

**Walshaw Scobell Street Tottington/Walshaw
Bury District,
Greater Manchester
Extended Preliminary Ecological Assessment
with comments on the ecological information presented in the technical
reports of the planning application
and the recent planning history with respect to ecological matters
For
Friends of Bury Folk**



Pignut

Dave Bentley

Entomology and Ecology Services

www.davebentleyecology.co.uk

(23/05/2025 V2)

davebentleyecology@gmail.com

ABSTRACT

1 Friends of Bury Folk (FOBF) have commissioned a botany survey and habitat assessment of land at Scobell Street Tottington/ Walshaw which is the subject of a planning application for up to 275 houses. The survey was completed in three full days by ecological consultant Dave Bentley in May 2025. Dave Bentley has over 40 years' experience in nature conservation in Bury and further afield and has been an ecological consultant since 1993. There has been extreme time pressure to complete this report in a few days before the close of the planning comments window.

2 A Desk study was completed referring to iRecord, NBN Atlas, the BSBI and iNaturalist for records, as well as Bury Council's own Great Crested Newt and Ponds Survey Report from 2004-7. An appeal for Hedgehog records from the local community was made. The Technical Report of the planning application has been studied.

3 The work is completed with reference to the Chartered Institute of Ecology and Environmental Management's Guidelines for Preliminary Ecological Appraisals and to Best Practice. Best Practice is also embedded in the GMCA's guidelines for Places for Everyone, the Government's EIA Regulations and is alluded to by the requirements of the NPPF.

4 The FOBF DAFOR botany survey of the fields and margins revealed 23 grass species and 69 forbs and others (trees and shrubs excluded). FPCR Environment & Design recorded and documented 1 grass and 3 forbs species. FOBF survey divided the site into 8 fields.

5 The FOBF botany survey revealed 6 UKHab Lowland Meadow Priority Habitat Indicator present in May: Pignut, Bistort, Greater Bird's-foot-trefoil, Meadow Vetchling, Common Sedge and Sneezewort. Others could be present. FPCR Environment & Design recorded and documented none.

6 The FOBF quadrat sample from 83 quadrats revealed 18 grass species and 35 forbs and others, whilst FPCR Environment & Design presented no quadrat data.

7 The FOBF UKHab assessment of the quadrat data and DAFOR revealed two g3a Lowland Meadow Priority Habitats - western Brookside Meadow and the Quarry and marshy finger. FPCR Environment & Design wrongly stated these fields were Modified Grassland in a Poor Condition. The law places a legally biodiversity duty on Bury Council to conserve Priority Habitats.

8 The FOBF UKHab assessment of the other meadows showed they are each g3c Other Neutral Grassland in Moderate Condition. FPCR Environment & Design wrongly stated these fields were Modified Grassland in a Poor Condition.

9 The hedgerows are all Good Condition Priority Habitats and both the FOBF consultant and FPCR Environment & Design agree on this. Bluebells are a major component of the hedgerows.

10 Hedge 3 on the southern boundary by the footpath is an Important Hedgerow when tested using the Hedgerow Regulations, on the basis of 8 Woody Species, 5 Woodland Species, a bank, a partial ditch, no gaps and connections. FPCR Environment & Design wrongly stated none were Important Hedgerows. Additionally as all the hedges support Red-listed Birds (e.g. Greenfinch, House Sparrow) they are all classed as Important Hedgerows under the Hedgerow Regulations.

11 Birds. The combined list of FPCR Environment & Design and the FOBF ecologist means there are now 42 species recorded, 13 Amber Listed species and 6 Red Listed species, 7 Priority Species and 2 Protected Species. This elevates the importance of the site.

12 Common Toad, a Priority Species, breeds in the reservoirs just to the south. It ranges across the application site using the land habitats. This means the whole site is the habitat of this Priority Species. FPCR Environment & Design recorded no Common Toad and did not even raise it.

13 Alien Invasive Plants. Bury Council Development Management asked the applicant's planning consultant to provide a survey of Alien Invasive Species. They recorded one such Schedule 9 plant – Himalayan Balsam. However FPCR Environment & Design failed to record and plot Schedule 9 Montbretia, Japanese Rose and Herringbone Cotoneaster which are present. Additionally Snowberry is present and this is listed as an Alien Invasive Shrub for the BNG Woodland Condition Assessment.

14 Invertebrates. Three invertebrate species of interest were found whilst botany surveying – the Cinnabar Moth Priority Species, the Red Listed Data Deficient Alder Leaf Beetle and the large Leech *Trocheta subviridis*. An invertebrate survey will find more of interest. FPCR Environment & Design recorded nothing and dismissed the value of the site for all but common species despite them finding a record of Cinnabar Moth next to the site (where it was found inside the site in May 2025).

15 There is a Fox den in the Quarry and it is necessary to remind everyone that the Mammal Act prevents the crushing of mammals whilst they are in their dens.

16 Bats. FPCR Environment & Design recorded over 21,000 contacts with bats from 4 static detectors – covering 5 species. FOBF ecologists have added a 6th species Noctule Bat. They draw attention to the lengthy description of a methodology for bats in buildings provided by FPCR that was NOT used. Additionally the Alder tree on the southern boundary cannot be dismissed without careful individual survey work, given its potential was highlighted in the FPCR condition assessment.

17 Hedgehog Priority Species Red Listed Vulnerable. Whilst FPCR Environment & Design state that Hedgehogs are a Priority Species they appear to forget that the law places a Biodiversity Duty on Local Planning Authorities to conserve them. Records collected by local people indicate the plans will cause a wholesale slaughter of Hedgehogs rather than conserve them.

18 Grassland Fungi. Despite the CIEEM stating that Preliminary Ecological Appraisals should consider Fungi FPCR Environment & Design does not mention Grassland Fungi. Given that the Presence of Grassland Fungi has caused a major issue at Elton Reservoir these really should be considered.

19 Comments are made on the remnants of Historic Landscape, and on the numerous informal footpaths people have created around the fields. The Historic Environment Record and the Public Rights of Way Definitive map for the area warrant updating.

20 Lack of ecological input to the Places For Everyone Walshaw Allocation JPA9. Text from the PFE Public Examination is included which sets out that no Habitat or Botany Survey were submitted for the Public Examination or the Public Consultation.

21 Given the failures in the planning application Technical Report, a discussion is presented about Best Practice in Ecology. FPCR Environment & Design reference the Chartered Institute for Ecology and Environmental Management (CIEEM) several times. What has been presented there on behalf of the applicant appears to include some examples of the very bad practices in ecology.

1 INTRODUCTION

- 1.1 The planning application site at Scobell Street Walshaw and Tottington in Bury District, Greater Manchester (SD781120) was surveyed to the CIEEM Guidelines for Preliminary Ecological Appraisals Second Edition 2017 and for Biodiversity Net Gain (BNG) by Dave Bentley Entomology and Ecology Services in May 2025. The client is Friends of Bury Folk. A PEA asks questions and the Extended PEA answers the questions. The planning application is called “Outline application for up to 275 dwellings and associated open space and infrastructure - Land off Church Street/Scobell Street, Walshaw, Bury”. The window closed for comments to the planning application within two weeks of commission.
- 1.2 An appraisal of old Ordnance Survey maps held by the National Library of Scotland indicates that the field boundaries away from the Quarry and Scobell Street are of some age, predating all maps. Where field boundary hedges have gone ridges remain. The damp pits in the centre of the site between Field 6 and Field 7 appear to predate the field boundaries for the oldest maps show the field boundary wrapping around the pit (north pit), or subdividing it (south pit).
- 1.3 David Bentley conducted the survey. He has been in conservation since 1983 and has been a professional ecologist since 1993. Foremost he is a botanist and an entomologist and a wetland ecologist.
- 1.4 The Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Preliminary Ecological Appraisals are explicit in what is required to be assessed and provided:
- * A Habitat Survey Map.
 - * A desk study. In this case the NBN Atlas and iRecord were consulted.
 - * An assessment of the possible presence and likely importance of the following:
 - Plants
 - Fungi
 - Terrestrial and aquatic invertebrates
 - Fish (where relevant, based on an assessment of any watercourses and water bodies present);
 - Amphibians (including both breeding and terrestrial habitat)
 - Reptiles
 - Breeding, wintering and migratory birds
 - Bats (including potential roost sites, and foraging and commuting habitats/features)
 - Other protected or priority mammal species, as relevant.
 - * Mapping of any stands of non-native invasive plant species
 - * Recording of any incidental sightings of priority or protected species, or field signs of such species.

- * Box 1 of the PEA Guidelines discusses Protected and Priority Species information and this is stated to include Protected and Section 41 Priority Species and Priority Habitats and also Red Data listed taxa and indeed Nationally Scarce taxa, as well as Birds of Conservation Concern Red (most declining) and Amber listed taxa. The JNCC Taxon List names the plethora of higher plants, bryophytes, fungi and wild animals, including invertebrates that are considered scarce.

1.5 BNG requires we consider the impact of the development on Priority Habitats etc.

2 METHODS

2.1 The field survey days were on 11th, 12th, 14th and 18th May 2025 (three full days), and usually started before 7am. All PPE was cleaned beforehand to meet biosecurity needs.

2.2 These were warm, dry, spring days.

2.3 Plants were examined and noted to DAFOR rating and data from 10 or 11 quadrats per field unit were taken. The site habitat was assessed with UKHab Ltd 2023 UK Habitat Classification Version 2 (at <https://www.ukhab.org>) and the BNG Condition Assessments spreadsheet and BNG User Guide was referred to.

2.4 Debris in the site was lifted to look beneath and examine. This can locate amphibians, signs of small mammals and invertebrates. Other field notes and observations were made.

2.5 A very basic invertebrate assessment was made by direct observation.

2.6 This is not a full breeding bird survey. However records were made of birds by direct observation and by making frequent sound recordings for interpretation by a respected local bird expert who frequently assists the consultant in this way.

2.7 Maps produced for the planning application were used in the field, notably the levels map and the tree and hedge survey map of the arboriculture consultants.

3 DESK STUDY

3.1 Site history is dealt with in the introduction.

3.2 A search of iRecord and NBN Atlas and iNaturalist was made.

3.3 The Bury Council Great Crested Newt Survey of 2004-7 was consulted for amphibian records in the area and for plants species recorded in the wetlands on site.

3.4 The Technical Reports of the planning allocation were examined.

3.5 The findings of the desk study are presented with the results for ease of reading.

4 BOTANY SURVEY AND UKHAB ASSESSMENT

4.1 In November 2024 Helen Leach of Bury Planning Development Management wrote to Emery Planning asking for, amongst others, “Ecology assessment and BNG” and “Given the scale of the development a full extended phase 1 habitat survey should occur.” In fact in order to assess a site for Biodiversity Net Gain a UKHab assessments needs to be undertaken – this assessment defines a habitat unit plot or linear habitat by its vegetation species composition and structure.

The grassland surveys all require a careful and complete inventory of the species and their distributions. UKHab workers also use sample 1m square quadrats to count the number of species and their percentage cover. To determine what a grassland or other habitat actually is, UKHab frequently asks for the number of species (of certain grades) within these 1m squares. Multiple sample quadrats are needed to achieve what might be considered an accurate reflection of the site’s vegetation. One simply cannot walk over a large site like this and make a declaration as to how many species there are in any given field. It requires careful botany surveys to DAFOR scale followed by quadrats.

4.2 This report describes the DAFOR botany and quadrat survey carried out by FOBF’s ecologist, with between 10 and 11 quadrats studied per field, total 83 quadrats. The quadrat data is provided in the tables at the end of the report.

Here are the facts from the Friends of Bury Folk botany survey of May 2025:

4.3 EIGHT fields were accepted (Figure below), four on the north of the site, and four on the south, with the eastern plot split into the two distinct habitats they are.

4.4 There are a total of SIX Lowland Meadow Indicator species located to date (Pignut, Bistort, Greater Bird’s-foot-trefoil, Meadow Vetchling, Sneezewort and Common Sedge). It is highly possible that other later flowering Indicator Species will appear over the summer into autumn.

4.5 A total of 23 grasses and 69 forbs and others were recorded all told, with tree and shrubs being additional.

4.6 Now FPCR for the developer recorded 1 species of grass and 3 species of forbs and others (Here is their complete species list as found in their report: Ribwort Plantain, Creeping Thistle, Creeping Buttercup and Meadow Foxtail). There are no Indicator Species according to FPCR.

4.7 Here are the data totals for the 8 fields, and this explains how the UKHab definition is worked out (a spreadsheet is available from the author for manipulation)

4.8 Field 8 Western Brookside Meadow 12/05/2025

10 quadrats with between 7 and 14 species. A total of 66 species is this field not including shrubs.

g3a Neutral Grassland Lowland Meadow Consideration:

More than 15 species of grasses, forbs, ferns, sedges per square metre	FAIL
Does not exceed 10% cover of Ryegrasses and White Clover	PASS
>30% cover of accepted herbs/sedges: 49.2%	PASS
Springtime Lowland Meadow Indicator Species present: FOUR	PASS
Bistort, Common Sedge, Meadow Vetchling, Greater Bird’s-foot-trefoil	

THIS IS A LOWLAND MEADOW PRIORITY HABITAT g3a

Bury Planning Department’s survey of the wetland in this field in 2004 revealed three of the Indicator species – showing this field was important. This is not new information.

4.9 Field 4 Quarry and finger of marshland 14/05/2025 & 18/05/2025

11 quadrats with between 6 and 13 species. A total of 57 species is this field not including shrubs.

g3a Neutral Grassland Lowland Meadow Consideration:

More than 15 species of grasses, forbs, ferns, sedges per square metre	FAIL
Does not exceed 10% cover of Ryegrasses and White Clover	PASS
>30% cover of accepted herbs/sedges: 52.818%	PASS
Springtime Lowland Meadow Indicator Species present: FIVE	PASS
Pignut, Bistort, Meadow Vetchling, Common Sedge, Sneezewort	

THIS IS A LOWLAND MEADOW PRIORITY HABITAT g3a

4.10 Field 1 Cricket Field (NW) 11/05/2025

11 quadrats with between 6 and 13 species. A total of 36 species is this field not including shrubs. The sum of species in the two wetlands in the field is 31.

g3a Neutral Grassland Lowland Meadow Consideration:

More than 15 species of grasses, forbs, ferns, sedges per square metre	FAIL
Does not exceed 10% cover of Ryegrasses and White Clover	PASS
>30% cover of accepted herbs/sedges: 34.54%	PASS
Lowland Meadow Indicator Species recorded	TWO
Sneezewort, Bistort	

Other neutral grassland consideration:

>20% cover of accepted herbs/sedges: 34.54%	PASS
>8 taxa per square metre inc forb, grass, sedge, rush (average): 9.09	PASS
>/ one grass species not sown for agriculture abundant (purple below)	PASS
Does not exceed 30% cover of Ryegrasses and White Clover	PASS

THIS IS OTHER NEUTRAL GRASSLAND g3c (at least) and is NOT "Modified Grassland g4"
CONDITION: 4 passes - Moderate

4.11 Field 2 with Scobell Street frontage 11/05/2025

11 quadrats with between 6 and 10 species. A total of 36 species is this field not including shrubs. The rough roadside area is not included in the above – 20 species inc Bistort

g3a Neutral Grassland Lowland Meadow Consideration:

More than 15 species of grasses, forbs, ferns, sedges per square metre	FAIL
Does not exceed 10% cover of Ryegrasses and White Clover	PASS
>30% cover of accepted herbs/sedges: 26.455%	FAIL
Springtime Lowland Meadow Indicator Species present	TWO
Pignut, Bistort	

Other neutral grassland consideration:

>20% cover of accepted herbs/sedges: 26.455%	PASS
>8 taxa per square metre inc forb, grass, sedge, rush (average): 8.27	PASS
>/ one grass species not sown for agriculture abundant (purple below)	PASS
Does not exceed 30% cover of Ryegrasses and White Clover	PASS

THIS IS OTHER NEUTRAL GRASSLAND g3c (at least) and is NOT "Modified Grassland g4"
CONDITION: 4 passes – Moderate

4.12 FIELD 3 COPPER TROUGH FIELD 12/05/2025

10 quadrats with between 6 and 11 species. A total of 28 species is this field not including shrubs.

g3a Neutral Grassland Lowland Meadow Consideration:

More than 15 species of grasses, forbs, ferns, sedges per square metre	FAIL
On average does not exceed 10% cover of Ryegrasses and White Clover	PASS
>30% cover of accepted herbs/sedges: 35.1%	PASS
Springtime Lowland Meadow Indicator Species present Pignut, Bistort	TWO

Other neutral grassland consideration:

>20% cover of accepted herbs/sedges: 35.1%	PASS
>8 taxa per square metre inc forb, grass, sedge, rush (average): 8.7	PASS
>/ one grass species not sown for agriculture abundant (purple below)	PASS
Does not exceed 30% cover of Ryegrasses and White Clover	PASS

THIS IS OTHER NEUTRAL GRASSLAND g3c (at least) and is NOT "Modified Grassland g4"
CONDITION: 4 passes – Moderate

4.13 FIELD 5 SOUTHEASTERN FIELD 14/05/2025 & 18/05/2025

10 quadrats with between 7 and 13 species. A total of 21 species is this field not including shrubs.

g3a Neutral Grassland Lowland Meadow Consideration:

More than 15 species of grasses, forbs, ferns, sedges per square metre	FAIL
On site average probably exceed 10% cover of Ryegrasses (and White Clover)	FAIL
>30% cover of accepted herbs/sedges: 28.3 %	FAIL
Springtime Lowland Meadow Indicator Species present Bistort	ONE

Other neutral grassland consideration:

>20% cover of accepted herbs/sedges: 28.3%	PASS
>8 taxa per square metre inc forb, grass, sedge, rush (average): 9.9	PASS
>/ one grass species not sown for agriculture abundant (purple below)	PASS
Does not exceed 30% cover of Ryegrasses and White Clover	PASS

THIS IS OTHER NEUTRAL GRASSLAND g3c (at least) and is NOT "Modified Grassland g4"
CONDITION: 4 passes - Moderate

4.14 FIELD 6 RIDGE & FURROW FIELD 11/05/2025

10 quadrats with between 6 and 9 species. A total of 30 species is this field not including shrubs.
14 species recorded in wetland in SW corner of field.

g3a Neutral Grassland Lowland Meadow Consideration:

More than 15 species of grasses, forbs, ferns, sedges per square metre	FAIL
On average does not exceed 10% cover of Ryegrasses and White Clover	PASS
>30% cover of accepted herbs/sedges: 43.4%	PASS
Springtime Lowland Meadow Indicator Species present Pignut, Bistort	TWO

Other neutral grassland consideration:

>20% cover of accepted herbs/sedges: 43.4%	PASS
>8 taxa per square metre inc forb, grass, sedge, rush (average): 7.6	FAIL
>/ one grass species not sown for agriculture abundant (purple below)	PASS
Does not exceed 30% cover of Ryegrasses and White Clover	PASS

THIS IS OTHER NEUTRAL GRASSLAND g3c (at least) and is NOT "Modified Grassland g4" (passed 3 out of 4)
CONDITION: 4 passes - Moderate

4.15 FIELD 7 TWO PITS FIELD

11/05/2025

10 quadrats with between 7 and 11 species. A total of 44 species in this field not including shrubs.

g3a Neutral Grassland Lowland Meadow Consideration:

More than 15 species of grasses, forbs, ferns, sedges per square metre	FAIL
On average does not exceed 10% cover of Ryegrasses and White Clover	PASS
>30% cover of accepted herbs/sedges: 26.1%	FAIL
Springtime Lowland Meadow Indicator Species present Pignut, Bistort	TWO

Other neutral grassland consideration:

>20% cover of accepted herbs/sedges: 26.1%	PASS
>8 taxa per square metre inc forb, grass, sedge, rush (average): 9.1	PASS
>/ one grass species not sown for agriculture abundant (purple below)	PASS
Does not exceed 30% cover of Ryegrasses and White Clover	PASS

THIS IS OTHER NEUTRAL GRASSLAND g3c (at least) and is NOT "Modified Grassland g4"

CONDITION: 4 passes - Moderate

4.16 We will happily take anyone onto the site and will test any random quadrats they like. The reader can do it themselves. Four sticks, a tape measure, one metre square, count all the different species and assess % coverage. Due to plants overtopping each other the count can be over 100%.

4.17 So, the above are the facts. Now let us look at the fiction from FPCR:

4.18 Total of four species recorded, no quadrat data presented, no DAFOR, no Indicator Species recorded. One day allowed on site for their staff member to survey the stream and ditches, assess the hedges and assess the scrub and woodland strip and assess the grassland which measures about 11.56 hectares when using an online polygon measuring tool. The staff member has "over four years' experience". The three full days the FOBF ecologist took, with nearly 40 years' experience in botany surveys, may have not been complete. **The FPCR staff member had NO TIME allowed to do the necessary work**, even if their skill or fitness level set was up to it. Why did FPCR allow basically no time to do the required UKHab survey?

4.19 From this baseline of no results FPCR then builds this fiction:

"4.7 The habitats within the Site are mapped on Figure 2. The Site primarily comprises modified grassland of which, on the southern aspect, specifically is wet. The Site has small areas of mixed and bramble scrub and a small area of mixed woodland. There is a network of hedgerows and lines of trees and two watercourses one identified as a wet ditch in the north of the Site and one identified as Walshaw Brook in the south of the Site.

Modified grassland

4.8 Modified grassland (MG) was the most dominant habitat on Site. Six areas of MG were identified. All MG parcels were not subject to any grazing at the time of the survey and appeared to receive limited management. MG parcels 1, 2 and 4 had a varied sward height with good structural diversity.

*4.9 All the MG parcels failed the broad definition for other neutral grassland habitat which included not meeting the criteria of <8 species per m² and <20% of broadleaved herbs and sedges. The MG parcels do have some other neutral grassland indicator species present, such as; ribwort plantain *Plantago lanceolata*, creeping thistle *Cirsium arvense* and creeping buttercup *Ranunculus repens*. However, these are all at low frequencies and fail to meet the 'other neutral Grassland' frequency criteria. The dominant grass species present is meadow foxtail *Alopecurus pratensis* which is a fast*

growing grass identified on wetter Sites, and similar to perennial rye-grass *Lolium perenne*, which is often identified on drier Sites.

4.10 All areas are of low distinctiveness and are species poor, generally comprising an average of less than 5 species per m². All six areas were in 'poor' condition at the time of surveying. Modified grassland habitats within the Site are therefore not considered to be an important ecological feature within the context of this assessment."

4.20 We note that no quadrat data is provided by FPCR. And that is the sum total of the data they collected and upon which they made their assessment in one day whilst looking at streams - Ribwort Plantain, Creeping Thistle, Creeping Buttercup and Meadow Foxtail. That is four listed grass/herb species. And none of their non-existent quadrats achieve 8 species per square metre. And from no botany survey they claim they have enough data to complete a UKHab assessment and thus worked out for BNG that the grassland is Poor Condition Modified Grassland. They never did a survey and they never did an assessment. They state the site was ungrazed so there was no reason not to see what was there. This did not look. They could not look in a single day. This is a very poor piece of work, ranking with the worst the FOBF ecologist has encountered in a long career.



5 HEDGEROWS – PRIORITY HABITATS

5.1 The hedges and hedge fragments consisted of unmanaged Hawthorn on hedge banks, supplemented with Holly, Elder, Dog Rose, English Oak, English Alder, Wild Cherry, Rowan, Hazel, Ash (disease present on site), Grey Willow, Ivy and Bramble and a few individuals of Sycamore, Lupin and Horse Chestnut. The hedges are tall, wide and bushy, and are dense both at the base and at height.

5.2 The ground flora of the hedge banks is woodland in character with all told eight "Woodland Species" of the Hedgerow Regulations - with Bluebell (native), Pignut, Common Dog-violet, Herb-robert, Lady Fern, Broad Buckler Fern, Common Male Fern and Scaly Male Fern plus Nettle, Cleavers,

Honeysuckle, Greater Stitchwort, Wood Forget-me-not, Cow-parsley, Garlic Mustard, Rosebay Willowherb, Creeping Soft-grass, Red Fescue and False Oat-grass.

5.3 Aliens Himalayan Balsam and Pink Purslane are present showing the dampness of the site.

5.4 These are Good Condition hedgerows in terms of BNG.

5.5 The Lanpro Historic Environment Desk-based Assessment in the application's Technical Report states they believe the hedge between fields 5 and 6 to the south east of the site (adjacent the ridge and furrow)(aka Hedge 2 in the FPCR Reports) is "of potential importance".

5.6 Now FPCR claim that they have considered the hedgerows under the Hedgerow Regulations thus:*"4.17 None of the hedgerows would be considered important under the Hedgerow Regulations 1997 due to the low number of woody species present. All hedgerows were in 'good' condition except H3 which was considered to be in 'moderate'. However, all hedgerows supported at least 80% native canopy species and therefore meet the criteria as a Habitat of Principal Importance under the NERC Act 2006."*

5.7 It is good that FPCR state the hedgerows are Priority Habitats for the purposes of any planning application and we ask the Council planners to note this.

5.8 However the Hedgerow Regulations has three strands – historic environment; woody species numbers and frequency; home to protected species or red-listed birds. So as all of the Hedgerows support breeding (or at least singing) Greenfinch and/or House Sparrow, Red Listed birds, then all are Important Hedgerows under the Hedgerow Regulations.

5.9 FPCR do not understand the provisions of the Hedgerow Regulations.

5.10 Do any of the Hedgerows qualify as Important Hedges based on Numbers of Woody species and Woodland (Plant) Species?

Yes. Hedge H3 of FPCR, the southern boundary hedge, is an Important Hedgerow - it has Hawthorn, Elder, Holly, English Alder, Grey Willow, Ash, English Oak and Dog Rose of the qualifying tree species. That is 8 species thus qualifying as an Important Hedgerow. Furthermore it also has a bank, a partial ditch, no gaps, connections with 2 other hedges and 5 qualifying Woodland (Plant) Species – Bluebell, Herb-robert, Common Male Fern, Lady Fern, Broad Buckler Fern (as well as Bistort).

5.11 Had FPCR actually conducted a proper hedgerow botany survey they would have seen these features and would have recorded at least Hedge 3 as an Important Hedgerow.

5.12 Shortness of time to respond prevents us running the data from the other hedges through the methodology. Note the comments of Lanpros about Hedge 2 of FPCR in the Historic Environment Desk-based Assessment.

6 BIRDS

6.1 Now Helen Leach for Bury Planning Development Management specifically asked Emery Planning (email 20/11/2024) for an Ecological Assessment that included a breeding bird survey.

6.2 Here is the bird list from FPCR given in the application's Technical reports. Our bird list from this 2025 survey and a visit earlier in 2025 confirms some species and adds others (at foot). We have increased the site list of 28 provided by FPCR to 42 species. The Walshaw Scobell Street list has risen in importance – with FPCR there were 7 Amber Listed species and 4 Red Listed species, 5 being Priority

Species. The site list now has an extra 6 Amber Listed species, an extra 2 Red Listed species, 2 more Priority Species and 2 Protected Species. There are now 42 species recorded, 13 Amber Listed species and 6 Red Listed species, 7 Priority Species and 2 Protected Species. **FOBF expect that this extra importance is taken into account as a material planning consideration.**

Canada Goose			Also 2025
Mallard	Amber List		
Swift	Red List		Also 2025
Feral Pigeon			
Woodpigeon	Amber List		Also 2025
Collared Dove			Also 2025
Jay			
Magpie			Also 2025
Jackdaw			Also 2025
Carrion Crow			Also 2025
Blue Tit			Also 2025
Great Tit			
Swallow			
Long-tailed Tit			
Chiffchaff			
Whitethroat	Amber List		Also 2025
Wren	Amber List		
Starling	Red List	Priority Species	Also 2025
Song Thrush	Amber List	Priority Species	
House Sparrow	Red List	Priority Species	Also 2025
Dunnock	Amber List	Priority Species	Also 2025
Blackbird			Also 2025
Robin			Also 2025
Pied Wagtail			
Chaffinch			Also 2025
Greenfinch	Red List		Also 2025
Goldfinch			
Reed Bunting	Amber List	Priority Species	
Rook	Amber List		Extra 2025
Herring Gull	Red List	Priority Species	Extra 2025

Common Gull	Amber List		Extra 2025
Lesser Black-b'd Gull	Amber List		Extra 2025
Blackcap			Extra 2025
Lesser Redpoll	Red List	Priority Species	Extra 2025
Siskin			Extra 2025
Tawny Owl	Amber List		Extra 2025
Sparrowhawk	Amber List		Extra 2025
Redwing	Amber List	Protected Species	Extra 2025
Common Buzzard			Extra 2025
Lesser Whitethroat			Extra 2025
Goldcrest			Extra 2025
Barn Owl		Protected Species	iNaturalist 1/1/2019 162m to south and confirmed over on bat walk in Field 1 Cricket Field NE of Cophthorne Cattery on 22/05/2025.

The Red Listed and Priority Species birds are in MORE hedgerows and scrub areas in 2025 than FPCR indicated for 2024.

7 GREAT CRESTED NEWTS & PRIORITY SPECIES COMMON TOAD

7.1 There never was any need for the FPCR to survey for Great Crested Newts as the distribution of all amphibians in Bury is well known. Dave Bentley completed a survey of hundreds of ponds for Bury Council 20 years ago. We know where every newt pond is.

7.2 Now EPRC stated that they would be looking for Priority Species but not once do they mention the Priority Species Common Toad which breeds in the reservoirs just to the south of the site. It is a serious omission for a survey for Priority Species not to survey for Common Toad when doing aquatic surveys. As a result the client and the LPA have no data on population size of the Priority Species Common Toad that will be impacted upon by the development – losses will be from hydrological impact on the water source for the reservoirs, possible eutrophication, and impact on Toad land habitat from direct loss and further killing on roads. This has not been investigated by FPCR at all.

7.3 We are aware that a search for reptiles was completed even though we have no records of reptiles in Bury. None have turned up in a lifetime's nature conservation work in the Borough. We know a survey was conducted because some of the metal refugia are still present on site a year after the survey.

7.4 Table 13 is a list of records provided by the Greater Manchester Ecology Unit. We do not understand why the Great Crested Newt records from Mason's Farm shop west of Walshaw Village from 2004 are not showing. These Great Crested Newt records are held by Bury Planning Department, having commissioned the work, and also the GMEU. The nearest GCN breeding pond is 768m from the site boundary. This was an incomplete data search. Why?

8 ALIEN INVASIVE PLANT SPECIES

8.1 During the FOBF botany survey of May 2025 Alien Invasive Schedule 9 plants species (and others of concern) were looked for and recorded. We do not seek to do the job of the developer by mapping these.

8.2 This is the methodology of FPCR *“Invasive/ Non Native Species 3.72 Consideration was given as to the presence of invasive species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) (WCA 1981).”*

8.3 The FOBF survey recorded FIVE Alien Invasive Plant species on site:

Himalayan Balsam Schedule 9 Alien Invasive Plant

Montbretia Schedule 9 Alien Invasive Plant

Japanese Rose *Rosa rugosa* Schedule 9 Alien Invasive Plant

Herringbone Cotoneaster Schedule 9 Alien Invasive Plant

Snowberry listed as an Alien Invasive Shrub for the BNG Woodland Condition Assessment

8.4 The FPCR Ecological Appraisal report for Wain Estates listed just one Alien Invasive Plant species:

Himalayan Balsam Schedule 9 Alien Invasive Plant

8.5 Now Helen Leach for Bury Planning Development Management specifically asked Emery Planning (email 20/11/2024) for an Ecological Assessment that included Invasive Species. This means all, not just some. We conclude that Bury Council’s request has not been dealt with. Such species need to be properly destroyed as part of any planning scheme. Any Ecological Study seeking a planning consent must properly identify and map Alien Invasive Species – at least those who seek to meet “best practice” as promoted by the CIEEM, GMCA and by The EIA Regulations.

9 INVERTEBRATES

9.1 The CIEEM Guidelines for Preliminary Ecological Appraisal requires *“An assessment of the possible presence and likely importance of the following: • Terrestrial and aquatic invertebrates”*. Box 1 of the PEA Guidelines discusses Protected and Priority Species information and this is stated to include Protected and Section 41 Priority Species (SPI) and Priority Habitats and also Red Data listed taxa and indeed Nationally Scarce and Nationally Notable taxa (of which there are many invertebrates), as well as Birds of Conservation Concern Red and Amber listed taxa. It gives invertebrate assessments equal standing to bird assessments.

9.2 Thus we can reasonably require an accurate assessment of invertebrates from any planning application. Given the timescales of responding to THIS planning application before the deadline the FOBF ecological has been unable to provide more than a preliminary appraisal. FPCR, the ecological consultants for the project, had a whole survey year to prepare a proper assessment and they did not do so.

9.3 The FOBF ecologist is an entomological consultant. In Bury at Elton Reservoir Allocation he has located 1285 invertebrate taxa with 43 of these being officially Scarce (Red Data or Nationally Scarce and Nationally Notable). The key point here is that careful evaluation and then sampling in non-

intensively managed piece of urban edge countryside in this very town might well produce invertebrate species of interest that are worthy of conservation.

9.4 This is what FPCR claim: *“Invertebrates.*

4.28 Habitats on Site offer limited value for invertebrates. Trees, woodland, grassland and hedgerow boundaries will hold higher value for some common invertebrate species but are unlikely to provide habitat for any Species of Principal Importance (SPI).

4.29 Invertebrates are therefore not considered further in the assessment.”

9.5 Bearing in mind what an entomological consultant has found in Bury’s urban edge countryside it is clear that the statement of FPCR was not written by an entomologist and was not written by anyone who had read the Desk Study in the same report. It is likely that this is simply copy and paste between reports.

9.6 So let’s examine what the Desk Study of FPCR said with regards to invertebrates:

“Moths and Butterflies

Buff Ermine Spilosoma lutea SPI 1 A single sighting observed in 2011 c. 270m south west the Site

Cinnabar Tyria jacobaeae SPI 1 A single sighting observed in 2020 adjacent to the northern Site boundary

White Ermine Spilosoma lubricipeda SPI 1 A single sighting observed in 2011 c. 270m south west the Site”

9.7 So they have records of three Invertebrate Priority Species aka SPI aka Species of Principal Importance, one literally adjacent the site boundary. So why then state: *“Trees, woodland, grassland and hedgerow boundaries will hold higher value for some common invertebrate species but are unlikely to provide habitat for any Species of Principal Importance (SPI)”*

9.8 FPCR have clearly not investigated the habitat requirements of these three moths before deciding that the site won’t provide a habitat for them. FPCR should have set out the habitat requirements of these insects but they did not engage with the species at all.

Buff Ermine – food plants - many herbaceous species, especially Nettle...Honeysuckle – lives in moist habitat including parks, gardens, hedges, woodland. Plenty of food plants and damp grassland with hedges on site.

White Ermine – food plants – wide range including Nettles and Docks. Gardens, hedges, woodland etc. Plenty of food plants and damp grassland with hedges on site.

Cinnabar – Food plants – Common Ragwort and other members of the genus. That lives on the site. So where was it seen? The Desk Study told them exactly where to look - adjacent to Field 2 where in the roadside area Common Ragwort grows. And any visit on a sunny day in from May will reveal that moth flying in the site. The FOBF entomologist recorded two of them flying there on 11/05/2025.

9.9 So at least one invertebrate SPI Priority Species was highlighted by them and discounted from being present for no reason at all. When it clearly is present.

9.10 FPCR ‘s staff on this project do not understand invertebrate conservation, cannot recognise a species they had been advised to look out for, and cannot engage with a list of invertebrates provided to them other than to dismiss the list outright for no reason whatsoever.

9.11 A short list of easily identified invertebrates was recorded by the FOBF ecological whilst conducting the botany survey. There are many more species to be recorded on this site:

Cinnabar Priority Species

Alder Leaf Beetle RDBNRDD – Listed as Red Data Nationally Rare Data Deficient in 2014 but now having fixed the reason for its near extinction and doing well on Alder trees. A bright blue beetle very easy to spot on any on Alder tree leaves – there are four such trees on site. Any ecologist engaging in a minimal way with insects can record this on sight.

Orange-tip Butterfly one of several easy to records insects, Speckled Wood Butterfly, Green-veined White Butterfly, Small Tortoiseshell Butterfly, Large White Butterfly

Green Dock Beetle, Altica Willowherb Beetle, 7-spot Ladybird, Rove Beetle *Stenus junco*, Ground Beetles *Pterostichus nigrita* and *Bembidion lampros*.

Downlooker Snipe Fly, Hoverflies – various, *Rhingia* sp Hoverfly, Yellow Dung Fly, *Tipula* Craneflies.

Wetland Snail *Oxyloma elegans*, White-lipped Banded Snail, various slugs

Red-tailed Bumblebee, White-tailed Bumblebee, Early Bumblebee, Hairy-faced Black Ant

Banded Wolf Spider *Pardosa amentata*

Grass Bugs including *Stenodema laevigata*

Flat-backed Millipede *Polydesmus angustus*

The above records made with no effort whatsoever, all easy to identify.

***Trocheta subviridis* is a large semi-terrestrial leech** was found in Field 1 (southern part) under an abandoned tent. This was a first record in a 40 year career for the surveyor but in the last 10 years the Environment agency have been finding them in NW England. It remains a Greater Manchester rarity.

9.12 Conclusion of the FOBF entomologist: The meadows, hedges, trees and wetlands, and especially the Priority Habitats will support a range of common and uncommon invertebrate species, specific to the habitat type. Some of these species will be officially scarce, and indeed one Priority Species Moth, one Red Data listed beetle, and one county rarity Leech have already been recorded by chance.

10 FOX AND OTHER MAMMALS NOTED

10.1 There is an occupied Fox den in Field 4 Quarry in a patch of bare sand. Whilst the Fox is not a Protected Species it is illegal to crush them or bury them alive by virtue of the Wild Mammals (Protection) Act 1996. “If, save as permitted by this Act, any person mutilates, kicks, beats, nails or otherwise impales, stabs, burns, stones, crushes, drowns, drags or asphyxiates any wild mammal with intent to inflict unnecessary suffering he shall be guilty of an offence.” Therefore the dens can only be sealed and removed if work determines the dens are no longer in use and they are then sealed at the time.

10.2 Roe Deer were seen. The empty nests of Short-tailed Field Voles or Wood Mice were found under refugia. Small burrows of animals unknown were noted in some hedge banks.

11 BATS

11.1 It can be seen from the FPCR report that their static bat detectors on the application site made over 21,000 records of these protected mammals.

Common Pipistrelle 21,015 98.132%
Pipistrelle Species 247 1.153%
Myotis Species 82 0.383%
Nathusius' pipistrelle 53 0.247%
Soprano Pipistrelle 17 0.079%
Brown Long-eared 1 0.005%
100% is the total contacts

11.2 Bat walks by local naturalists, from Bolholt Reservoirs to Scobell Street (including on 22/05/2025), have recorded Common Pipistrelle, Nathusius' Pipistrelle, Soprano Pipistrelle AND Noctule Bat. We don't discount the large Alder on the southern hedge boundary from having a potential bat roost

11.3 The FPCR Report states their findings on bats in buildings and on bats in trees:

"Roosting Bats

4.46 There are no trees or buildings present at the Site containing features suitable for roosting bats. Buildings comprised a number of glass houses, metal and small wooden sheds.

4.47 It is therefore considered unlikely that roosting bats would pose a constraint to proposals, and they are scoped out of further assessment."

11.4 Why does the FPCR methodology cover 2 ¼ pages of type to explain its bats and buildings survey e.g. how roof tiles were examined, roof voids were entered, endoscopes used etc? None of this was actually done as it was not needed. More lazy copy and paste reporting to describe a methodology that was NOT employed.

11.5 FPCR state this contradictory comment regarding trees: *"4.21 The mature trees present increase the structural and habitat diversity of the Site and are likely to be of value to local wildlife including bats, birds and invertebrates."* The FOB ecologist has deduced the Alder tree, at least, needs further examination for potential roosting bats.

12 HEDGEHOGS – A PRIORITY SPECIES AND RED DATA VULNERABLE

12.1 Hedgehogs are a material planning consideration.

12.2 FPCR state this:

"5.32 Given the habitats on Site it is assumed that hedgehogs are present. As a result of their declining status of this species and their sensitivity to development activity they have been considered Site level importance and will therefore be scoped out of the EIA assessment.

However, the CEMP (Construction Environmental Management Plan) will include control measures to reduce the likelihood of harm through measures such as: installing escape routes or covering trenches overnight, and pre-clearance checks of suitable vegetation by an Ecological Clerk of Works. In addition, during the operational phase, hedgehog friendly fencing should be installed as part of the development, to allow movement of hedgehog through the Site."

This seems to be copy & paste. They are referring to an EIA that Emery Planning have asked the Council not to require!

12.3 That said, an appeal for local Hedgehog records was made by and local people came forwards with photographs and very believable testimony. This map shows that Hedgehogs, are seen in housing areas alongside the planning application countryside and are recorded dead on the roads killed crossing between habitat patches. The map here shows live records as blue squares and dead on road records as blue dots. They are killed crossing roads between patches of habitats. We only see them on roads and in gardens near patch habitats as they are active at night, so though we don't see them in the countryside we know they are there from edge records like these. **These records show that wholesale slaughter is planned for the local farmland Hedgehogs.**



Records	Species	Families	Groups	Downloads
Accepted name	Common name	Group		
<i>Erinaceus europaeus</i>	West European Hedgehog	terrestrial mammal		



Meadow Vetchling before flowering

13 GRASSLAND FUNGI

13.1 The CIEEM Guidelines for Preliminary Ecological Appraisal requires “An assessment of the possible presence and likely importance of the following: • Fungi”

13.2 Box 1 of the PEA Guidelines discusses Protected and Priority Species information and this is stated to include Protected and Section 41 Priority Species (SPI) and Priority Habitats and also Red Data listed taxa and indeed Nationally Scarce and Nationally Notable taxa (of which there are many grassland Fungi), as well as Birds of Conservation Concern Red and Amber listed taxa. It gives grassland Fungi assessments equal standing to bird assessments. Waxcap Grasslands are included in UKHab.

13.3 The FOBF ecologist includes Grassland Fungi in his assessments. In Bury at Elton Reservoir Allocation he has located for example 21 Waxcap taxa (including IUCN Red List and uncommon species) and 7 Clubs, Spindles and Corals etc and the site is of county, regional and national Importance for Grassland Fungi. The key point here is that an autumn careful evaluation and then sampling in non-intensively managed piece of urban edge countryside in this very town might well produce Grassland Fungi species of interest that are worthy of conservation. Walshaw Scobell Street may support important Grassland Fungi or an important assemblage.

13.4 Here is what FPCR said about Grassland Fungi.....

14 HISTORICAL FEATURES

14.1 We have made submissions to both Bury Planning and the Greater Manchester Archaeological Advisory Service that some features are worthy of being listed, and thus protected, on the County and Borough Heritage Environment Record – two sets of stone gate posts, two animal drinking troughs, some surviving ridge and furrow grassland and a potential Bronze Age Barrow site on the summit of the highest point of the site. The Lanpro Historic Environment Desk-based Assessment does not rule out that there may be sub-surface archaeological interest on the site, for which they have NOT investigated.

14.2 Lanpro states this “9). The existing field boundaries within and bounding the study site have been classified according to date and plotted in Figure 10. **The earliest available map was the Tottington Lower End Tithe map of 1838 (Figure 3), which showed the field boundaries having originated from the late 18th or early 19th century (Figure 10).** These relate to a large number of the present-day field boundaries within the study site, although many are so poorly preserved that they are only represented by modern post and wire fences or marked by a line of mature trees. The only field boundary of any potential importance, in accordance with the criteria of the 1997 Hedgerow Regulations, is a north/south hedgerow in the south-east of the study site; this is the most well preserved on site and pre-dates 1850.”

14.3 Given the earliest map showing field boundaries is the Tottington Lower End Tithe Map of 1838 then there is absolutely no way that Lanpro can state the map showed field boundaries (i.e. the hedgerows and hedge banks) “**having originated**” in the late 18th Century or early 19th Century. All one can tell is the date the boundaries were plotted as present - the statement by Lanpro is unfounded. **We can say the field boundaries pre-date 1838 and thus are some of the oldest known boundaries (and hedgerows) in the borough.**

15 PUBLIC RIGHTS OF WAY

15.1 In addition to the definitive footpaths there are actively used walking routes over the whole site and we submitted these are now *defacto* Public Rights of Way. The formalisation of these paths in law is in preparation.

16 LACK OF ECOLOGICAL INPUT TO THE PLACES FOR EVERYONE WALSHAW ALLOCATION JPA9

16.1 To set the lack of information and the need for a remedy to this lack of information in context we need to look at the lack of information in the supporting documents of Places for Everyone with both sets of surveyors deciding not to survey the site for botany and hence Priority Habitats - and Tyler Grange only using public footpaths. There was no ecological survey submitted to Places for Everyone. The below is taken from Examination Documents complete:

1 The **Technical Note from Tyler Grange of 2017** updated 2019 is here: <https://www.greatermanchester-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/10.03%20Site%20Allocations%20-%20Bury/JPA9%20Walshaw/10.03.40%20-%20JPA9%20-%20Walshaw%20HIMOR%20and%20VHW%20Ecology%20Technical%20Note,%202020.pdf>

2 “1.4. **This report does not constitute a comprehensive assessment of ecological issues, which would require additional fieldwork at the site.**”

3 “4.5. **The survey was conducted from public footpaths, and so not all of the site was accessed during the initial site visit;** details from the site visit were augmented by aerial maps to create the Habitat Features Plan 11034/P01a.” So no field plots were entered other than where paths are = no survey.

4 “5.1. **Whilst it is appreciated that this is only a broad level assessment,** and no protected species surveys have been undertaken, this technical note has demonstrated that development within the proposed site could be accommodated, with respect to ecological matters.”

5 There has been no ecological survey, no botanical survey of the plots, a one day (30/6/2017) walk around public footpaths on a huge site is the only input. There has been no record search. **This is a worthless piece of work that simply said there will be amphibians, bats, bird, badgers and perhaps, water vole, otters and reptiles. There is no recommendation for a proper Habitat Survey or botanical assessment of the field plots. This is not a PEA so the JPA9 allocation is unsound.**

6 This is **the PEA of Ascerta of 1st May 2019:** <https://www.greatermanchester-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/10.03%20Site%20Allocations%20-%20Bury/JPA9%20Walshaw/10.03.41%20-%20JPA9%20-%20Walshaw%20Redrow%20Preliminary%20Ecological%20Appraisal,%202019.pdf>

7 This report looks at just over a quarter of the JPA9 allocation, per the maps provided, so it is not a report for the whole allocation.

8 “4.7 The site visit was undertaken in early May. The phase 1 habitat survey was undertaken during the optimal survey period. Therefore, no limitations to the phase 1 habitat survey occurred.” “Table 5.1 **Detailed vegetation surveys are unlikely to be required due as this habitat is intensely managed.**”

9 The ecologists have fallen into the usual trap by stating that short grazed swards are only improved grassland and have therefore dismissed them. For instance at Coney Green Elton Reservoir the farmer grazes sheep over the autumn and winter and early spring after harvest and then allows the late spring, summer and early autumn for grass growth and a hay cut - the fields are registered Priority Habitat with Waxcap CHEGD but when the grass is short they cannot be evaluated or assessed as such. Proven facts tends to get in the way of assumptions. **As late as January 2025 the Greater Manchester Ecology Unit elected to make a large chunk of the short grassland at Elton Reservoir Allocation part of a Grade A Site of Biological Importance and this was accepted by Bury Council.**

10 "4.2.....The surveys particularly focused on the following species and habitat features:

- Mammals (badgers, bats, otter and water vole);
- Birds;
- Amphibians and reptiles;
- Invertebrates;
- Hedgerows and boundaries;
- Invasive plant species; and
- Plant communities and trees."

11 Regarding plant communities Ascerta recorded a total of 42 plant species. Dave Bentley recorded 38 plant species for Bury Council at one of the ponds alone. Not one parcel has a botany survey that can be used to test for Priority Habitats. There is no serious or competent botanical assessment ergo this is not even a Habitat Survey as claimed.

12 Regarding invertebrates other than this copy and paste methodology invertebrates are not mentioned again.

13 "Table 5.1 Detailed vegetation surveys and bat activity surveys may be required....etc"

"Table 5.3 The trees within the site provide at least negligible to moderate bat roost habitat. The trees were not subject to a detailed inspection during the visit."This is totally contrary to the copy and paste methodology which states: "4.3....Preliminary Roost Assessment Trees All trees were inspected for Potential Roost Features (PRFs). Features searched for included: Natural or woodpecker holes, cracks/splits in major limbs, loose bark, hollows/cavities, dense epicormic growth, bird and bat boxes. Where such features were found they were investigated for scratches or staining, bat droppings and smoothing of surfaces around entry points. Trees assigned a suitability of moderate or above may require further inspection if they are to be lost to the development.

14 There is a one and half page, detailed, copy and paste, tree inspection methodology for bat roots at 4.34....then this appears at "4.7 The preliminary roost assessment of trees where (sic) undertaken during the suboptimal survey period and suitable features may not have been visible due to the foliage growth."

15 Bats have 143 mentions in the report but they admit they have done no real survey work for bats!

16 This is not a PEA as it fails to engage with Plants, Fungi, Invertebrates and considers only c 25%+ of the allocation, is a proforma report that does not do what it states it will do, and thus the JPA9 allocation is unsound (twice).

.17 BEST PRACTICE IN ECOLOGY NOT FOLLOWED IN EITHER PLANNING APPLICATION OR ALLOCATION SUPPORTING DOCUMENTS

17.1 Best Practice in ecology is promoted by the Chartered Institute for Ecology and Environmental Management including via the Guidelines for Preliminary Ecological Appraisals and the Guidelines for Ecological Impact Assessment. Best Practice also embedded in the GMCA's guidelines for Places for Everyone, the Government's EIA Regulations and is alluded to by the requirements of the NPPF.

17.2 FPCR's reports for this development mention "best practice" twice.

17.3 GMCA stated this for Places for Everyone : *"It is assumed all development will be brought forward in line with **best practice**, the requirements of the planning system and legislation that covers the protection of designated sites/habitats and species. There is potential that non-designated sites and wildlife corridors may be affected by development. Larger sites on the edge of the urban area on greenfield land might pose more of a potential risk to biodiversity than sites in the urban area. However they would also have the potential to create new sites of ecological interest and the development of multi-functional sites co-located next to housing."* From GMCASD17 Growth and Spatial Options Paper (02.01.10).

17.4 The EIA Regulations require best practice (the failure to provide which is what we have been complaining about throughout the PFE process): *"(b) information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment;"*

17.5 NPPF December 2024 (and earlier renditions): *Habitats and biodiversity*

192 *To protect and enhance biodiversity and geodiversity, plans should:*

Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

17.6 There is need to point out that the "ecology work" for the **PFE Walshaw Allocation** did in no way identify, map and safeguard the Priority Habitats we now know to exist on site (Field 1 (Brookside) and Field 4 (Quarry and Marsh). And that the proposal (in the outline plans) in no way promotes the conservation of these Priority Habitats: in one case loss for housing development, in the other case excavation for a balancing lake. Nor did the "ecology work" recognise the "g3c Other neutral grassland" that covers the rest of the site.

193. *When determining planning applications, local planning authorities should apply the following principles:*

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

17.7 FPCR states: *"3.80 This assessment aims to provide baseline ecological data for the Site and as such presents an overview of the habitats and features present. Due to the transient and complex*

nature of ecosystems, no investigation can provide a complete representation or prediction of the natural environment present, however every effort has been made to ensure an accurate description of the Site in presented following best practice guidance, experience, and professional judgement.

3.81 The UKHab map (Figure 2) has been reproduced from detailed field notes and informed by aerial imagery, OS mapping and Site maps provided by the client. The accuracy of this figure is therefore ultimately guided by the accuracy of these sources and can only be relied upon to a certain degree of resolution.” It is interesting how FPCR blames other sources for their deficiencies in their own work.

17.8 This report refutes the above statements from FPCR. The work for FOBF has proven that there has been no botanical survey of the meadows, there could not have been in the time allowed, and that the UKHab assessment of FPCR is a work of fiction. Had a survey been done then the plant species which make up the meadows being considered would have been recorded. Both sets of habitat work by FPCR and FOBF were completed in May, a year apart. The two Priority Habitats will appear on Natural England’s Priority Habitat Inventory and MAGIC Map in due course, whilst the others may be accepted as Semi-improved Good.



Hedgerow Bluebell



Bistort



Common Sedge



Sneezewort pre-flowering



Greater Bird's-foot-trefoil pre-flowering

THESE ARE THE TABLES BELOW. EMAIL AUTHOR TO REQUEST AN EXCEL FILE:

Gtr Bird's-foot-trefoil LMIS	0												
Common Sedge LMIS	0												
Sneezewort LMIS	1	R?			iNat record								
Oval Sedge	0												
Bush Vetch	0												
Cuckooflower	4	O		5		4	5				4		
Field Woodrush	0												
Bluebell (native)	0	Hedges											
Red Clover*	2	VO			10	10							
Ribwort													
Plantain*	4	O-F	40		5	5					2		
Common Sorrel	5	O			1		1	2	3	5			
Meadow Buttercup*	8	O-A	5	50	10	5	60	10		10	5		
Common Mouse-ear	4	O	1			1				3	1		
Sticky Mouse-ear	0												
Dandelion	2	O	1		1								
Common Hogweed*	0	Hedges											
Marsh Cudweed	1	VLO											15
Common Water-starwort	1	VLF											10
Bog Stitchwort	1	VLF											1
Cleavers	0	Edges											
Short-fruited Willowherb	0												
Great Willowherb	0												
Rosebay Willowherb	0												
Wavy Bitter-cress	1	VLO				1							
Wild Angelica*	0												
Marsh Thistle	0												
Marsh Horsetail	0												

Common Horsetail	0												
Water Horsetail	0												
Soft Rush*	2	OVL F										20	1
Toad Rush	1	VLF											6 0
Nettle (ignore for CA)	2	VO+ edges								2		5	
Cow-parsley (ignore for CA)	0	Edges											
Honeysuckle (ignore for CA)	0												
Bramble (ignore for CA)	0	Hedges											
% Cover herbs & sedges above			47	55	27	26	66	12	3	20	1 2	25	8 7
Average 11 quadrats 34.54%													
Tufted Hair-grass	0												
Marsh Foxtail*	3	OVL F				5					1		5
Meadow Foxtail	8	F- OLA	1	10	10	1	5	5	2	72			
Creeping Bent*	2	OVL F										5	3
Common Bent*	0												
Red Fescue	3	OVL F			1			1	1				
Rough Meadow-grass*	4	O			1	1				1		5	
Smooth Meadow-grass	4	O	1				1	1	1				
Sweet Vernal-grass	6	F	70	70	70	52				2	7 0		
Crested Dog's-tail*	0												
Yorkshire Fog*	1 1	A	10	30	10	5	60	15	90	1	1 0	70	2
Creeping Soft-grass	0	OLF											

Soft Brome	0												
False Oat-grass*	1	Edges								2			
Floating Sweet-grass	1												3
Cock's-foot*	1	VO								1			
Perennial Ryegrass*	3		2		1		4						
Italian Ryegrass	3	O					5	1	1				
Creeping Buttercup*	10	O-A	1	5	15	20	4	70	5	1	4	0	1
Broad-leaved Dock	2	O				4	2						
Creeping Thistle*	0	VO											
Himalayan Balsam (Sch 9)	0												
<i>Brachthecium rutabulum</i>	1		1										
Bindweed sp		Edges											
Wetlands in Field 1		Marsh by drain outfall		Marsh near Cattery									
Cuckooflower		O											
Red Clover*		R											
Common Sorrel		O		O									
Common Mouse-ear		O											
Dandelion				O									
Bog Stitchwort		OVL F											
Cleavers		F											
Short-fruited Willowherb		O-F											
Great Willowherb		O-F		O									
Wavy Bitter-cress		OVL F		O-F									
Common Horsetail		O		F									

Soft Rush*		F		D									
Nettle (ignore for CA)		F											
Bramble (ignore for CA)		VLD		O									
Meadow Foxtail		O-F											
Creeping Bent*		LF											
Rough Meadow-grass*		F											
Yorkshire Fog*		F											
Floating Sweet-grass		O											
Cock's-foot*		O											
Creeping Buttercup*		F		F									
Broad-leaved Dock		O											
Creeping Thistle*		O		O									
Himalayan Balsam (Sch 9)		F		F									
Greater Reedmace		LD											
Bittersweet		VLF											
Brooklime		VLF											
Common Ragwort		VO											
Broad Buckler Fern		O		O									
Lady Fern		O		A									
Common Male Fern				O									
Grey Willow				present									
Goat Willow				present									

Field 2
11/05/2025

Field with Scobell Street frontage
g3a Neutral Grassland Lowland Meadow
Consideration:
More than 15 species of grasses, forbs, ferns, sedges per square metre
Does not exceed 10% cover of Ryegrasses and White Clover
>30% cover of accepted herbs/sedges: 26.455%

Springtime Lowland Meadow Indicator
Species present
Other neutral grassland consideration:
>20% cover of accepted herbs/sedges: 26.455%
>8 taxa per square metre inc forb, grass, sedge, rush (average): 8.27
>/ one grass species not sown for agriculture abundant (purple below)
Does not exceed 30% cover of Ryegrasses and White Clover

FA
IL
PA
SS
FA
IL
T
W
O
PA
SS
PA
SS
PA
SS
PA
SS

THIS IS OTHER NEUTRAL GRASSLAND g3c (at least) and is NOT "Modified Grassland g4"
CONDITION: A 10 positive species listed in UKHab g3c * PASS; B Varied sward PASS; C little bare ground PASS; D no bracken PASS ; E Himalayan Balsam FAIL; E 10 or more taxa per metre FAIL . Four passes = Moderate

* = species listed in Ukhav for Other Neutral Grassland, plus any Lowland Meadow Indicator Species (LMIS)

	Field 2	DA	FO	R	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q
90															
Total species (excl moss)	36				10	6	9	9	9	5	9	10	8	9	7
Total % cover (excl moss)					100	100	118	117	160	100	0	3	3	9	8

AUTUMN HAWKBIT?

Bare ground	0															
Pignut LMIS	1	VL														1
Bistort LMIS	1	O														2
	Present	OV														
	t	LF														

Meadow Vetchling LMIS	0												
Gtr Bird's-foot-trefoil LMIS	0												
Common Sedge LMIS	0												
Sneezewort LMIS	0												
Oval Sedge	0												
Bush Vetch	0												
Cuckooflower	0												
Field Woodrush	0												
		He											
		dg											
		es											
Bluebell (native)	0												
Red Clover*	0												
Ribwort													
Plantain*	2	O	67										2
Common Sorrel	9	O-F	2	7	10	60	5	2	1	4			1
Meadow Buttercup*	8	O-A	5	20	4	1		4	5	60	1		
Common Mouse-ear Sticky	1	O-VLF	2										
Mouse-ear Dandelion	1	R	1										
Common Dandelion	2	O	1		1								
Hogweed*	0												
Marsh Cudweed	0												
Common Water-starwort	0												
Bog Stitchwort	0												
		Edg											
		es											
Cleavers	0												
Short-fruited Willowherb	0												
Great Willowherb	0												
Rosebay Willowherb	0	VL											
Wavy Bitter-cress	1	O											4

Great Willowherb	R
Common Horsetail	LO
Cow-parsley (ignore for CA)	OL F
Meadow Foxtail	A
Creeping Bent*	VLF OL
Red Fescue	F
Rough Meadow-grass*	OV LF
Sweet Vernal-grass	O
Yorkshire Fog*	O OV
Cock's-foot*	LF
Creeping Buttercup*	O
Creeping Thistle*	O
Himalayan Balsam (Sch 9)	VLF
Bindweed sp Hybrid	VO
Bluebell	R
Common Ragwort	VO

Cinnabar Moth Priority Species
in the roadside habitat

<p>Field 3</p> <p>12/05/2025</p>	<p>Copper Trough</p> <p>Field</p>	<p>g3a Neutral Grassland Lowland Meadow</p> <p>Consideration:</p> <p>More than 15 species of grasses, forbs, ferns, sedges per square metre FAI</p> <p>On average does not exceed 10% cover of Ryegrasses and White Clover L</p> <p>>30% cover of accepted herbs/sedges: PA</p> <p>35.1% SS</p> <p>Springtime Lowland Meadow Indicator Species present TW</p> <p>O</p> <p>Other neutral grassland consideration:</p> <p>>20% cover of accepted herbs/sedges: PA</p> <p>35.1% SS</p> <p>>8 taxa per square metre inc forb, grass, sedge, rush (average): 8.7 PA</p> <p>>/ one grass species not sown for agriculture abundant (purple below) SS</p> <p>Does not exceed 30% cover of Ryegrasses and White Clover PA</p> <p>SS</p> <p>THIS IS OTHER NEUTRAL GRASSLAND g3c (at least) and is NOT "Modified Grassland g4"</p> <p>CONDITION: A 10 positive species listed in UKHab g3c* PASS; B Varied sward PASS; C little bare ground PASS; D no bracken PASS ; E Himalayan Balsam FAIL; E 10 or more taxa per metre FAIL . Four passes = Moderate</p>											
	<p>Field 3</p> <p>DAF</p> <p>OR</p>	<p>* = species listed in Ukhhab for Other Neutral Grassland, plus any Lowland Meadow Indicator Species (LMIS)</p>											
		<table border="0"> <tr> <td></td> <td style="text-align: center;">Q1</td> <td style="text-align: center;">Q2</td> <td style="text-align: center;">Q3</td> <td style="text-align: center;">Q4</td> <td style="text-align: center;">Q5</td> <td style="text-align: center;">Q6</td> <td style="text-align: center;">Q7</td> <td style="text-align: center;">Q8</td> <td style="text-align: center;">Q9</td> <td style="text-align: center;">Q10</td> </tr> </table>		Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10
	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10			
Total species (excl moss)		9	6	11	9	10	8	8	8	10			
Total % cover (excl moss)		145	153	145	119	132	177	8	8	0			
AUTUMN HAWKBIT?	28												
Bare ground	0												
Pignut LMIS	3	OLF	1	2	15								
Bistort LMIS	2	F-A		60	20								
Meadow Vetchling LMIS	0												
Gtr Bird's-foot-trefoil LMIS	0												
Common Sedge LMIS	0												

Sneezewort													
LMIS	0												
Oval Sedge	0												
Bush Vetch	0												
Cuckooflower	1	VO											1
Field Woodrush	0												
		VO+											
		hedg											
Bluebell (native)	1	e			2								
Red Clover*	0												
Ribwort													
Plantain*	2	O	2							5			
Common Sorrel	8	F	60	50	10	5	10	10		10			10
Meadow	1												
Buttercup*	0	F	5	1	1	2	5	5	5	5	15		20
Common													
Mouse-ear	1	O							8				
Sticky Mouse-ear	0												
Dandelion	1	VO											1
Common													
Hogweed*	0												
Marsh Cudweed	0												
Common													
Water-starwort	0												
Bog Stitchwort	0												
		Edge											
		s											
Cleavers	0												
Short-fruited													
Willowherb	0												
Great													
Willowherb	0												
Rosebay		Edge											
Willowherb	0	s											
Wavy Bitter-cress	0												
Wild Angelica*	0												
Marsh Thistle	0												
Marsh Horsetail	0												
Common													
Horsetail	0												
Water Horsetail	0												
Soft Rush*	0												
Toad Rush	0												
Nettle (ignore for CA)	0												
Cow-parsley (ignore for CA)	1	R					5						
Honeysuckle (ignore for CA)	0												

Bramble (ignore for CA)	0	Edges										
% Cover herbs & sedges above			68	111	15	42	20	15	13	20	15	32
Average of 10 quadrats 35.1%												
Tufted Hair-grass	0											
Marsh Foxtail*	0	VO										
Meadow Foxtail	7	O	1		1	1	1			1	1	3
Creeping Bent*	0											
Common Bent*	2	VO			3		1					
Red Fescue	1										25	
Rough Meadow-grass*	2	O-LF					2	5				
Smooth Meadow-grass	4	O					4		5		5	1
Sweet Vernal-grass	5	O-F		1					1	30	70	25
Crested Dog's-tail*	0											
Yorkshire Fog*	0	A	60	40	70	50	70	90	40	10	50	23
Creeping Soft-grass	0											
Soft Brome	0											
False Oat-grass*	0											
Floating Sweet-grass	0											
Cock's-foot*	3	O-VLF			5	5	4					
Perennial Ryegrass*	7	O-F	5		1				5	5	2	5
Italian Ryegrass	6	O	1		20	20			1	5		3
Creeping Buttercup*	9	O-A	10	1	30	1	30	60	40	5		15
Broad-leaved Dock	1	O										4
Creeping Thistle*	0											
Himalayan Balsam (Sch 9)	0	Hedge										
<i>Brachthecium rutabulum</i>	0											
Raspberry		VLF Hedge										
Herb-robert		e										

Snowberry
(alien) By
houses

Field 4 Quarry &
linear marsh
14/05/2025 &
18/05/2025

Quarry &
linear marsh
g3a Neutral Grassland Lowland

Meadow Consideration:

More than 15 species of grasses, forbs, ferns, sedges per square metre FA
IL
Does not exceed 10% cover of PA
Ryegrasses and White Clover SS
>30% cover of accepted PA
herbs/sedges: 52.818% SS
Springtime Lowland Meadow Indicator PA
Species present: FIVE SS
THIS IS A LOWLAND MEADOW
PRIORITY HABITAT g3a

		Field 4Q										Q	Q
		DAFOR	Q6	Q7	Q8	Q9	Q10	Q11	Q12	Q16A	Q16B	Q17	Q18
Total species (excl moss)		6	12	12	13	8	10	9	9	11	9	9	9
Total % cover (excl moss)		109	100	0	102	103	187	171	159	177	16	12	23
AUTUMN HAWKBIT?													
Bare ground	0												
Pignut LMIS	2	O-OLFOVLF-LD	8			60							8
Bistort LMIS Meadow	1	LD											0
Vetchling LMIS	1	O-LF		4									
Gtr Bird's-foot-trefoil LMIS	0												
Common Sedge LMIS	2	O-OLFO				3				55			

Average of 11 quadrats
52.818%

Tufted Hair-grass	2	OVL										2	4
Marsh Foxtail*	1	O-VLF						1					
Meadow Foxtail	6	OLF	50		6			3	25	30		4	
Creeping Bent*	1												2
Common Bent*	0												
Red Fescue	5	OLF				1	30	1	5			4	
Rough Meadow-grass*	6	OLF	40		60				30	20	5	15	
Smooth Meadow-grass	4	O				2	3		5		5		
Sweet Vernal-grass	3	OVL					3	30					2
Crested Dog's-tail*	0												0
		O-											2
Yorkshire Fog*	8	OVL			3	1	3	1	15	20	2		0
Creeping Soft-grass	0												
Soft Brome	0												
		O-											
False Oat-grass*	0	OLF											
Floating Sweet-grass	0												
Cock's-foot*	4	O-F	5		2	65	12						
Perennial Ryegrass*	3	O-VLF					1	5					5
Italian Ryegrass	0	R											
Creeping Buttercup*	5	OLF				10	1			30	15		2
Broad-leaved Dock	0	O-VLF											
Creeping Thistle*	7	O	10		1	2	2		3	5		1	
Himalayan Balsam (Sch 9)	4	OLF	15		5	4						1	
<i>Brachthecium rutabulum</i>	1												1
Common Dog-violet		VLO											
Wood Forget-me-not		Hedg e VO											
Hedge Woundwort		Hedg es VLO											
Annual Meadow-grass		VO											

Greater Plantain	VLO
Smooth Sow- thistle	R
Common Figwort	R
Hoary Willowherb	O
Common Ragwort	O
Hedge Mustard	R
Bindweed	O
Yarrow*	R
Common Male Fern	VO
Nipplewort	LVO
	O-
Lady Fern	OLF
Brooklime	VLF
Hairy Sedge	LO
Raspberry	LA
Snowberry (alien)	VLA
Creeping Thistle	O
Common Ragwort	O
Bittersweet	VLF
Bog Stitchwort	OLF
Greater Stitchwort	VLF

Field 5 South of
Quarry
14/05/2025 &
18/05/2025

Southeastern Field

g3a Neutral Grassland Lowland Meadow

Consideration:

More than 15 species of grasses, forbs, ferns, sedges per square metre **FA**
IL

On site average probably exceed 10% cover of Ryegrasses (and White Clover) **FA**
IL

>30% cover of accepted herbs/sedges: **FA**
28.3 % **IL**

Springtime Lowland Meadow Indicator **O**
Species present **NE**

Other neutral grassland

consideration:

>20% cover of accepted herbs/sedges: **PA**
28.3% **SS**

>8 taxa per square metre inc forb, grass, sedge, rush (average): 9.9 **PA**
SS

>/ one grass species not sown for agriculture abundant (purple below) **PA**
SS

Does not exceed 30% cover of Ryegrasses and White Clover **PA**
SS

THIS IS OTHER NEUTRAL GRASSLAND g3c (at least) and is NOT "Modified Grassland g4"

CONDITION: A 10 positive species listed in UKHab g3c* PASS; B Varied sward PASS; C little bare ground PASS;

D no bracken PASS ; E Himalayan Balsam FAIL; E 10 or more taxa per metre FAIL . Four passes = Moderate

Field 5 * = species listed in Ukhav for Other Neutral Grassland, plus any Lowland Meadow Indicator Species (LMIS)

DA FO R	Q1	Q2	Q3	Q4	Q5	Q13	Q1 4	Q1 5	Q 19	Q 20
Total species (excl moss)	12	8	7	9	9	11	12	8	13	10
Total % cover	102	139	113	103	111	221	4	8	2	8

**AUTUMN
HAWKBIT?**

Bare ground **0**

Pignut LMIS **0**

Bistort LMIS **2** **OV**
LF

20

70

Cow-parsley (ignore for CA)	0												
Honeysuckle (ignore for CA)	0												
Bramble (ignore for CA)	0												
% Cover herbs & sedges above Average of 10 quadrats 28.3%		12	6	30	18	23	40	21	31	21	81		
Tufted Hair- grass	0												
Marsh Foxtail*	2	VO		1					2				
Meadow Foxtail	9	O-F	1	2	1	15		10	20	1	4	3	
Creeping Bent*	0												
Common Bent*	0												
Red Fescue	1	LF	5										
Rough Meadow- grass*	3	O				2	1		5				
Smooth Meadow-grass	7	O	3			3	2	20	2	10	5		
Sweet Vernal- grass	4	OLF	40				30				40	5	
Crested Dog's- tail*	2	LF	8				8						
	1												
Yorkshire Fog*	0	F	5	5	50	15	5	30	5	5	25	15	
Creeping Soft- grass	0												
Soft Brome	0												
False Oat-grass*	0												
Floating Sweet- grass	0												
Cock's-foot*	2	VO	1										2
Perennial Ryegrass*	6	O		5	2		2	20	1		4		
Italian Ryegrass	8	O-F	2	45	10	30		1	25	40		1	
Creeping Buttercup*	1												
	0	F-A	25	75	20	15	40	60	50	50	2	20	
Broad-leaved Dock	2	O				5			2				
Creeping Thistle*	0												
Himalayan Balsam (Sch 9)	0												
<i>Brachthecium rutabulum</i>	0												

Field 6

Ridge & Furrow Field

11/05/2025

g3a Neutral Grassland Lowland Meadow

Consideration:

More than 15 species of grasses, forbs, ferns, sedges per square metre **FAI L**
 On average does not exceed 10% cover of Ryegrasses and White Clover **PA SS**
 >30% cover of accepted herbs/sedges: 43.4% **PA SS**
 Springtime Lowland Meadow Indicator Species present **TW O**

Other neutral grassland consideration:

>20% cover of accepted herbs/sedges: 43.4% **PA SS**
 >8 taxa per square metre inc forb, grass, sedge, rush (average): 7.6 **FAI L**
 >/ one grass species not sown for agriculture abundant (purple below) **PA SS**
 Does not exceed 30% cover of Ryegrasses and White Clover **PA SS**

THIS IS OTHER NEUTRAL GRASSLAND g3c (at least) and is NOT "Modified Grassland g4" (passed 3 out of 4)

CONDITION: A 9 positive species listed in UKHab g3c* PASS; B Varied sward PASS; C little bare ground PASS; D no bracken PASS ; E Himalayan Balsam FAIL; E 10 or more taxa per metre FAIL . Four passes = Moderate

Field 6 * = species listed in Ukhav for Other Neutral Grassland, plus any Lowland Meadow Indicator Species (LMIS)

DAF OR	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10
Total species (excl moss)	7	7	8	6	7	8	8	9	9	7
Total % cover (excl moss)	152	102	155	159	103	134	1	12	12	15

AUTUMN HAWKBIT?

Bare ground **0**

Pignut LMIS **3** **OVL** **2 20 40**

Bistort LMIS **3 F** **60 80 5**

Meadow													
Vetchling LMIS	0												
Gtr Bird's-foot-trefoil LMIS	0												
Common Sedge LMIS	0												
Sneezewort LMIS	0												
Oval Sedge	0												
Bush Vetch	0												
Cuckooflower	2	VO		10				1					
Field Woodrush	0												
		Hed											
Bluebell (native)	0	ges											
Red Clover*	0												
Ribwort													
Plantain*	2							1		2			
Common Sorrel	5						40	1		10	15	40	
Meadow	1												
Buttercup*	0	F	1	30	1	15	20	10	1	10	5	1	
Common													
Mouse-ear	0												
Sticky Mouse-ear	0												
Dandelion	0	O											
Common													
Hogweed*	0												
Marsh Cudweed	0												
Common Waterstarwort	0												
Bog Stitchwort	1									2			
		Hed											
Cleavers	0	ges											
Short-fruited		Edg											
Willowherb	0	es											
Great													
Willowherb	0												
Rosebay		Hed											
Willowherb	0	ges											
Wavy Bittercress	1									1			
Wild Angelica*	0												
Marsh Thistle	0												
Marsh Horsetail	0												
Common													
Horsetail	0												
Water Horsetail	0												
Soft Rush*	1	R								10			
Toad Rush	0												

Nettle (ignore for CA)	0	Edges											
Cow-parsley (ignore for CA)	0	Hedges											
Honeysuckle (ignore for CA)													
Bramble (ignore for CA)	0	Edges											
% Cover herbs & sedges above			61	40	81	15	60	13	14	24	45	81	
Average of 10 quadrats 43.4%													
Tufted Hair-grass	0												
Marsh Foxtail*	0	VO											
Meadow Foxtail	9	F	1	1	2	10	10	10	10		2	20	
Creeping Bent*	1	R							1				
Common Bent*	0												
Red Fescue	0												
Rough Meadow-grass*	0	O											
Smooth Meadow-grass	1						1						
Sweet Vernal-grass	3	OLF	70		10			40					
Crested Dog's-tail*	0												
Yorkshire Fog*	1												
Creeping Soft-grass	0	A	5	20	20	30	10	1	75	70	70	50	
Soft Brome	0												
False Oat-grass*	0												
Floating Sweet-grass	0												
Cock's-foot*	2	O								15	3		
Perennial Ryegrass*	7	O-F	5	10	1	20	2			10		1	
Italian Ryegrass	2	O		1							1		
Creeping Buttercup*	1												
Broad-leaved Dock	0	A	10	30	40	80	20	70	1	1	1	1	
Creeping Thistle*	3	O			1	4				1			
Himalayan Balsam (Sch 9)	0	Edges											
<i>Brachthecium rutabulum</i>	0												

Compact Rush	R
Common Male Fern	Hed ge Hed
Herb-robert	ge Hed
Lady Fern	ges
White Clover*	R - path
Wetland in SW Corner:	
Alder trees mature & small	Pre sen t Pre sen
Grey Willows	t
Soft Rush	D
Tufted Hair- grass	O
Creeping Bent	O
Rough Meadow- grass	O
Floating Sweet- grass	VO Edg
Bluebell (native)	e
Himalayan Balsam (Sch9)	F
Common Water- starwort	R
Wavy Bitter- cress	VO
Foxglove	R
Rosebay	
Willowherb	O
Lady Fern	O
Broad Buckler Fern	O
Pink Purslane (alien)	LO

Field 7

Two pits field

11/05/2025

g3a Neutral Grassland Lowland Meadow

Consideration:

More than 15 species of grasses, forbs, ferns, sedges per square metre **FAI L**
 On average does not exceed 10% cover of Ryegrasses and White Clover **PA SS**
 >30% cover of accepted herbs/sedges: **FAI L**
 26.1%
 Springtime Lowland Meadow Indicator Species present **TW O**

Other neutral grassland consideration:

>20% cover of accepted herbs/sedges: **PA SS**
 26.1%
 >8 taxa per square metre inc forb, grass, sedge, rush (average): 9.1 **PA SS**
 >/ one grass species not sown for agriculture abundant (purple below) **PA SS**
 Does not exceed 30% cover of Ryegrasses and White Clover **PA SS**

THIS IS OTHER NEUTRAL GRASSLAND g3c (at least) and is NOT "Modified Grassland g4"

CONDITION: A 12 positive species listed in UKHab g3c* PASS; B Varied sward PASS; C little bare ground PASS; D no bracken PASS ; E Himalayan Balsam FAIL; E 10 or more taxa per metre FAIL . Four passes = Moderate

*** = species listed in Ukhav for Other Neutral Grassland, plus any Lowland Meadow Indicator Species (LMIS)**

Field 7	DA	FO	R	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10
Total species (excl moss)				9	10	7	9	8	10	11	10	7	10
Total % cover (excl moss)				105	116	100	103	102	146	9	7	5	1
AUTUMN HAWKBIT?	44												
Bare ground	0												
Pignut LMIS	1	R-VLF						2					

Soft Rush*	2	OL A	40											35
Toad Rush	0													
Nettle (ignore for CA)	0	Edg es												
Cow-parsley (ignore for CA)	0	Edg es												
Honeysuckle (ignore for CA)														
Bramble (ignore for CA)	0	Edg es												
% Cover herbs & sedges above Average of 10 quadrats 26.1%			41	8	4	7	5	14	97	35	10	40		
Tufted Hair-grass	0													
Marsh Foxtail*	1	LO	5											
Meadow Foxtail	0	F	1	5	5	2	30	70	5	20	10	1		
Creeping Bent*	1	VLF												35
Common Bent*	0	Edg es												
Red Fescue Rough	0													
Meadow-grass* Smooth	5	O-F				1	15	15			5	1		
Meadow-grass Sweet Vernal-grass	7	O	1	1	11			1	1	1	10			
Crested Dog's-tail*	5	O-F	5	20		12				1		10		
Yorkshire Fog*	0	A	30	20	30	20	30	15	10	5	10	4		
Creeping Soft-grass	1	OV LF R-				25								
Soft Brome	2	VLF Edg es			1	35								
False Oat-grass*	0													
Floating Sweet-grass	2	VL O	2	1										
Cock's-foot*	3	O					2	10	1					
Perennial Ryegrass*	3	O		1	24						5			
Italian Ryegrass	1	VO							2					
Creeping Buttercup*	1													
Broad-leaved Dock	0	A O	20	60	25	1	20	20	3	40	60	10		

Creeping Thistle*	1	VO	1
Himalayan Balsam (Sch 9)	0	Edg es	
<i>Brachthecium rutabulum</i>	0		
Reed Canary- grass		VLA	
Brooklime		VLF	
Lady Fern		Hed ges	
Broad Buckler Fern		Hed ges	
Garlic Mustard		Hed ge	

Field 8

Western brookside field

12/05/2025

g3a Neutral Grassland Lowland

Meadow Consideration:

More than 15 species of grasses, forbs, ferns, sedges per square metre	FA IL
Does not exceed 10% cover of Ryegrasses and White Clover	PA SS
>30% cover of accepted herbs/sedges: 49.2%	PA SS
Springtime Lowland Meadow Indicator	PA
Species present; FOUR	SS
THIS IS A LOWLAND MEADOW	PA
PRIORITY HABITAT g3a	SS

Field 8

	DAFOR	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10
Total species (excl moss)	66	14	11	11	8	6	1	7	8	1	9
Total % cover (excl moss)		100	100	185	128	104	1	6	1	2	5
AUTUMN HAWKBIT?											
Bare	1		15								
Pignut LMIS	0										
Bistort LMIS	2	OVLF	10					4			
Meadow Vetchling LMIS	3	OLF	4	4	100						
Gtr Bird's-foot-trefoil LMIS	1	R								2	
Common Sedge LMIS	1	VLF		22							

Sneezewort LMIS	0									
Oval Sedge	0									
Bush Vetch	0	O								
								1		
Cuckooflower	5	O	1		1	1		0		1
Field Woodrush	0									
Bluebell (native)	0	Edges								
Red Clover*	0									
										2
Ribwort Plantain*	3	O						4	5	0
Common Sorrel	6	O-F	8	4			3	3	8	2
Meadow								1		2
Buttercup*	4	O-F			2		1	0		0
Common Mouse-ear	0	O								
Sticky Mouse-ear	0	R								
								1		
Dandelion	1	O						1		
Common										
Hogweed*	1	VO				3				
Marsh Cudweed	0									
Common Water-starwort	0	VLF								
										1
Bog Stitchwort	3	LF		1	3					5
Cleavers	1	Edges							1	
Short-fruited										
Willowherb	3	O-LF	5	4						1
Great Willowherb	2	LO			1					1
Rosebay										
Willowherb	1	Edges				5				
Wavy Bitter-cress	3	LF	3	1						1
Wild Angelica*	1	LO	1							
Marsh Thistle	1	LVO	3							
Marsh Horsetail	0									
Common										
Horsetail	4	O	3	2	5					2
Water Horsetail	3	VLF	5	2						2
										1
Soft Rush*	4	LA	38	22	4					0
Toad Rush	0									
Nettle (ignore for CA)	4	O+Edges	1		1	10			5	
Cow-parsley (ignore for CA)	1	LO							70	
Honeysuckle (ignore for CA)	0									
Bramble (ignore for CA)	0	Edges								

% Cover herbs & sedges above			82	62	117	19	4	3	9	84	3	4
Average of 10 quadrats 49.2%							8	8	9	6	6	1
Tufted Hair-grass	0	LO										
Marsh Foxtail*	0	LO										
								1				
Meadow Foxtail	7	F-A	8	1		2	60	0	1	60		
Creeping Bent*	0											
Common Bent*	0											
Red Fescue	0											
Rough Meadow-grass*	7	O-A	10	22	3	100	5			30	6	0
Smooth								1				
Meadow-grass	5	O					5	0	1	5		4
Sweet Vernal-grass	0	OLF										
Crested Dog's-tail*	0											
								3	7			1
Yorkshire Fog*	4	O-A					30	0	0			2
Creeping Soft-grass	0											
Soft Brome	0											
False Oat-grass*	0	Edges										
Floating Sweet-grass	0	VLF										
Cock's-foot*	0	O										
Perennial									2			1
Ryegrass*	2	ovlf							0			7
Italian Ryegrass	1	O										2
Creeping								1				2
Buttercup*	5	O-A			60			0	5		5	7
Broad-leaved												
Dock	3	O				5		3				2
Creeping Thistle*	4	O			5	2				2	1	
Himalayan												
Balsam (Sch 9)	0	Edges										
Montbretia (Sch 9)		R										
<i>Brachthecium rutabulum</i>	1	Present										2
<i>Kindbergia praelonga</i>		Present										
Bindweed sp		VLF										
Pink Purslane		OVLF										
Annual Meadow-grass		Path										
Broad Buckler-fern		Edges										

Lady Fern	Edges
Scaly Male Fern	R
Reed Canary- grass	LA
Lesser Celandine	LO
Small Sweet- grass	LO
Common Ragwort	VO
Brooklime	LO
Prickly Sow- thistle	VO
Fringe-cups (alien)	VLO
Red Champion	VLO
Garlic Mustard	VLO
Hybrid Bluebell (alien)	VLO (by gardens)
Ivy-leaved Speedwell (alien)	VLA
Wood Forget-me- not	R

END