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Dusk Survey Results

November 2024

Project Reference: PR-0260-24

Phase 5 – Sherrif Street

Rochdale

OL12 6QZ

National Grid Reference: SD 8935 1382



Phase 5, Sherrif Street, Rochdale, OL12 6QZ
Dusk Survey Results in Relation to Bats

Document Title	Dusk Survey Results
Project Reference	PR-0260-24
Issue Number	1.0
Prepared for	RBH
Prepared by	Tyrer Ecological Consultants Ltd

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Survey Dates	Dusk 1: 27/08/2024	Dusk 2: 28/08/2024	Dusk 3: 17/09/2024
Reviewed by	Mrs. K. Wilding CEnv MIEMA ACIEEM		
Review Date	14/11/2024		
Approved by	Mrs. K. Wilding CEnv MIEMA ACIEEM		
Date of Issue	14/11/2024		

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Executive Summary

As part of a proposed planning application concerning the demolition of six apartment blocks on Sherrif Street, Rochdale, Tyrer Ecological Consultants Ltd carried out a daytime preliminary roost assessment in relation to bats with an inclusive inspection for breeding birds on the 24th July 2024. The survey was commissioned by RBH; the scope of proposals is understood to involve the demolition of six apartment blocks known as Ollerton, Newstead, Romsey, Quinton, Ullesthorpe and Vaynor along with the clearance of the site.

Tyrer Ecological Consultants Ltd were commissioned to undertake the recommended further bat surveys; the surveys which were carried out in August & September 2024, in accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023).

Bats

*Based on the results gathered during the 2024 dusk surveys, the buildings Vaynor and Quinton are ascertained to be host to day roosts for common pipistrelle bats. See **Section 5.0** for further details on the roosts.*

*An indicative mitigation scheme has been produced in **Section 6.0** of this report, and forms part of the detailed recommendations for the proposals.*

Survey Validity

Bat emergence/re-entry surveys are typically **valid for a period of 12 – 18 months**; Ideally, the survey data should be from the most recent optimal survey season before a planning or licence application is submitted, however this is 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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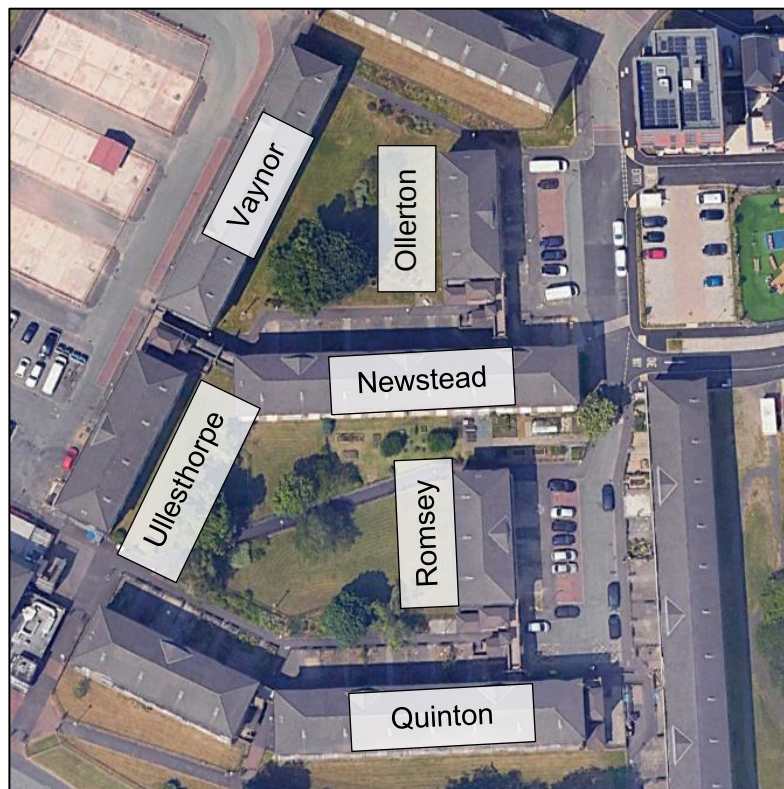
7.0 References

Appendix I: *PR-0260-24 Phase 5, Sherrif Street - Bats Breeding Birds – Tyrer Ecological Consultants*
(October 2024)

1.0 Background & Introduction

- 1.1 As part of a proposed planning application concerning the demolition of six apartment blocks on Sherrif Street, Rochdale, Tyrer Ecological Consultants Ltd carried out a daytime preliminary roost assessment in relation to bats with an inclusive inspection for breeding birds on the 24th July 2024. The survey was commissioned by RBH; the scope of proposals is understood to involve the demolition of six apartment blocks known as Ollerton, Newstead, Romsey, Quinton, Ullesthorpe and Vaynor (See Figure 1.1) along with the clearance of the site. The survey concluded the following:

***"Bats:** Based upon the findings of the survey covered through sections 5.0 – 6.0 of the report and supported by Appendix I, the six buildings at Phase 5, Sherrif Street are determined to offer a bat roost suitability of 'Low' in accordance with Bat Conservation Trust - Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023); further survey work is recommended to be carried out at the site before an impact assessment can be concluded."*



- 1.2 Tyrer Ecological Consultants Ltd were therefore commissioned to undertake the recommended further bat survey; the initial surveys were carried out in August with an additional survey undertaken at Quinton and Vaynor in September 2024; These surveys were undertaken in accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023). See **Figure 1.2** overleaf for BCT guidelines extract.

Table 7.2. 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 or PRF-I	Moderate roost suitability	High roost suitability or PRF-M
One survey visit. One dusk emergence survey ^a (structures). No further surveys required (trees).	Two separate dusk emergence survey visits ^b .	Three separate dusk emergence survey visits ^b .

Figure 1.2 – BCT extract on suitability survey implications

- 1.3 The surveys aimed to identify the presence or reasonably conclude the absence of bats within the buildings. 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).
- 1.4 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)
- 2.3 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.
- 2.4 Up to ten bat species have been recorded in Greater Manchester, many of which will utilise built structures for roosting. A variety of building types and features are utilised by bat species at different times of year ranging from occupied residential dwellings to disused barns and bridges. The most frequently encountered species is the common pipistrelle bat (*Pipistrellus pipistrellus*); its abundant status in Greater Manchester is mirrored throughout the UK.

Policy

- 2.5 Guidance for Local Authorities: Extract from Office of the Deputy Prime Minister – Circular 06/2005:
- “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 planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision”.*
- 2.6 Paragraph 186 of the National Policy Planning Framework (as revised in December 2023) 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*

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.

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."

- 2.7 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."

3.0 Survey Methods

- 3.1 Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023) 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.”

- 3.2 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

- 3.3 The timing of the surveys took place in August & September 2024, thus spanning the time period where bats are within their active season.

- 3.4 In accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023), 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 that Natural England accept bat surveys and grant EPSMLs in relation to bats.

- 3.5 Typically only surveys within this period are accepted by licensing authorities, as the results of these surveys are used to inform an EPS licence application or a non-licensable Precautionary Working Method Statement (PWMS).

- 3.6 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, and specifically how to detect bats and to correctly identify / disseminate bat calls.

- 3.7 When considering survey protocol, the decisions about whether dusk or dawn surveys are selected are based on the extensive experience of Tyrer Ecological Consultants Ltd, the nature of the building and species that can be anticipated as being present either at the property or in the locality as well as any visual limitations at the survey site.

- 3.8 Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023), it is specified that:

“Roost re-entry visits prior to dawn are no longer routinely recommended for presence/absence surveys due to the risk of bats returning early and being missed ... As return times appear to be far more variable (Andrews & Pearson, 2022).”

- 3.9 In this case, the bat roost potential that exists at presents no problems for dusk observations; if a building is complex, or observations were restricted, or species that are difficult to detect at dusk are suspected then dawn surveys would be conducted where appropriate. At the site there are no visual constraints and to date there is no evidence to suggest the presence of such species.

- 3.10 Survey protocol should not be determined by parties who are 1) not familiar with the site 2) do not have a sufficient level or experience in relation to the undertaking of dusk / dawn bat surveys.
- 3.11 The number of surveys and surveyors was adequate relative to the roost potential that was identified on attendance of the site, i.e. '**Low**', and required a varying number of surveyors to accurately monitor potential roost features (PRFs) across the various structures. A maximum of 4 surveyors on **each building** were required at any one time.
- 3.13 During the first dusk survey undertaken at the buildings Vaynor and Quinton emergences were observed, these two buildings were therefore re-surveyed, as a precautionary measure; it is considered enough information had already been collected to characterise the roosts from the PRA and initial dusk emergence survey.
- 3.14 Surveyors were strategically positioned so that all elevations with bat roost potential could be observed without limitation. The surveyors were aided with Anabat SD2, Anabat Scout, Elekon Batlogger M & M2, Echometer EM2, Peersonic RPA3, 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, Anabat Insight, Kaleidoscope, BatExplorer or equivalent computer software to verify field observations.
- 3.15 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 Nightfox Whisker Night Vision Binoculars – recordings would be subject to review the following day to identify emergences / flight lines and species / abundance.

Survey Limitations

- 3.16 Following the completion of the further surveys, having carefully considered the results and conclusions derived from all surveys to date, no significant constraints were experienced that might hinder the gathering of ecological data on which to base sound conclusions and recommendations.

4.0 Results

4.1 Three dusk emergence surveys were undertaken at the site, during July, August & September 2024 by up to four surveyors on each building at any one time. Surveyor credentials have been given within **Table 4.1**; **Table 4.2** shows survey timings and weather conditions, whilst **Tables 4.3 – 4.4** alongside **Figures 4.1 – 4.3** document the results of the dusk surveys.

Table 4.1 – Surveyor credentials

Surveyor(s)	Experience	Surveyor Credentials
Mr. S. Irwin	30+ years	- Highly experienced Bat Specialist with Natural England Class 2 License (CLS-13604). - Has provided a catalogue of bespoke mitigation schemes as part of successful granted mitigation licences in England and Wales. - Natural Resources Wales bat licence. (Licence no. 73156:OTH:CSAB:2016) - Barn owl (CI29/00039)
Mr. J. Pescod Qualifying CIEEM	6 years	- Senior Ecologist with extensive training and experience, - MRes Advanced Biological Sciences, BSc (Hons), - Accredited agent on the Natural England Class 2 Bat License (CLS-14227) of Mrs. K. Wilding.
Miss T. Hesketh	5 years	- Experienced Consultant Ecologist, with 5 years of professional training and experience. - BSc in Biology and MSc in Conservation Management, - Accredited agent on the Natural England Class 2 Bat License (CLS-14227) of Mrs. K. Wilding.
Miss. K. Judson Qualifying CIEEM	4 years	- An experienced Consultant Ecologist holding a BSc (Hons.) Biology and MSc Conservation Management (a CIEEM accredited course). - Holding a FISC Level 5 (2022). - Accredited agent on the Class 2 Natural England bat licence of Mrs. K. Wilding (CLS-14227).
Mr. D. Burrows Qualifying CIEEM	5 years	- An experienced Project Ecologist with 5 years of professional training and experience, - BSc in Wildlife Conservation and MSc in Conservation & Biodiversity, - Accredited agent on the Natural England Class 2 Bat License (CLS-14227) of Mrs. K. Wilding.
Mr. H. Mulligan Qualifying CIEEM	2 years	- Consultant Ecologist with a range of training and experience. MBiolSci in Biological Sciences (Zoology), Qualifying CIEEM - Accredited agent on the Class 2 Natural England bat licence of Mrs. K. Wilding (CLS-14227).
Miss C. Rimmer	2 years	Junior Ecologist with a variety of training and experience, currently undergoing further extensive survey training,

Surveyor(s)	Experience	Surveyor Credentials
		- BSc Hons in Wildlife and Conservation, - Accredited agent on the Natural England Class 2 Bat License (CLS-14227) of Mrs. K. Wilding.
Miss J. Collins	1 year	- Junior Ecologist currently undergoing survey training, - BSc in Wildlife Conservation and MSc in Wildlife Conservation and Drone Applications, - Accredited agent on the Natural England Class 2 Bat License (CLS-14227) of Mrs. K. Wilding.
Dr. R. King MCIEEM	15+ years	Highly experienced Seasonal Consultant at Tyrer Ecological Consultants Ltd.
Mr. H. Green	30+ years	- Highly experienced Bat Specialist, and carer whom has professional surveying experience over decades with Tyrer Ecological Consultants Ltd, - Holder of a Natural England Class 2 Bat License (CLS-03290).
Ms. K. Swift	10+ years	- Highly experienced Seasonal Consultant at Tyrer Ecological Consultants Ltd, - Holder of a Natural England Class 2 Bat License (CLS-22801).
Mr. M. Smith	7 years	An experienced seasonal consultant with experience of undertaking professional bat surveys.
Mr. M. Moss	3 years	A seasonal ecological consultant with experience of undertaking professional bat surveys
Mr. J. Wright	1 year	- A seasonal consultant with experience of undertaking professional bat surveys, - BSc in Biology and MSc in Zoology.
Miss S. Moreton	1 year	A seasonal ecological consultant with experience of undertaking professional bat surveys.
Miss R. Donnelly	1 year	A seasonal ecological consultant with Tyrer Ecological consultants.

Table 4.2 – Survey date, times and weather conditions

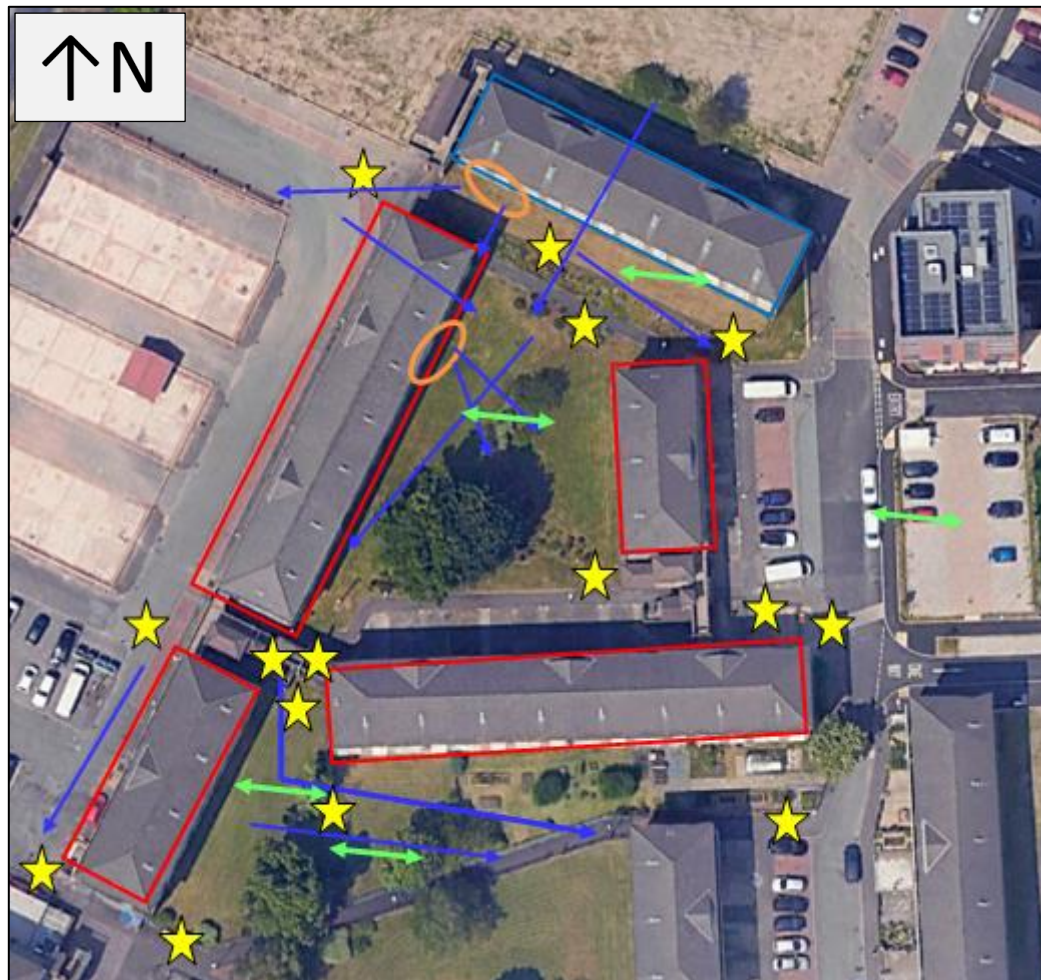
Times of Survey	Date	Weather Conditions
Dusk survey 1 1949 – 2140 Vaynor, Quinton, Ollerton & Newstead	27/08/24	Sunset: 2009 Dry, Calm (0/12 Beaufort), 100% cloud cover Start temp: 17°C End temp: 16°C
Dusk survey 2 1949 – 2140 Romsey, Ullesthorpe	28/08/24	Sunset: 2009 Dry, Calm (1/12 Beaufort), 20% cloud cover Start temp: 19°C End temp: 16°C
Dusk survey 3 1858– 2050 Vaynor, Quinton	17/09/24	Sunset: 1918 Dry, Calm (0/12 Beaufort), 100% cloud cover Start temp: 17°C End temp: 16°C

Table 4.3 – Dusk survey results

Survey Dates	Time	Activity
27/08/24 Vaynor, Ollerton, Ullesthorpe & Newstead	1949 – 2140	Summary: Emergence of x4 common pipistrelle bats in total from across 2 from 'Vaynor' and 2 from a non-target building 'Zedburg' which was not included as part of this application. 2011-13 hrs: Two common pipistrelle (CP) emerged from a gap in the soffit on the eastern elevation of Vaynor and began to forage over the grassland to the west. 2014-16 hrs: CP X2 foraging above trees to west of Newstead 2017 hrs: CP commuted east to west across the northern elevation of Ollerton. 2020 hrs: CP commuted over the top of Vaynor west to east 2022 hrs: CP foraging to north of Ollerton 2027 hrs: CP commuted north to south across the eastern elevation of Vaynor. 2027 hrs: CP commuted west to east to the south of Newstead 2031 hrs: CP commuted along the western elevation of Ullsthorpe. 2034 hrs: CP foraging the south of Newstead. 2035 hrs: CP emerged from non-target building and flew south 2035 hrs: CP commuted onto site from north of Vaynor 2040 hrs: CP recorded foraging in the carpark to the east of Newstead 2054 hrs: CP commuted around Newstead from the north and off site General activity comprised of occasional foraging by up to two common pipistrelle bats, as along with the emergence of two common pipistrelle bats from a target building (Vaynor) and the emergence of two common pipistrelle from a non-target building (Zedburg).
Dusk survey 2 28/08/24 Romsey & Quinton,	1949 – 2140	Summary: Single emergence of a common pipistrelle from a target building (Quinton). 2030-38 hrs: two common pipistrelle (CP) commuted onto site from the west and foraged over the grassland to the west of Romsey. 2038 hrs: CP emerged from the soffit on the southern elevation of Quinton and flew south.

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Survey Dates	Time	Activity
		2035 hrs: CP foraging in trees to the northwest of Quinton 2039 hrs: CP commuted south across the western elevation of Quinton General activity comprised of near sporadic foraging by up to two common pipistrelle bats, and a single emergence of a common pipistrelle from a target building (Quinton)
17/09/2024 Quinton and Vaynor	1859 – 2050	Summary: No bat emergence for the duration of survey. 1934-42 hrs Common Pipistrelle (CP) foraging above the trees to the north of Quinton 1940 hrs: Common pipistrelle commuted east to west above Quinton. 1940 hrs: CP foraging along the eastern elevation of Vaynor General activity comprised of constant occasional by a single common pipistrelle bat.



Dusk Survey 1 – 27/08/2024

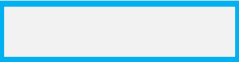
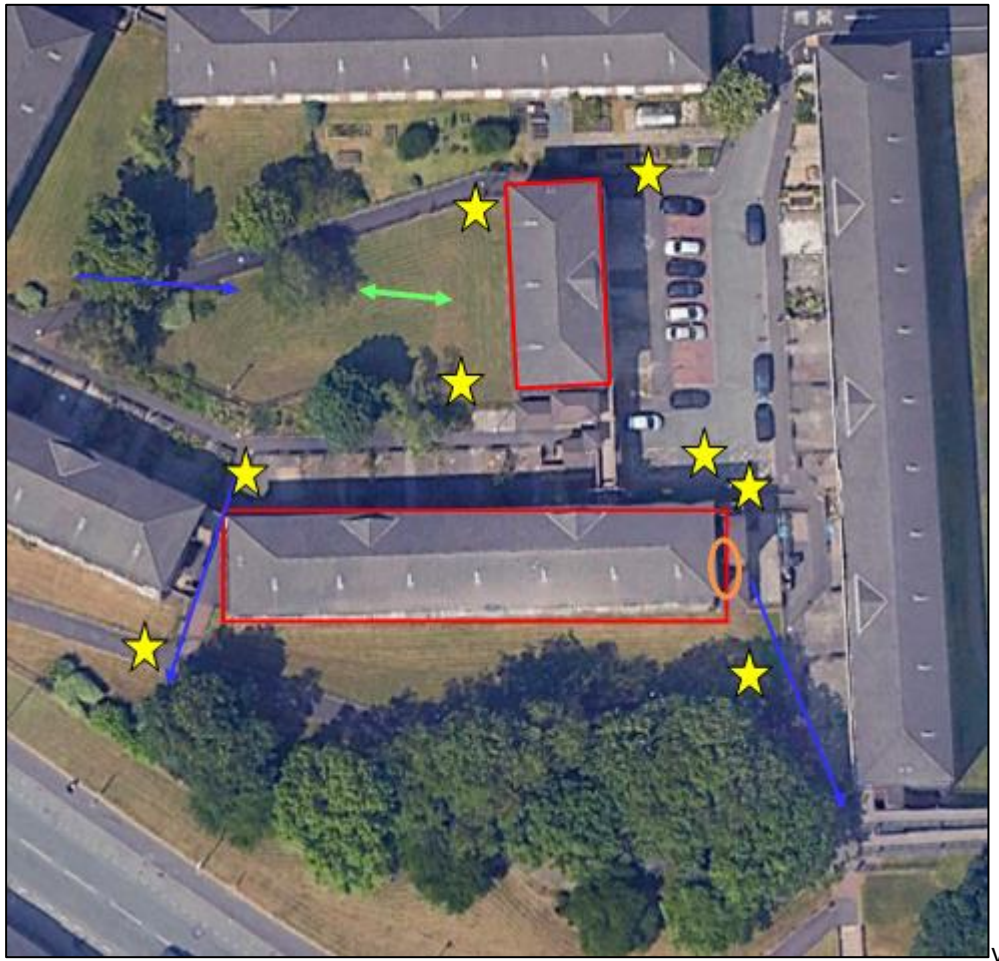
Key			
	Target buildings		Foraging activity
	Surveyor positions		Commuting activity
	Directional compass		Emergence point
	Non-target building		

Figure 4.1 – Visual Aid – Dusk survey results with Key



Dusk Survey 2 – 28/08/2024

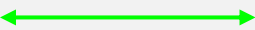
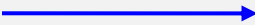
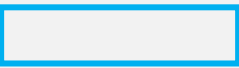
Key			
	Target buildings		Foraging activity
	Surveyor positions		Commuting activity
	Directional compass		Emergence point
	Non-target building		

Figure 4.2 – Visual Aid – Dusk survey results with Key



Dusk Survey 3 – 17/09/2024

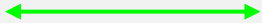
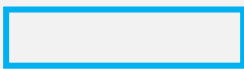
Key			
	Target buildings		Foraging activity
	Surveyor positions		Commuting activity
	Directional compass		Emergence point
	Non-target building		

Figure 4.3 – Visual Aid – Dusk survey results with Key

5.0 Conclusions & Recommendations

5.1 Based on the results gathered during the 2024 dusk surveys, the buildings Quinton and Vaynor are ascertained to be host to day roosts for common pipistrelle bats, with each roost hosting 1 and 2 individuals (respectively).

5.2 Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023) describes a day roost as the following:

Day roost: *“A place where individual bats, or small groups, rest or shelter in the day during the summer.”*

5.3 The exact scope of proposals has not been provided to the author at the time of writing, however it is understood that a residential development will occur within the site boundary. For the purposes of this report, it is considered that all of the structures on site will be subject to demolition.

5.4 Based on the above, impacts to a protected species will need to be addressed from both a conservation and legal perspective, along with the application of appropriate mitigation before any works can take place. A European Protected Species Mitigation Licence (EPSML) or Bat Earned Recognition (BER) license will be required to legally impact upon places that are 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.**

5.5 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.

5.6 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.

6.0 Indicative Mitigation

- 6.1 From the evidence gained during the surveys, the use of the site is considered to be of ‘**Low**’ level significance relatable to common pipistrelle bats and their current conservation status (as according to current EPS mitigation licencing applications); the proposed mitigation is proportionate to that use. However, if at any time that assessment is revised to a higher level, then the mitigation will also be accordingly revised.
- 6.2 The following procedures and mitigation recommendations are designed to allow the Local Planning Authority (LPA), in association with their ecological advisors, 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.
- 6.3 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.
- 6.4 The LPA will consider the mitigation in relation to the potential success of a Natural England licence application and 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. If the LPA consider that the mitigation is over 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, in this case, deems the proposed new roost creation as appropriate and not over and above what is required.
- 6.5 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 European Protected Species 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 severe.
- 6.6 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 or obstructing any place that is used by bats as a resting place or breeding site. The licence is issued by the EPS Licensing Team of Natural England.

Summary of Mitigation

- 6.7 With the proposed demolition on site, with residential development to follow, it is therefore acknowledged that the presence of roosting bats needs to be addressed from both a legal and conservation perspective. For the purposes of this report, it is considered that both of the roosts will be subject to destruction; as such, there is a necessity to pursue an alternative solution.
- 6.8 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 proposed works.
- 6.9 Key commuting routes are generally located around the mature trees on site, it is understood that these cannot be retained as part of the development. The residential development is

unlikely to significantly increase levels of lighting across the site, however key foraging areas are likely to be lost as a result without the implementation of mitigation measures. It is recommended that a lighting plan is produced for the site, ensuring that bats can continue to move through and beyond the site, and allowing for unilluminated access to the roost provision described below.

- 6.10 This lighting plan should be produced by a suitably qualified lighting specialist and should be checked by a bat ecologist against this dusk report to ensure that key commuting and foraging areas are not subject to intense lighting.
- 6.11 To ensure that bats are not left without a roost while works take place that could displace bats from their roost at the building, a pole-mounted receptor roost will need to be installed at the site. Such as 2F Schwegler Bat Box (General Purpose) (or other suitable tree mounted bat box equivalent – to be agreed with the express consent of the ecologist). Receptor roosts serve as a receiver unit for if bats must be captured and translocated to it by the licenced ecologist during the works schedule. The receptor roost should be installed and be in place prior to any deconstruction 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 a permanent roost provision following the works** (see Figure 6.1 overleaf).



Figure 6.1 – Proposed location of pole receptor roost [] © Google Earth Pro 2023/24

Works to be undertaken by the Ecologist

- 6.12 **Licence Application:** A protected species licence from Natural England (NE) will be applied for by a suitably qualified Ecologist, subsequently the 'Named Ecologist', in conjunction with the applicant, which will provide details of the measures undertaken to maintain the favourable conservation status of the bats present on site. This could take the form of either an A13 bat mitigation licence or could utilise the Earned Recognition (ER) scheme to streamline the process and improve the outcome for both bats and the client.
- 6.13 **Toolbox Talk:** Once a protected species licence is in place, at the pre-commencement stage the Named Ecologist (or accredited agent) 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 license, i.e. license, method statement, mitigation figures and work schedule to be kept on site for the duration of the work.
- 6.14 **Pre-commencement Check:** Prior to any work being undertaken the presence / absence of bats, as far as is possible, will be established by the Named Ecologist (or accredited agent) undertaking a thorough investigation of the areas at which bats have been observed using the site. This will involve a thorough inspection of these areas during dismantling using endoscopes and / or narrow-beam torch, as necessary, and will involve a soft strip at the local areas of interest, as necessary, which involves the careful lifting, inspecting and removal of components.
- 6.15 **Timing Implications:** No timing implications are necessary in relation to the day roosts on site. Consideration should be given as to the suitability of other structures on site for alternative roost types and bat behaviour, for example swarming, mating and hibernation.
- 6.16 **Ecological Clerk of Works:** The Named Ecologist (or accredited agent) will supervise careful dismantling of all places of bat roost interest. In addition, at the Named Ecologist'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. All dismantling of potential roost features will be undertaken during favourable weather conditions (above 9°C).
- 6.17 **Exclusion:** 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 Named 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.
- 6.18 **Capture:** Any bats located by the Named Ecologist (or accredited agent) will be removed, placed in a secure box with soft tissue and transferred into the receptor roosts that will have been previously erected as indicated below. **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.

Works undertaken by the contractor

- 6.19 Two day roosts with a variety of access points and crevice locations were identified on site. Whilst no plans have been provided to the author, it is considered that buildings will be demolished, and therefore that **both roosts will be subject to destruction.**

- 6.20 As such, it is that the most feasible and productive route forward in terms of maintaining the favourable conservation status of the bats confirmed as roosting on site would be to integrate trees that are to be retained post works in close proximity to the existing roost locations, providing like-for-like crevice opportunities. The measures will be as follows **(however this plan will need to be confirmed when the site plans have been provided to the author)**:
- Erection of two 2F Schwegler Bat Box (General Purpose), to be retained following completion of the works to provide suitable crevice opportunities in substitute for the identified day roosts. These boxes should be retained in perpetuity of the development.
- 6.21 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.
- 6.23 No post-development monitoring is required for the roost given that they are 'Day roosts' of 'Low' significance, as stated following current guidance (Bat Mitigation Guidelines) concerning Day roosts / low significance roosts.
- 6.24 Lighting must not be directed at or close to the roost areas nor will it affect nearby foraging places or flight lines. The lighting plan recommended above should take into account the proposed roosting mitigation, and all flight lines to and from these features should be unilluminated at key times.

7.0 References

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Appendix I: *Preliminary Bat Roost Assessment of Structures for Potential Bat Roost Habitat*
(The Environment Partnership, July 2024)