



Preliminary Roost Assessment

Ronald Gorton Centre, 6 Castlemere Street, Rochdale, Lancashire OL11 3SW

FOI Industry Ltd

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Industry Guidelines and Standards

This report has been written with due consideration to:

- Chartered Institute of Ecology and Environmental Management (2017). Guidelines for Preliminary Ecological Appraisal. 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.1. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2017). Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2020). Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- British Standard 42020 (2013). Biodiversity – Code of Practice for Planning and Development.
- British Standard 8683:2021 (2021). Process for Designing and Implementing Biodiversity Net Gain.

Proportionality

The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate.

The desk studies and field surveys undertaken to provide a Preliminary Ecological Appraisal (PEA) might in some cases be all that is necessary.

(BS 42020, 2013)

Executive Summary

Arbtech Consulting Limited was instructed by FOI Industry Ltd to undertake a Preliminary Roost Assessment (PRA) at Ronald Gorton Centre, 6 Castlemere Street, Rochdale, Lancashire OL11 3SW (hereafter referred to as “the site”). The survey was required to inform a planning application for the conversion of existing building to form Training and Product Research & Development Facility with associated office space (Use Classes E(g)(i) & E(g)(ii)) together with replacement roof and installation of cladding to all elevations (hereafter referred to as “the proposed development”).

The following is work you will need to commission to comply with planning policy and legislation. Further information, along with opportunities for biodiversity enhancement, are outlined in Table 6 of this report.

Feature	Survey Results Summary	Impact Assessment	Recommendations
Roosting bats (B1)	Building B1 has negligible value for roosting bats due to a large, exposed features. Furthermore, connectivity to the site is poor with no suitable habitat on site for bats to utilise for foraging and commuting into the wider landscape. Additionally, street lighting on all elevations further reduces the likelihood of bats being present.	Bats are very unlikely to be roosting within this building and as such, there are not anticipated to be any impacts on roosting bats as a result of the renovations to this building.	The proposal of recladding and roof works will have a likely low potential for impacts to bat roosts. It is anticipated that any risk to bats can be reduced to an acceptably low level through the implementation of a precautionary working method during and post-development. This will include the following measures: ▪ Works will be scheduled during the winter months (November to March) when bats are least likely to be present, insofar as is possible. ▪ A toolbox talk will be given to contractors to make them aware of the possible presence of bats on the site. ▪ An inspection utilising an endoscope of the missing timber boards identified in this report will be undertaken prior to works commencing. ▪ In the unlikely event that a bat or evidence of bats is discovered during the development all work must stop and a bat licensed ecologist contacted for further advice.
Nesting birds (B1)	The building could be used by nesting birds. The missing timber panel features are large and could be utilised by passerine birds.	The proposed development could result in the destruction or the disturbance and subsequent abandonment of active bird nests.	Works should be undertaken outside the period 1st March to 31st August. If this timeframe cannot be avoided, a close inspection of the building should be undertaken immediately, by qualified ecologist, prior to the commencement of work. All active nests will need to be retained until the young have fledged.

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed by FOI Industry Ltd to undertake a Preliminary Roost Assessment (PRA) at Ronald Gorton Centre, 6 Castlemere Street, Rochdale, Lancashire OL11 3SW (hereafter referred to as “the site”). The survey was required to inform a planning application for the conversion of existing building to form Training and Product Research & Development Facility with associated office space (Use Classes E(g)(i) & E(g)(ii)) together with replacement roof and installation of cladding to all elevations (hereafter referred to as “the proposed development”). A plan showing the proposed development is provided in Appendix 1.

The aim of the PRA was to determine the presence or evaluate the likelihood of the presence of roosting bats, and to gain an understanding of how bats could use the site for roosting, foraging or commuting. This has been undertaken with due consideration to the “Bat Surveys for Professional Ecologists —Good Practice Guidelines” publication (Collins, 2016). No previous ecology reports have been produced for this site by Arbtech Consulting Ltd or, to the author's knowledge, by any other consultancy.

1.2 Site Location and Landscape Context

The site is located at National Grid Reference SD 89416 12753 and has an area of approximately 0.4ha comprising hard standing, two trees and two buildings. It is surrounded by built up areas which includes residential dwellings with their associated garden areas and commercial units which provide limited connectivity into the wider landscape. The wider landscape comprises deciduous woodland, lowland fens and wood-pasture and parkland. A site location plan is provided in Appendix 2.

1.3 Scope of the Report

This report provides a description of all features suitable for roosting, foraging and commuting bats and evaluates those features in the context of the site and wider environment. It further documents any physical evidence collected or recorded during the site survey that establishes the presence of roosting bats. It provides information on possible constraints to the proposed development as a result of bats and summarises the requirements for any further surveys to inform subsequent mitigation proposals, achieve planning or other statutory consent and to comply with wildlife legislation. To achieve this, the following steps have been taken:

- A desk study has been carried out.
- A field survey has been undertaken, including an inspection of built structures and a ground level assessment of trees, to determine the presence or the suitability of any features which bats could use for roosting and to assess the suitability of the site's bat foraging and commuting habitat.
- An outline of potential impacts on any confirmed or unidentified roosts has been provided, based on the proposed development.
- Recommendations for further surveys and mitigation have been made, along with advice on the requirements for a European Protected Species Licence (EPSL) application if appropriate.
- Opportunities for the enhancement of the site for roosting, foraging and commuting bats have been set out.

2.0 Methodology

2.1 Desk Study

The desk study included a 2km radius review of statutory designated sites with bat qualifying interests and granted EPSL records for bats held on magic.gov.uk database. An assessment of the surrounding landscape structure was also completed using aerial images from Google Earth and OS maps.

2.2 Field Survey

The survey was undertaken by Matthew Edwards on the 16th January 2024: accredited agent to Natural England Bat Licence Number: 2022-10404-CL18-BAT.

2.3 Breeding Birds and Other Incidental Observations

The surveyor also made note of any other ecological constraints observed during the survey, notably the likelihood of presence or signs of breeding birds, and the suitability of the site for barn owls.

2.4 Suitability Assessment

The PRA comprised an assessment of each building to be impacted by the proposed development for potential to support roosting bats. The survey was led by an experienced ecologist and was based on current best practice guidelines (Collins 2023). All features that are likely to be impacted by the proposed development were assessed for their potential to support roosting bats. The surveyor systematically surveyed all features suitable for bats and signs of bat activity.

The PRA included a visual inspection (including the use of binoculars and torches where required) of the exterior and interior of each building for evidence of bat use (e.g. droppings, scratch marks, staining and sightings). Factors considered whilst undertaking the PRA comprised internal conditions, presence of features suitable for use by roosting bats, proximity to foraging habitats or cover and potential for disturbance. Notes were made relating to relevant characteristics of features providing potential access points and roosting opportunities for bats. Table 1 below details the rationale for determining bat roost value of buildings subject to the PRA.

Table 1: Rationale for assigning bat roost value.

Assigned Bat Roosting Potential	Description/ Rationale
Confirmed roost	Evidence of roosting bats within the building.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions, and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/ stable hibernation site.
Medium	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, condition and surrounding habitat but unlikely to support a roost of high conservation status, such as maternity and hibernation.

Low	A building with one or more potential roost sites that could be used by individual bats opportunistically at any time of year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/ stable hibernation site, but could be used by individual hibernating bats).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
None	No habitat features likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/ suitable shelter at all ground. Underground levels.

A ground level tree assessment of three trees impacted by the development were undertaken, comprising a visual inspection was undertaken from ground level using binoculars to identify any possible roost features. Habitats were categorised in accordance with Tables 4.2 of the “Bat Surveys for Professional Ecologists —Good Practice Guidelines” publication (Collins, 2023), which are replicated in Table 2 below.

Table 2: Features of a tree that are correlated with use by bats

Classification	Feature of tree and its context
None/ negligible	Either no potential roost features in the tree or highly unlikely to be any.
Further Assessment Required (FAR)	Further assessment required to establish if potential roost features are present in the tree.
Potential Roost Features (PRF)	A tree with at least one PRF. Where sufficient information is available, each PRF will be classified as: - PRF-I – PRF is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats. - PRF-M – PRF is suitable for multiple bats and may therefore be used by a maternity colony.

2.5 Limitations

It should be noted that whilst every effort has been made to describe the features on site in the context of their suitability for roosting bats, this does not provide a complete characterisation of the site. This survey provides a preliminary view of the likelihood of bats being present. This is based on suitability of the habitats on site and in the local area, the ecology and biology of bats as currently understood, and the known distribution of bats as recovered during the desk study. Bats are highly mobile creatures that switch roosts regularly and therefore the usage of a site by bats can change over a short period of time.

A biological records data search has not been undertaken. However, given the location of the site, the nature of the habitats present and the assessed suitability of the site for protected or notable species, it is not anticipated that the purchase of biological records data will add any significant weight or alter the conclusions and recommendations outlined in this report.

These limitations have been taken into account during the evaluation of the site and requirement for further surveys and mitigation.

3.0 Results and Evaluation

3.1 Designated Sites

Details of any statutory designated sites within a 2km radius of the site, including their reasons for notification, are provided in Table 3 below.

Table 3: Statutory designated sites with bat qualifying interests within 2km radius of the site

Designated site name	Distance from site	Reasons for notification from Natural England
Rochdale Canal SSSI & SAC	910m south-east	The Rochdale Canal contains important habitats for submerged aquatic plants and emergent vegetation, including extensive colonies of the nationally scarce SAC species floating waterplantain <i>Luronium natans</i> . The site also supports a diverse assemblage of aquatic flora, notably its assemblage of pondweeds, <i>Potamogeton</i> spp; the nine species of which found in the canal represent a balanced community which reflects the quality of water.

3.2 Historical Records

A search of the magic.gov.uk database for granted EPSLs within a 2km radius of the site has been completed. Displaced bats from licensed sites <2km away from the survey site will find alternative habitat either within the mitigation measures implemented as part of the licence or will relocate to other known roosts sites in close proximity to the licensed site. EPSL records for bats are summarised in Table 4.

Table 4: Granted EPSLs for bats within 2km of the site

EPSL reference	Bat species affected	Impacts allowed by licence
EPSM2009-709	Common pipistrelle	Destruction of a resting place
2015-8047-EPS-MIT	Common pipistrelle, Daubenton's bat, and Soprano pipistrelle	Destruction of a resting place
EPSM2011-2750	Common pipistrelle and Soprano pipistrelle	Destruction of a resting place

3.3 Field Survey Results

The weather conditions recorded at the time of the survey are shown in Table 5. The results of the field survey are detailed in Table 6 and illustrated in Appendix 3.

Table 5: Weather conditions during the survey

Date:	16 th January 2024
Temperature	1°C
Humidity	90%
Cloud Cover	100%
Wind	1mph
Rain	None

Table 6: PRA Results

Feature	Description	Photographs
Bat foraging and commuting habitat	The site is predominantly hard standing and buildings with small area of vegetated landscaping and two trees. The site provides low value foraging habitat with minimal connectivity into the wider landscape. Furthermore, street lighting is located on all elevations reducing dark corridors to the site. Furthermore, this reduces the likelihood of bats utilising the building by delaying or preventing emergence from roosts, resulting in reduced foraging time and missing the peak time of insect abundance.	
B1 - overview	B1 is a large rectangular single storey building utilised as a warehouse. The building is flat roofed throughout reducing its likelihood of providing suitability for void dwelling bats. Furthermore, the interior provides no dark areas for roosting bats. The timber cladding is in poor condition on its southern and western elevations with missing timber exposing bitumen felt lining. The red circle opposite showing missing timber panels on the eastern section of the southern elevation.	

B1 – southern elevation	The bitumen felt on the southern elevation is in poor condition. Furthermore, the feature is large and exposed reducing the suitability for bats due to the likelihood of temperature fluctuations with a large exposed sub-space. This would reduce bat’s ability to thermoregulate.	
B1 – southern elevation	Missing timber panels to the west of the southern elevation have been filled with expanding foam. This has resulted in no features being present for bats to utilise.	
B1 – western elevation	The western elevation provides large areas of missing timber panels. The feature is large and exposed reducing the suitability for bats due to the likelihood of temperature fluctuations with a large exposed sub-space.	

B1 – western elevation	The photo opposite showing the extent of missing timber panels on the western elevation.	
B1 – northern elevation	No features are present on the northern elevation. All timber cladding is tight fitting with no gaps for bats to utilise.	

B1 – Interior	The photo opposite showing the interior of the expanding foam section.	
B1 – interior	The photo opposite showing exposed bitumen felt lining which is consistent throughout the interior building.	

B2 – eastern elevation	B2 is a square brick-built building in a dilapidated condition. The intact fascia board is tight fitting to the wall with no gaps for bats to roost under. Furthermore, the roof has historically failed providing no suitability for bats.	 A photograph showing the eastern elevation of a square brick building. A green metal fence runs along the front, with a black sign that reads "NO PARKING IN FRONT OF GATES". The ground is covered in snow. A timestamp in the bottom right corner reads "16/01/2024 11:06".
B2 – western elevation	The brickwork throughout the dilapidated building is in good condition with no gaps for crevice dwelling bats to utilise.	 A photograph showing the western elevation of the brick building. A yellow ramp or structure is visible on the left side. The brickwork appears solid. A green metal fence is visible on the right. A timestamp in the bottom right corner reads "16/01/2024 11:46".

4.0 Conclusions, Impacts and Recommendations

Taking the desk study and field survey results into account, Table 6 presents an evaluation of the value of the site for bats and also details any other ecological constraints identified such as nesting birds in relation to the proposed development.

Table 6: Evaluation of the site for bats and any other ecological constraints

Building/Tree	Survey Results Summary	Impact Assessment	Recommendations	Biodiversity Enhancement Opportunities ¹
Roosting bats (B1)	Building B1 has negligible value for roosting bats due to a large, exposed features. Furthermore, connectivity to the site is poor with no suitable habitat on site for bats to utilise for foraging and commuting into the wider landscape. Additionally, street lighting on all elevations further reduces the likelihood of bats being present.	Bats are very unlikely to be roosting within this building and as such, there are not anticipated to be any impacts on roosting bats as a result of the renovations to this building.	The proposal of recladding and roof works will have a likely low potential for impacts to bat roosts. It is anticipated that any risk to bats can be reduced to an acceptably low level through the implementation of a precautionary working method during and post-development. This will include the following measures: ▪ Works will be scheduled during the winter months (November to March) when bats are least likely to be present, insofar as is possible. ▪ A toolbox talk will be given to contractors to make them aware of the possible presence of bats on the site. ▪ An inspection utilising an endoscope of the missing timber boards identified in this report will be undertaken prior to works commencing. ▪ In the unlikely event that a bat or evidence of bats is discovered during the development all work must stop and a bat licensed ecologist contacted for further advice.	The following habitat creation and enhancement opportunities could be incorporated into the proposed development which would be beneficial for foraging bats: ▪ Planting of native tree, shrub and hedgerows to increase foraging opportunities.
Roosting bats (B2)	Building 2 has no value for roosting bats due to a lack of potential roost features.	No habitat features likely to be used by any roosting bats at any time of the year.	None.	

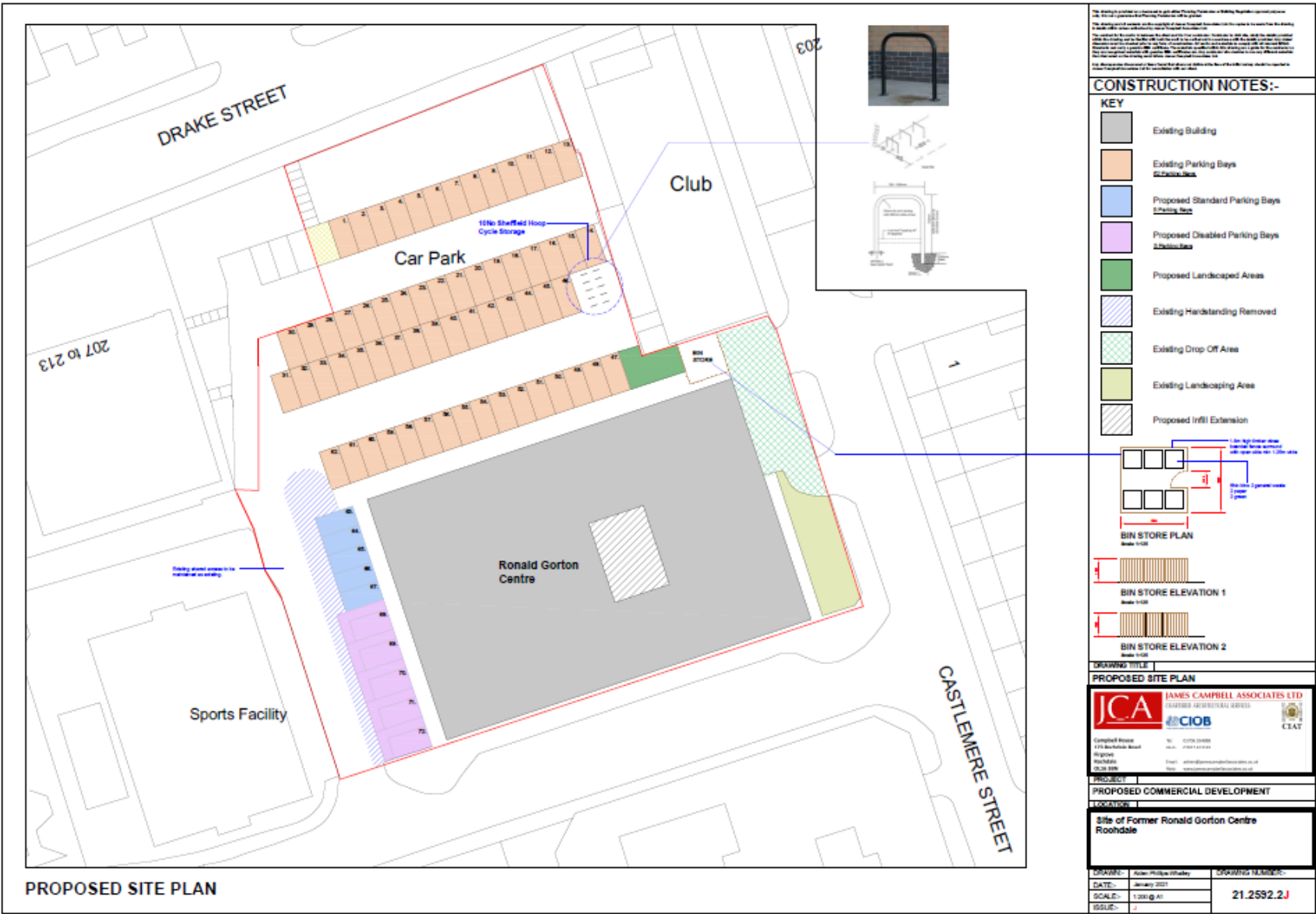
¹ The Local Planning Authority has a duty to ask for enhancements under the NPPF (2021).

Roosting bats (Trees)	Trees on site have no value for roosting bats due to a lack of potential roost features. Furthermore, trees are unaffected by the proposed development.	No habitat features likely to be used by any roosting bats at any time of the year.	None.	
Foraging and commuting bats	A small area of vegetation to the east provides limited suitability for local bat populations (if present) for foraging.	The proposed development will not result in the removal of any habitats which could be used by foraging bats.	None.	The following habitat creation and enhancement opportunities could be incorporated into the proposed development which would be beneficial for foraging bats: ▪ Planting of native tree, shrub and hedgerows to increase foraging opportunities.
Nesting birds (B1)	The building could be used by nesting birds. The missing timber panel features are large and could be utilised by passerine birds.	The proposed development could result in the destruction or the disturbance and subsequent abandonment of active bird nests.	Works should be undertaken outside the period 1st March to 31st August. If this timeframe cannot be avoided, a close inspection of the building should be undertaken immediately, by qualified ecologist, prior to the commencement of work. All active nests will need to be retained until the young have fledged.	The installation of a minimum of two bird boxes on mature trees around the site boundaries or on retained buildings will provide additional nesting habitat for birds e.g. Schwegler 1B Nest Boxes (trees) Schwegler 2H Robin Boxes (trees) Woodstone Nest Box (buildings or trees) Or a similar alternative brand. Tree boxes should be positioned approximately 3m above ground level where they will be sheltered from prevailing wind, rain and strong sunlight. Small-hole boxes are best placed approximately 1-3m above ground on an area of the tree trunk where foliage will not obscure the entrance hole.
Nesting birds (B2)	The building offers no opportunities for nesting birds.	None.	None.	

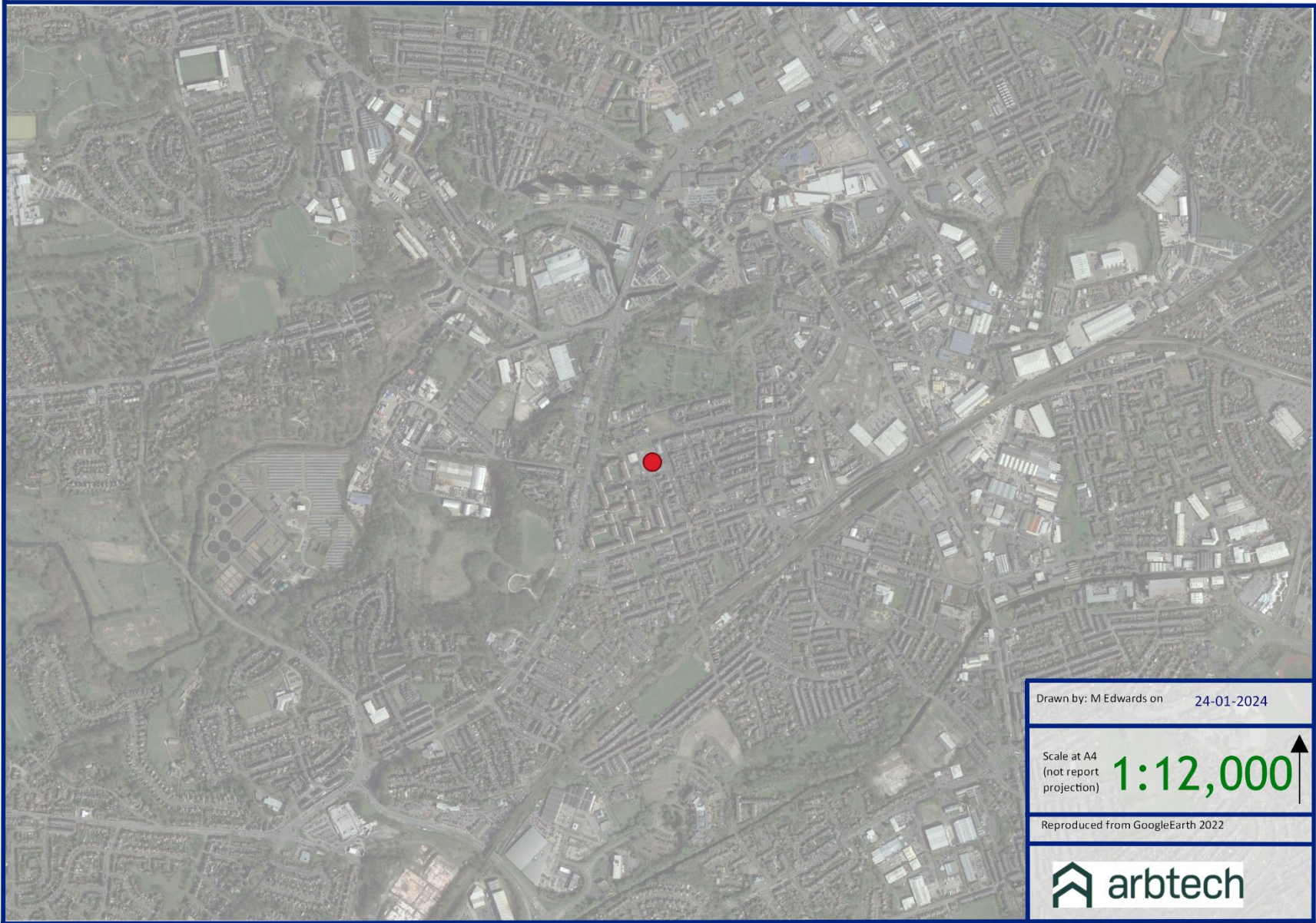
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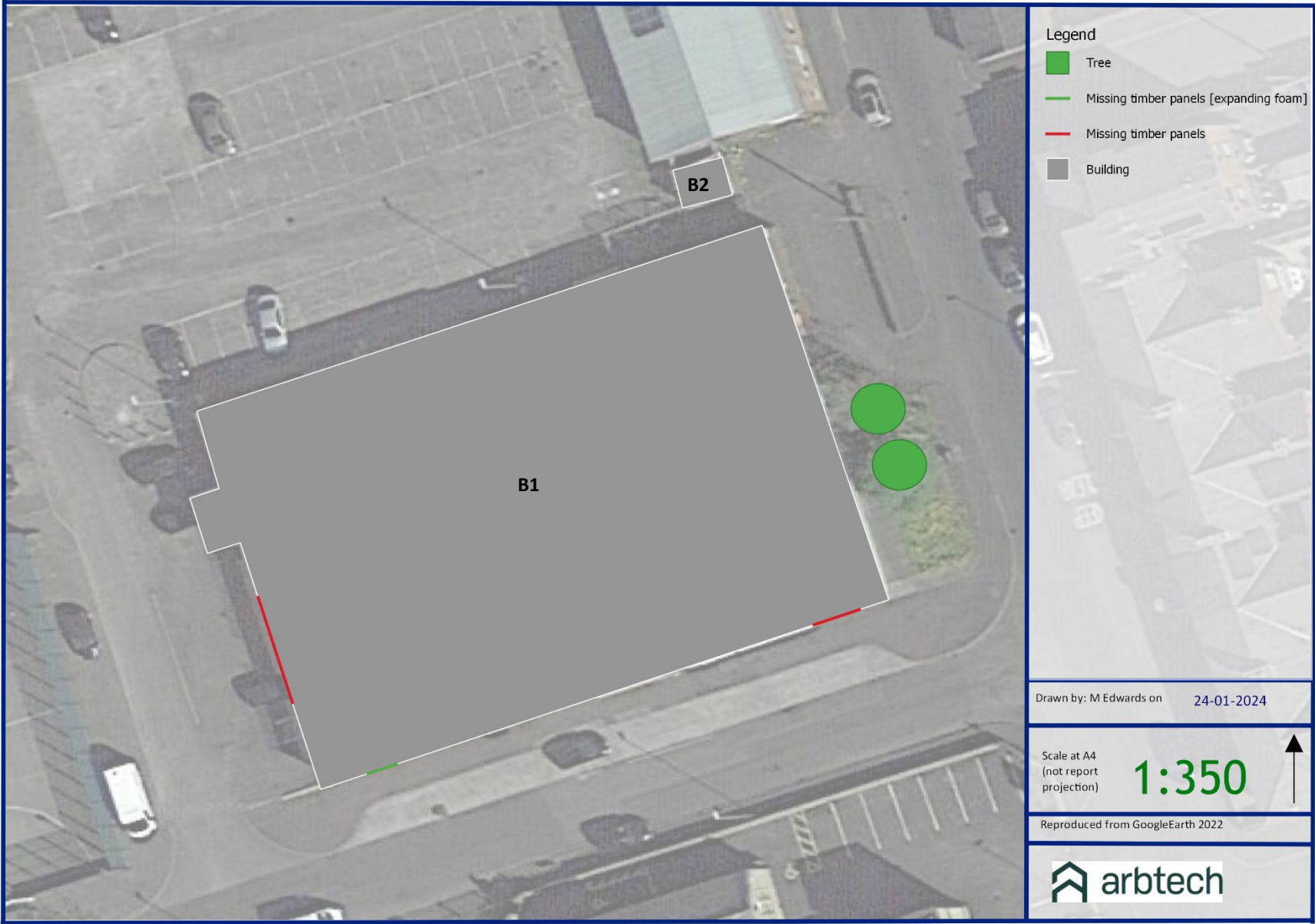
Appendix 1: Proposed Development Plan



Appendix 2: Site Location Plan



Appendix 3: PRA Plan



Appendix 4: Legislation and Planning Policy Related to Bats

LEGAL PROTECTION

All species of bat are fully protected under ***The Conservation of Habitats and Species Regulations 2017*** (as amended) through their inclusion on Schedule 2.

Regulation 43: Protection of certain wild animals - offences

(1) A person is guilty of an offence if they:

- (a) Deliberately captures, injures or kills any wild animal of a European protected species,
- (b) Deliberately disturbs wild animals of any such species,
- (c) Deliberately takes or destroys the eggs of such an animal, or
- (d) Damages or destroys a breeding site or resting place of such an animal,

(2) For the purposes of paragraph (1) (b), disturbance of animals 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) In the case of animals of a hibernating or migratory species, to hibernate or migrate; or
- (b) To affect significantly 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) through their inclusion on Schedule 5. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection
- Selling, offering or exposing for sale, possession or transporting for purpose of sale

NATIONAL PLANNING POLICY

National Planning Policy Framework 2021

The National Planning Policy Framework promotes sustainable development. The Framework specifies the need for protection of designated sites and priority habitats and species. An emphasis is also made on the need for ecological infrastructure through protection, restoration and re-creation. The protection and recovery of priority species (considered likely to be those listed as species of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006) is also listed as a requirement of planning policy.

In determining a planning application, planning authorities should aim to conserve and enhance biodiversity by ensuring that: designated sites are protected from harm; there is appropriate mitigation or compensation where significant harm cannot be avoided; measurable gains in biodiversity in and around developments are incorporated; and planning permission is refused for development resulting in the loss or deterioration of irreplaceable habitats including aged or veteran trees and also ancient woodland.

The Natural Environment and Rural Communities Act 2006 and the Biodiversity Duty

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'.

Section 41 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'. This list is intended to assist decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications. A developer must show that their protection has been adequately addressed within a development proposal.

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A European Protected Species Licence (EPSL) issued by Natural England will be required for works likely to affect a bat roost or for operations likely to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g. survive, breed, rear young and hibernate). The licence is to allow derogation from the relevant legislation but also to enable appropriate mitigation measures to be put in place and their efficiency/success to be monitored. The legislation may also be interpreted such that, in certain circumstances, important foraging areas and/or commuting routes can be regarded as being afforded *de facto* protection, for example, where it can be proven that the continued usage of such areas is crucial to maintaining the integrity and long-term viability of a bat roost (Garland & Markham, 2008).

There are 17 species of bat breeding in England and Natural England issues licences under Regulation 55 of the Habitats Regulations to allow you to work within the law.

Licences are issued for specific purposes stated in the Regulations, if the following three tests are met:

- The purpose of the work meets one of those listed in the Habitats Regulations (see below);
- That there is no satisfactory alternative;
- That the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range

The Habitats Regulations permits licences to be issued for a specific set of purposes including:

1. include preserving public health or public safety or other imperative reasons of over-riding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment;
2. scientific and educational purposes;

3. ringing or marking; and,
4. conserving wild animals.

Development works fall under the first purpose and Natural England issues bat mitigation licences for developments.

EUROPEAN PROTECTED SPECIES POLICIES

In December 2016 Natural England officially introduced the four licensing policies throughout England. The four policies seek to achieve better outcomes for European Protected Species (EPS) and reduce unnecessary costs, delays and uncertainty that can be inherent in the current standard EPS licensing system. The policies are summarised as follows:

- Policy 1; provides greater flexibility in exclusion and relocation activities, where there is investment in habitat provision;
- Policy 2; provides greater flexibility in the location of compensatory habitat;
- Policy 3; provides greater flexibility on exclusion measures where this will allow EPS to use temporary habitat; and,
- Policy 4; provides a reduced survey effort in circumstances where the impacts of development can be confidently predicted.

The four policies have been designed to have a net benefit for EPS by improving populations overall and not just protecting individuals within development sites. Most notably Natural England now recognises that the Habitats Regulations legal framework now applies to 'local populations' of EPS and not individuals/site populations.