Evidence of the Japanese knotweed found to the east of the site.



Appendix C: Vegetation Removal Strategy



Appendix D: Legislation

Section 14 (2) of the Wildlife and Countryside Act 1981 (WCA 1981) states that “if any person plants or otherwise causes to grow in the wild any plant which is included in Part II of Schedule 9, he shall be guilty of an offence”. Japanese knotweed is one of the plants listed in Schedule 9. Anyone convicted of an offence under Section 14 of the WCA 1981 may face a fine of £5,000 and/or 6 months’ imprisonment, or 2 years and/or an unlimited fine on indictment.

The Environmental Protection Act 1990 (EPA) contains a number of legal provisions concerning “controlled waste”, which are set out in Part II. Any soil or plant material contaminated with Japanese knotweed that you discard, intend to discard, or are required to discard is likely to be classified as controlled waste. The most relevant provisions in the EPA is section 33 (1a) and (1b). These create offences to do with the deposit, treating, keeping, or disposing of controlled waste without a permit. Section 33 (1c) makes it an offence to keep, treat, or dispose of controlled waste in a manner likely to cause pollution of the environment or harm to human health. Section 34 places duties on any person who imports, produces, carries, keeps, treats, or disposes of controlled waste. Waste must be handled responsibly and in accordance with the law at all stages between its production and final recovery or disposal. Waste must be transferred to an authorised person, in other words, a person who is either a registered carrier or exempted from registration by the Waste (England and Wales) Regulations 2011 (Waste Regulations). A waste transfer note must be completed and signed giving a written description of the waste as per regulation 35 of the Waste Regulations. This must be sufficient to enable the receiver of the waste to handle it in accordance with their own duty of care. Failure to comply with these provisions is an offence.

The Infrastructure Act 2015 contains powers to compel landowners to control or eradicate invasive non-native species and permits authorised persons to enter land to carry out species control operations at the landowner’s expense.

10. Notice to Readers: Conditions of this Report

All reports are certified products and cannot be shown, copied, or distributed to third parties without the written permission of Elite Ecology. No liability is accepted for the contents of the report, other than to that of the client(s). If any part of this report is altered without the written permission of Elite Ecology, then the whole report becomes invalid.

Elite Ecology agrees to supply ecological consulting services and advice of a preliminary or thorough nature as advised or commissioned. Upon commissioning Elite Ecology to undertake the work, the client(s) grant access to the site upon the agreed date. If no site access is available upon this date, Elite Ecology holds the right to charge the client(s) for lost staffing time and additional travel costs.

Elite Ecology undertake all site surveys with reasonable skill, care, and diligence, within the terms of the contract that has been agreed with the client and abiding by the Elite Ecology Terms and Conditions. The actions of the surveyors on site, and during the production of the report, were undertaken in accordance with the Code of Professional Conduct for the Chartered Institute of Ecology and Environmental Management.

The latest good practice guidelines put in place by Natural England or the relevant statutory conservation bodies have been followed by the surveyors on site. If those methodologies fail to identify a protected species during the survey efforts, no responsibility can be attributed to Elite Ecology. If any of these guidelines are adapted between the date(s) of the surveys being undertaken and the submission of this report, then Elite Ecology takes no responsibility for this.

Should any equipment be damaged or lost on site at the fault of the client(s), then Elite Ecology withholds the right to charge 100% above the current market value for that exact product or the nearest similar product.

The survey results purport the current status of the site and its potential for protected species utilisation at the time of surveying. It should not be viewed as a complete list of the possible flora and fauna species that could be using the site at different times of the year.

Elite Ecology has been provided with full payment for this report and thus the product has been released to the client(s) for the purpose of their planning application. If any part of the report is lost or altered without the written permission of Elite Ecology, then the entire report becomes invalid. Due to the potential for continual change within the natural world, this report is valid for **2 years only** from the date of the last survey visit. If this report is submitted after the 2 year deadline, then a further updated inspection will be required to ascertain whether the site remains in the same condition as it was when initially inspected.

No reliance should be made on any such comments in relation to the structural integrity of the features located on the surveyed site. All information within the report is based solely on evidence that has been found on site during the service provided. No individual opinion or inference will be made other than that of the suitably qualified ecologist appointed to the project.