



**CENOTAPH,
MIDDLETON MEMORIAL GARDENS,
ROCHDALE**

BAT SURVEY REPORT

**Prepared for
Rochdale Borough Council**

October 2024

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CONTENTS

1. INTRODUCTION

2. SURVEY METHODOLOGY

- 2.1 Search for Existing Records
- 2.3 Survey methodology
 - Preliminary Roost Assessment
- 2.10 Evening Emergence Surveys
- 2.15 Constraints

3. FINDINGS & INTERPRETATION

- 3.1 Review of Existing Records
- 3.4 Survey methodology
 - Preliminary Roost Assessment
- 3.7 Evening Emergence Surveys
- 3.9 Interpretation of Survey Findings

4. RECOMMENDATIONS

5. REFERENCES

PHOTOGRAPHS

FIGURE

- 1 Layout of cenotaph building and evidence of use by bats

APPENDIX

- I Legislation

1. INTRODUCTION

- 1.1 This report has been prepared for Rochdale Borough Council. It presents the results of a Preliminary Roost Assessment and evening emergence surveys for bats at the cenotaph building in Middleton Memorial Gardens, in Rochdale, Greater Manchester undertaken between July and September 2024.
- 1.2 The proposal is to refurbish the building due to vandalism and general wear and tear. The proposals are to re-roof and to replace missing and existing ceiling below the roof.
- 1.3 The cenotaph building is 'U' shaped and single-storey, built from brick and has a straightforward pitched and tiled roofs with single hips on outside corners and T-shaped on each 'open' end. The small building sections that form the T-shaped ends have two gable ends (see photos). The aspects facing into the Memorial Gardens are open sided.
- 1.4 The Memorial Gardens is located off the very busy A576 Manchester Old Rd in the Middleton, approximately 8km northeast of the centre of the city of Manchester. To the south on the opposite side of the Manchester Old Rd is the local nature reserve Alkrington Woods. The woodlands here are extensive and mature and there are several waterbodies present within including The River Irk and Boardman Brook which run through it along with several large still-water pools present. To the immediate north is the disused former civic offices site and leisure facilities of sports pitches. Immediately north of this is the extensive woodland around the Sunny Brow Nursery School and further on the extensive wooded areas, open grasslands and pools within the North Manchester Golf Club. All of the above provide excellent foraging and commuting habitats for bats. The OS grid reference for the Memorial Gardens site is SD 86222 05523.
- 1.5 The report describes the methods used for the surveys and any constraints encountered, along with the results of the surveys and any evidence of bats found. The findings are then assessed in light of the proposals and recommendations for further survey or action are given where appropriate.
- 1.6 The legislation relating to bats is given in Appendix I.

2. METHODOLOGY

Search of Existing Records

- 2.1 The local record centre, Greater Manchester Ecology Unit (GMEU), was contacted for existing records of bats occurring within 1km of the site.
- 2.2 The results of a record search can help to set a site into the context of its surroundings, as well as provide valuable information on the known presence of bats in the local area.

Survey Methodology

Preliminary Roost Assessment

- 2.3 A Preliminary Roost Assessment was undertaken on the 22nd July 2024 by Max Robinson. Max each has over 22 years' experience working in the ecology sector and is licensed by Natural England to survey for bats (class 2 licence).
- 2.4 An assessment of the building was made in terms of its suitability to support roosting bats. Factors considered included internal conditions, presence of features suitable for use by crevice dwelling and free hanging bats, proximity to foraging habitats/cover and potential for disturbance.
- 2.5 A description of the building was made, and any potential roost features catalogued. The building was assigned to one of the following categories according to the potential to support bats:
 - Bat roost – evidence of use by bats present. Further survey (usually a minimum of three evening emergence surveys) would normally be undertaken to confirm the type of roost and number of bats present, etc. Additional surveys are sometimes needed to help characterise the roost. Works affecting the roost would need to be undertaken under a statutory licence from Natural England, with precautionary and mitigation measures implemented as specified by the licence.
 - High Potential – building exhibiting features very suitable for use by roosting bats (such as gaps between tiles and underfelt, gaps below ridge tiles, significant crevices within the walls) and offering optimal roosting opportunity, including for maternity roosting. Often several suitable features will be present. Further survey (usually a minimum of three evening emergence surveys) would normally be undertaken to establish use by bats and, if confirmed, the type of roost and number of bats present, etc. If no roost is identified, precautionary measures would need to be implemented during works to the building.
 - Moderate Potential – building exhibiting features less suitable for roosting bats and offering less suitable roosting opportunity. Suitable roosting opportunity may be limited to a smaller number of features. Further survey (usually a minimum of two evening emergence surveys) would normally be undertaken to establish use by bats and, if confirmed, the type of roost and number of bats present, etc. If no roost is identified, precautionary measures would need to be implemented during works to the building.

- Low/Negligible Potential – building exhibiting features very unlikely to be used for roosting or no features suitable for roosting. For low potential buildings, further survey (usually a single evening emergence survey) would normally be undertaken to establish use by bats and, if confirmed, the type of roost and number of bats present, etc. Precautionary measures may need to be implemented during works to the building, although sometimes no further action would be required.
- 2.6 A detailed visual inspection of the exterior and interior of the building was undertaken. The inspection followed standard methodologies set out in the *Bat Surveys for Professional Ecologists – Good Practice Guidelines*, Bat Conservation Trust (Collins, 2023).
- 2.7 Externally, a visual inspection of features such as gaps in the fabric of the building was made for evidence of bat use from ground level. Evidence searched for included droppings and staining from fur-oil and urine. The survey was undertaken from the ground and aided using close-focusing binoculars and a high-powered torch where necessary.
- 2.8 The internal survey followed a similar approach, with a search made for bat droppings, prey residues (such as fly or moth wings) and urine stains, as well as resident bats.
- 2.9 The weather conditions during the survey were as follows: dry and overcast, with a light breeze (Beaufort Scale 2) and a temperature of 20°C.

Evening Emergence Surveys

- 2.10 Three evening emergence surveys were carried out on the building, one in August and two in September 2024. The first two surveys were undertaken with three surveyors on each visit (surveyors were, Max Robinson, Helen Ball, Philip Playford, Lauren Taylor and Carrie Alcock). The third visit was undertaken by two surveyors Max Robinson and Helen Ball.
- 2.11 The emergence surveys were carried out during the evening and commenced approximately 0.5 hours before sunset and finished 1.5 hours after sunset. The surveys followed standard methodologies set out in *Bat Surveys for Professional Ecologists – Good Practice Guidelines*, Bat Conservation Trust (Collins, 2023).
- 2.12 Bat detectors (Anabat Scout Detectors, Titley Electronics, Australia) were used to identify the presence and identity of bats. Bat calls picked up by the detectors were written onto a compact flash card and, where necessary, analysed on a PC to confirm species. Thermal scopes (Guide TK612 and Pixfra Arc A613) were used to aid the surveys, with the surveyors using a screen to watch video in real time whilst the cameras recorded. Recorded footage was watched following completion of the surveys, and any emergence of bats correlated with the sound recordings.
- 2.13 The thermal cameras were positioned externally around the building to record any bats emerging from the locations identified as containing potential roost features. The interior of the roof was also checked for bat activity during the course of the evening surveys.

2.14 The table below summarises the weather conditions during each survey.

Date	Weather Conditions	Temperature
15 th August 2024	Dry, feeling humid, broken 80% cloud cover but clearing, light air (BS1).	Start: 17.5°C End: 14.0°C
23 rd September 2024	Dry, 95% cloud cover, heavy and low, light air (BS1).	Start: 14.3°C End: 12.1°C
28 th September 2024	Dry, 20% cloud cover at start, calm (BS0).	Start: 12.8°C End: 9.9°C

Constraints

2.15 Parts of the building were inaccessible for viewing during survey, being on boundary edges and aspects facing neighbouring areas without access.

3. SURVEY FINDINGS & INTERPRETATION

Review of Existing Records

- 3.1 The ecological record centre, GMEU, provided information on bats that have been recorded within 1km of the site.
- 3.2 Bats have been recorded on 100 occasions with records dating between 1987 and 2022. Two species only have been recorded definitively, common pipistrelle *Pipistrellus pipistrellus* and Daubenton's *Myotis daubentonii* bats. Other records are to the genus *Pipistrellus* and *Myotis* and thus could be the species already named above or other species.
- 3.3 A search of the MAGIC maps website has been carried out for evidence of Natural England European Protected Species Licences granted for bats. The four nearest licences all cover common pipistrelle roosts with three of the four being maternity roosts. They are located at distances of 3.4km to the northeast, 3.5km to the southeast and two at 5.3km southwest. No sites covered by a licence fall within 2km of the building.

Survey Findings

Preliminary Roost Assessment

- 3.4 The **cenotaph** is 'U' shaped, built from brick, with pitched roofs clad in slates, there are two hipped (outside) corners and two short, pitched roofs between gable ends where the main building 'T's into two end sections at the ends of the 'U' shape. The two ends have short roofs with two gable ends. running between gable ends. There are windows and doorways as for the most part the inward (memorial garden) facing aspects are open allowing access below the roof from the memorial gardens. The pitched roof has had a discrete roof void present; however, due to vandalism and general wear and tear, many ceiling panels are missing completely or have become compromised. There are numerous gaps below both the ridge and common tiles and at the tile verges. There are also several gaps and holes in the external walls between rafter and wall where rafters emerge from wall tops. Internally there are gaps at wall verges and between ridge board and ridge tiles allowing access to gaps below ridge tiles.
- 3.5 Internally, the building is open fronted facing into the memorial gardens with pillars only supporting the roof. The back wall is complete and runs for the entirety of the building on aspects facing north, west and east. The pitched roof has a ceiling below creating a roof void, although many panels are missing or have been compromised one way or another, with rain damage, etc. No lining felt, sarking boards or torching back the slate tiles and gaps are present past the ridge board to the voids below the ridge tiles. In the roofs at each end of the arms of the 'U' shaped cenotaph the gable end wall verges can be seen and are easily accessible by and suitable for use by roosting bats. When viewing the roof void above the Fusilier Lee Rigby Memorial (during the third evening visit) what appeared to be several bat droppings were noted below the wall verge of the gable end facing into the memorial gardens. These droppings were out of reach of the surveyor and the building here too hazardous to attempt to climb into the void and retrieve them. A

single dropping was also seen closer to the access point, this dropping was crushed and determined to be a likely pipistrelle bat dropping.

- 3.6 From the findings of the PRA the building was initially graded as holding **moderate potential** for roosting.

Evening Emergence Surveys

- 3.7 The table below summarise the survey findings. Please also refer to the Figure at the end of the report.

Date (2024)	Findings
15 th August	No emergence recorded. Small numbers of common pipistrelle bats were active between 20:54 and 22.10. Foraging over the memorial gardens and in the surroundings.
23 rd September	Three common pipistrelle emerged from within the roof void above the Fusilier Lee Rigby Memorial. The bats circled around the memorial gardens and below the roof of the cenotaph several times before disappearing over the roof to the north.
28 th September	No emergence recorded. Two distant passes only from common pipistrelle were recorded during the survey.
General bat activity across the surveys	Small numbers of common pipistrelle were active throughout much of the first survey – activity was intermittent with regular bouts of foraging. The second survey activity was much less and on the third visit activity was minimal.

- 3.8 During the second evening emergence survey three bats were recorded emerging from the building and thus a third site visit was undertaken. Due to the survey season coming to a close at the end of September the third survey visit could not be spaced more than a few days later than the second visit. Thus, the third visit was undertaken five days after the second visit on the 28th September. During the third visit the roof void was reassessed. Above the Fusilier Lee Rigby Memorial what appeared to be several bat droppings were noted below the wall verge of the gable end aspect facing into the memorial gardens. These droppings were out of reach of the surveyor and the building here too hazardous to attempt to climb into the void and retrieve them. A single dropping was also seen closer to the access point, this dropping was crushed and from size and shape determined to be a likely pipistrelle bat dropping.

Interpretation of Survey Findings

- 3.9 Surveys have confirmed that the cenotaph building is used by bats for roosting.
- 3.10 The cenotaph building is used by common pipistrelle for day roosting. Bats emerged from the roof above the Fusilier Lee Rigby Memorial likely from internal

wall verges (or possibly from below ridge tiles via gaps by the ridge board). Individual/ small numbers of common pipistrelle bats also make use of the cenotaph as for day roosting.

- 3.11 The surveys were relatively well spaced across the time of year when bats are most active and were carried out during good weather conditions reducing the likelihood that a maternity roost (where females gather to give birth and raise their young) has been missed.

4. RECOMMENDATIONS

Licensing

- 4.1 Common pipistrelle use the building for roosting. In view of the legal protection afforded to bats (see Appendix I), a statutory European Protected Species (EPS) development licence will need to be sought from Natural England to undertake works to the building that would affect bats and their roosts.
- 4.2 In order to issue a licence, Natural England require detailed and up-to-date information about the status of bat roosts and bat use of the building. In addition, a commitment to mitigation and compensation measures where applicable would be necessary and any consents for the work need to be in place.
- 4.3 In order to obtain a licence from Natural England, the following three tests need to be satisfied:
- there is no satisfactory alternative;
 - the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range; and
 - the action authorised preserved public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment.

Replacement Roosting and Access Provision

- 4.4 As part of licensing, proposals need to incorporate bat mitigation and compensation measures to meet Natural England's minimum requirements. Replacement roosting provision has been designed in conjunction with the architect.
- 4.5 Replacement roosting provision will be incorporated into the ridges of the cenotaph:
- The roof will be re-tiled using the existing or similar tiles to those currently present.
 - Where it is necessary to install a roof lining and this has the potential to be exposed to any bat, traditional bitumen hessian type 1F felt, or a non-bitumen coated roofing membrane (NBCRM) with a test certificate approved by Natural England, must be used: this test certification is often cited as a 'snagging propensity test'.
 - If treatment is necessary, all timber/wood used on the roofs where the replacement roosting provision is to be installed must be treated with chemicals currently on Natural's England's approved list of 'Bat roost and Timber products (TIN 092)'. Only treatments on the approved list may be used.
 - Gaps will be created under the ridge tiles on the roof to provide a total of ten roosting locations with associated access points for bats. The roosting locations will be spaced and staggered across the sides of the roof ridge.

- The roosting locations could be created by mortaring the ridge tiles in place to create a suitable-sized void below for bats to use for roosting. When the ridge tiles are laid it will be important to ensure the spaces within the ridge tiles remain unfilled with mortar and there are lengths of the ridge tiles that remain unobstructed, although some blockages below the ridge tiles will be needed to prevent draughts.
- Access points into the ridge roosting areas will be provided, consisting of small gaps of suitable dimensions - c. 20mm high by 20mm long. These will be created where the ridge tiles meet the common roof tiles to enable bats to access the roosting locations below the ridge tiles.
- An access point into each roosting location will be provided (ten access points in total) installed equidistantly along the roof ridges to coincide with the roosting locations below the ridge tiles. Access points will be staggered across the ridges to reduce wind blow beneath the tiles.
- There may be other opportunities that can be taken up in providing roost opportunities for bats (such as integrated bat boxes in walls) but this may well need the input and agreement of the listed buildings officer.

Lighting

- 4.6 If lighting is to be installed in the memorial gardens as part of the proposals this must consider bat use. No lights should be used near bat roosting and access provision, and these locations must remain unlit (and not affected by light spill). In addition, dark corridors must be maintained between the roost/access points and surrounding habitats. The use of low lux intensity lighting, possibly with timers or motion detectors, would help to reduce light spill into these areas. If external lighting is to be installed in the memorial gardens, then a lighting engineer should be employed to design the lighting necessary when considering bat use. The ecologist would need to be consulted and approve the lighting design.

Precautionary Working Practices

- 4.7 Precautionary working practices would need to be put in place during works to the cenotaph building in accordance with the licence conditions. All personnel undertaking the work would need to be made aware of these requirements. Licensable activities need to be supervised by the licensed ecologist.
- 4.8 There would be a need for timing restrictions when certain works (such as re-roofing) could take place on the building to reduce impacts on bats. Licensable works would need to be timed to avoid the winter months when bats are hibernating and are vulnerable to disturbance.
- 4.9 Precautionary measures would need to be implemented during works to the building to reduce possible impacts on bats and detailed in an ecological method statement following licensing requirements and best practice guidance.

5. REFERENCES

Collins, J. (ed). (2023). *Bat Surveys for Professional Ecologists – Good Practice Guidelines*. 4th Edition. Bat Conservation Trust, London.

PHOTOGRAPHS



1. Memorial Gardens and Cenotaph building.



2. Cenotaph building - 'east wing' viewed from rear



3. Cenotaph building - 'west wing'. Fusilier Lee Rigby memorial below small gable end on centre of photo.



4. Cenotaph building - 'east wing'.



5. Central section of the cenotaph building from within the memorial gardens



6. Missing ceiling panels



7. Open roof void above Fusilier Lee Rigby memorial.

1. All dimensions are in millimetres unless noted otherwise.
2. All dimensions must be taken on site and not measured off drawing.
3. All levels refer to metres Above Ordnance Datum (AOD).

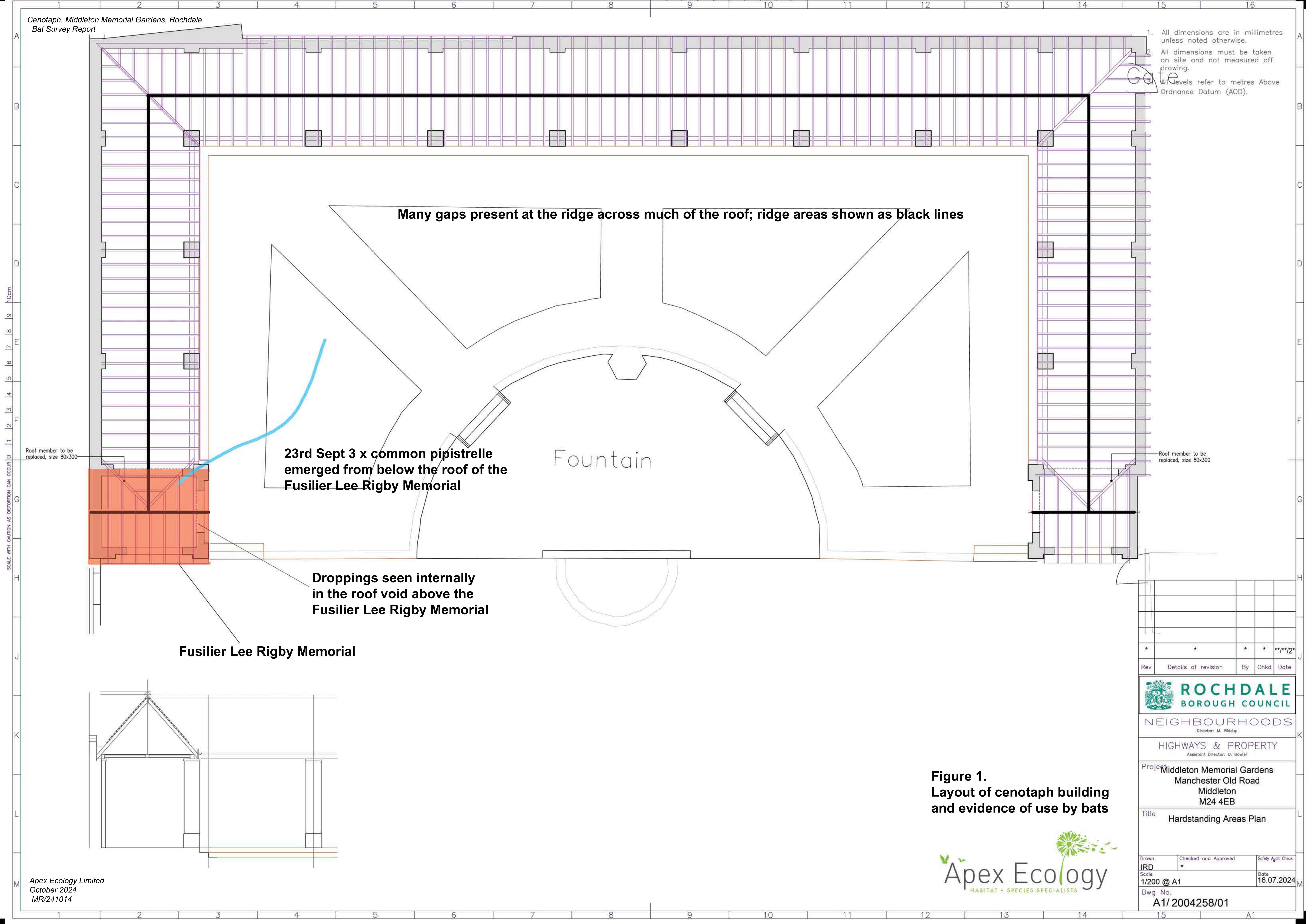


Figure 1.
Layout of cenotaph building
and evidence of use by bats

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Rev	Details of revision	By	Chkd	Date	
 ROCHDALE BOROUGH COUNCIL NEIGHBOURHOODS Director: M. Widdup HIGHWAYS & PROPERTY Assistant Director: D. Bowler ProjectMiddleton Memorial Gardens Manchester Old Road Middleton M24 4EB TitleHardstanding Areas Plan Drawn IRD Checked and Approved * Safety Audit Check * Scale 1/200 @ A1 Date 16.07.2024 Dwg No. A1/ 2004258/01					

APPENDIX

The information below is intended only as guidance to the legislation relating to bats and relates solely to England. It does not purport to provide legal advice. It is recommended that the legislative documents be referred to for the full legal wording and the services of a relevant specialist sought where legal advice is required.

There are eighteen different species of bat in the UK; some are very rare whilst others are widespread. However, because the populations of most species have declined in past decades, all British bats have been protected by law.

Bats are protected in England under European Legislation via the Conservation (Natural Habitats and Wild Flora and Fauna (92/43/EEC)) or 'The Habitats Directive'. The Directive is transposed into UK law via the Conservation of Habitats and Species Regulations 2017 (known as the Habitats Regulations). Due to their inclusion on Schedule 2 of the Habitats Regulations, bats are considered 'European Protected Species'.

In summary, this legislation makes it an offence to:

- deliberately capture, injure or kill a bat;
- deliberately disturb a bat;
- damage or destroy a breeding site or resting place of any bat;
- possess a bat (alive or dead) or any part of a bat.

Disturbance of bats includes in particular any disturbance which is likely:

(a) to impair their ability:

- (i) to survive, to breed or reproduce, or to rear or nurture their young; or
- (ii) to hibernate or migrate; or

(b) to affect the local distribution or abundance of the species to which they belong.

Bats are also protected under the Wildlife and Countryside Act 1981 (as amended), which has also been amended by the Countryside and Rights of Way (CROW) Act, 2000.

In summary, this legislation makes it an offence to:

- intentionally or recklessly disturb a bat while it is occupying a structure or place which it uses for shelter or protection;
- intentionally or recklessly obstruct access to any structure or place which any bat uses for shelter or protection.

NERC ACT AND BIODIVERSITY

A number of UK habitats and species are also included on the list of habitats and species which are of principal importance for the conservation of biodiversity in England as required under Section 41 of the Natural Environment and Rural Communities (NERC) Act. The NERC Act came into force on 1st Oct 2006. Section 41 (S41) of the Act requires the Secretary of State to publish a list of habitats and species which are of principal importance for the conservation of biodiversity in England. The list has been drawn up in consultation with Natural England, as required by the Act.

The S41 list is used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 40 of NERC Act to have regard to the conservation of biodiversity in England, when carrying out their normal functions.

Fifty-six habitats of principal importance are included on the S41 list. These are all the habitats in England that were identified as requiring action in the UK Biodiversity Action Plan (UK BAP) and continue to be regarded as conservation priorities in the subsequent UK Post-2010 Biodiversity Framework. They include terrestrial habitats such as upland hay meadows to lowland mixed deciduous woodland, and freshwater and marine habitats such as ponds and subtidal sands and gravels.

There are 943 species of principal importance included on the S41 list. These are the species found in England which were identified as requiring action under the UK Biodiversity Action Plan and which continue to be regarded as conservation priorities under the UK Post-2010 Biodiversity Framework. In addition, the Hen Harrier has also been included on the list because without continued conservation action it is unlikely that the Hen Harrier population will increase from its current very low levels in England. In accordance with Section 41(4) the Secretary of State will, in consultation with Natural England, keep this list under review and will publish a revised list if necessary.

The impact that this legislation has on the Planning system is also outlined in ODPM 06/2005 Government Circular: Biodiversity and Geological Conservation – Statutory obligations and their Impact within the Planning System. This states:

The presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Local authorities should consult English Nature [now Natural England] before granting planning permission. They should consider attaching appropriate planning conditions or entering into planning obligations under which the developer would take steps to secure the long-term protection of the species. They should also advise developers that they must comply with any statutory species' protection provisions affecting the site concerned.