

The Old Duke, Littleborough

Bat Survey Report

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1. Summary

- 1.1.1 A bat survey of The Old Duke in Littleborough was commissioned by the architect Laura Aspinall of Storah Architecture, on behalf of the client, Mark Cryer. A desk-based study and an update internal and external visual inspection was undertaken on 24th February 2026. The survey was undertaken to inform proposals to re-roof the Grade II listed dwelling with existing and replacement stone slates.
- 1.1.2 No evidence of current or recent bat roosting was recorded inside or outside The Old Duke, with scaffold on the building allowing a thorough direct inspection of potential roosting locations to be impacted by the re-roofing. Nonetheless, the stone-slate roofs provide a moderate level of bat roost suitability, primarily due to gaps beneath uneven slates, crevice opportunities at verges, and a low number of gaps onto the wall plate. Internal inspection was able to conclude that no roosting bats used the interior of the roof-space.
- 1.1.3 The bat survey guidance (Collins, 2023) recommends that a programme of two nocturnal surveys is typically undertaken during the survey season (May to August) in order to determine the presence or likely absence of roosting bats. In this instance, however, it is not considered necessary to undertake further nocturnal surveys in advance of the proposed re-roofing works. This apparent departure from the guidance is justified as direct inspection of those potential roost features likely to be affected by the re-roofing was possible from the scaffold. No evidence of bat roosting was recorded during this inspection and, whilst the scaffold remains in place, the roosting situation associated with the main roof is unlikely to change.
- 1.1.4 In this instance, it is instead considered that there is scope to proceed without further nocturnal survey, providing the terms of a non-licensed method statement are followed.
- 1.1.5 The proposed works involve re-roofing The Old Duke using the existing stone slates with limited replacements. The principal long-term risk to bats arises from the potential installation of standard breathable roofing membranes, which are known to entangle bats. The client has therefore committed to the use of a bat-safe membrane.
- 1.1.6 The non-licensed method statement includes the appropriate timing of works, with any re-roofing during the main bat activity season (May–September) to be preceded by a pre-works nocturnal survey to be completed within 72 hours prior to the works commencing. As an additional precaution against disturbing any hibernating bats, it is also recommended that works avoid the peak hibernation period (December–February).
- 1.1.7 A toolbox talk would be delivered to roofers by a licensed bat ecologist at the onset of works, with the ecologist remaining to oversee the removal of key roof sections. If a roosting bat/bats, or signs of bats, were encountered then the need to halt works and obtain a bat mitigation licence would be re-assessed. Nesting bird legislation also applies, and works should not proceed between March–August unless preceded by a nesting bird check.

2. Introduction

- 2.1.1 A bat survey of The Old Duke in Littleborough was commissioned by the architect Laura Aspinall of Storah Architecture, on behalf of the client, Mark Cryer, on 9th February 2026.
- 2.1.2 The survey was undertaken to inform proposals to re-roof the Grade II listed dwelling.
- 2.1.3 This report details the findings of a desk based study and an update internal and external visual inspection, undertaken on 24th February 2025.
- 2.1.4 The Old Duke is located off Ealees adjacent to a former mill pond at the eastern edge of the town of Littleborough.

3. Habitat Assessment

- 3.1.1 The Old Duke was located adjacent to extensive prime bat foraging habitat including a former mill pond immediately southwest of the dwelling and the extensive deciduous woodland of Ealees Wood, bordering the garden to the northeast.
- 3.1.2 At least a moderate abundance of bats of a diverse range of species was expected to use the local area.

Table 1. Location and habitat table

Name and address: The Old Duke, 10 Ealees, Littleborough, OL15 0HJ			
OS Grid Ref. SD 94232 16293		Altitude. 161 m	
Local Planning Authority: Rochdale Borough Council			
Features on site and adjacent to site			
Feature	On site	Adjacent	Comments
Buildings	✓	✓	Adjacent to other residential and industrial buildings.
River			River Roch located 295 m northwest of site.
Standing water		✓	House located adjacent to former mill pond.
Bridges tunnels and culverts			Associated with the Rochdale Canal and River Roch.
Trees	✓	✓	Trees located in dwelling garden.
Woodland		✓	Dwelling curtilage adjoins Ealees Wood.
Grassland	✓	✓	Lawns within garden.

Figure 1. Site location



Figure 2. Drone image of site, taken in February 2026



3.2 Aims

3.2.1 The survey was conducted to help determine the following:

- The presence/absence of roosting bats.
- Bat roosting areas and access/egress points into the structure.
- The level of bat roost potential associated with the structure.
- The number and species of bat roosting within the structure.
- Record any evidence of bird nesting in the surveyed building.
- Identify further survey work or mitigation requirements.

4. Methodology

4.1 Data Consultation

4.1.1 Bat records for locations within 1 km of the site were requested from Greater Manchester Ecology Unit. Bat records collected by South Lancashire Bat Group are also held by Greater Manchester Ecology Unit.

4.1.2 A search of the Multi-Agency Geographical Information for the Countryside website was also undertaken to identify historic European Protected Species licences obtained for locations within 2 km of the site.

4.1.3 Field Survey

Preliminary Roost Assessment

4.1.4 A preliminary roost assessment of site buildings was undertaken on 24th February 2026 by Robert Bell (MCIEEM; Bat Survey Class license WML-A34-Level 4, 2025-84862-CL20-BAT).

4.1.5 The following activities were carried out during the surveys in compliance with relevant Bat Survey Guidelines (Collins, 2023):

- A brief inspection and assessment of the site and habitats present to within 300 m.
- An extensive examination of all parts of the building both inside and out to record structural features and condition and to record features that may be suitable for roosting bats. Particular attention was paid to any crevices or gaps in walls, lintels, gaps between beams and joists and to the possibility of finding droppings stuck to walls, floors or other surfaces, or insect remains below beams, among a number of other factors. All signs indicative of a bat roost presence including live or dead bats, droppings, feeding remains, scratch marks and staining were recorded.
- An assessment of the building's bat roost potential (negligible, low, moderate, high or confirmed roost).

4.1.6 In addition, any signs of nesting bird usage of the building were recorded.

4.1.7 The following equipment was used or at hand during the survey:

- Clulight
- Binoculars
- Endoscope
- Ladders
- Drone

4.2 Survey Limitations

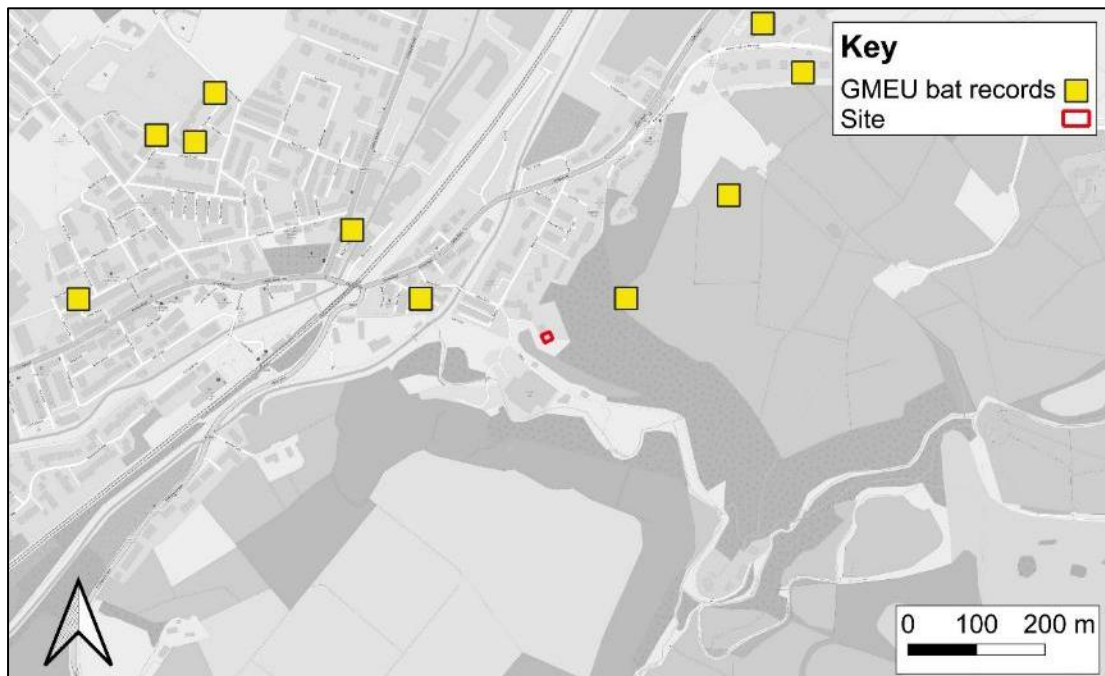
4.2.1 Although the survey was undertaken outside the main bat activity period, daytime inspections can be undertaken at any time of year. Any bat droppings within internal spaces (i.e. roof void) would be expected to be preserved for many months.

5. Results

5.1 Data Consultation

- 5.1.1 A total of 51 bat records were provided by Greater Manchester Ecology Unit (Figure 2). None of these records related to the site, with the closest record comprising a series of common pipistrelle foraging records collected from the adjacent millpond between 2005-2009. The nearest roost comprised a common pipistrelle *Pipistrellus pipistrellus* maternity roost (count of 31 bats), located c. 175 m west of the site, recorded in 2010.
- 5.1.2 Bat species positively identified in the supplied bat records comprised common pipistrelle, soprano pipistrelle *Pipistrellus pygmaeus*, Daubenton's bat *Myotis daubentonii*, whiskered bat *Myotis mystacinus* and noctule *Nyctalus noctula*. Other bat records were attributed to either an unidentified *Myotis* species, an unidentified *Pipistrellus* species, or an unidentified bat species.
- 5.1.3 No bat EPS mitigation licences have been issued for locations within 2 km of the site.

Figure 2. Locations of bat records close to site, as supplied by Greater Manchester Ecology Unit



5.2 Field Survey

- 5.2.1 No signs of bats were recorded from either the inside or outside of The Old Duke. The Old Duke was considered to display a moderate level of bat roost suitability.
- 5.2.2 Evidence of past jackdaw *Corvus monedula* nesting was recorded beneath a hole in the roof above the northwest gable. No other evidence of bird nesting was recorded.

External description

- 5.2.3 The Old Duke comprised a Grade II listed early C19th stone-built three-storey dwelling formerly used as a pub, and initially as a series of dwellings (Plates 1-3). On the rear/northeast of the building was a three storey stone extension, which now comprised a separate dwelling (Plates 2 & 3). The main house had a dual-pitch stone slate roof, with a mortar-filled verge and mortar-bedded ridge tiles. Stone chimneys were present in either gable, although these chimneys were capped with the exception of one gas flue pipe. A flat roof covered in mineral-surfaced roofing felt was present across the northeast extension. The pitched roof of the main dwelling had been subject to numerous short-term repairs over recent decades, with sections of steel and plastic sheet inserted to replace or seal gaps between broken stone slates.
- 5.2.4 The dwelling had solid stone walls, with wood-framed double glazed windows. The façade/southwest elevation had wooden guttering, whilst the edges of the extension's flat roof had a plastic fascia board and plastic guttering. The extension's northwest elevation had a single-storey wood-framed porch with a dual-pitched Welsh-slate covered roof with mortared clay ridge tiles and wooden barge boards (Plate 3).
- 5.2.5 A scaffold had been erected around the main roof in late-January 2026 and was accessible during the survey.

Plate 1. Façade – southwest elevation



Plate 2. Southeast gable



Plate 3. Northeast elevation



Potential roost features on exterior

5.2.6 Potential bat roosting features noted from the exterior of The Old Duke comprised the following:

- Gaps between uneven stone slates, particularly near the gable verges (Plates 4-6).
- In one location near the northeast chimney, a larger opening between roof slates in the verge had allowed access to jackdaw, which the owner reported had nested in that location in the past (Plate 6).
- Very occasional access to the wall top at the base of the southwest roof pitch, although this potential opening was mainly mortar filled.
- A gap – up to c. 2 cm between the fascia board and wall of the extension, in places.

5.2.7 It was possible to access the main pitched roof, and all gaps between the slates were inspected using a torch and endoscope, together with the access points onto the southwest wall top. Gaps between the fascia board and wall on the extension could

only be inspected from ground level using a torch. However, this potential roost feature would not be impacted by the proposed works.

Plate 4. Representative section of roof near southwest gable, showing extensive repairs and gaps between stone slates



Plate 5. Inspecting gaps between stone slates on the mid-pitch



Plate 6. Larger gap between slates leading to void accessed by jackdaw, above northwest gable



Plate 7. Space between top of wall and underside of roof slates on southwest elevation, mainly mortar filled



Plate 8. Gap between fascia board and wall on extension



Internal inspection

- 5.2.8 The pitched roof was suspended on queen post roof trusses, purlins, a ridge beam, rafters and battens. The roof had been quite recently vaulted (during Winter 2025/2026) at the time of survey, with the upper floor of the house and the open roof space very clean, due to recent works in the area (Plate 9).
- 5.2.9 An image of the roof, taken prior to works to vault it, showed that spray foam insulation had been used on the underside of the slates, with the homeowner confirming this was installed before 2007 (Plate 10).

Plate 9. Roof space of dwelling in February 2026



Plate 10. Image of roof space taken by third party, prior to vaulting, showing spray-foam insulation on underside of roof slates



6. Assessment

6.1 Summary and Evaluation of Findings

- 6.1.1 No evidence of roosting bats was recorded within The Old Duke. Although the building was considered to display a moderate level of bat roost suitability, being of traditional construction and located adjacent to prime bat foraging habitat, the scaffold allowed close inspection of those potential roost features likely to be affected by the proposed re-roofing works. It was also noted that the underside of the roof was lined with spray-foam insulation, restricting bat access beneath the tiles. In addition, the presence of scaffold close to the eaves was likely to have reduced the likelihood of bats roosting at the time of the inspection.
- 6.1.2 Evidence of past usage of the roof by nesting jackdaws was recorded from a single location, with scope for nesting birds to use other sections of the roof.

6.2 Legislation and Policy Guidance

Bats

- 6.2.1 Bats receive protection under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 and the Wildlife and Countryside Act 1981 (as amended).
- 6.2.2 It is an offence to:
- Deliberately capture (or take), injure or kill a bat.
 - Intentionally or recklessly disturb bats whilst they are occupying a structure or place used for shelter or protection or obstruct access to any such place.
 - Damage or destroy the breeding or resting place (roost) of a bat.
 - Possess a bat (live or dead), or any part of a bat.
 - Intentionally or recklessly obstruct access to a bat roost.
 - Sell (or offer for sale) or exchange bats (dead or alive).
- 6.2.3 The Convention on Biological Diversity, signed in Rio de Janeiro, Brazil in 1992, requires member states to develop national strategies and to undertake a range of actions aimed at maintaining or restoring biodiversity. The UK Biodiversity Strategy was produced in response to the Convention.
- 6.2.4 In England & Wales, the Natural Environment and Rural Communities (NERC) Act, 2006 imposes a duty on all public bodies, including local authorities and statutory bodies, in exercising their functions, “to have due regard, as far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”. It notes that “conserving biodiversity includes restoring or enhancing a population or habitat”. Barbastelle *Barbastella barbastellus*, Bechstein’s *Myotis bechsteinii*, brown long-eared, greater horseshoe *Rhinolophus ferrumequinum*, lesser horseshoe *Rhinolophus hipposideros*, noctule and soprano pipistrelle bats are included as priority species within Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. At a more local level there are Local Biodiversity Action Plans for smaller geographical areas which may cover a greater or lesser range of bat species.
- 6.2.5 The National Planning Policy Framework for England was revised in 2024. This document states that plans should ‘promote the conservation, restoration and re-

creation of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity’.

Birds

6.2.6 All wild birds are protected under the Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000), which makes it illegal (subject to exceptions) to:

- Intentionally kill, injure or take any wild bird.
- Take, damage or destroy the nest (whilst being built or in use) or eggs of any wild bird.

6.3 Further Survey, Recommendations and Enhancements

Bats

- 6.3.1 The bat survey guidance (Collins, 2023) recommends that a programme of two nocturnal surveys is typically undertaken during the survey season (May to August) in order to determine the presence or likely absence of roosting bats. In this instance, however, it is not considered necessary to undertake further nocturnal surveys in advance of the proposed re-roofing works. This apparent departure from the guidance is justified as direct inspection of those potential roost features likely to be affected by the re-roofing was possible from the scaffold. No evidence of bat roosting was recorded during this inspection and, whilst the scaffold remains in place, the roosting situation associated with the main roof is unlikely to change.
- 6.3.2 In this instance, it is instead considered that there is scope to proceed without further nocturnal survey, providing the terms of a non-licensed method statement are followed.
- 6.3.3 Although the roof of the dwelling displays suitability for use by roosting bats, the proposed new roof could be constructed in a way which retains this suitability and re-creates potential bat roosting locations.
- 6.3.4 The principal long-term hazard to roosting bats associated with re-roofing works is the potential installation of a standard breathable roofing membrane. Such membranes contain woven filaments in which bats are known to become entangled, often resulting in fatality (Appendix 1). In light of this risk, the clients have committed to the use of a bat safe roofing membrane during re-roofing.
- 6.3.5 The Old Duke is to be re-roofed with stone slates. Consequently, potential roosting features on the existing roof, which result from slates of uneven width, will largely be re-created ‘like for like’ during the re-roofing process. In the event that a bat roost, which was not in use at the time, was uncovered then there would be scope to re-create this in the same location, although the need for a licence would need to be re-assessed at this stage. Hessian-backed Type 1F bituminous felt would be used at any identified bat roost location.
- 6.3.6 In order to help prevent reckless disturbance or the killing or injuring of any bats roosting at the time of works, the terms of a non-licensed method statement should be followed, with such an approach presented in full in Appendix 2.

- 6.3.7 Re-roofing works should not be carried out during the main bat activity season (May–September) unless a pre-works nocturnal survey is completed within 72 hours prior to the works commencing. As an additional precaution against disturbing any potentially hibernating bats, it is also recommended that works avoid the peak hibernation period (December–February).
- 6.3.8 Once the scaffold is erected and prior to roof strip works proceeding, a toolbox talk should be delivered to the roofing team by a licensed bat ecologist, who should then remain on site to oversee key aspects of the roof strip (i.e. the removal of ridge and verge slates etc.). In the event that a bat or bats are found then the need for works to cease while a bat mitigation licence is obtained would be reassessed.
- 6.3.9 Assuming there is no cause to stop works and obtain a bat mitigation licence then the final stage of the non-licensed method statement approach would be for the licensed bat worker to sign off the finished roof prior to the removal of scaffold.

Birds

- 6.3.10 The proposed works should either commence outside the main bird nesting period (March–August) or be preceded by a nesting bird check, which could be undertaken as part of the non-licensed method statement works.

6.4 Conclusions

- 6.4.1 The Old Duke displayed a moderate level of bat roost suitability but no evidence of bat presence was identified during the survey. With the adoption of a bat-safe roofing membrane and adherence to a non-licensed method statement, it was considered that the risk of breaching bat protection legislation could be kept to an acceptable level.
- 6.4.2 On this basis, the re-roofing works may proceed without additional nocturnal survey, provided the works occur outside sensitive periods, or are preceded by a timely pre-works check. If a roosting bat/bats, or signs of bats, were encountered then the need to halt works and obtain a bat mitigation licence would be re-assessed. A licensed bat ecologist should oversee key elements of the roof strip and verify the reinstatement of any identified roost locations prior to scaffold removal. Compliance with these measures, alongside precautionary nesting-bird checks where required, will help ensure the works meet legislative requirements and avoid ecological harm.

7. References

Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition). The Bat Conservation Trust.

Appendix 1. Bats and Roofing Membranes

Standard roof membranes can cause the death of significant numbers of bats. Traditional bitumen coated roofing felt is recommended where roosting bats are expected to be present.

The problem

Non-bitumen coated membranes used below roof slates and tiles present a significant problem for bats. Over time, strands are pulled away from the surface of these materials as bats crawl over them. These fuzzy strands are very strong and can tangle and trap bats, sometimes causing the death of bats over multiple years¹.

One example we have encountered comprised a pipistrelle roost which formed in a building extension constructed in 2009. Over the course of just 13 years the roofing felt degraded to the extent that it trapped and killed more than 10 bats. Fortunately, the problem in this roost was identified and remedial work was undertaken to replace the roofing membrane in 2022.

Plate A1.1. Four dead pipistrelles tangled in breathable roofing felt



Although a new roof might be considered to lack potential bat access points, that is often not the case. Roofs covered with stone slates almost always have gaps large enough to be accessed by bats, this is often also the case where imitation stone slates are used. On older buildings the uneven roof timbers and/or building design also often results in gaps on wall tops and between slates. Even on new builds it is often possible for bats to access potential roosts via features such as dry verge capping. Some bats can access a space no wider than a biro pen, therefore it is not surprising that they can find their way into most buildings.

Safe roofing membranes (and membranes behind cladding)

The best roofing membrane option for areas where bat roosts are expected is traditional Type 1F bitumen coated hessian backed roofing felt. Bitumen coated roofing felts have been widely and safely used as a secondary weather barrier since approximately the 1950s/1960s. Wooden sarking has also been used for many decades and if appropriately treated, is safe for

¹ Wearing S. Essah E., Gunnel K. & Bonser R. (2013) Double jeopardy: the potential for problems when bats interact with breathable roofing membranes in the United Kingdom. Architecture and Environment

use in bat roosts, or where bats could be, present. Most commercially available products come pretreated but if required, a list of suitable timber treatment products are listed on the government website². Wooden sarking also has the benefit of adding additional insulation and is usually breathable.

There are breathable membrane products which have passed a test known as the snagging propensity test. The test attempts to replicate the wear and tear which results from bats crawling over the membrane. At the time of writing (to our knowledge) two products have passed the test and are accepted for use in bat roosts by Natural England: SIGA Majcoat 200 SOB Diffusion and TLX BatSafe^{3,4}. Although both have passed this test, it is unclear how they would fair over a long timeframe, and particularly within larger bat roosts. For this reason, we do not recommend that they are used for known bat roosts, and particularly for large (maternity roosts). However, they may provide a much needed option for roofs where future bat use cannot be ruled out, sarking boards are not an option, and a breathable solution is required.

Additional considerations

In recent years a fairly substantial proportion of the lofts we have surveyed which had existing breathable felt, were found to have been damaged by wasps (Plate A1.2). In these situations, the wasps appear to have chewed holes in the felt and formed nests in the holes. This doesn't appear to be a problem associated with the traditional bitumen coated roofing felt. Obviously, any holes within roofing felt would be likely to significantly reduce its functionality as a secondary weather barrier. Where bats or birds do come into contact with breathable roofing membranes, they can damage the membrane causing it to leak and they can also significantly reduce the breathability of the felt in that location.

Plate A1.2. Damage to a breathable roofing membrane adjacent to a wasp nest



Traditional bituminous Type 1F roofing felt is a non-breathable product and therefore ventilation is required. This can be achieved, even in buildings with vaulted ceilings, but requires some consideration during the design stage. Products to increase the ventilation within roofs where bituminous Type 1F felt has already been installed are also available but should not be considered as the primary ventilation option.

² Accessible at: <https://www.gov.uk/government/publications/bat-roosts-insecticides-and-timber-treatments/timber-treatment-products-suitable-for-use-in-or-near-bat-roosts>

³ <https://www.gov.uk/government/publications/bats-apply-for-a-mitigation-licence#full-publication-update-history~:text=Use%20of%20safe%20roofing%20membranes>

⁴ TLX BatSafe requires all joints and cut edges to be taped in order to prevent the fraying of bare edges.

Appendix 2. Non-Licensed Method Statement

TOOLBOX TALK NOTES – THE OLD DUKE

- The measures detailed in this document have been developed to reduce the likelihood of a breach of bat protection legislation and to help safeguard the long-term interests of roosting bats at this site during re-roofing of the section of The Old Duke.
- The proposed works are not covered by any bat mitigation licence. Outside of a bat licence, it is illegal to deliberately capture, injure or kill a bat, with bats also protected from deliberate or reckless disturbance and from deliberate or reckless damage or destruction of a breeding site or resting place (roost). Disturbing a bat roost can lead to unlimited fines, up to six months in prison and seizing of items used to commit the offence, e.g. vehicles, plant or machinery.
- Prior to the works commencing a licenced bat ecologist will deliver this Toolbox Talk (setting out the terms of the non-licensed method statement) to the roofing team.
- Re-roofing works should not be carried out during the main bat activity season (May–September) unless a pre-works nocturnal survey is completed within 72 hours prior to the works commencing. As an additional precaution against disturbing any hibernating bats, it is also recommended that works avoid the peak hibernation period (December–February).
- Removal of key sections of the roof (including as a minimum ridge tiles and slates on the verges) of The Old Duke should be overseen by a licensed bat ecologist. If a bat/bats or signs of bats are encountered during the roof strip then the need for works to cease while a bat mitigation licence is obtained would be reassessed.
- The only acceptable types of roofing felt to be used in connection with this project include felt or membranes, shown to be bat safe, at least on the upper surface. Such materials comprise hessian-backed Type 1F bituminous felt, Siga Majcoat 350, TLX BatSafe and Siga Majcoat 200 SOB. Hessian-backed Type 1F bituminous felt would be used at any identified bat roost location.
- Regardless of the need or otherwise for a bat licence, any bat roost location identified during the roof strip is to be re-created like-for-like. In most cases this could be achieved simply by ensuring that a crevice access space was recreated between stone slates in the identified roost location.
- If bats are recorded at a time that an ecologist is not present on site, then all works in the surrounding area should cease and a licensed bat worker should be contacted immediately (Robert Bell – 07816 328926).
- Several species of bat in the UK have been shown to occasionally carry rabies. For this reason and to avoid injuring the bats, construction staff should not handle bats.
- UK bats are very small animals, and the bodies of the smallest bats are able to fit inside a match box. Several species of UK bat are able to conceal themselves in gaps and crevices little wider than 1 cm.



This image shows a pipistrelle bat approximately 5cm in length

- Bat droppings appear similar in size and shape to mouse droppings, but if rolled between your thumb and forefinger will crumble to dust, unlike mouse droppings.
- Any material with potential to form a crevice should be removed by hand with care. Suitable crevices/features should be searched, if possible, using a torch, prior to removal. All material concealing an enclosed crevice/void should be lifted in such a way as to avoid crushing any animals' underneath. If bats or bat droppings are encountered during stripping works, then all works in the surrounding area should cease and the licensed bat worker should be contacted.

Development staff that have received toolbox talk

Signature	Name	Organisation	Date