

Dusk Survey Results

August 2026

Spurr House
Pole Lane
Bury
BL9 8QL

National Grid Reference: SD 8203 0699



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Executive Summary

As part of a granted planning application with Bury Council (Ref.: 72240) at Spurr House, Bury (termed 'the site'), Thomson Environmental Consultants carried out a Preliminary Ecological Appraisal (PEA) in August 2022.

Following the PEA with included Preliminary Roost Assessment (PRA) which categorised the building as pertaining to '**Moderate**' bat roost potential, ProHort were commissioned to undertake the recommended further bat surveys; the surveys, totalling two dusk emergence surveys, were carried out in August & September 2025. No emergence of any bat species was recorded.

The application was granted consent in March 2026. Following a delay in the demolition of the building, and to address a planning condition, Tyrer Ecological Consultants Ltd were therefore commissioned to undertake updated bat surveys; the two dusk emergence surveys were carried out in June & July 2026, in accordance with the updated Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023).

Bats

Based on the results gathered during the 2026 dusk surveys, the building is ascertained to be host to three Day Roosts, each for a single common pipistrelle.

A European Protected Species Mitigation Licence (EPSML) will be required from Natural England for the proposed development to legally proceed.

*A Mitigation Scheme to inform the EPSML application, and to demonstrate to the Local Authority that the favourable conservation status of the species identified can be maintained, has been provided in **Section 6.0** of this report.*

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 a licence not be applied for within this time period, updated surveys may be required.

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Appendix II: *Bat Emergence Survey* (ProHort Ltd, October 2025)

1.0 Background & Introduction

- 1.1 As part of a granted planning application with Bury Council (Ref.: 72240¹) at Spurr House, Bury (termed 'the site'), Thomson Environmental Consultants carried out a Preliminary Ecological Appraisal (PEA) in August 2022 (**Appendix I**).
- 1.2 The survey was commissioned by Watson Homes; proposals are for the demolition of the existing buildings and site clearance works to facilitate the construction of 60 residential units with landscaping and access. See **Figure 1.1** for a proposed site plan.

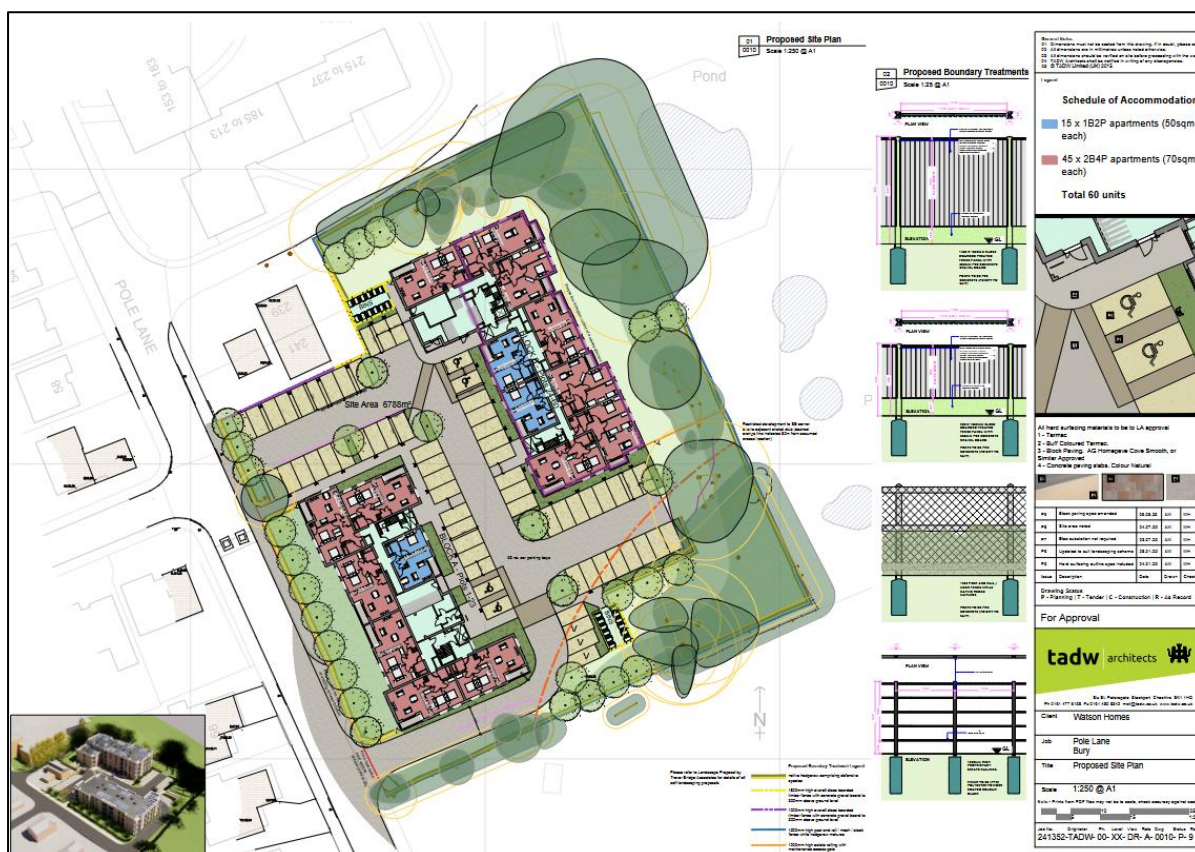


Figure 1.1 – Proposed site plan (preliminary) © tadw architects

- 1.3 Included within the PEA was a Preliminary Roost Assessment (PRA) of any built structures and trees on site in relation to bats. Based on the findings of the PRA, the former School Building (B1) at Spurr House was duly categorised as pertaining to 'Moderate' bat roost suitability and the Shed (B2) was duly categorised as pertaining to 'Low' bat roost suitability, in accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd ed. (2016).
- 1.4 ProHort Ltd were therefore commissioned to undertake two further bat surveys; the two dusk emergence surveys were carried out at B1 in August & September 2025, in accordance with the 2016 BCT guidelines (**Appendix II**). No bats were recorded emerging from the building during either survey, with activity from common pipistrelles (*Pipistrellus pipistrellus*) and noctules (*Nyctalus noctula*). No reference to B2 is made within the 2025 report; no evidence of B2 is present at the site at the time of writing.

¹ See: https://planning.bury.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal= BURY_DCAPR_63603

- 1.5 The application was granted consent in March 2026, subject to a number of conditions. Condition 8 of the granted consent states:

“If demolition has not occurred prior to 31st April 2026 further dusk emergence bat survey [sic] shall be carried out between May and July in any year and the findings provided to and agreed in writing by the LPA. Demolition timings shall then be subsequently carried out in accordance with approved timetable.”

- 1.6 As demolition of B1 had not occurred by 31st April 2026, Tyrer Ecological Consultants Ltd were therefore commissioned to undertake the recommended further bat surveys; the two dusk emergence surveys were carried out in June & July 2026, in accordance with the updated Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023).

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 ‘Moderate’ suitability survey implications

- 1.7 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), where necessary, will be supplied within this report.
- 1.8 This report should be read, understood and presented to the local authority as an additional document to **Appendices I & II** (see Contents page).

2.0 Bats – Legislation & Policy

2.1 All British bats and their **roosts are afforded full protection under the Wildlife & Countryside Act (1981) (as amended) and are listed in Schedule 2 of the Conservation of Habitats and Species Regulations (2017) (as amended). When dealing with cases where an EPS (all UK bats) may be affected, a planning authority is a competent authority within the meaning of Regulation 7 of the Regulations, and therefore 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 Uses of Buildings by Bats

- a) Summer breeding roost, and day/occasional roost (May – August)
- b) Hibernation roost (October – March)
- c) Transitional or temporary roost (other 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.

*** 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.*

2.4 Up to ten bat species have been regularly recorded within Greater Manchester to date, many of which use built structures, notably occupied residential buildings, for roosting. The most frequently encountered bat species is the common pipistrelle, and its abundant status in Greater Manchester is reflected throughout the UK.

Policy

2.5 The National Planning Policy Framework² (NPPF) (as revised in August 2026) sets out the government’s policies for plan making and for making decisions on development proposals in England. Several policies within section 19 of this framework, titled ‘Conserving and enhancing the natural environment’, relate to biodiversity (see **Table 2.1**):

Table 2.1 – Relevant polices from NPPF

Policy Title	Policy Summary
N1: Identifying environmental opportunities and safeguards	Development plans should safeguard and enhance the natural environment, and reflect the wider benefits from natural capital and ecosystem services, setting out hierarchical importance of sites from international to local level, identifying opportunities to conserve, enhance and recover important habitats, priority / threatened species and strengthen ecological networks. Development should be proposed in suitable locations which minimise impact upon ecologically important landscapes, and should include provision for wildlife, taking into account Local Nature Recovery Strategies and Natural England’s Green Infrastructure Standards for England.

² See: <https://www.gov.uk/guidance/national-planning-policy-framework>

Policy Title	Policy Summary
N2: Improving the natural environment	Development proposals should contribute positively to the natural environment, considering the environmental qualities of the land, strengthening ecological networks, conserving and enhancing existing natural features of nature conservation value, using green infrastructure to secure multiple benefits built into the design of the scheme to ensure long term efficacy and by minimising adverse impacts on biodiversity. If significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated or, as a last resort, compensated for, then the development should be refused.

- 2.6 The following policy from the Greater Manchester 'Places for everyone' Joint Development Plan (adopted March 2024) which covers nine Greater Manchester districts including Bury Council is considered relevant to this assessment (see **Table 2.2**):

Table 2.2 – Relevant policies as extracted from the Greater Manchester Places for Everyone Development Plan³

Policy Title	Summary
Policy JP-G8: A Net Enhancement of Biodiversity and Geodiversity	Development will be expected to: A. Follow the mitigation hierarchy of: I. Avoiding significant harm to biodiversity, particularly where it is irreplaceable, through consideration of alternative sites with less harmful impacts, then II. Adequately mitigating any harm to biodiversity, then III. Adequately compensating for any remaining harm to biodiversity B. Avoid fragmenting or severing connectivity between habitats; C. Achieve a measurable net gain in biodiversity of no less than 10% D. Make appropriate provision for long-term management of habitats and geological features connected to the development

³ See: <https://www.greatermanchester-ca.gov.uk/media/azeptwds/places-for-everyone-joint-development-plan-document.pdf>

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 surveys took place in June & July 2026, thus within the highly active and social breeding season, when females have given birth and are in maternity roosts.

- 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 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.

- 3.10 The number of surveys and surveyors was adequate relative to the roost potential that was identified on attendance of the site, i.e. **‘Moderate’**, and requiring seven surveyors to accurately monitor potential roost features (PRFs) across the structure. Surveyor credentials are provided in **Table 3.1** overleaf:

Table 3.1 – Surveyor credentials

Surveyor(s)	Experience	Surveyor Credentials
Mr. H. Mulligan ACIEEM	4 years	- Senior Ecologist and BNG Lead with a range of training and experience, - MBiolSci in Biological Sciences (Zoology), - Accredited agent on the Natural England Class 2 Bat Licence (2025-84395-CL18-BAT) of Mrs. K. Wilding.
Miss. R. Brown Qualifying CIEEM	3 years	- Consultant Ecologist with a range of training and experience - BSc (Hons.) Environmental Science - Accredited agent on the Natural England Class 2 Bat Licence (2025-84395-CL18-BAT) of Mrs. K. Wilding.
Mr. G. Windle Qualifying CIEEM	2 years	- Junior Ecologist with a range of experience and currently undergoing extensive training, - MSc in Conservation Management (a CIEEM accredited course), - Accredited agent on the Class 2 Natural England bat licence of Mrs. K. Wilding (2025-84395-CL18-BAT).
Mr. H. Green	30+ years	- Highly experienced Bat Specialist and carer, with professional surveying experience over decades with Tyrer Ecological Consultants Ltd, - Holder of a Natural England Class 2 Bat Licence (CLS-03290).
Dr. R. King MCIEEM	15+ years	Highly experienced seasonal consultant with extensive experience of undertaking professional bat surveys.
Mrs. K. Swift	10+ years	- Seasonal ecologist who has extensive experience undertaking professional bat surveys, - Holder of Natural England Class 2 Bat Licence (2025-84292-CL18-BAT).
Mr. M. Smith	7 years	An experienced seasonal consultant with extensive experience of undertaking professional bat surveys.
Miss. L. Wilde	2 years	A seasonal consultant with experience of undertaking professional bat surveys.
Miss. A. M. Tarrasó	2 years	- A seasonal consultant with experience of undertaking professional bat surveys. - MSc in Conservation Management (a CIEEM accredited course).
Mr. J. Wright	2 years	A seasonal consultant with experience of undertaking professional bat surveys.
Miss S. Kacperski	1 year	- A seasonal consultant with experience of undertaking professional bat surveys, - BSc (Hons) Plant Science.
Ms. V. Ferguson	1 year	A seasonal consultant with experience of undertaking professional bat surveys.

- 3.11 Surveyors were strategically positioned so that all elevations with bat roost potential could be observed without limitation. The surveyors were aided by full spectrum electronic bat detectors including the Anabat Scout, Elekon Batlogger M & M2, Echometer EM2 Pro, Peersonic RPA3, or equivalent detectors which enable the locating and recording of the high frequency calls that are emitted by bats; echolocation calls were analysed the next day using Anabat Insight, Kaleidoscope, BatExplorer, Sonobat or equivalent computer software to verify field observations.
- 3.12 Where deemed necessary and appropriate by the attending ecologist(s), elevations were also surveyed via the use of Night Vision Aids (NVA), with deployment undertaken in line with relevant guidance documents, including Bat emergence surveys with night vision aids: A technical guide for professional ecologists (BCT, 2026) and Thermal Imaging: Bat Survey Guidelines (Fawcett Williams, 2021).
- 3.13 Devices such as near infrared (NIR) imaging cameras (Panasonic HC-VXF990, Canon XA35, Canon XA70, Nightfox Whisker & Nova Night Vision Binoculars) were utilised in combination with NIR lighting apparatus (for example Nightfox Arc, Nightfox XB5, or additional spot lights & floodlights). Thermal imaging equipment (such as the Thermal Master DV2) was also deployed by the survey team when necessary, in combination with the NIR systems as described.
- 3.14 In accordance with the Good Practice Guidelines, NVA recordings were subject to review as soon as possible following completion of the survey, typically the following day, to identify emergences / flight lines and species / abundance.

Survey Limitations

- 3.15 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 Two dusk emergence surveys were undertaken at the site, during June & July 2026 by seven surveyors at any one time. **Table 4.1** shows survey timings and weather conditions, whilst **Tables 4.2 – 4.3** alongside **Figures 4.1 – 4.6** document the results of the dusk surveys.

Table 4.1 – Survey date, times and weather conditions

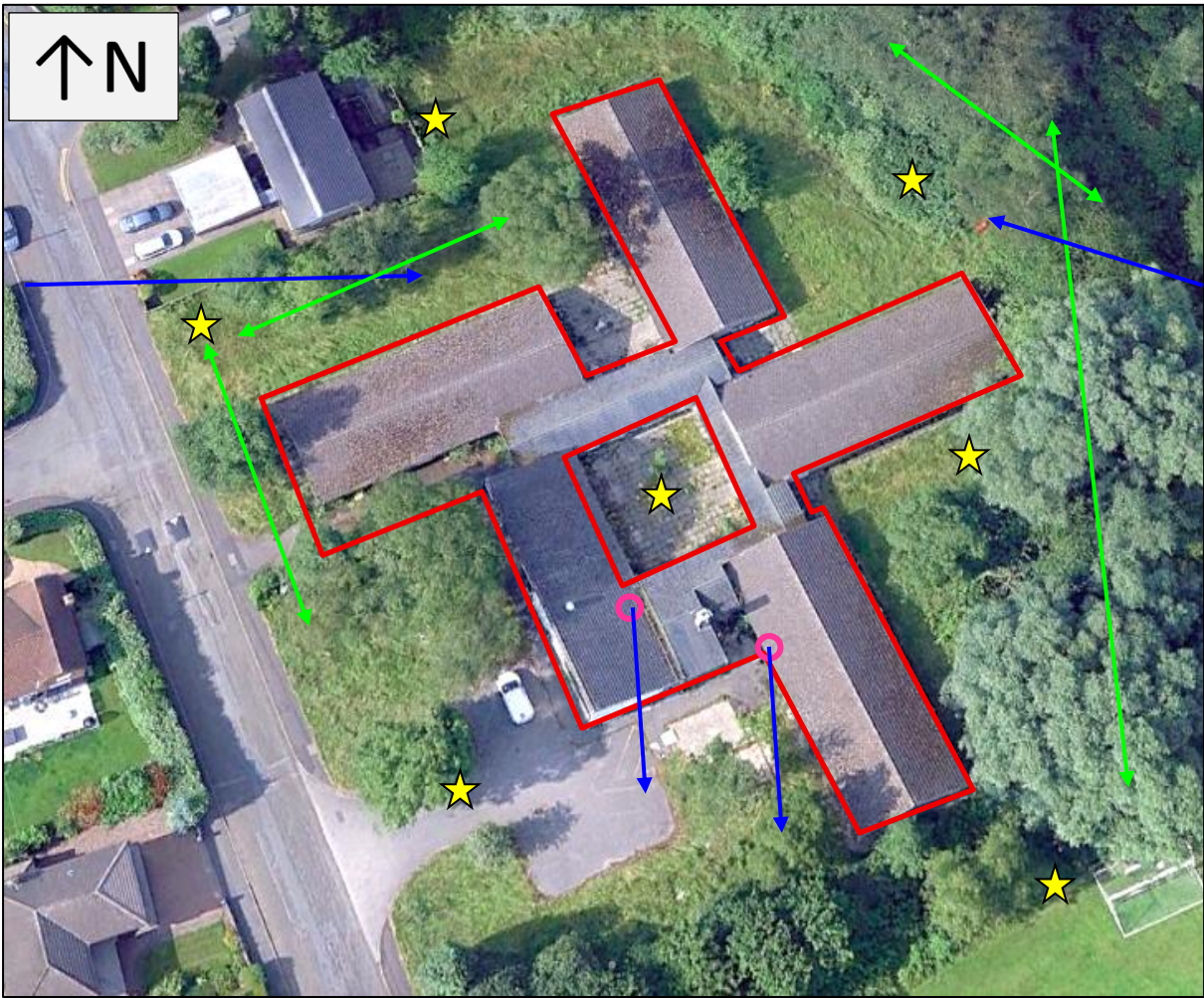
Times of Survey	Date	Weather Conditions
Dusk survey 1 2121 – 2311	17/06/2026	Sunset: 2141: Dry, Light air (1/12 Beaufort), 5% cloud cover Start temp: 18°C End temp: 16°C
Dusk survey 2 2118 – 2308	08/07/2026	Sunset: 2138: Dry, Calm (0/12 Beaufort), 0% cloud cover Start temp: 23°C End temp: 17°C

Table 4.2 – Dusk survey results

Survey Dates	Time	Activity
17/06/2026	2121 – 2311	Summary: Emergence of a single common pipistrelle from the east-facing roof pitch of the south-western corner of the building (EP1), and of a single common pipistrelle from the south-western elevation of the southern wing of the building (EP2). 2156 hrs: a common pipistrelle (CP) emerged from beneath a lifted tile on the east-facing roof pitch of the south-western corner of the building. EP1 2205 hrs: a CP emerged from beneath a lifted tile on the south-western elevation of the southern wing of the building. EP2 2205 – 2300 hrs: a CP was occasionally recorded foraging around the north-east of the building. 2205 – 2237 hrs: a CP commuted onto site from the east then foraged around the trees to the east of the site occasionally. 2206 – 2253 hrs: two CP commuted onto the site from the west and foraged occasionally around the north-west of the building. General activity comprised of occasional foraging and commuting by up to two common pipistrelles at a time.

Spurr House, Pole Lane, Bury, BL9 8QL
Dusk Survey Results in Relation to Bats

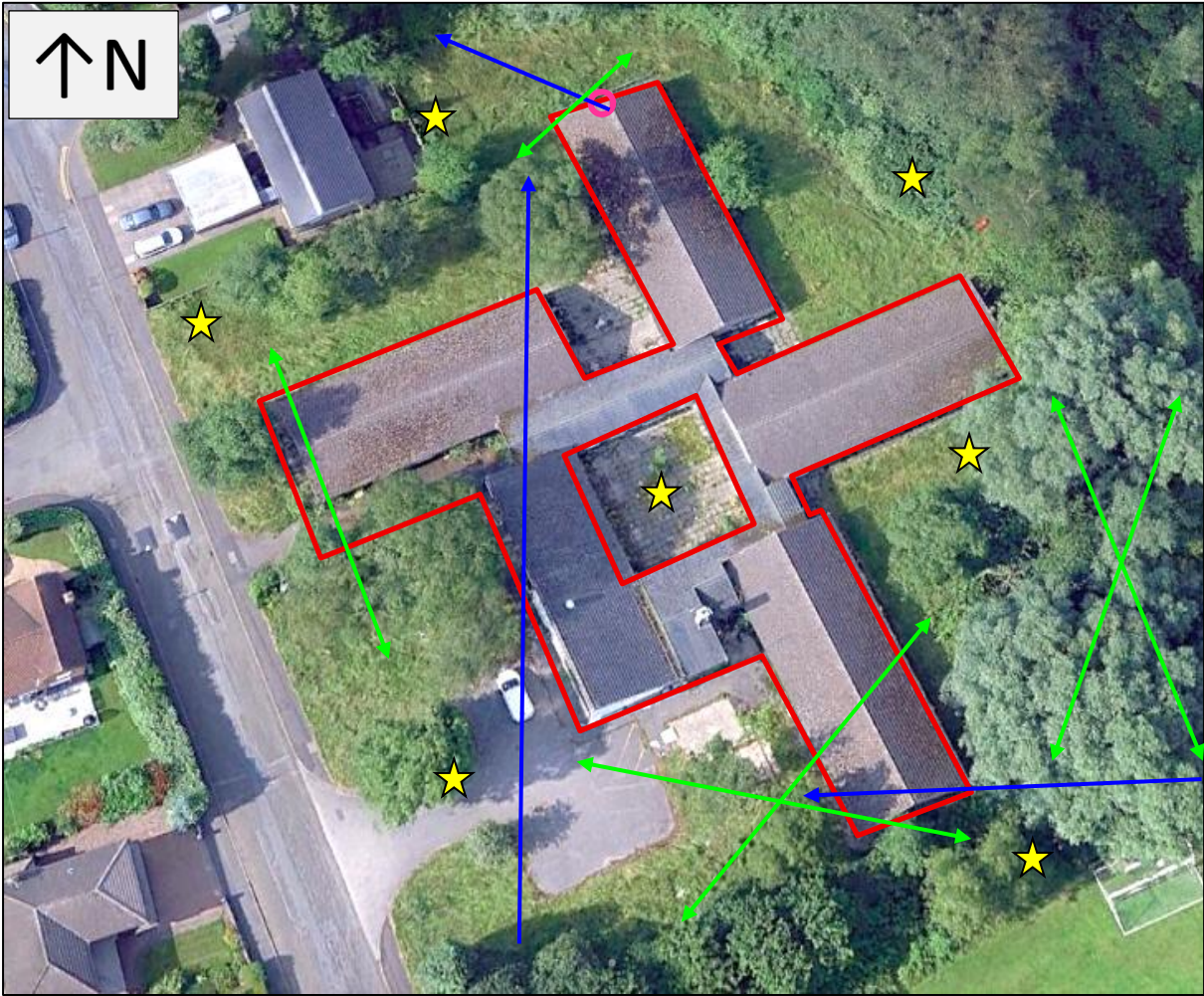
Survey Dates	Time	Activity
08/07/2026	2118 – 2308	Summary: Emergence of a single common pipistrelle from the ground-floor door on the northern gable of the northern wing of the building (EP3). 2143 – 2259 hrs: up to two CP commuted onto site from the west and foraged and chased around the south of the building. 2144 hrs: a CP commuted south to north over the site. 2145 – 2304 hrs: up to two CP foraged frequently around the trees to the east of the site and around the south-east of the site. 2147 hrs: a CP emerged from a ground-level door on the northern gable of the northern wing of the building. EP3 2150 hrs: up to three CP foraged around the northern gable of the northern wing of the building. 2209 – 2229 hrs: two CP foraged over the western wing of the building constantly. 2207 – 2308 hrs: up to two CP constantly foraged around the trees to the east of the site. General activity comprised of regular foraging up to three common pipistrelles.



Dusk Survey 1 – 17/06/2026

Key			
	Surveyed structure		Foraging activity
	Surveyor positions		Commuting activity
	Directional compass		Emergence point

Figure 4.1 – Visual Aid – Dusk survey results with Key



Dusk Survey 2 – 08/07/2026

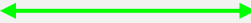
Key			
	Surveyed structure		Foraging activity
	Surveyor positions		Commuting activity
	Directional compass		Emergence point

Figure 4.2 – Visual Aid – Dusk survey results with Key

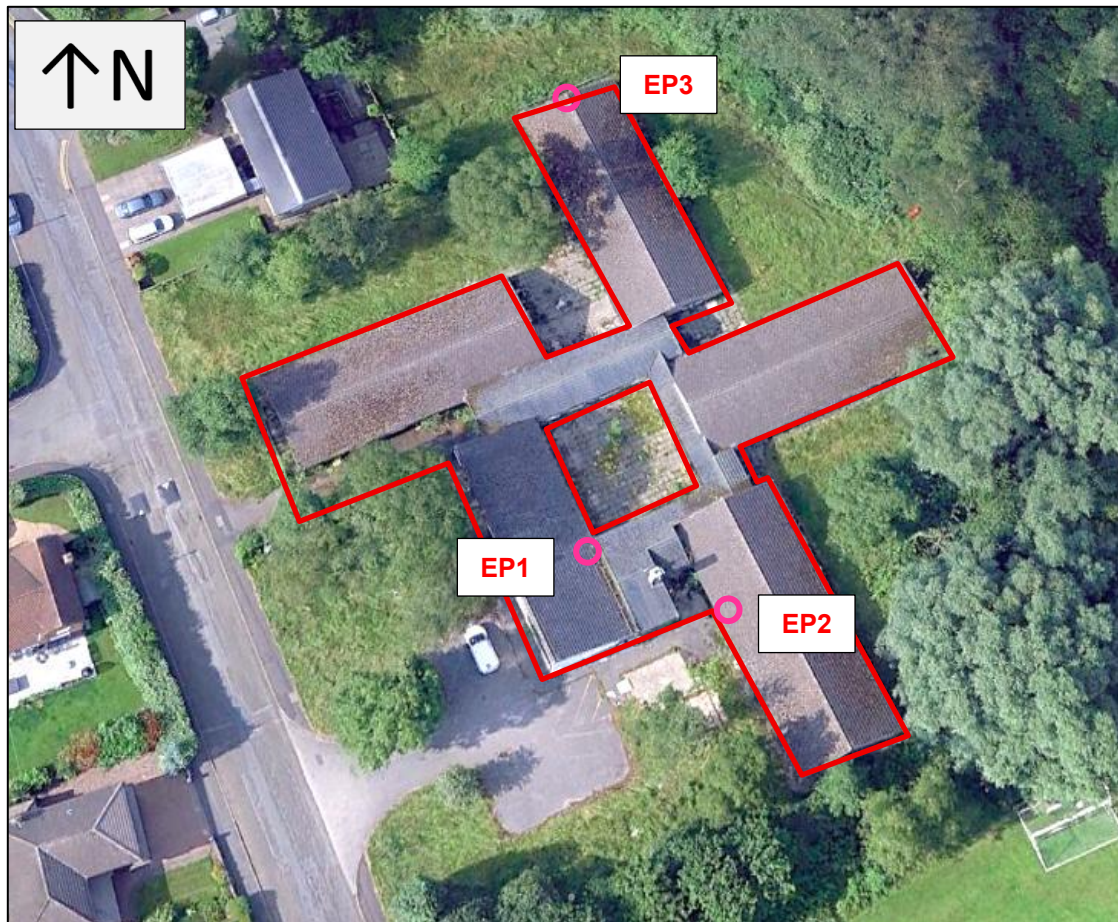


Figure 4.3 – Location of emergence point © Google Earth Pro 2026



Figure 4.4 – Location of Emergence Point 1 on the east-facing roof pitch of the south-western corner of the building (EP1)



Figure 4.5 – Location of Emergence Point 2 on the south-western elevation of the southern wing of the building (**EP2**)



Figure 4.6 – Location of Emergence Point 3 from the ground floor door of the northern gable of the northern wing of the building (**EP3**)

5.0 Conclusions & Recommendations

5.1 Based on the results gathered during the dusk surveys, the building is ascertained to be host to three Day Roosts, each for a single common pipistrelle.

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 For clarity, the roost categorisation, location and access point has been provided in **Table 5.1** below, alongside the site status assessment and the conservation significance⁴ of the roost:

Table 5.1 – Roost locations and access points at Spurr House

Roost Reference	Species	Count	Roost Location	Access Points	Site Status Assessment	Conservation Significance
1	Common pipistrelle	1	East-facing roof pitch, south-western corner of building	EP1 – Lifted tile	Day	Site
2	Common pipistrelle	1	South-western roof pitch, southern wing	EP2 – Lifted tile	Day	Site
3	Common pipistrelle	1	Internal crevice within northern wing	EP3 – Ground-floor door	Day	Site

5.4 Proposals are understood to involve the demolition of the existing former building to allow the erection of 60 residential units with associated access and landscaping. See **Figure 5.1** below for the location of the roosts in reference to the proposed site plan.

⁴ As extracted from **Reason, P.F. & Wray, S.** 2025. UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.2 Chartered Institute of Ecology and Environmental Management, Ampfield



Figure 5.1 – Approximate location of existing roosts over proposed site plan © tadw architects

- 5.5 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) 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.**
- 5.6 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.
- 5.7 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 Mitigation

- 6.1 From the evidence gained during the surveys, the use of the site is considered to be of '**Site**' level significance for common pipistrelles and their current conservation status (as according to current EPS mitigation licensing 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 Notwithstanding that Planning Consent has been granted, 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.
- 6.3 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

- 6.4 With the existing structures on site set to be demolished, it is acknowledged that the presence of a roosting bat needs to be addressed from both a legal and conservation perspective. For the purposes of this report, **it is considered that the roost will be subject to destruction**; as such, there is a necessity to consider alternative solutions.
- 6.5 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 applicant to undertake the proposed works.
- 6.6 Commuting routes are generally located to the borders of the site, particularly along the eastern site boundary. The key commuting routes appear to be being retained at the post-development stage, with the trees to the east shown as retained in the Landscape Management Plan (tba landscape architects, January 2025), in addition to further planting of native scrub and hedgerow which will shield the development from a cricket club to the south. As such, the works are considered to entail a net positive impact on the commuting routes to the boundaries of the site.
- 6.7 The existing taller vegetation around the building provides a moderate value foraging resource, evidenced by the frequent usage of these areas by up to three common pipistrelles. Some of the existing vegetation, primarily to the west, will be cleared to allow the creation of new carparking and access. However, the planting of new trees over grassland and ornamental planting along the western site boundary will mitigate this, whilst the underplanting of trees with scrub in the eastern half of the site will increase its overall value for foraging bats.
- 6.8 There will likely be an increase in lighting to around the newly created residential units and carparking. It is therefore recommended that a bat-friendly lighting plan is produced for the site, which should include measures to avoid illumination of key commuting and foraging areas at the boundaries of the site, specifically in the denser vegetation at the eastern site boundary, and the new tree line to the west.
- 6.9 This lighting plan should be produced by a suitably qualified lighting specialist and should be checked by a licensed bat ecologist against this dusk report to ensure that roost provision and key commuting / foraging areas are not subject to intense lighting.

- 6.10 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 tree-mounted receptor roost will need to be installed at the site. The pole-mounted box should be a Schwegler 2F Bat Box⁵ (or suitable 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 licensed 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).

Works to be undertaken by the Ecologist

- 6.11 **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 applicant.
- 6.12 **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 licence, i.e. licence, method statement, mitigation figures and work schedule to be kept on site for the duration of the work.
- 6.13 **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.
- 6.14 **Timing Implications:** Whilst no assessment on non-classic hibernation was carried out during the PRA undertaken by Thomson, the PRFs identified are unlikely to be suitable for hibernation purposes, and no seasonal restrictions will be applied. However, there is a low chance they could be utilised opportunistically by low numbers of pipistrelle bats, a genus which frequently uses non-classic hibernation sites. It is therefore recommended that all works to the structure are undertaken in the following suitable weather conditions, to minimise the risk of harm for any torpid bats, subject to their presence:
- It is dry / calm,
 - Temperatures are no lower than 8°C for at least an hour or two from dusk on 3-4 consecutive nights.
- 6.15 **Ecological Clerk of Works:** The Named Ecologist (or their 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.
- 6.16 **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

⁵ See: <https://www.nhbs.com/2f-schwegler-bat-box-general-purpose>

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. **The fitting of exclusion devices will not be undertaken during November-March.**

- 6.17 **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. If bats are in ill-health they will be taken into care by a previously nominated bat carer. **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

- 6.18 Three Day Roosts, each with one identified access point, were identified on site, which will be destroyed during the proposed works. As the existing building which is host to the roosts must be demolished to facilitate the proposed development, retention or modification of the identified roosts is not possible.
- 6.19 As such, it is considered that the most feasible and productive approach in terms of maintaining the favourable conservation status of the identified species roosting on site is to integrate novel roosting provision back into one of the proposed structures on site. A detailed study of the planning drawings (specifically 241352-TADW-00-ZZ-DR-A-0067-P-7 & 241352-TADW-00-XX-DR-A-0011-P-10 © tadw architects) indicates that the two new structures in close proximity to the location of the existing roosts provide suitable locations for bat roost provision. Therefore, the following measures will be undertaken at the site, in tandem with the proposed retention of the receptor roost:

- Three integrated 'Bird Brick Houses - bat brick nest boxes⁶' in a suitable location in proximity to the three roosts to be lost, to remain unilluminated and to have favourable commuting pathways to foraging grounds in the wider area (the retained hedgerow). The boxes should be mounted at a height of approximately 6m and integrated into the walls of the new buildings. See **Figure 6.1** below for the location of the proposed mitigation measures on site.



⁶ See: <https://www.birdbrickhouses.co.uk/products/bat-brick-houses/>

Spurr House, Pole Lane, Bury, BL9 8QL
Dusk Survey Results in Relation to Bats

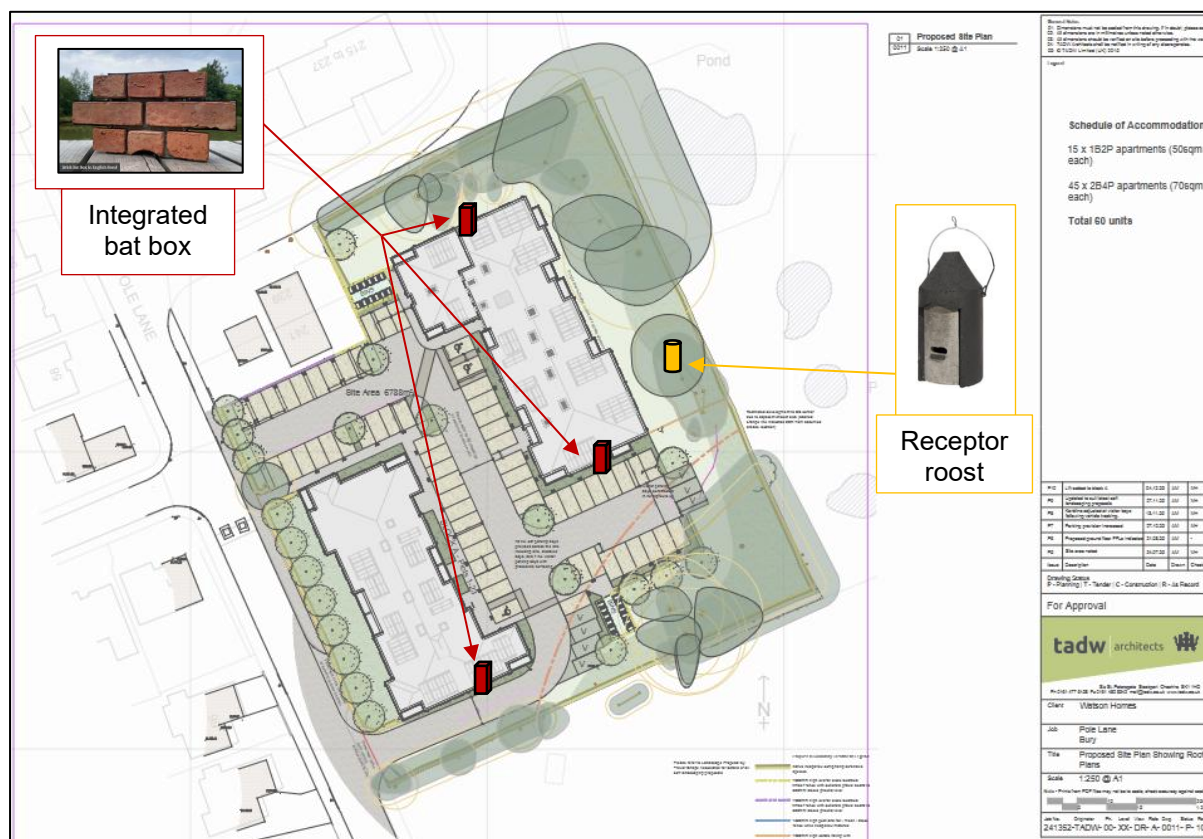


Figure 6.1 – Proposed location of receptor roost and mitigation measures over approved site plan © tadw architects

- 6.20 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.
- 6.21 No post-development monitoring is required for the roosts given that they are ‘Day Roosts’ of ‘Low’ significance, as stated following current guidance (Bat Mitigation Guidelines) concerning Day Roosts / low significance roosts.
- 6.22 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 Ecological Appraisal, Preliminary Roost Assessment and Biodiversity Net Gain Assessment* (Thomson Environmental Consultants, January 2023)

Appendix II: *Bat Emergence Survey* (ProHort Ltd, October 2025)