



Bat and Bird Mitigation and Enhancement Plan

Lower Starring Farm, Starring Road Littleborough, Lancashire, OL15 8HN

Suzanne Gumbley

Status	Issue	Name	Date
Final v1	1	Natalie Evans BA (Hons), MA, MRSB, Principal Consultant, Bat Licence Lead	01/07/2024

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Ltd. was commissioned by Suzanne Gumbley to prepare a Bat and Bird Mitigation and Enhancement Plan for Lower Starring Farm, Starring Road Littleborough, Lancashire, OL15 8HN to satisfy conditions 7 and 9 of the draft decision notice which read:

7 - The dwelling hereby approved shall not be occupied until such time as a scheme of biodiversity enhancements for the site including, but not limited to, the provision of bird boxes, bird bricks, bat boxes and bat bricks to be situated externally on, or integrated to the fabric of the dwellings hereby approved has been submitted to and approved in writing by the Local Planning Authority. The duly approved scheme shall be implemented in full prior to first occupation of the dwellings and retained thereafter.

Reason: In the interests of enhancing biodiversity and habitat provision within the site in accordance with Policy G7 of the adopted Rochdale Core Strategy and the National Planning Policy Framework.

9 - No development shall take place until details of a bat avoidance method statement has been submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of ensuring the conservation of protected species in accordance with Policy G7 of the adopted Rochdale Core Strategy, the National Planning Policy Framework and the Wildlife and Countryside Act 1981 (as amended).

Reason for pre-commencement condition: Construction works on the site pose a threat to protected species and therefore a scheme needs to be agreed in advance of any works taking place.

Arbtech consulting Ltd have carried out a PRA in 2023 which resulting in the following conclusions and recommendations:

Feature	Survey Results Summary	Impact Assessment	Recommendations
Roosting bats (B1)	B1 has moderate value for roosting bats. Possible suitable roosting sites for crevice dwelling species were noted across the roof of B1 below slightly raised roof tiles.	The proposed development will result in the conversion of the barn section of B1. No impacts to the residential section are anticipated as part of the proposed development. It is to the consultants understanding that the roof of B1 and the location of potential crevice dwelling bat roosting sites will not be impacted by	As stipulated in professional survey guidance, moderate value buildings typically require two bat emergence or re-entry survey to be completed during the active bat season (optimal May to August, suboptimal September) to confirm presence or likely-absence of a bat roost.

	No suitable roosting sites or access point for void dwelling species such as brown long-eared bats were noted during the survey. No evidence of bats was noted during the survey. Three EPSL's were returned within 2km of the site.	the proposed development as it is anticipated that only internal works will be undertaken in addition to the creation of windows in the walls are anticipated. Therefore it is considered that there will be no impact to bats as a part of the proposed development.	However, in this case as only internal works are anticipated with no roofing works to be undertaken it is considered that the works could be undertaken under a Bat Mitigation Plan which would include methods such as timings of works to reduced any potential impact to bats to an acceptably low level. Acceptance of this approach would be at the discretion of the Local Planning Authority, given that this would be a deviation from standard survey guidance. If any works are to be undertaken that will impact the roof including the existing roof lining then further surveys will be required as per the aforementioned professional survey guidance,
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Since the initial PRA survey in 2023, the plans have been updated to include works to the roof as follows:

'There will be works to provide ventilation at ridge level & roof repairs subject to the condition of the roof when the proposed conservation style rooflights are installed.'

This will involve removal of roof and ridge tiles which could damage, modify or destroy bat roosts and could kill or injure bats if present. These works trigger the requirement for further survey, following best practice guidelines.

There are also risks involved with the installation of any new insulation and boarding internal up against the internal roof lining.

2.0 Bat Mitigation Plan

2.1 Informative

The following tables detail the proposed mitigation, habitat creation and biodiversity enhancement measures for the development as well as management requirements to ensure the longevity of these measures.

2.2 Persons Responsible and Lines of Communication

A Development Biodiversity Champion should be designated for the demolition and construction phase of the development. The Biodiversity Champion should be someone with significant influence during construction, such as the site owner, contract or project manager. The Development Biodiversity Champion is responsible for ensuring all actions outlined in this plan are implemented including the provision of a toolbox talk prior to works commencing. Any queries with regards to the mitigation prescriptions should be addressed to the project ecologist and communication should be retained between the Development Biodiversity Champion and project ecologist or a suitably qualified Ecological Clerk of Works (ECoW) throughout the construction phase of the development where necessary to ensure the mitigation is applied and impacts to adjacent ecological receptors are effectively minimised. The project ecologist's contact details are located on the title page of this report. It is recommended that the Biodiversity Champion informs the project ecologist or ECoW of the commencement of construction works and provides updates where necessary.

2.3 Survey Requirements

This plan will allow certain elements of work to be carried out prior to the additional required surveys being undertaken.

Prior to the commencement of any works impact the internal or external roof structures, the following surveys are required, following best practice for a moderate habitat value building:

Two dusk emergence surveys using two surveyors and 3 night vision aids (2 external 1 internal) will be required between May and August, the surveys must be at least 3 weeks apart.

If bat roosts cannot be ruled out, or bat roosts identified after the two surveys, a third survey may be required and the roof works will need to be permitted by an appropriate bat licence from Natural England.

2.3 Mitigation Measures

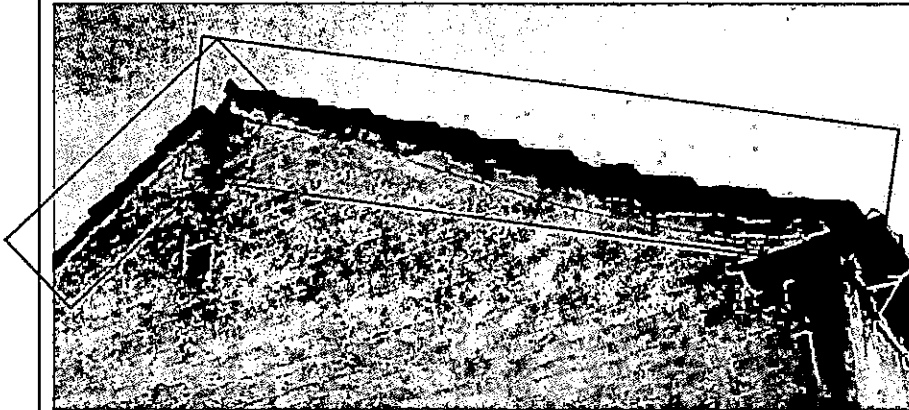
Table 1 details the licencing, mitigation, compensation and enhancement measures to be implemented at the site.

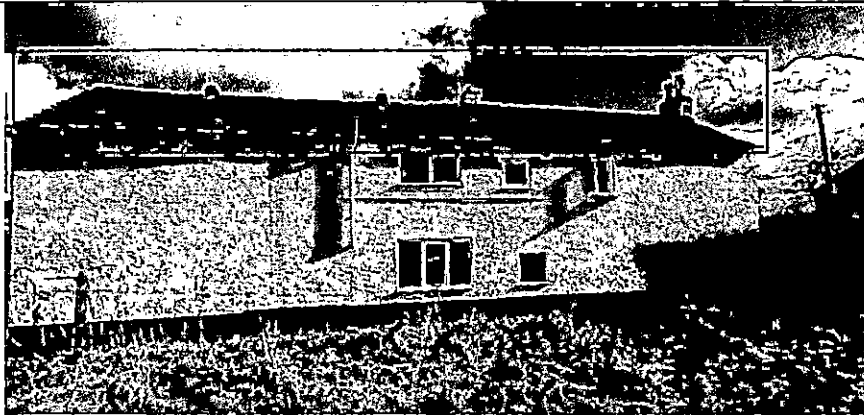
Table 1: Mitigation, Compensation and Enhancement Measures

Works	Specification
External roof works	There must be no external roof or eaves works carried out until the dusk emergence surveys have been completed. If no bat roosts have been identified after the surveys, then roof works can be carried out without any further survey or licence. If bat roosts are confirmed, the roof works will need to be permitted by a protected species licence from Natural England.
Internal roof works	There must be no works carried out that touches the internal timbers, eaves or roof lining until the dusk emergence surveys have been completed. If no bat roosts have been identified after the surveys, then internal roof works can be carried out without any further survey or licence. If bat roosts are confirmed, then certain works might need to be permitted by a protected species licence from Natural England.
Timing restrictions	Roof level works - TBC following dusk emergence surveys. Ground level works can proceed unrestricted.
ECoW requirements and retained ecologist	TBC following dusk emergence surveys. Ecological supervision will be required for any work that impacts any bat roost discovered. If no bat roosts are identified, works can be carried out without ecological supervision.

Bat roosting features

The following areas provide suitable roosting features for bats and must not be repaired/replaced/worked on or blocked until surveys have been completed that either confirm no roosts present, or bat roosts are present and a licence is in place. All areas of roof and verges are included.



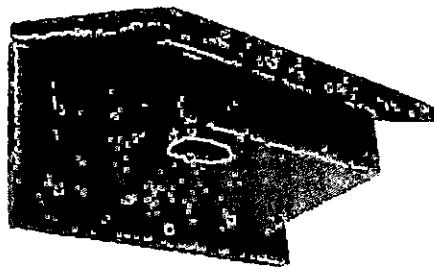


Where any scaffolding or other access equipment is proposed in these areas, there must be no netting or sheeting used within 5m of the these features, and no obstruction of the features by poles or walkways.

Internally, there must be no work that touches the roof lining, as bats could roost between the tiles and felt. There must be no insulation or boarding that is installed directly against the felt. There must be no removal of roof lining.



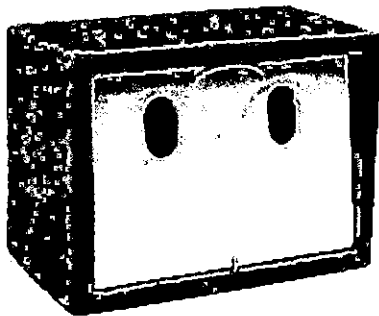
Bat enhancements	Two of the following bat boxes will be installed on the building on completion of works: Eliza Bat Box - https://www.nhbs.com/elisa-bat-box Low Profile Woodstone Bat Box - https://www.nhbs.com/low-profile-woodstone-bat-box The bat boxes will kept on site in perpetuity and replaced if they falls or become damaged. Due to the nature of the development, there are no new wall structures to be able to include integrated bat boxes. The boxes will be installed once works have been completed and prior to first occupation.
Bird enhancements	3 x swift nest chambers will be provided externally on the building, on a northern elevation. These will be placed in groups and out of direct sunlight. The following makes/models would be appropriate but others are available: Vivara Pro WoodStone Swift Nest Box



<https://www.nhbs.com/woodstone-swift-nest-box>

x2 house sparrow nest boxes will be installed in a group on the north elevations (see plan in Appendix 2).

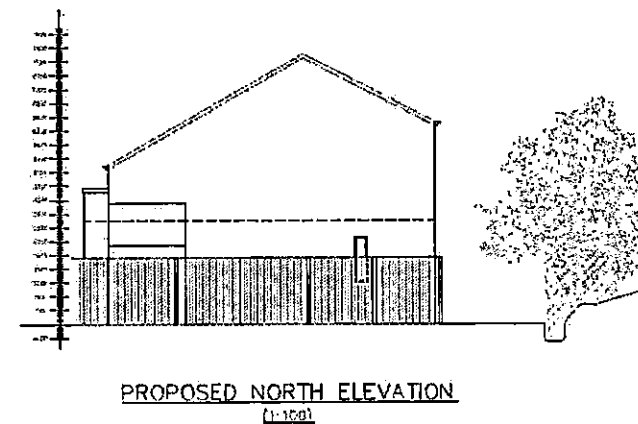
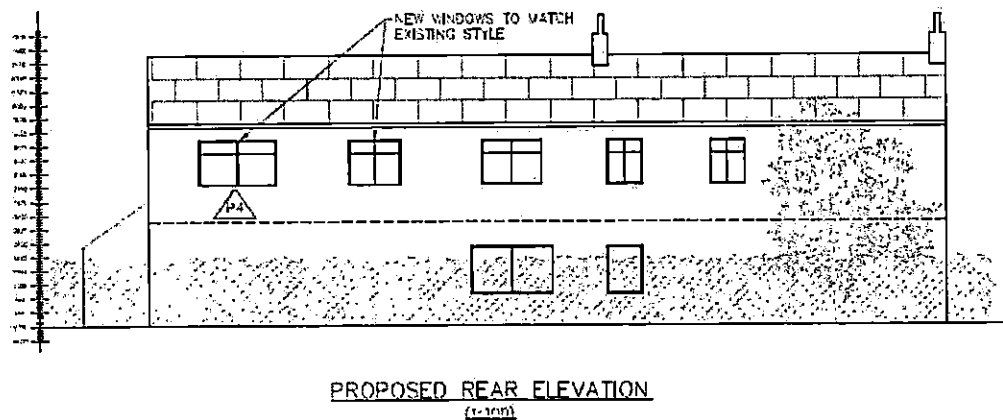
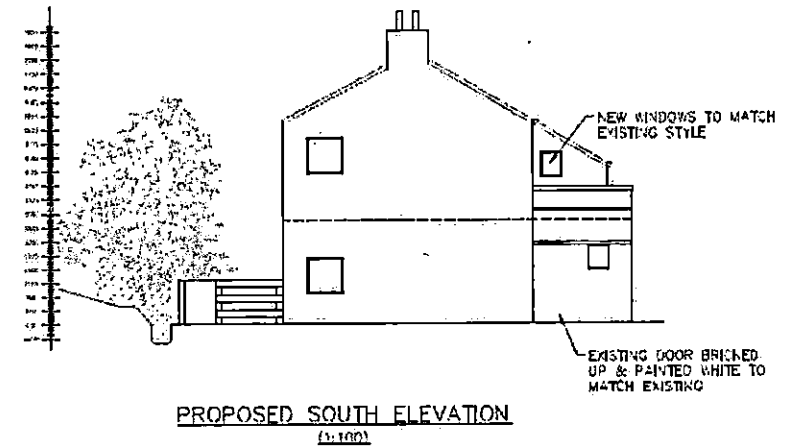
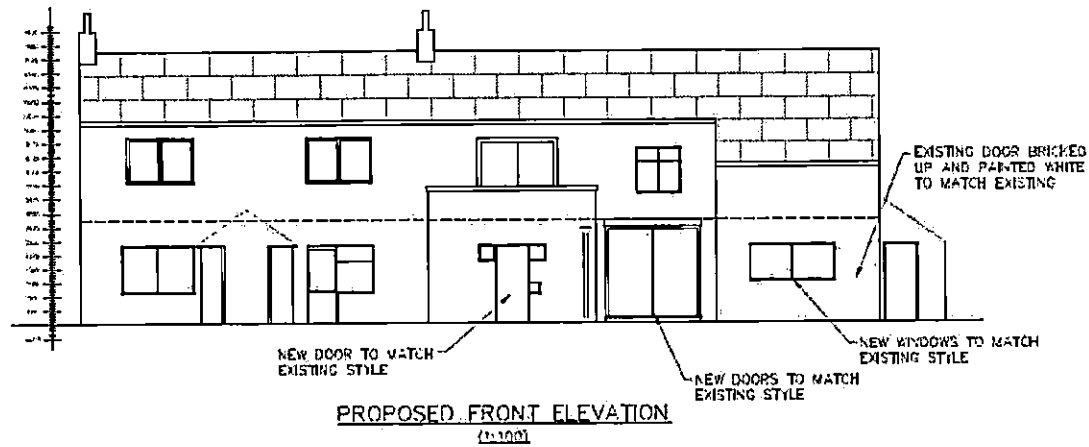
Vivara Pro WoodStone House Sparrow Nest Box x2



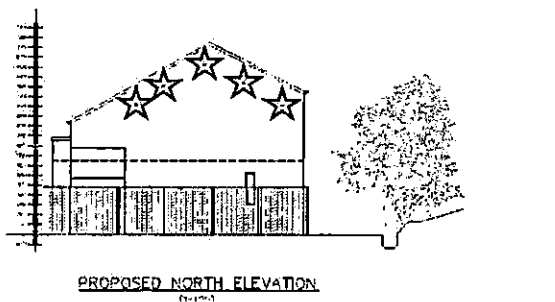
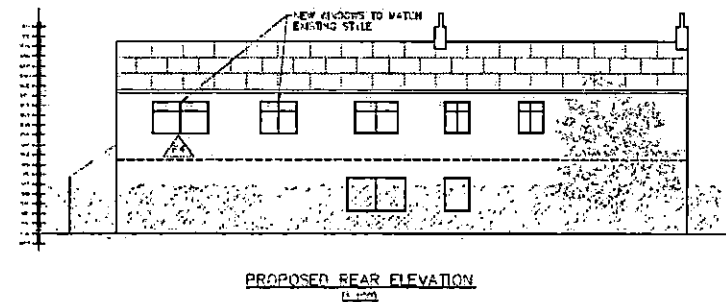
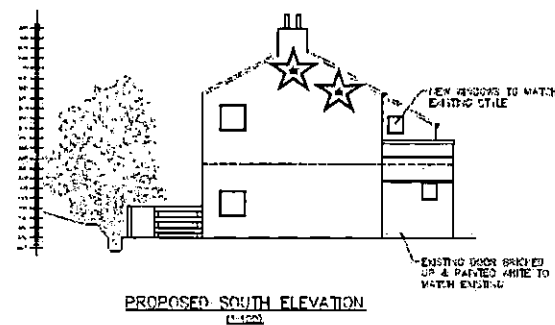
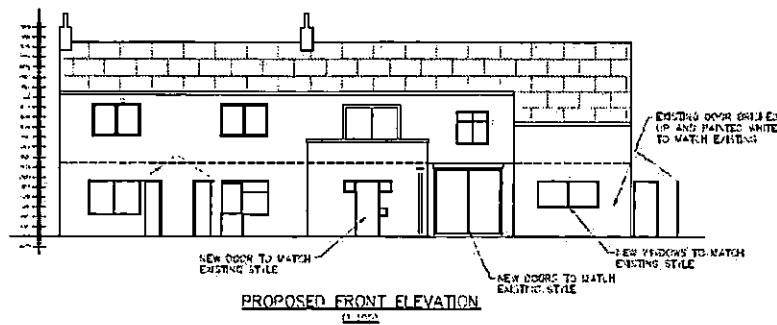
<https://www.nhbs.com/vivara-pro-woodstone-house-sparrow-nest-box>

The boxes will be installed once works have been completed and prior to first occupation.

Appendix 1: Proposed Plans



Appendix 2: Bat and Bird Box Locations



Bat boxes mounted on wall



Bird boxes mounted on wall just under the eaves

Appendix 4: Legislation and Planning Policy

LEGAL PROTECTION

All species of bat are fully protected under ***The Conservation of Habitats and Species Regulations 2017*** 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 (ENGLAND)

National Planning Policy Framework 2017

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 UK Biodiversity Action Plan priority species) 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; opportunities to incorporate biodiversity in and around developments are

encouraged; 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 on development works:

A European Protected Species Mitigation (EPSM) Licence 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

4. conserving wild animals

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