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Tyrer Ecological Consultants Ltd, Roselands, 3 Cross Green, Formby L37 4BH

Dusk Survey Results

November 2023

St. Mary's CE Primary School
Oldham Road
Rochdale
OL11 2HB

National Grid Ref: SD90421157



St. Mary's CE Primary School, Oldham Road, Rochdale, OL11 2HB
Dusk Survey Results

Document Title	Dusk Survey Results
Prepared for	Rochdale Borough Council
Prepared by	Tyrer Ecological Consultants Ltd

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N.B. *Bat emergence/re-entry surveys are typically valid for a period of 12-18 months, at the discretion of the Local Planning Authority and/or Natural England. Should your planning application not achieve consent, or a licence application (where required) not be applied for within this time period, updated surveys may be required.*

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Appendix I: Inspection & Assessment in Relation to Bats & Breeding Birds (Tyrer Ecological Consultants Ltd, October 2023)

1.0 Background and Introduction

1.1 As part of a proposed application for planning consent at St. Mary's CE Primary School in Rochdale, Tyrer Ecological Consultants Ltd carried out a daytime preliminary roost assessment in relation to bats with an inclusive inspection for breeding birds in August 2023. Proposals entail the full reroofing of the structure.

1.2 As a part of this appraisal, a Preliminary Roost Assessment (PRA) was carried out, which concluded the following in relation to bats:

"Based upon the findings of the survey, covered through sections 6.0 – 7.0 of the report and supported by Appendix I, St. Mary's CE Primary School is determined to offer 'Moderate' bat roost suitability in accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd ed. (2016), warranting the requirement for further survey effort at the site before an impact assessment can be concluded.

It is recommended that two dusk emergence and/or dawn re-entry surveys are conducted at the site during the active season of bats (May – August, extending into September), in order to establish if / how the garage is being used by bats, and if so, identify the species present, abundance, roost locations and flight lines around the site following emergence / re-entry."

1.3 Although two surveys were recommended, due to the late stage of the season at which the daytime assessment was conducted, there was not sufficient time within the active season to conduct two dusk emergence surveys, and as such only a single survey could be undertaken. However, Policy 4 of the European Protected Species Policies for Mitigation Licenses, entitled "Alternative Sources of Evidence to Reduce Survey Requirements" states the following:

"Natural England will be expected to ensure that licensing decisions are properly supported by survey information, taking into account industry standards and guidelines. It may however accept a lower than standard survey effort where all the following apply:

- costs or delays associated with carrying out standard survey requirements would be disproportionate to the additional certainty that it would bring*
- ecological impacts of development can be predicted with sufficient certainty*
- mitigation or compensation will ensure that the licensed activity does not detrimentally affect the conservation status of the local population of any EPS"*

1.4 In line with the above, a lowered standard of survey was considered to be necessary for this development. Firstly, from a financial standpoint, capital finance was approved for this scheme by Rochdale Borough Council for the 2023-2024 financial year, meaning that the works would need to commence prior to April 2024, or else the funding could be at risk. Delaying the works until two surveys could be undertaken within the next active season of bats (May 2024) would mean that the time period for funding would be missed, and the scheme could be cancelled entirely.

1.5 Furthermore, the scheme is considered essential on health and safety grounds; due to the degraded nature of the roof, regular leaks have occurred within the school in recent years, posing a potential risk to pupils and having significant financial repercussions. In addition to this, a children's nursery lies adjacent to the school to the south, and in recent weeks a slate fell from the roof of St. Mary's into the playground of the nursery. Should the works be postponed until May of 2024, the risk of falling slates from the roof could pose a substantial risk to the children who attend the adjacent nursery.

- 1.6 It is additionally considered that the ecological impacts of the development can be predicted with sufficient certainty; the school is not considered to hold hibernation potential, due to the occupied and heated nature of the structure which would not offer the conditions suitable throughout this period, and the explored loft spaces did not hold the typical requirements for hibernation suitability, with inconsistent thermal characteristics. Furthermore, the loft spaces are not suitable for the maternity requirements of loft-dwelling species, due to their small size and inconsistent thermal character. Therefore, it is considered that, should the building be utilised by bats, this would be limited to low numbers of individual bats for 'day roosting' during the active season, and as such no impacts are foreseen by undertaking the proposed works outside of the active season.
- 1.7 To further prevent potential impacts, an Ecological Clerk of Works (ECoW) will supervise the stripping of the roof. The ECoW will supervise careful dismantling of all places where opportunities for bats exist in the building, with the strip being carried out section to section. All dismantling of potential roost features will be undertaken during favourable weather conditions (above 9°C), and outside of the main active season of bats (May – September inclusive) to minimise risk of impacts to bats.
- 1.8 Finally, in terms of mitigation and compensation measures, by incorporating integrated mitigation measures into the reroofed structure of the school, regardless of potential emergences during the dusk survey effort, the long-term impact of the development will be neutral-positive. Integrated Habibat Bat Access Slates (see **Figure 1.1**) are carefully designed to provide access to a roof lining for our protected bat species, whilst blending in seamlessly to a slate roof. By incorporating a number of these integrated slates into the roof structure where potential currently exists, the opportunities for bats currently present at the building will be recreated, ensuring that any bats that may utilise the building during the active season will still have opportunities to roost within the building.



Figure 1.1 – Habibat Bat Access Slates

- 1.9 Taking all of the above into consideration, it is considered that in this instance, a reduced survey effort is acceptable. Tyrer Ecological Consultants Ltd were therefore recommissioned by Rochdale Borough Council to carry out the further dusk survey in September 2023, thus within the most recent active season of bats, in accordance with the Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd ed. (2016) edition – see **Figure 1.2**).

Table 7.3 Recommended minimum number of survey visits for presence/absence surveys to give confidence in a negative result for structures (also recommended for trees but unlikely to give confidence in a negative result).		
Low roost suitability	Moderate roost suitability	High roost suitability
One survey visit. One dusk emergence or dawn re-entry survey ^a (structures). No further surveys required (trees).	Two separate survey visits. One dusk emergence and a separate dawn re-entry survey. ^b	Three separate survey visits. At least one dusk emergence and a separate dawn re-entry survey. The third visit could be either dusk or dawn. ^b

Figure 1.2 – Extract from Bat Conservation Trust – *Bat Surveys for Professional Ecologists: Good Practice Guidelines*, 3rd ed. (2016)

- 1.10 The survey aimed to identify the presence or reasonably conclude the absence of bats within the building. The results, conclusions and recommendations following the survey, including any indicative mitigation to inform an application to Natural England for a European Protected Species Mitigation Licence (EPSML), where necessary, will be supplied within this report.
- 1.11 This report should be read, understood and presented to the local authority as an additional document to **Appendix I** (see Contents page).

2.0 Bats - Legislation & Policy

2.1 All British bats and their ****roosts**¹ are afforded protection under Schedule 5 of the Wildlife & Countryside Act (1981) (as amended) and are listed in Schedule 2 of The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579). When dealing with cases where a European Protected Species (EPS) (all UK bats) may be affected, a planning authority is a competent authority within the meaning of the Regulation 7 of the Regulations, that has a statutory duty as the local authority to have due regard to the provisions of the Regulations in the exercise of its functions.

2.2 Use of Buildings by Bats

- a) Summer breeding roost (May-August)
- b) Hibernation roost (October-March)
- c) Transitional or temporary roost (Mainly spring/summer months)

Roost selection is often closely correlated to suitable foraging habitat within a reasonable commuting distance from the roost and different sites are used depending upon insect densities and abundance, climatic conditions can also affect their ability to successfully forage. All British bats are insectivorous.

Policy

2.3 Paragraph 180 of the National Policy Planning Framework (as revised in July 2021) states:

180. 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;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁶³ and a suitable compensation strategy exists; and,

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

¹ ******The term **roost** is generically referred to as a place that bat/s use for the any of the above reasons, however it should be noted that under the Conservation of Habitats and Species Regulations (2019) (EU Exit) (Regulation 43 (d) the term roost is not used but refers to "a *breeding site or resting place of such an animal*" and is afforded legal protection. The roost, breeding site or resting place of bats, which ever terminology is used is legally protected whether or not bats are in occupation.

- 2.4 This national focus on the conservation of biodiversity and the natural environment is further echoed in Policy G7 of the Rochdale Core Strategy, entitled 'Increasing the value of biodiversity and geodiversity', which states:

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

This policy goes on to state:

"It is important to ensure that statutorily protected sites are given very strong protection e.g. the borough's SSSI's, SPA and SAC's. Details in respect of requirements for new developments on or adjacent to the European Protected Sites will be contained within the Allocations DPD. Where a development has the potential to affect the conservation interests of a site protected by European legislation, we will require full assessment of any impacts and mitigation measures, including Habitats Regulations Assessment as well as any required Environmental Assessment. For non-statutorily designated sites, development should not adversely affect its core ecological value and extent and wherever possible avoid and fully mitigate any impacts. Proposals should also take full account of protected species interest and the need to maintain existing population levels and minimise unavoidable impacts on either protected species or their habitats. It should be noted that 'brownfield' sites can be of significant biodiversity interest, and can also contribute to wider ecological networks, and this must be taken into account."

3.0 Protected Species in Greater Manchester

- 3.1 Up to ten bat species have been recorded in Manchester, most of which use built structures, notably occupied residential properties, for roosting. All bats feature on the local biodiversity action plan for the area; the most frequently encountered bat species is the Common Pipistrelle (*Pipistrellus pipistrellus*) which will roost in building crevices, and its abundant status in Manchester is reflected throughout the UK.

4.0 Survey Methods

- 4.1 Bat Conservation Trust - Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd ed. (2016) edition states:-

"The guidelines do not aim to either override or replace knowledge and experience. It is accepted that departures from the guidelines (e.g. either decreasing or increasing the number of surveys carried out or using alternative methods) are often appropriate. The guidance should be interpreted and adapted on a case-by-case basis according to site-specific factors and the professional judgement of an experienced ecologist. Where examples are used in the guidelines, they are descriptive rather than prescriptive."

- 4.2 Relative to the above the survey protocol has been determined using the collective and long standing experience of Tyrer Ecological Consultants Ltd and knowledge of the specific nature of the site.

Survey Protocol

- 4.3 In accordance with Bat Conservation Trust - Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd ed. (2016), it is specified that: *"The bat active period is generally considered to be between April and October inclusive"*, though the period of **May - August** is the optimal most productive period to identify breeding / maternity sites that Natural England accept bat surveys and grant European Protected Species Mitigation licences (EPSML).
- 4.4 The timing of the survey took place in September, and whilst outside of the main breeding season is still within the active and social season of bats. September is a time when summer roosts are starting to disperse, and bats are moving into a transitional period prior to the hibernation season. The main active season of bats is generally accepted as May – August across the industry, though this can be extended into September dependent on the roost potential identified at a building. In this instance, given the character of the loft spaces identified during the Preliminary Roost Assessment, St. Mary's is considered highly unlikely to support a maternity roost of any of the bat species identified as being present within the Greater Manchester area. However, it is considered a suitable building to offer day / transitional provision for bats, and thus a survey at this time of year is considered to be a productive month to complete emergence observations.
- 4.5 Where bats are roosting, they are likely to be detected by the ecologists who are trained in the use of bat detector hardware and call analysis software (Analook / Kaleidoscope), and specifically how to detect bats and to correctly identify/disseminate bat calls.
- 4.6 Furthermore, at dawn, temperatures are usually lower than at dusk; as a result, bat activity can, in some locations, be less frequent. Additionally, where singular/small numbers of bats are present and there are no survey constraints then dawn surveys are of no more value than dusk surveys; singular bats can and do return to a roost before dawn and as a result a dawn survey would not record them anyway.

BCT issued an Interim Guidance Note in May 2022 in advance of a 4th edition of bat survey guidelines to be published in Summer 2022, which supersedes existing guidelines and states in relation to dawn surveys that:

"Whilst dawn surveys can reward surveyors with displays of dawn swarming behaviour, there is a concern that bats that have returned earlier will be missed..."

The 4th edition of the survey guidelines will therefore transition away from the standard use of dawn surveys, particularly as a method for presence/absence surveys in favour of dusk surveys supported by NVAs. The use of NVAs has the potential to improve the quality of dusk surveys, providing clarity on exact emergence points and bat counts that might not otherwise be available because of the limitations of the human eye."

- 4.7 Survey protocol should not be determined by parties who are 1) not familiar with the site, and 2) do not have a sufficient level of experience in relation to the undertaking of dusk/dawn bat surveys.
- 4.8 Six surveyors were required to accurately monitor potential roost features (PRF's) on the building at any one time; the locations and positions of the surveyors was in correspondence with the features that were identified during the daytime survey.
- 4.9 Surveyors were strategically positioned so that all elevations with bat roost potential, as described in the daytime report, could be observed without limitations. The surveyors were aided with Anabat, Batlogger, Echometer EM2, Peersonic, or equivalent electronic bat detectors that enable the locating and recording of the high frequency calls that are emitted by bats; echolocation calls were analysed the next day using Analook or equivalent computer software to verify field observations; where deemed appropriate by the attending ecologists, elevations were also surveyed via the use of a Night Visual Aid (NVA) Camera (Panasonic HC-VXF990) (or similar) – recordings would be subject to review the following day.

Survey Limitations

- 4.10 No significant limitations were encountered that impacted upon Tyrer Ecological Consultants ability to conduct surveys using best practice methodology or the conclusion of this report.

5.0 Results

5.1 One dusk emergence survey was undertaken on 28th September 2023 by six surveyors; surveyor credentials have been given within **Table 5.1**. **Tables 5.2-5.3** alongside **Figure 5.1** document the results of the dusk survey.

Table 5.1 - Surveyor Credentials

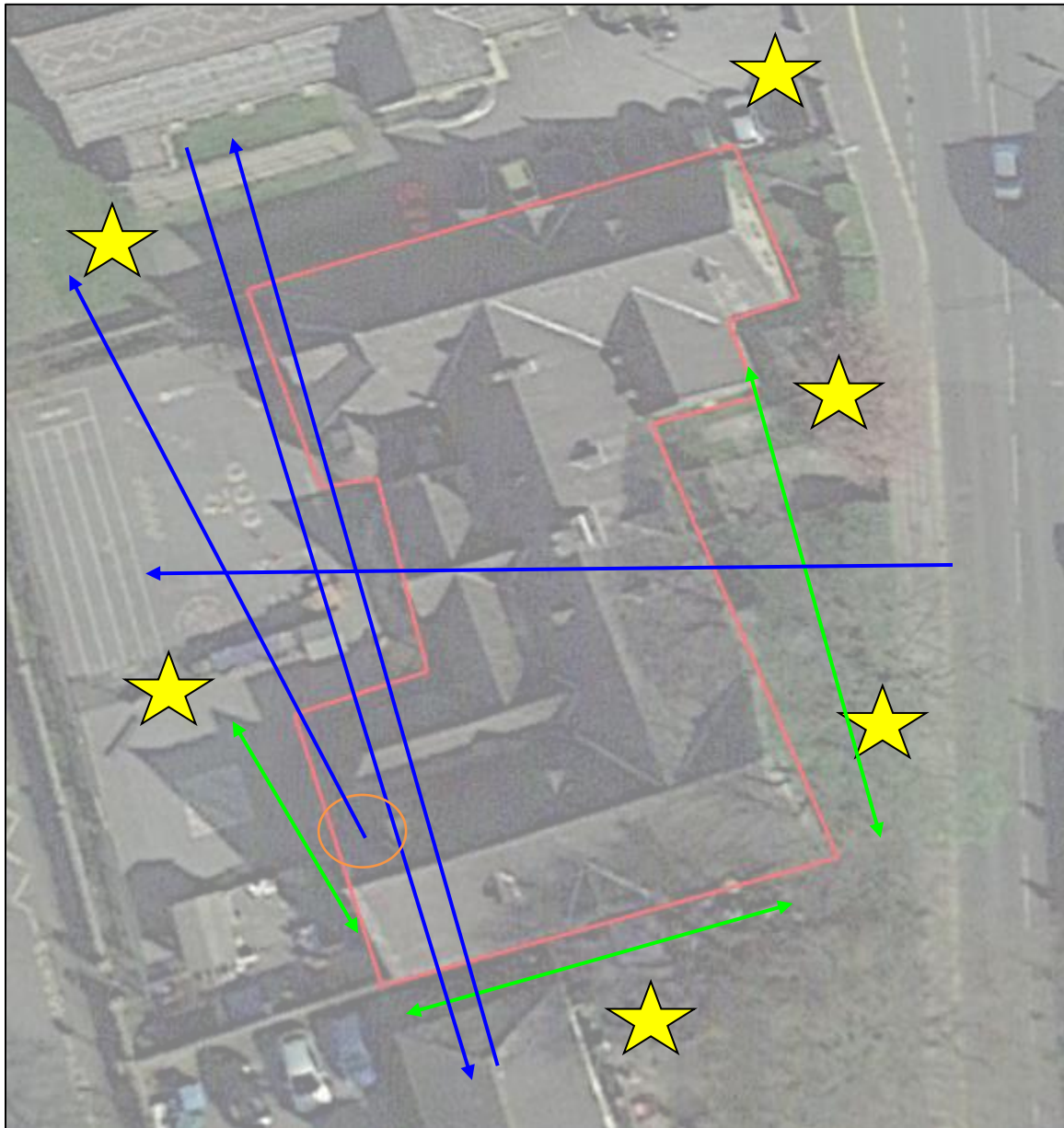
Name	Experience	Details
Miss. K. Judson Qualifying CIEEM	3 years	- An experienced Consultant Ecologist, - Holding a BSc (Hons.) Biology and MSc Conservation Management (a CIEEM accredited course), - Accredited agent on the Class 2 Natural England bat license of Mrs. K. Wilding (CLS-14227).
Miss. C. Rimmer	1 year	- Trainee Ecologist undergoing extensive training and experience, - BSc Hons in Wildlife and Conservation.
Mr. H. Green	30+ years	- Highly experienced bat specialist and carer with surveying experience with Tyrer Ecological Consultants Ltd over decades, - Holds a Class 2 Natural England bat license (CLS-03290).
Mr. M. Smith	7 years	An experienced seasonal bat surveyor with Tyrer Ecological Consultants Ltd.
Mr. D. Ney	5 years	An experienced seasonal ecological consultant with experience of undertaking professional bat surveys.
Mrs. R. King MCIEEM	15 years	An experienced seasonal ecological consultant with experience of undertaking professional bat surveys.

Table 5.2 – Survey date, time and weather conditions

Time	Date	Weather Conditions
1833 – 2025	28 th September 2023	Sunset: 1853: Dry, 100% cloud cover, light breeze Start temp: 16°C End temp: 14°C

Table 5.3 – Dusk Survey Results

Time	Dusk Survey	Activity
1833 - 2025	28 th September 2023	Summary: Emergence of a common pipistrelle from beneath a lifted slate on the northern elevation of the south-western roof pitch, activity limited to occasional foraging from a single common pipistrelle and a single pass by a noctule. 1912 hrs: Common pipistrelle (CP) commuting from east to west over building 1915 – 1929 hrs: Occasional foraging by a single CP at south and south-west of the building 1923 – 1955 hrs: Frequent foraging by a CP in tree canopy at east of the building 1928 hrs: Emergence of a CP from beneath a lifted slate on the northern elevation of the south-western roof pitch, close to the gable verge. 1928 – 1949 hrs: Sporadic commuting passes by CP north to south and vice versa over site 1929 hrs: Noctule pass heard but not seen



Dusk Survey – 28/09/2023

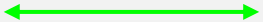
Key			
	Site Boundary		Foraging activity
	Surveyor Positions		Commuting activity
	Directional compass		Emergence point

Figure 5.1 - Visual Aid - Dusk Survey Results with Key



Figure 5.2 – Emergence point from which a single common pipistrelle emerged during the dusk survey

6.0 Survey Conclusions & Recommendations

- 6.1 Based on the results gathered during the September 2023 dusk survey effort, St Mary's has been ascertained to be host to a 'Day roost', supporting a singular common pipistrelle, located beneath a lifted slate on the northern elevation of the south-western roof pitch, close to the verge. Activity around the site was limited to commuting and foraging by a single common pipistrelle (*Pipistrellus pipistrellus*) bat and a single pass by a noctule (*Nyctalus noctula*).
- 6.2 Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd ed. (2016) describes a Day roost as the following:
- Day roost:** *"A place where individual bats, or small groups of males, rest or shelter in the day but are rarely found by night in the summer."*
- 6.3 The proposed works are understood to involve the reroofing of the whole structure; it is therefore likely that the roost will be destroyed during the proposed works. A European Protected Species Mitigation Licence (EPSML) will be required to legally affect a roost / place that is "actively used for breeding, rest or shelter (roost)" by bats, however, before a licence can be applied for all planning issues need to be resolved.
- 6.4 In order that the LPA can implement its obligations under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), appropriate and proportionate mitigation will need to accompany the planning application which will demonstrate that the "*favourable conservation*" of the species concerned can be maintained.
- 6.5 Additionally, it should be noted that installation of new lighting as part of a development scheme that exceeds current levels may have a negative impact upon foraging / commuting bats confirmed as present in the vicinity, particularly if increased light spillage occurs in areas currently valued and relatively free from illumination. There are several measures that can be used to offset impacts upon bats, where lighting is unavoidable; these include, however are not limited to: the light source used and luminaire design, and accessories to direct light at its intended target. Numerous software programmes are currently available which can be used inform lighting plans, demonstrating how lighting decisions will illuminate a site. the reader is referred to the Bat Conservation Trust's 'Bats and Artificial Lighting at Night' guidelines (August 2023) for further information.

7.0 Indicative Mitigation

- 7.1 From the evidence gathered during the surveys, the use of St. Mary's by bats is adjudged to be of 'Low' level significance in relation to common pipistrelle bats.
- 7.2 The above has been considered in accordance with the observed species' current conservation status (as according to current EPS mitigation licencing applications in England); the proposed mitigation is proportionate to that use. If, however, at any time that assessment is revised to a higher level, then the mitigation will also be accordingly revised.
- 7.3 The following procedures and mitigation recommendations are designed to allow the Local Planning Authority (LPA), in association with their ecological advisers, to determine a Planning Application where a European Protected Species has been identified and will be affected by the work for which the Planning Application seeks consent. In addition, Local Planning Authorities in accordance with the obligations placed upon them by way of their duties under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579) have to take into consideration the presence of a European Protected species (EPS) before determination of an application where it/they have been identified.
- 7.4 The LPA need to consider the mitigation in relation to the potential success of a Natural England (NE) licence application and/or if in their opinion the mitigation is considered as being appropriate, or if it is over and above what is required; if they determine that the mitigation is appropriate then a Planning Condition should be attached requiring the roost provision to be implemented in accordance with this ecological report. If the LPA consider that the mitigation is over and above what is necessary but require "enhancement" as part of their Local Biodiversity / Net-Gain Planning Policies, this should be included in the terms of Consent. The acting bat ecologist deems the proposed new roost creation as appropriate and not over and above what is required.
- 7.5 Notwithstanding that Planning Consent is granted or equally if the work is undertaken outside of the planning system, whereby projects that do not require planning consent may affect bats or their roost, including disturbance, it does not absolve the applicant, site owner, developer or any other party involved with the work from ensuring that an application is made for a Natural England development licence, to legally undertake work that will affect bat(s) or their roost(s). If work is undertaken without a licence and bat(s) or their roost(s) is/are affected, then a breach of current wildlife legislation will occur for which penalties are high.
- 7.6 Under Regulation 53(1) and 56(3)(a) of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), a licence is required prior to disturbing bats or destroying / damaging / obstructing any place that is used by bats as a resting place or breeding site.
- 7.7 The licence is issued by the EPS Licensing Team of Natural England.

Summary of Mitigation

- 7.8 Proposals entail the full reroofing of St. Mary's. It is acknowledged that the presence of roosting bats within the roof of the building needs to be addressed from both a legal and conservation perspective.
- 7.9 The mitigation proposals outlined in this report are seen to form the most productive way forward that will retain long term roosting opportunities for bats and minimise disturbance whilst also enabling the client to undertake the renovation works to the building.

- 7.10 No habitat loss is anticipated as part of the proposals with local treelines understood to be retained. No temporary or permanent impacts are anticipated in relation to foraging or commuting habitat, with the semi-natural habitats in proximity not affected by the works.
- 7.11 To ensure that bats are not left without a roost while works take place that could displace bats from their roost(s) at the building, a receptor bat roost will need to be installed on a suitable surface such as a mature tree. The receptor roost will be a bat box such as a Schwegler 2F bat box (or equivalent tree box if this model is not available). Receptor roosts serve as a receiver unit should bats must be captured and translocated to them by the licenced ecologist during the works schedule. The receptor roost should be installed and be in place prior to any roofing works and be within a reasonable distance and line of sight of the existing roost(s). The bat box will be retained post works to serve as permanent roost provision following the works (see **Figure 7.1** for a visual aid).

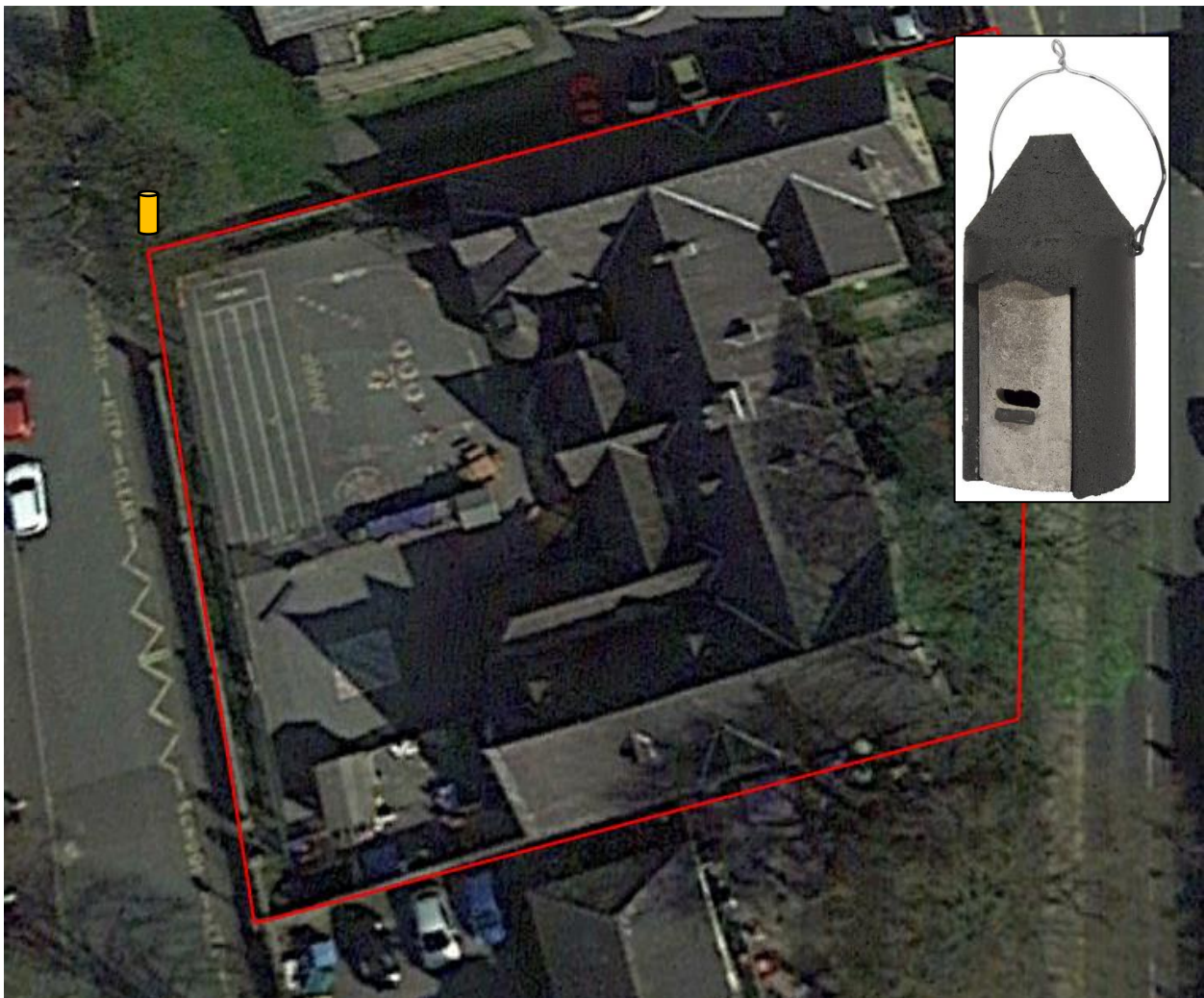


Figure 7.1 – Receptor roost [] proposed location in reference to the surveyed structure, and Schwegler 2F bat box (adapted over Google Earth Pro 2023)

Pre-works – assigned Ecological Clerk of Works (ECoW)

- 7.12 Once an EPSML is in place, at the pre-commencement stage a suitably qualified Ecologist (SQE) is to undertake a site induction 'Toolbox talk' to the Licensee and all contractors on possible bat presence and discuss document features taken from the EPSML, i.e. License, Method Statement, Mitigation Figures and Work Schedule to be kept on site for the duration of the work. Prior to any work being undertaken the presence/absence of bats, as far as is possible, will be established by undertaking a thorough investigation of the area at which bats have been observed using the site, namely the lifted slates on the northern elevation of the south-western roof pitch. This will involve a thorough inspection of these areas during dismantling using an endoscope and/or narrow-beam torch, as necessary, and will involve a soft roof strip at the local area of interest around slates, as necessary, which is the careful lifting, inspecting and removal of roof components.

The Ecologist will supervise careful dismantling of all places of bat roost interest. In addition, at the Ecologist's / ECoW's discretion, wherever opportunities for bats exist in other areas of the building, supervised dismantling/inspections will extend to these areas with strategies for safely removing bat(s) applied, as long as a maternity colony is not considered to have taken up occupancy of the building.

All dismantling of potential roost features will be undertaken during favourable weather conditions (above 9°C).

Where crevices are extensive, or where it cannot be conclusively ascertained that bats are absent from a crevice, exclusion devices may be fitted for a period of 3 days and 3 nights, or longer, at the Ecologists discretion – this is where material is placed over the entrance area(s) of a roost allowing bats a means of escape whilst preventing them from re-accessing. This method will only be adopted if necessary, and exclusion fitted cavities will only be filled in following this process.

No post-development monitoring is required for the roost given that it is a 'Day roost' of 'Low' significance, as stated following current guidance (Bat Mitigation Guidelines) concerning Day roosts / low significance roosts.

This mitigation proposed is subject to the approval of the Natural England EPS team who may influence the terms of this mitigation; all proposed roost provisions outlined hereafter will be dedicated for bats and permanent.

Work to be undertaken by the Ecologist

- 7.13 **Capture / Exclusion:** Once an EPSML is in place, the Licensee / assigned contractors should ensure a safe means of access to allow the named Ecologist to investigate the confirmed roost areas. In addition, wherever opportunities for bats exist in other parts of the building, the supervised dismantling will extend to these areas at the discretion of the ecologist in attendance as covered above.

In the event of bat(s) being present, it / they will be removed, placed in a secure box with soft tissue and transferred into the receptor bat boxes that will have previously been erected nearby as indicated in **Figure 7.1**. Only once it has been conclusively established by the named Ecologist that bat(s) are absent can works continue to completion.

In the unlikely event that bats are found outside of supervision time, then as legal requirement and conditions of the licence, work will immediately cease, and the named Ecologist will be contacted for further advice; contractors must not touch, handle or in any way cause bats to move without ecological supervision.

Work to be undertaken by the Contractor

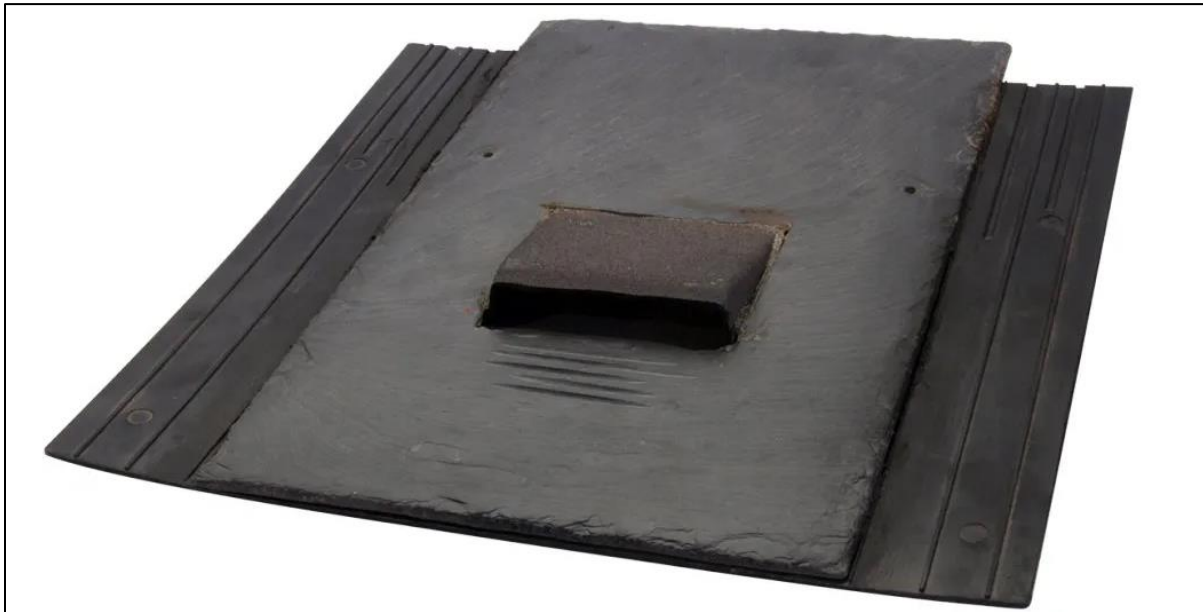
- 7.14 A single roost was identified during the dusk survey, which will be destroyed during the renovation works. It is thus recommended that suitable, like for like mitigation roosting provisions be incorporated into the proposals. These measures alongside the retention of the aforementioned receptor roost will ensure that the proposed works have no negative impact on the bats roosting in St. Mary's (subject to finalisation during the EPSML application process, see illustrative figures overleaf):
- One integrated bat slate will be installed on the northern elevation of the south-western roof pitch close to the gable, as a mitigation measure to replicate the roost identified using the building.
 - Furthermore, in line with Policy 4, alongside the mitigation measure above, an additional three integrated bat slates will be incorporated within the reroofed structure in areas where potential currently exists. This will enhance the building for bats, thus ensuring the long-term impact of the development will be neutral-positive. This ensures that the opportunities for bats currently present at the building will be recreated, ensuring that any further bats that may utilise the building during the active season will still have opportunities to roost within the building.
 - See **Figure 7.2** for indicative locations of the proposed bat slates within the reroofed structure.
 - It is imperative that traditional bitumen 1F roofing felt will be used as the chosen local underfelt / roof lining as opposed to any breathable roofing membrane (BRM). Modern breathable roofing membranes (BRM) entrap bats through wear and tear in the synthetic polymers used to protect the breathable membrane causing bats harm, injury and death. Alternatively, [one modern roof lining](#) has been approved by the BCT for use in roosts.
 - Should the use of a bitumen 1F or other safe lining not be feasible for any reason, alternative mitigation measures will be required. However, the applicant should be aware that alternative mitigation will be less likely to meet the 'like-for-like' roost replacement requirements of Natural England and pose greater risk of the EPSML application being refused.



Figure 7.2 – Proposed location of mitigation bat slate [■] and enhancement bat slates [■] in reference to the building (adapted over Google Earth Pro 2023)

- 7.15 The created bat roost(s) will be permanent and dedicated for bats; they cannot be used for any other purpose.
- 7.16 Management requirements for the roost(s) are considered to be absent, though it will be the Licensee's responsibility to ensure all new roost access points and building condition remains in favourable working order post-development.
- 7.17 The Ecologist should carry out a suitable check to ensure the mitigation has been delivered; this should be stipulated by a planning condition.
- 7.18 No post-development monitoring is typically required for the roost given that it is a 'Day roost', as stated following current guidance (Bat Mitigation Guidelines) and conservation status concerning common pipistrelle 'Day roosts'/low significance roosts.
- 7.19 All mitigation proposed is subject to the approval of the Natural England EPS team who may influence the terms of this mitigation; all proposed roost provisions outlined hereafter will be dedicated for bats and permanent.

See proposed bat slate mitigation below.



Breathable Roofing Membranes (BRMs) can trap the feet of bats, resulting in death or injury. It is therefore essential that any ingress points lead to areas lined with traditional bitumen 1F underfelt which is bat safe.

7.0 References

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Appendix I: Inspection & Assessment in Relation to Bats & Breeding Birds (Tyrer Ecological Consultants Ltd, October 2023)