



Indigo Ltd
S u r v e y s

Ken Mills, Rochdale

Preliminary Roost Assessment (PRA)

Brodie Ingoe

SD 89015 14791

241428

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Author: Steven Whitcher, MCIEEM

Revision 1 A

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Disclaimer

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In line with Chartered Institute of Environmental and Ecological Management (CIEEM) recommendations the findings of this survey are deemed valid for 18 months from the date of the survey.

1. Summary

Purpose	Planning permission is being sought for a residential development of Ken Mills in Rochdale. A Preliminary Roost Assessment of the site was commissioned to support the application for planning permission.
Results	No granted Natural England licences were identified in close proximity to the building on the MAGIC website. Area 1 of the building was considered to provide a moderate potential to support roosting bats due to voids in the walls and roof, open access to the interior and inaccessible areas of roof void. Area 2 of the building was considered to provide negligible opportunities for roosting bats due to the lack of suitable voids. The trees to the rear of the building were assessed to provide Further Assessment Required suitability for roosting bats due to the limited access available around the trees. The land surrounding the building was assessed to provide a moderate value foraging and commuting habitat for bats, due to the presence of tree lines and woodland in the surrounding area. The building was assessed to provide suitable nesting opportunities for a range of bird species with a confirmed house sparrow nest present and signs that tawny owls use the building as a nest site or roost.
Recommendations	It is recommended that no further works commence on Area 1 of the building prior to further bat activity surveys being carried out. It is recommended that the trees to the rear of the building are retained during the proposed development or that further surveys of the trees are carried out prior to removal/disturbance. It is recommended that a sensitive lighting scheme is implemented during all phases of the proposed development. It is recommended that no works are carried out in the vicinity of the sparrow nest, identified in the front of the building, until the young have fledged from the nest. It is recommended that any works on the building avoid the nesting season or are preceded by a thorough nesting bird survey, carried out by a suitably experienced surveyor. It is recommended that consideration is given to including bat and bird boxes in the buildings during the development. It is also recommended that consideration is given to including a tawny owl nest box in a suitable location on site during the development.
Conclusions	If the development is preceded by further surveys for bats and birds, covered by a Natural England licence, if required, and includes measures to reduce impacts from lighting and provide opportunities for bats and birds in the developed site, the impact of the proposals will be minimal.

2. Introduction

2.1. Purpose

2.1.1. Planning permission is being sought for a residential development of Ken Mills in Rochdale.

2.1.2. A Preliminary Roost Assessment (PRA) of the site was commissioned to support the application for planning permission.

2.2. Site Description and Location

2.2.1. Ken Mills comprises an existing industrial property located on New Street in Rochdale.



Figure 1: Showing the extent of the surveyed area.

2.2.2. The building comprises two areas, an existing single and two storey factory building (Area 1), and a large metal framed building to the rear (Area 2). For the purpose of this survey the two sections of the building have been dealt with separately.

2.2.3. Area 1

2.2.3.1. Area 1 comprises a single and two storey brick and stone factory that makes up the frontage of the site, along New Street and Sweet Briar Close. The windows to the front of the building are wood framed with the windows to the rear predominantly infilled with concrete blocks. A large roller door is present in the southern section of the frontage, providing vehicle access into the building.

2.2.3.2. Wooden fascia boards are present along the front of the building. To the rear the building adjoins the steel framed section of the building, Area 2.

2.2.3.3. The roof of the building comprises slate covered pitched roofs with roof lights over the main single and two storey areas with a sloping corrugated cement roof over a small area of the building to the northwest.



Figure 2: Area 1 of the building, viewed from the northeast.

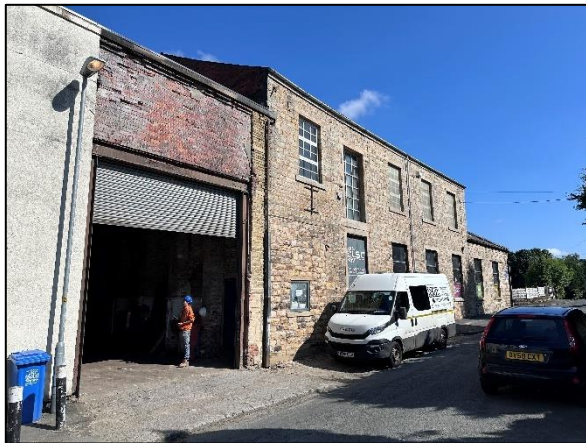


Figure 3: Area 1 of the building, viewed from the south.



Figure 4: The interior of the two-storey section of the building.

2.2.3.4. Internally the building comprises a series of separated rooms within the two-storey section of the building, with the 1st floor rooms predominantly open into the roof void, due to the ceilings having been removed, apart from a small area to the south of the building. The single storey areas of the building are open into the roof void.

2.2.4. Area 2

2.2.4.1. Area 2 comprises a large metal framed building located to the rear of Area 1. The building is clad with concrete sheets with a pitched concrete sheet roof.



Figure 5: Area 2, the large metal framed structure.



Figure 6: The interior of Area 2.

2.2.4.2. Internally the area comprises a single room that is open to the inside of the cement sheets. The building is directly connected to the internal spaces within Area 1 through a window opening towards the centre of the building and the vehicle access to the south.

2.2.5. The land immediately surrounding the building comprises New Street to the east and Sweet Briar Close to the north. To the west a line of trees separate the site from the adjacent residential properties and to the south the buildings are directly connected to the neighbouring residential property.

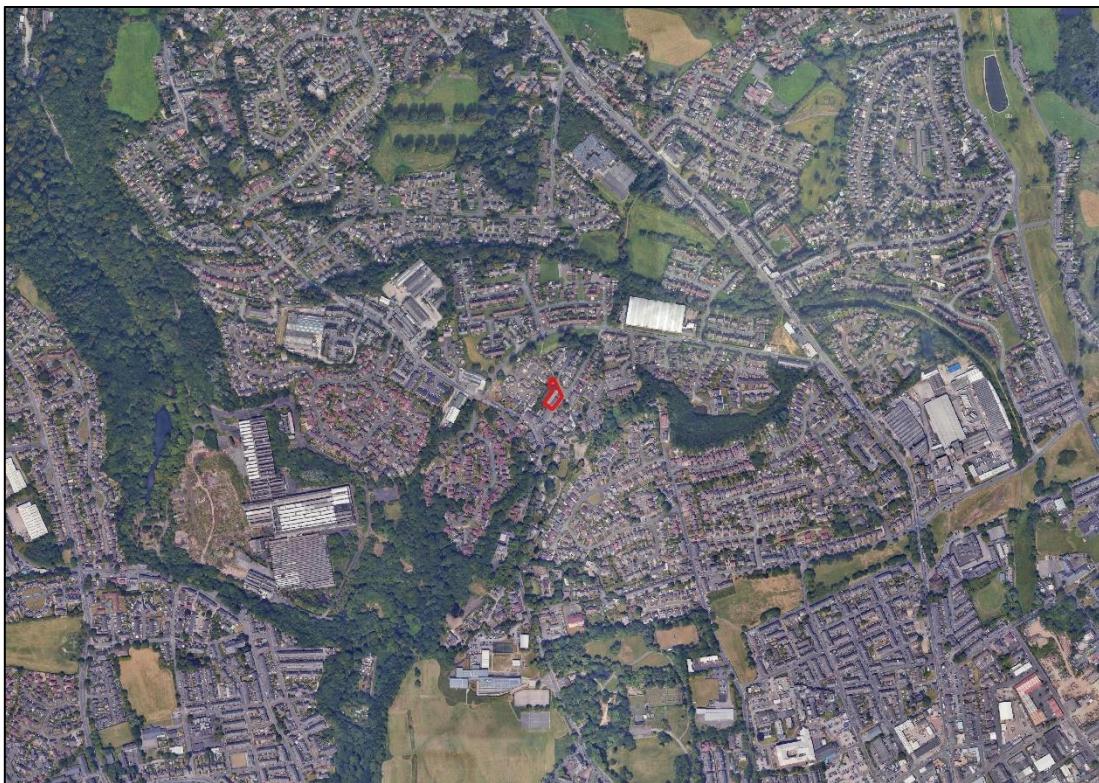


Figure 7: Showing the site in context with the wider surrounding area.

2.2.6. The wider surrounding area comprises areas of urban land within Rochdale with established areas of woodland or tree lines in close proximity to the east and southwest and the River Spodden a short distance to the southwest and west.

2.3. Proposals

2.3.1. The plans are initially to convert the southern section of the building into a residential property, although a wider residential development of the site is planned for the future.

2.3.2. The plans in Appendix I of this report show the proposed conversion of the southern section of the building.

3. Methodology

3.1. Desk Study

3.1.1. The MAGIC website was searched for records of existing European Protected Species (EPS) licences within the surrounding area.

3.2. Field Study

3.2.1. A field survey of the site was undertaken by Steven Whitcher (MCIEEM) on the 24th June 2024. The Preliminary Roost Assessment (PRA) was carried out in accordance with the Bat Conservation Trust Good Practice Guidelines, 4th edition (2023) and was also advised by BTHK Bat Roosts in Trees - A Guide to Identification and Assessment for Tree-Care and Ecology Professionals (2018) and BRHK Bat Roosts in Rock – A Guide to Identification and Assessment for Climbers, Cavers & Ecology Professionals (2021).

3.2.2. The weather at the time of the survey was fine, sunny and still (BWS-0) with a temperature of 23°C.

3.2.3. During the survey all buildings, structures and trees were searched for bat roosting potential or evidence of existing roosts, including:

- Checking buildings, structure and trees for cracks, voids or other Potential Roost Features (PRF).
- Looking for signs of staining or worn areas indicating a roost entrance.
- Searching for droppings, foraging remains such as wings or other field signs.

3.2.4. The inspection included a visual inspection using a bright torch (1 million candle power), ladders and also an inspection with binoculars, a pole camera and an endoscope, where applicable.

3.2.5. The habitat around the site was also assessed for its suitability to support foraging and commuting bats by looking at the value of the surrounding habitat and the connectivity of the site to the wider area.

3.3. Limitations/Constraints

3.3.1. This PRA was carried out as a daytime survey and therefore does not provide accurate information on bat emergence or entry or on foraging and commuting activity in the surrounding area.

3.3.2. No access could be gained to the separated roof void in the southern section of Area 1 due to the lack of an access hatch into that area of the building. This is considered a constraint to the internal inspection of the building.

3.3.3. At the time of the survey some sections to the north of the building had been demolished, with the timing of the demolition unknown, and works were ongoing on the stripping of the cement sheets from Area 2 of the building. There were also signs that the ceilings within the two-storey section of the building had previously been removed, although again the timing was unknown. The level of constraint to the survey caused by the recent works is unknown with

the survey only able to assess the building in the condition it was found at the time of the survey.



Figure 8: Removed ceilings within Area 1.



Figure 9: Machinery due to ongoing works in Area 2.

The trees to the rear of the building lie on the site boundary and therefore a thorough inspection of all sides of the trees was not possible during the survey. This is considered a significant constraint to the survey of the trees.

4. Results and Interpretation

4.1. Desk Study

4.1.1. Two existing records of granted bat licences were identified within 2km of the site on the MAGIC website. The records both relate to sites located in excess of 1.5km to the south of the site.

4.2. Field Study

4.2.1. The findings of the survey have been split to cover the two areas of the building, as shown in Figure 1, separately.

4.2.2. Area 1

4.2.2.1. The walls of Area 1 were found to be in a generally good condition but displayed an abundance of voids due to missing pointing and dislodged or missing stones and bricks.

4.2.2.2. The fascia boards to the front of the building were not tight to the stonework providing access behind the fascia boards and potentially to the wall tops.



Figure 10: Voids in the stonework of the building.



Figure 11: Voids behind the fascia boards.

4.2.2.3. The slate roofs of the building were found to be in a generally good condition although several voids were identified leading under slightly lifted or dislodge ridge tiles and areas of leadwork on the southern section of the building.



Figure 12: Voids under the ridge tiles.



Figure 13: Dislodged ridge tiles and gaps under leadwork.

4.2.2.4. The corrugated section of roof was found to be in a good condition, providing limited opportunities for bats.

4.2.2.5. Potential access to the interior of the building was present due to the window opening to the rear of Area 1 and extensive voids in Area 2, allowing flight access to the interior.

4.2.2.6. Internally the building was found to display queen post timbers with a bituminous lining felt inside of the two-storey sections of the building with a boarded ceiling present into the roof void of the single storey areas.



Figure 14: The roof structure in Area 1.



Figure 15: The bituminous lining felt present in Area 1.

4.2.2.7. No bat field signs were identified throughout the accessible areas of the interior, although open flight access was available to the interior and the walls and roof timbers displayed voids suitable to support roosting bats.

4.2.2.8. Overall, Area 1 was considered to provide a moderate potential to support roosting bats due to voids in the walls and roof, open access to the interior and inaccessible areas of roof void. Therefore, any works carried out on Area 1 may have an impact on roosting bats, if they are present in the building.

4.2.2.9. During the survey a house sparrow (*Passer domesticus*), a species on the UK Birds of Conservation Concern (BoCC) red list, was identified entering a void in the stonework on the front of the building, as shown in Figure 16, implying the presence of a nest in that location.



Figure 16: The location of the sparrow nest (circled).



Figure 17: Tawny owl field signs.

4.2.2.10. Abundant feathers, droppings and pellets were identified throughout the two-storey areas of the building with the signs implying that tawny owls (*Strix aluco*), a species on the UK BoCC amber list, use the building as a feeding perch or nest site. No active nest was identified in the building at the time of the survey.

4.2.2.11. Due to the presence of the sparrow nest and tawny owl field signs works carried out during the nesting season, which is March to September, will potentially have an impact on any birds present in the building. The proposed works will also cause the loss of a house sparrow and potential tawny owl nest location.

4.2.3. Area 2

4.2.3.1. The walls of Area 2 displayed abundant holes due to missing corrugated sheets, although it was not clear which sheets had been removed during the works ongoing at the time of the survey. The remaining areas of the walls were generally found to be well sealed with tight joints between the corrugated sheets.

4.2.3.2. The roof of the building was found to be in a good condition with no missing sheets and the joints tightly sealed, providing no significant opportunities for roosting bats.

4.2.3.3. Internally the building comprised an exposed metal frame on the inside of the corrugated panels with no separated roof void or other cavities present. No bat field signs were visible throughout the interior of the area during the survey.

4.2.3.4. Overall, Area 2 was considered to provide negligible opportunities for roosting bats due to the lack of suitable voids. Therefore, the demolition of this area of the building is considered unlikely to directly impact on roosting bats, although the works may indirectly impact roosting bats if they are present in the adjoining Area 1.

4.2.3.5. Further tawny owl feathers were identified throughout Area 2, although no nest sites or significant perches were identified.

4.2.3.6. Area 2 was assessed to provide suitable nesting opportunities for a range of bird species due to the open access and exposed metal framework, although no active nests were identified.

4.2.3.7. Due to the opportunities Area 2 provides for nesting birds any works carried out during the nesting season, which is March to September, will potentially have an impact on any birds present in the building.

4.2.4. The trees to the rear of the building were inspected from the site side and no Potential Roost Features (PRF) were identified. However, the trees could not be thoroughly inspected from all sides and were therefore assessed to provide Further Assessment Required (FAR) suitability for roosting bats. Any works that impact the trees, either directly through removal of the trees, or indirectly, through increased levels of disturbance and changes in lighting or noise, may impact on roosting bats if they are present in the trees.

4.2.5. The land surrounding the building was assessed to provide a moderate value foraging and commuting habitat for bats, due to the presence of tree lines and woodland in the

surrounding area. A thorough assessment of the foraging and commuting activity on and around the site was not carried out as part of the site survey.



Figure 18: The interior of Area 2, viewed from Area 1.



Figure 19: The tree line to the rear of the building.

4.2.6. The proposed works are the residential development of the site, although a full site design is not yet known. If the works include the removal of the trees to the rear of the buildings the works are considered likely to have an impact on foraging and commuting bats, although the impact will be minimal because the trees don't form part of a wider linear feature.

5. Recommendations

5.1. It is recommended that no further works commence on the building prior to further bat activity surveys being carried out, in line with the Bat Conservation Trust (BCT) Good Practice Guidelines (2023).

5.2. For a building with a moderate potential to support roosting bats the guidelines require two surveys carried out during the peak survey season, which is May to August. The survey should be carried out by sufficient surveyors and/or Night Vision Aids (NVA) to cover all areas of potential around the building, which is considered to be four surveyors/NVA.

5.3. Further recommendations regarding the requirement for a Natural England licence to cover the proposed works should be made on completion of the bat activity surveys.

5.4. It is recommended that the trees to the rear of the building are retained during the proposed development. If there is a need to remove any of the trees it is recommended that the works are preceded by further surveys of the trees, commencing with a ground assessment including full access around the trees, and a re-assessment of the likely impact on foraging and commuting bats.

5.5. It is recommended that a sensitive lighting scheme, in line with BCT and Institute of Lighting Professionals (ILP) Guidance (2023) is implemented during all phases of the proposed development.

5.6. It is recommended that no works are carried out in the vicinity of the sparrow nest, identified in the front of the building, until the young have fledged from the nest.

5.7. It is recommended that any works on the building avoid the nesting season, which is March to September, where possible. Any works that are carried out during the nesting season should be immediately preceded by a thorough nesting bird survey, carried out by a suitably experienced surveyor. Any nests identified must remain undisturbed until the young have fledged from the nest.

5.8. As an enhancement to the site, it is recommended that consideration is given to including bat and bird boxes in the buildings during the development. It is also recommended that consideration is given to including a tawny owl nest box in a suitable location on site during the development.

5.9. The moderate risk does not apply to the section of building that is attached to the main Mill that is to be converted back to a single dwelling.

6. Conclusions

6.1. If the development is preceded by further surveys for bats and birds, covered by a licence, if required, and includes measures to reduce impacts from lighting and provide opportunities for bats and birds in the developed site, the impact of the proposals will be minimal.

7. References

BTHK (2018). Bat Roosts in Trees – A Guide to Identification and Assessment for Tree-Care and Ecology Professionals. Exeter: Pelagic Publishing.

BRHK (2021). Bat Roosts in Rock – A Guide to Identification and Assessment for Climbers, Cavers & Ecology Professionals. Pelagic Publishing, Exeter.

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CIEEM (2017) Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.

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Countryside Rights of Way Act 2000. Available at <http://www.legislation.gov.uk/ukpga/2000/37/contents> (Accessed 5th April 2022).

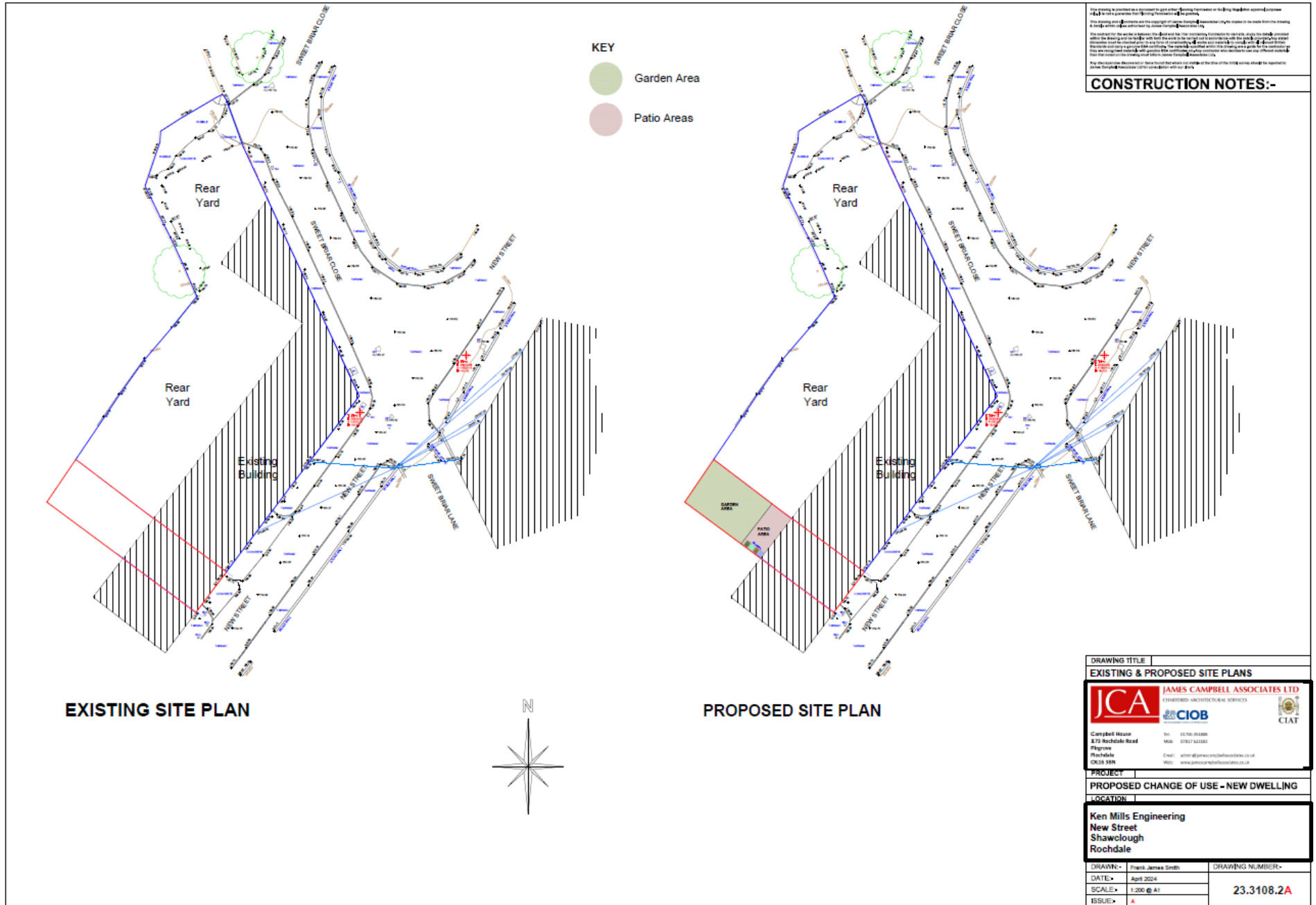
The Habitats Directive. Available at http://www.ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm (Accessed 5th April 2022).

National Planning Policy Framework (2021). Available at <http://www.gov.uk/guidance/national-planning-policy-framework> (Accessed 5th April 2022).

Natural Environment and Rural Communities (NERC) Act 2006. Available at <http://www.legislation.gov.uk/ukpga/2006/16/contents> (Accessed 5th April 2022).

The Wildlife and Countryside Act 1981. Available at <http://www.legislation.gov.uk/ukpga/1981/69> (Accessed 5th April 2022).

Appendix I: **Development Plans**



Appendix II: Planning Policy and Species Legislation Summary

1. Planning Policy

1.1. The National Planning Policy Framework (NPPF, 2019) sets out the governments planning policies and how they should be applied. Section 15 of the policies refers to 'Conserving and enhancement the natural environment'. This outlines how local authorities should deal with biodiversity when considering planning applications.

1.2. NPPF paragraph 180 States:

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 reasons 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.*

2. Legislation Summary

Site	Legislation	
Locally Designated Sites	Locally designated sites are not covered by any statutory legislation but are protected by local development plans.	
Statutory Sites	Statutory sites are protected in different ways depending on the reason for the sites designated with sites being covered by legislation including the Wildlife and Countryside Act 1981 and the Habitats Directive.	
Species and Habitats of Principal Importance	Species and habitats of principal importance are covered by the Natural Environment & Rural Communities Act 2006.	
Species	Legislation	Offences include
Badgers	Protection of Badgers Act 1992	○ Wilfully kill, injure, take, possess or cruelly ill-treat a Badger, or attempt to do so; ○ To intentionally or recklessly interfere with a sett (this includes disturbing Badgers whilst they are occupying a sett, as well as damaging or destroying a sett or obstructing access to it).
Bats	Conservation of Habitats and Species Regulations 2017 (as amended) Wildlife and Countryside Act 1981	○ Deliberately kill, injure or capture a bat; ○ Deliberately disturb bats; ○ Damage or destroy a breeding site or resting place of a bat. ○ Obstruct access to any structure or place which any bat uses for shelter or protection; or

		Disturb any bat while occupying a structure or place which it uses for that purpose.
Birds	Wildlife and Countryside Act 1981	- Intentionally kill, injure, or take any wild bird; - Intentionally take, damage or destroy a nest of any such bird whilst it is in use or being built; or - Intentionally take or destroy an egg of any such bird.
Crayfish	Wildlife and Countryside Act 1981	- Obstruct access to any structure or place which a crayfish uses for shelter or protection; or - Disturb a crayfish while occupying a place which it uses for that purpose.
Great Crested Newts	Conservation of Habitats and Species Regulations 2017 (as amended) Wildlife and Countryside Act 1981	- Intentionally or deliberately capture, injure, kill, or disturb the species; - Intentionally or recklessly damage, destroy or disturb a GCN in a place of shelter or protection, or obstruct access to such a place; or - Damage or destroy a breeding site or resting place.
Hazel Dormice	Conservation of Habitats and Species Regulations 2017 (as amended) Wildlife and Countryside Act 1981	- Deliberately capture, injure or kill a dormouse; - Deliberately disturb dormice; - Damage or destroy a breeding site or resting place of a dormouse - Obstruct access to any structure or place which a dormouse uses for shelter or protection; or - Disturb a dormouse while occupying a structure or place which it uses for shelter or protection
Otters	Conservation of Habitats and Species Regulations 2017 (as amended) Wildlife and Countryside Act 1981	- Deliberately capture, injure or kill any wild otter; - Deliberately disturb wild otters; - Damage or destroy a breeding site or resting place of an otters. - Disturb an otters while it is occupying a structure or place which it uses for shelter or protection; or - Obstruct access to such a place.
Red Squirrels	Wildlife and Countryside Act 1981	- Kill, injure or take a red squirrel; - Damage, destroy or obstruct access to any structure or place which a red squirrel uses for shelter or protection; or - Disturb a red squirrel while it is occupying a structure or place which is used for that purpose.
Reptiles (non EPS)	Wildlife and Countryside Act 1981	Intentionally kill or injure a reptile.
Water Voles	Wildlife and Countryside Act 1981 Natural Environment & Rural Communities (NERC) Act 2006	- Intentionally capture, kill or injure water voles; - Intentionally or recklessly damage, destroy or block access to their places of shelter or protection; or - Disturb water voles while occupying a place of shelter used for that purpose.

Local authorities therefore have a duty to consider protected species as a material consideration when assessing planning applications. The ODPM Government Circular 06/2005 states: *‘It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.’*

Appendix III: **Bat Activity Survey Locations**

