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To: [Development Management](#)
Subject: 24/01086/FUL
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Good morning,

Thank you for consulting GMEU on this application at Lower Town House Barn, Littleborough (24/01086/FUL). Apologies for the slight delay in responding. The application is accompanied by an Inspection & Assessment for Bats & Breeding Birds (Dec 2021), Dusk Survey Results (Aug 2022) and Dusk Survey Results (June 2024), authored by Tyrer Ecological Consultants Ltd. Based on the submitted information, GMEU have the following comments:

Bats

The bat assessment appears to be appropriate, and I have no reason to doubt the findings. As per the documents provided, the initial Preliminary Roost Assessment (PRA) found the existing barn to have 'moderate' potential for roosting bats, triggering the requirement for two emergence surveys. Subsequently, the surveys were carried out in 2022 and repeated in 2024 (with the most recent best practice guidelines used in 2024 (4th edition, 2023)). In 2022, one common pipistrelle was observed emerging from the barn at the southern aspect on both surveys. In 2024, one common pipistrelle was observed emerging from beneath a roof tile on the southern aspect during the first survey and two common pipistrelles were observed emerging from an internal roost on the north aspect during the second survey.

The report states that the barn hosts three 'day roosts' of common pipistrelle only and it is assumed that professional judgement has been applied to carry out two surveys only. Given that the roosts are common pipistrelle only and in very small numbers, we can be confident that mitigation will be feasible and that a European Protected Species Mitigation Licence (EPSML) for bats would be issued by Natural England. The EPSML must be sought from Natural England and approved, prior to any works taking place and after planning permission has been granted. The licence will include a full mitigation strategy and details on the methods which will be undertaken to safeguard bats during the works. A condition to this effect must be placed on any permission. The mitigation and enhancement recommendations such as a sensitive lighting scheme and bat boxes should also be implemented (as per the 2024 report).

Nesting birds

Although no birds were identified nesting in the building in 2021, there is potential that nesting birds could now be present. As all wild birds, their nest and eggs are protected under the Wildlife and Countryside Act 1981 (as amended), we would recommend that the following condition be attached to any permission, should it be granted:

No removal of or works the barn shall take place during the main bird breeding season 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check for active birds' nests immediately before clearance and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site.

Biodiversity Net Gain (BNG)

The proposal appears to be exempt from BNG under the de minimis rule, as no habitat removal is proposed, and the site has zero baseline value (buildings and hardstanding

only).

In summary, we are satisfied that the application can be forwarded to determination and that any permission, if granted, is supported by the conditions recommended. This includes the requirement for a bat EPSML to be sought from Natural England and approved, when planning permission has been granted and prior to any works taking place.

If you have queries relating to this advice, please do not hesitate to contact me.

Kind regards,

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