

East Lancashire Paper Mill, Radcliffe

PRELIMINARY BAT ROOST ASSESSMENT

784-B038963 – V2

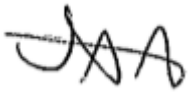
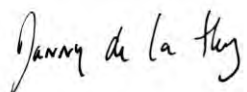
Morris Homes

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CONTENTS

INTRODUCTION	1
1.1 Background	1
1.2 Site Location	1
1.3 Development Proposals	1
1.4 Purpose of the Report	1
METHODOLOGY	2
2.1 Desk Study	2
2.1.1 Previous Reports	2
2.1.2 Local Ecological Records Centre	2
2.1.3 Online Resources	2
2.2 Field Surveys	2
2.2.1 Bats	2
2.2.2 Birds	3
2.3 Limitations	3
BASELINE CONDITIONS	5
3.1 Desk Study	5
3.1.1 Previous Reports	5
3.1.2 Local Ecological Records Centre	5
3.1.3 Online Resources	6
3.2 Field Surveys	6
3.2.1 Bats	6
3.2.2 Ground Level Tree Inspection	7
3.2.1 Nesting Birds	7
RECOMMENDED FURTHER SURVEY	8
4.1 Roosting Bats	8
4.1.1 Recommended Further Surveys	8
4.2 Nesting Birds	9
4.2.1 Further Recommendations	9
CONCLUSION	10
REFERENCES	11
FIGURES	12
APPENDIX A – REPORT CONDITIONS	13
APPENDIX B – DRAWING REF: PL0-P4 A	14

APPENDIX C – PLANNING POLICY & LEGISLATION	15
Bats	15
Birds	15
Revised National Planning Policy Framework	15
The Greater Manchester Local Plan	17
The Greater Manchester Biodiversity Action Plan	17
APPENDIX D – DESK STUDY EXTRACT	18
APPENDIX E – DETAILED SURVEY NOTES	19

EXECUTIVE SUMMARY

Contents	Summary
Site Location	The site is located at East Lancashire Paper Mill, Radcliffe (approximately 4.8km south of Bury in Greater Manchester, National Grid Reference: SD 79296 07445).
Proposals	The proposals are for a residential development, providing up to 400 homes which may potentially include a new secondary school and associated works including relocation of cricket pitch, including a pavillion, provision of open space and sports facilities and demolition of existing building and structures.
Existing Site Information	List of previous reports: • WYG (2016) Extended Phase 1 Habitat Survey Report • WYG (2017a) East Lancashire Paper Mill, Badger Site Inspection Report • WYG (2017b) East Lancashire Paper Mill, Badger Survey Report • WYG (2017c) East Lancashire Paper Mill, Bat Activity Survey Report • WYG (2017d) East Lancashire Paper Mill, Botanical Survey Report • WYG (2017e) East Lancashire Paper Mill, Breeding Bird Survey Report • WYG (2017f) East Lancashire Paper Mill, Great Crested Newt Survey Report • WYG (2017g) East Lancashire Paper Mill, Invertebrate Survey Report • WYG (2018) Ecological Appraisal
Scope of this Survey(s)	• Undertake a Preliminary Roost Assessment of any buildings or structures located within the site and recommend further survey work if required. • Undertake a ground level tree assessment for roosting bats of all trees within the site and recommend further survey work if required. • Recommend mitigation or enhancement opportunities as required.
Results	No evidence of bats was observed during the PRA. Building 5 was assessed as having high suitability for roosting bats, Buildings 1, 2, 3, 6, 7 and 9 were assessed as having moderate suitability for roosting bats and Building 4 was assessed as having low suitability for roosting bats. Additionally, Buildings 1 and 4 may have potential for hibernation. There was no internal access to the building's surveys and no internal or close access to and around Building 9. Additionally, there was no access to an area north of the site due to fencing and as such the trees within this area were not assessed. A second section of limited access was around the eastern and southern area of the reservoir, though this area is to be retained in the proposed plan.
Recommendations	<u>Nocturnal surveys</u> Before any works can take place, • Building 5 requires three nocturnal bats surveys; • At least two nocturnal bats surveys are recommended for all other buildings; except, • Building 4 which requires one, to update the roost status.

	These surveys should be undertaken between May – September inclusive, with at least two weeks spaced between each survey. <u>Internal surveys</u> Buildings 1 and 4 may be suitable for hibernating bats, therefore an internal survey is needed to phase out hibernation status. If bats are identified to be roosting within the building an EPSML from Natural England will be required for the site. A mitigation strategy will be produced to detail the appropriate mitigation and / or compensation as required. <u>Limited access area</u> A thorough inspection is required for the area within the northern section of the site that was not inspected due to limited access. A tree climbing visit during winter is recommended to phase out / downgrade any trees that are identified as being suitable for roosting bats.
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GLOSSARY

BCT	Bat Conservation Trust
DEFRA	Department for the Environment, Food and Rural Affairs
EPS	European Protected Species
EPSML	European Protected Species Mitigation Licence
GMRC	Greater Manchester Record Centre
Natura 2000 site	A European site designated for its nature conservation value
NE	Natural England
NERC Act	Natural Environment and Rural Communities Act 2006
NPPF	National Planning Policy Framework
PRF	Potential Roosting Feature
SAC	Special Area of Conservation
W&CA	Wildlife & Countryside Act 1981 (as amended)

INTRODUCTION

1.1 BACKGROUND

Tetra Tech was commissioned by Morris Homes in September 2022 to undertake a Preliminary Bat Roost Assessment of the site known as East Lancashire Paper Mill (hereafter referred to as “the site”).

This report has been prepared by Graduate Ecologist Ashleigh Toomey BSc (Hons) and the conditions pertinent to it are provided in Appendix A.

1.2 SITE LOCATION

The ‘site’ is located in the small town of Radcliffe (approximately 4.8km south of Bury) in Greater Manchester. The central Ordnance Survey Grid Reference of the site is SD 79296 07445 (Figure 1).

The site is approximately 18.9 hectares and comprises habitats such as hardstanding, scrub, standing water, amenity grassland, introduced shrub, mature trees, bare ground and buildings.

In the wider area there are large expanses of woodland located in Springwater Park (approximately 0.75km east of the site). Between Springwater Park and the east of the site there is mainly scrub, marsh and grassland habitat. The river Irwell borders the southwest of the site and hydrologically connects Springwater Park to the site. There is also woodland along the south of the river corridor, approximately 0.5km south of the site. Immediately north and west of the site is the urbanised area of Radcliffe.

1.3 DEVELOPMENT PROPOSALS

The proposal comprises residential development of up to 400 homes, soft landscaping, access roads, potentially a new secondary school, and associated works including relocation of cricket pitch, including a pavillion, provision of open space and sports facilities and demolition of existing building and structures.

Refer to Appendix B for proposed plans (Drawing Ref: PL0-P4 A)

1.4 PURPOSE OF THE REPORT

The purpose of this report is to:

- Outline the legislative protection given to bats;
- Detail existing bat records and locally designated sites of relevance to bats within 2km of the site and internationally designated sites for bats within 20km of the site;
- Summarise the findings of the preliminary bat roost assessment of buildings and structures & ground level tree assessment;
- Provide an assessment of the potential ecological constraints to the proposed development works at the site and recommendations for further survey, avoidance, mitigation and enhancement where appropriate; and
- Discharge Condition 14 of the S73 decision notice issued by Bury Council on 25/10/21 (planning application 67597) ‘*If the development hereby approved does not commence before 30th April 2019, the building and trees on site shall be reassessed for bat roosting potential and the findings supplied to and approved in writing by the Local Planning Authority*’.

Note that scientific names are provided at the first mention of each species and common names (where appropriate) are then used throughout the rest of the report for ease of reading.

A summary of the key legislation is also provided in Appendix C.

METHODOLOGY

2.1 DESK STUDY

The desk study comprised the following sources of information:

2.1.1 Previous Reports

Previous reports relevant to the site that have been reviewed for this report include:

- WYG (2016) East Lancashire Paper Mill: Extended Phase 1 Habitat Survey Report
- WYG (2017) East Lancashire Paper Mill: Bat Activity Survey Report
- WYG (2018) East Lancashire Paper Mill: Ecological Appraisal

2.1.2 Local Ecological Records Centre

Information was requested from the Greater Manchester Ecology Unit (GMEU; Local Biodiversity Records Centre for Greater Manchester) for information on any nature conservation designations that include bats as a reason for designation and bat records within 2 km of the site.

Note that relevant extracts from the desk study are provided in Appendix D, as appropriate.

2.1.3 Online Resources

A search for relevant information was also made on the following website:

MAGIC www.magic.gov.uk - DEFRA's interactive, web-based database for statutory designations and information on any EPSML applications that have been granted in the local area.

2.2 FIELD SURVEYS

The following methodologies have been used to identify the ecological receptors present on or near the site, which are relevant to the proposed development.

Surveys were undertaken on 29th September 2022 by Project Ecologist Jade Armstrong BSc (Hons) MSc, NE Class 1 bat licence (2018-37885-CLS-CLS LICENCE) assisted by Assistant Ecologist Carlos DoladoHollyman BSc (Hons) MSc. Weather conditions were 16°C, no rain, with a light breeze and 60% cloud cover.

2.2.1 Bats

Any suitable buildings and trees on site were assessed from the ground for their suitability to support breeding, resting and hibernating bats using survey methods based on the *BCT Bat Surveys for Professional Ecologists: Good Practice Guidelines* (Collins, 2016) – hereafter referred to as the 'BCT Guidelines'.

Buildings

The roost assessment was completed to assess the likelihood of bats using the buildings within the site for summer roosting and winter hibernation.

External Inspection

The buildings were systematically inspected during daylight. Any features suitable for bats were noted such as weatherboarding, hanging tiles, soffit boxes, gaps in brickwork, cracks, crevices, lifted lead flashing slipped or broken tiles and missing mortar below ridge tiles. Features located at height were viewed from the ground using binoculars. Any potential bat access points were inspected for signs of bat presence such as:

- Bat droppings on the ground outside, on the floor inside or stuck to walls;

- Other evidence of bats such as feeding remains;
- Suitable entry and exit points around cladding, eaves, flashing, under tiles or gaps in mortar;
- Live bats, bat corpses or skeletons; and
- Oily marks (from fur) or localised clean spots around possible access points and roost areas.

Trees

All trees (Where possible) were inspected from the ground using binoculars and high-powered torches during daylight hours, and any features suitable for bats were noted, such as tear outs, knot holes, transverse snaps, basal cavities and lifting bark. Any potential bat access points or roost areas were identified and inspected for signs of bats such as:

- Bat droppings on the ground outside the feature or stuck to the tree;
- Other evidence of bats such as feeding remains; and
- Oily marks (from fur) or localised clean spots around possible access points and roost areas.

All buildings and trees were then categorised using the table below (refer to Table 1).

Table 1: Categories of Bat Roost Suitability (BCT Guidelines)

Suitability	Typical Roosting Features
Negligible	Negligible habitat feature on site likely to be used by roosting bats.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation). A tree of sufficient size and age to contain potential roost features but with none seen from the ground or features seen with only very limited roosting potential.
Moderate	A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only – the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed).
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis & potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.

2.2.2 Birds

Any suitable buildings or trees on site were also assessed from the ground for their suitability to support breeding birds. Any records of nesting were recorded during the assessment to inform on the likelihood of birds using the buildings or trees and advise on mitigation or avoidance measures as appropriate.

2.3 LIMITATIONS

To determine presence or likely absence of protected species usually requires multiple visits at suitable times of the year. As a result, this survey focuses on assessing the potential of the site to support species of note, which are considered to be of principal importance for the conservation of biodiversity with reference to those given protection under UK or European wildlife legislation. This report cannot therefore be considered a comprehensive assessment of the ecological interest of the

site. However, it does provide an assessment of the ecological interest present on the day the site was visited and highlights areas where further survey work may be recommended.

It is recognised that the optimum survey time for undertaking PRA is during winter (as foliage does not obstruct view of trees). The survey was completed in Autumn 2022. However, it was possible to fully assess all accessible trees and buildings to determine the potential for roosting bats. Therefore, surveying beyond the optimum time frame is not considered likely to effect conclusions drawn.

During the survey internal access was not available to the buildings. However, given the number of suitable access points identified on all aspects of buildings assessed, this limitation does not impact the final assessment grading and recommendations. Additionally, there was no internal or close access to and around Building 9. Therefore, the building was assessed as moderate as a precaution with the caveat that if there are any emergencies during surveys, a full suite of surveys will be required.

There was one area with no access in the north of the site due to fencing, which was viewed from the adjacent land. Japanese knotweed and Himalayan balsam were also noted within this area which is form of access constraint due to biosecurity. A number of trees were noted to be mature within this area and as such the limited access is considered a major constraint and where possible access should be gained and the area surveyed. A second section of limited access was around the eastern and southern area of the reservoir, though this area is to be retained in the proposed plan.

The details of this report will remain valid for a period of one year from the date of the survey (September 2023), after which the validity of this assessment should be reviewed to determine whether further updates are necessary. Note that the recommendations within this report should be reviewed (and reassessed if necessary) should there be any changes to the red line boundary or development proposals which this report was based on.

BASELINE CONDITIONS

3.1 DESK STUDY

3.1.1 Previous Reports

WYG (2016) Extended Phase 1 Habitat Survey Report

WYG's 2016 Extended Phase 1 Habitat Survey Report assessed the large majority of trees present on site were not old enough or established enough to have developed significant PRFs. However, eight trees on site were assessed as having potential to support roosting bats; one of which has 'moderate' suitability and seven of which had 'low' suitability. All the eleven buildings on site (including the four rows of terraced housing in the west of the site) were fully externally inspected for potential to support roosting bats. Building 1 was assessed as moderate and Buildings 2-4 were assessed as low potential to support roosting bats.

Buildings 2-4 (WYG, 2016) were re-assessed in the PRA, however it is to be noted that the buildings were numbered differently and Building 4 had already been demolished at the time of building assessment (referred to as Building 8 in this PRA; refer to Figure 2 for building numbers).

WYG (2017) East Lancashire Paper Mill, Bat Activity Survey Report

WYG's 2017 Bat Survey report recorded no evidence of bat roosting in the buildings on the main part of the ELPM site (WYG, 2017). Though five species of bat during the emergence/re-entry and activity surveys were recorded, these being common pipistrelle *Pipistrellus pipistrellus* and soprano pipistrelle *Pipistrellus pygmaeus*, Daubenton's *Myotis daubentonii*, brown long-eared *Plecotus auritus* and noctule *Nyctalus noctula*. The WYG bat activity transects identified that bat activity was highest in the east of the main site, with the reservoir providing foraging for Daubenton's bat. Lower levels of bat activity were recorded over areas of willow and bramble scrub (WYG, 2017).

WYG (2018) Ecological Appraisal

An Ecological Appraisal undertaken in August 2018 (WYG, 2018) determined that the site provided suitable habitat for commuting and foraging bats (broad-leaved semi-natural woodland, marshy grassland, dense scrub, swamp and the River Irwell). The site was assessed as providing 'moderate suitability' for commuting and foraging bats.

3.1.2 Local Ecological Records Centre

GMRC returned recent bat records for 9 species within a 2km radius of the site boundary, as shown in Table 2. This data includes roosts, foraging and commuting behaviours, Anabat recordings, release of injured bats and other casualties. Of these, 94 records of roosts were returned. These comprised one record of 3 unidentified bat species *Chiroptera* sp., 75 unidentified pipistrelle species *Pipistrellus* sp. and 16 common pipistrelle *Pipistrellus pipistrellus*.

Table 2: Bat records within 2km radius of the site boundary

Species	Latin Name	Number of records	Latest recorded year
Bat sp.	<i>Chiroptera</i> sp.	10	2014
Myotis sp.	<i>Myotis</i> sp.	24	2017
Brandt's bat	<i>Myotis brandtii</i>	1	2018
Brown long eared	<i>Plecotus auritus</i>	4	2020
Daubenton's bat	<i>Myotis Daubentonii</i>	12	2020
Pipistrelle sp.	<i>Pipistrellus</i> sp.	175	2020
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>	11	2020

Whiskered/Brandt's bat	<i>Myotis mystacinus / Myotis brandtii</i>	1	2020
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	245	2021
Lesser Noctule	<i>Nyctalus leisleri</i>	1	2021
Nathusius pipistrelle	<i>Pipistrellus nathusii</i>	3	2021
Noctule bat	<i>Nyctalus noctula</i>	44	2021

3.1.3 Online Resources

MAGIC returned 2 EPMSLs granted for bats within a 2km radius of the site boundary, as shown in Table 3. MAGIC was resourced on 27th October 2022.

Table 3: Bat EPMSLs within 2km radius of the site boundary

Reference	Distance and Direction	Species*	Licensable Actions
2015-15221-EPS-BDX	0.2km northwest	Common pipistrelle	Damage and destruction of a breeding and resting place
2018-37079-EPS-MIT	1.6km west	Common pipistrelle	Destruction of a resting place

3.2 FIELD SURVEYS

3.2.1 Bats

External Inspection

There were seven buildings identified within the site. Detailed results of the external building assessment are given in Appendix E.

Building 1

Building 1 looked to be disused at the time of survey. The building was assessed as offering **moderate suitability for use by roosting bats** due to gaps under the barge boards, cracks within the extension and absence of internal inspection (increased survey effort recommended). The building **may be suitable for use by hibernating bats** as the building is not immediately surrounded by other buildings and was not occupied at the time of survey, as such no heat fluctuations from heating would be present.

Building 2

Building 2 was a row of terrace residential properties which were occupied at the time of survey. The building was assessed as offering **moderate suitability for use by roosting bats** due to the absence of internal and rear (western façade) access for inspection, potential access under the eaves on the eastern façade and gaps under the lead flashing around the chimney stacks. The building was considered **unsuitable for use by hibernating bats** as all properties looked to be occupied and as such heating is likely to be used which would eliminate the constant low temperatures required for hibernation.

Building 3

Building 3 was of similar construction to Building 2 and constructed from brick with some properties rendered. The building was assessed as offering **moderate suitability for use by roosting bats** due to the absence of internal and rear (eastern façade) access for inspection, gap above a window lintel and slipped tiles on the western façade. The building was considered **unsuitable for use by**

hibernating bats as all properties looked to be occupied and as such heating is likely to be used which would eliminate the constant low temperatures required for hibernation.

Building 4

Building 4 was an electrical substation. The building was assessed as **offering low suitability for use by roosting bats**. The building **may suitable for use by hibernating bats** as the building was not occupied.

Building 5

Building 5 was an 'L' shaped residential dwelling. The building was assessed as offering **high suitability for use by roosting bats** due to a number of suitable access points, hanging tiles and absence of full access. The building was considered **not suitable for use by hibernating bats** as the building was occupied and as such heating is likely to be used which would eliminate the constant low temperatures required for hibernation.

Building 6

Building 6 was an 'L' shaped residential dwelling. There was no internal access to the building and the building was assessed as **offering moderate suitability for use by roosting bats** due to a number of areas of damage to the roof and absence of full access. The building was considered **not suitable for use by hibernating bats** as the building was occupied and as such heating is likely to be used which would eliminate the constant low temperatures required for hibernation.

Building 7

Building 7 was a workshop / warehouse style building. There was only access to the southern façade of the building and no internal access. The building was assessed as offering **moderate suitability for use by roosting bats** due to damage to the eastern corner brickwork of the southern façade and gaps under the gable end asbestos that may lead to internal access.

Building 8

In the previous ecological appraisal (WYG, 2018b) an eighth building was identified in the northern corner of the site. During this survey the building was found to be demolished with only the concrete footprint remaining. As such no assessment of this building was completed.

Building 9

Building 9 was a single-story cricket club, with areas of flat roof. There was no access inside or close to and around the building. As a precautionary approach due to limited access, the building was assessed as offering **moderate suitability for use by roosting bats**.

3.2.2 Ground Level Tree Inspection

The majority of the site was dominated by willow scrub or immature trees. These trees were not old enough or established enough to have developed significant potential roost features (PRFs) such as cracks, hollows, crevices, etc., and were assessed as having **negligible potential for roosting bats**. There were two areas within the site with limited access, the northern section was noted to have mature trees and as such a thorough inspection of this area is recommended. A second section of limited access was around the eastern and southern area of the reservoir, though this area is to be retained in the proposed plan.

3.2.1 Nesting Birds

There were no nesting birds identified on site during surveys. However, the site provides suitable nesting habitat for common nesting species such as swallow *Hirundo rustica*, house martin *Delichon urbicum* and wren *Troglodytes troglodytes*, and common tree dwelling species such as blackbird *Turdus merula*, blue tit *Cyanistes caeruleus*, and tawny owl *Strix aluco*.

RECOMMENDED FURTHER SURVEY

4.1 ROOSTING BATS

Refer to Table 4 for summary of building assessment, the grade of suitability to support roosting bats, number further surveys required and number of surveyors required. Further surveys are required to update the roost status of the buildings.

All bats and their roosts receive full protection both under the Wildlife and Countryside Act 1981 (as amended), and the Conservation of Habitats and Species Regulations 2017 (as amended) as EPS.

Table 4: Building Assessment Results

Building Number	Grading	Further surveys	Number of Surveyors
B1	Moderate	Two nocturnal surveys & hibernation survey	3
B2	Moderate	Two nocturnal surveys	4
B3	Moderate	Two nocturnal surveys	4
B4	Low	One nocturnal survey & hibernation survey	2
B5	High	Three nocturnal surveys	4
B6	Moderate	Two nocturnal surveys	3
B7	Moderate	Two nocturnal surveys	2
B8	N/A	N/A	N/A
B9	Moderate	Two nocturnal surveys	4

4.1.1 Recommended Further Surveys

4.1.1.1 Building/Structures

A minimum of three presence / likely absence bat surveys is required for Building 5. A minimum of two presence / likely absence bat surveys are required for Buildings 1, 2, 3, 6, 7 and 9. As there was no internal or external access to Building 9 during the inspection, if there are any emergences / re-entries during the first two surveys, a minimum of three surveys will be required. A minimum of one presence / likely absence bat survey is required for Building 4. Due to the nature of the buildings, a minimum of two and maximum of four surveyors are recommended for each building (refer to Table 4 and Figure 2 for locations).

The surveys are to be conducted between May to September inclusive and should comprise at least one dusk emergence and one dawn re-entry survey, with the third being either a dusk emergence or dawn re-entry. Each survey should be spaced at least two weeks apart. At least two of these surveys should be conducted between May and August inclusive to appropriately assess for breeding bats.

If bats are found to be roosting within the structure and proposed works will impact this roost (through disturbance or destruction) an EPSML will be required from NE to permit works. This EPSML will need to include a mitigation strategy to maintain favourable conservation status of bats roosting in the Building/Structure.

4.1.1.2 Hibernating Bats

Buildings 1 and 4 both have potential for hibernating bats. The building's interior was not inspected, therefore humidity and internal PRF's were not identified. As such, it is recommended that an internal survey should be carried out to rule out hibernation status.

This would require a minimum of two surveys whereby a suitably qualified ecologist will inspect all accessible cracks, crevices and voids for hibernating bats using a high-powered torch, mirrors and endoscopes. One survey will be undertaken in mid-January and one in mid-February. Additionally, static detectors should be deployed in the cellar between these two surveys (i.e. deployed in January and collected in February), collecting two weeks data for each month.

If bats are found to be hibernating within the structure and proposed works will impact hibernation (through disturbance or destruction) an EPSML will be required from NE to permit works. This EPSML will need to include a mitigation strategy to maintain favourable conservation status of bats roosting in the Building/Structure.

4.1.1.3 Aerial Bat Surveys (Trees)

The majority of the trees on site was considered to have negligible potential for roosting bats. However, a thorough inspection is needed for the area within the northern section of the site that was not inspected due to limited access. A tree climbing survey during winter can be provided by Tetra Tech to phase out or downgrade any trees that are identified as being suitable for roosting bats.

If emergence surveys are required, they are to be conducted between May to September inclusive at least two weeks apart. At least two of these surveys should be conducted between May and August inclusive to appropriately assess for breeding bats if the feature has been deemed suitable for a maternity roost.

If any features in the trees have suitability for hibernating bats additional assessment will be required within the hibernation season (December to February inclusive). These visits should be two weeks apart and follow the same assessment protocol as summer roosting assessment for trees.

Suitably qualified tree climber holding a level 2 bat licence will climb the tree to inspect any features identified during the initial assessment and inspect for any occluded features from ground inspection. This shall be undertaken using a double line system and inspection of the feature either with a high powered torch or articulated endoscope. Prior to climbing the tree, the surveyors shall assess whether the tree is safe to climb. If it is deemed hazardous to continue another assessment method will be recommended (either mobile elevated platform MEWP or nocturnal surveys).

4.2 NESTING BIRDS

The proposed works on the building may impact nesting birds, which may use the building during the nesting bird season (March to September inclusive). Any disturbance or damage caused to nesting birds would cause an offence under the W&CA.

4.2.1 Further Recommendations

It is recommended that the proposed works avoid the nesting bird season in order to minimise the risk of disturbing or damaging nesting activity of notable bird species and causing an offence. Since pigeons may nest at any time of the year, a nesting bird check may be required even if works are carried outside the nesting bird season.

A nesting bird check should be carried out by a suitably qualified ecologist no more than 48 hours prior to the works commencing. Any nesting birds found must be left in situ until the chick have fledged. The ecologist will advise on a suitable buffer zone following the check.

CONCLUSION

The PRA found that Building 5 was assessed as having high suitability for roosting bats, Buildings 1, 2, 3, 6, 7 and 9 were assessed as having moderate suitability for roosting bats and Building 4 was assessed as having low suitability for roosting bats. Additionally, Buildings 1 and 4 may have potential for hibernation.

Before any works are to take place, **nocturnal surveys are required for all buildings** to confirm the roost status, including an internal survey for Buildings 1 and 4 to confirm the hibernation status. Additionally, access to Building 9 and the northern section of woodland is required so a thorough inspection can be conducted.

If bats are identified to be roosting within the buildings an EPSML from Natural England will be required for the site. A mitigation strategy will be produced to detail the appropriate mitigation and / or compensation as required.

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- Statutory Instrument 2017 No. 1012; *The Conservation of Habitats and Species Regulations 2017 (as amended)*, HMSO
- Wildlife and Countryside Act, 1981 (as amended), HMSO.
- WYG (2016) Extended Phase 1 Habitat Survey Report
- WYG (2017) East Lancashire Paper Mill, Bat Activity Survey Report
- WYG (2018) Ecological Appraisal

Please note that the legislation which is relevant to this report is not included in the list above, but details are included in Appendix C below.

FIGURES

Figure 1 – Site Location Plan

Figure 2 – Recommended Surveyor Vantage Points



Site Location Plan

East Lancashire Paper Mill

Morris Homes

Legend

Site boundary



Notes:

Drawn by: CARYS.LAWSON
Checked by: KC
Office: Southampton

Figure No. 1
Revision No. A
21 October 2022

0 50 100 150 200 Meters
Scale 1:5,000 @A3

British National Grid
NGR: 379396E 407477N

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The Pavilion, 1st Floor
Botleigh Grange
Office Campus
Hedge End
Southampton
Hampshire, SO30 2AF



Recommended Surveyor Vantage Points

East Lancashire Paper Mill

Morris Homes

Legend

-  Site boundary
-  No Access
-  Buildings
-  Surveyor Location



Notes:

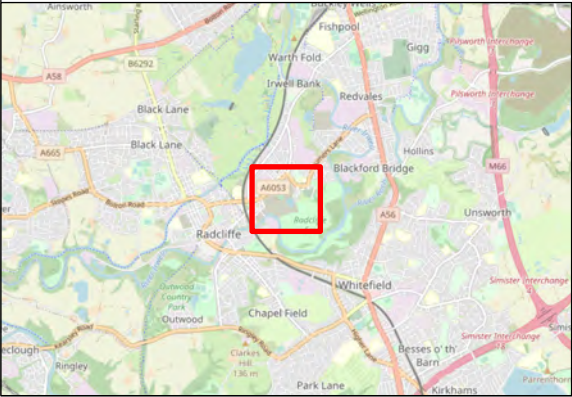
Drawn by: ELLA.CHRISTIE
Checked by: AT
Office: Southampton

Figure No. 2
Revision No. B
29 November 2022

0 50 100 150 Meters
Scale 1:3,000 @A3

British National Grid
NGR: 379384E 407473N

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Hampshire, SO30 2AF

APPENDIX A – REPORT CONDITIONS

This Report has been prepared using reasonable skill and care for the sole benefit of [Morris Homes] (“the Client”) for the proposed uses stated in the report by [Tetra Tech Environment Planning Transport Limited] (“Tetra Tech”). Tetra Tech exclude all liability for any other uses and to any other party. The report must not be relied on or reproduced in whole or in part by any other party without the copyright holder’s permission.

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The report refers, within the limitations stated, to the environment of the site in the context of the surrounding area at the time of the inspections’. Environmental conditions can vary and no warranty is given as to the possibility of changes in the environment of the site and surrounding area at differing times. No investigative method can eliminate the possibility of obtaining partially imprecise, incomplete or not fully representative information. Any monitoring or survey work undertaken as part of the commission will have been subject to limitations, including for example timescale, seasonal and weather-related conditions. Actual environmental conditions are typically more complex and variable than the investigative, predictive and modelling approaches indicate in practice, and the output of such approaches cannot be relied upon as a comprehensive or accurate indicator of future conditions. The “shelf life” of the Report will be determined by a number of factors including; its original purpose, the Client’s instructions, passage of time, advances in technology and techniques, changes in legislation etc. and therefore may require future re-assessment.

The whole of the report must be read as other sections of the report may contain information which puts into context the findings in any executive summary.

The performance of environmental protection measures and of buildings and other structures in relation to acoustics, vibration, noise mitigation and other environmental issues is influenced to a large extent by the degree to which the relevant environmental considerations are incorporated into the final design and specifications and the quality of workmanship and compliance with the specifications on site during construction. Tetra Tech accept no liability for issues with performance arising from such factors.

APPENDIX B – DRAWING REF: PL0-P4 A



- LEGEND**
- BIN STORE
 - AFFORDABLE UNITS
 - GRAY TO GREEN CORRIDOR
 - EASEMENT
 - EASEMENT
 - HUTCHINSONS GOIT
 - Proposed dwelling
 - Proposed dwelling to be built opposite hand
 - Proposed brick built garage
 - Proposed garage space
 - Common areas of shared drives in contrasting material or kerb edgings to delineate shared drive area
 - Proposed 1.8m high feather edge boarded timber screen fence
 - Proposed 1.8m high feather edge boarded timber screen fence with P.C.C. posts & gravel boards
 - Proposed 1.8m highV0.44m square brick piers at 2.0m ctrs with 0.65m high brick dwarf wallfeather edged bordered infill panels
 - Proposed 0.45m high timber post & rail divisional fence
 - Proposed 1.2m high metal railings
 - Proposed 0.45m high timber "V"-rail fence
 - Existing hedge to be retained
 - Existing hedge to be removed
 - Existing tree to be retained
 - Existing tree to be removed

EAST LANCS PAPER MILL				
SCHEDULE OF ACCOMMODATION				
AFFORDABLE				
NAME	DESCRIPTION	SIZE (sqft)	Units	TOTAL (sqft)
GRASSHOPPER	4 BED HOUSEHOLD + PARKING	504	16	8064
WINDSORHIRE	3 BED HOUSEHOLD + PARKING	463	22	11186
ARTISTIQUE	3 BED HOUSEHOLD + PARKING	405	18	7290
BLAZING SP	3 BED HOUSE + PARKING	461	1	461
BLAZING	3 BED HOUSE + PARKING	463	32	16816
GRANLEY	3 BED HOUSE + PARKING	386	4	1544
VALERIE	3 BED HOUSE + PARKING	386	0	0
Total		100	74928	
PRIVATE APARTMENTS				
NAME	DESCRIPTION	SIZE (sqft)	Units	TOTAL (sqft)
ABBY	2 BED APARTMENT + PARKING	738	21	15498
WINDSORHIRE	2 BED APARTMENT + PARKING	711	18	12798
COUCHMAN	2 BED FLY OVER APT + PARKING	685	0	0
ROSEBERRY	2 BED FLYOVER APT + PARKING	703	0	0
Total		55	39366	
PRIVATE HOUSING - MEWS + SEMIS				
NAME	DESCRIPTION	SIZE (sqft)	Units	TOTAL (sqft)
CAMBERLEY	2 BED MEWS + PARKING	793	12	9516
BARWELL	2 BED S/A MEWS + PARKING	770	1	770
COUCHMAN	3 BED SEMI DET + SINGLE GARAGE	874	18	15732
GRANLEY	3 BED SEMI DET + SINGLE GARAGE	934	15	14010
GRANLEY	3 BED SEMI DET + SINGLE GARAGE	1140	4	4560
THORNTON	3 BED SEMI DET + SINGLE GARAGE	902	3	2706
THORNTON	3 BED SEMI DET + SINGLE GARAGE	1168	17	13856
CHRISTOPHER	3 BED SEMI DET + SINGLE GARAGE	967	12	11604
GRANLEY	3 BED MEWS + PARKING	934	11	10274
LYONS	3 BED 3 ST S/A MEWS + GARAGE	1111	16	15776
CHRISTOPHER	3 BED 3 ST S/A MEWS + GARAGE	1138	2	2276
GRANLEY	3 BED SEMI DET + GARAGE	978	12	11736
Total		118	116092	
PRIVATE HOUSING - DETACHED - 3 BEDS				
NAME	DESCRIPTION	SIZE (sqft)	Units	TOTAL (sqft)
COTSWOLD / RYDALE	3 BED DET + DET SINGLE GARAGE	947	7	6929
GRANLEY	3 BED DET + DET SINGLE GARAGE	957	30	28710
GRANLEY	3 BED DET + DET SINGLE GARAGE	1056	10	10560
GRANLEY	3 BED DET + DET SINGLE GARAGE	1176	7	7932
Total		55	54587	
PRIVATE HOUSING - DETACHED - 4 BEDS				
NAME	DESCRIPTION	SIZE (sqft)	Units	TOTAL (sqft)
BRISTON / BRANCASTER	4 BED DET + DET SINGLE GARAGE	1170	14	16380
GRANLEY	4 BED DET + DET SINGLE GARAGE	1180	3	3540
GRANLEY	4 BED DET + DET SINGLE GARAGE	1118	22	24596
GRANLEY	4 BED DET + DET SINGLE GARAGE	1136	16	18176
GRANLEY	4 BED DET + DET SINGLE GARAGE	1407	18	19326
Total		71	88008	
Total		408	373776	

A

LAYOUT AMENDED FOLLOWING SLIGHT REPLAN

07.06.23

CW

REV

DESCRIPTION

DATE

INT

Morris Homes (North) Limited
Morland House
Altrincham Road
Wilmslow
Cheshire SK9 5NW
Tel: (01625) 544 444
Fax: (0845) 833 1845

Job Title

EAST LANCS PAPER MILL
RADCLIFFE

Dep. Title

PLANNING LAYOUT

Date

14.03.23

Drawn

Checked

Scale

1:1000 @ A0

Design

PL0-P4

Rev

A

APPENDIX C – PLANNING POLICY & LEGISLATION

BATS

All British bat species are given special protection within England by their inclusion on Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended) and Schedule 5 of the Wildlife and Countryside Act 1981 (as amended).

As a result, it is an offence to:

- Deliberately capture, injure or kill a bat;
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats;
- Damage or destroy a bat's roosting place (even if bats are not occupying a roost at the time);
- Possess or advertise, sell or exchange a bat (dead or alive) or any part of a bat; and
- Intentionally or recklessly obstruct access to a bat roost.

Where development will result in damage to suitable habitat where the species is known to be present, or risk harming or significantly disturbing bats, an EPSML is likely to be required from NE to allow the development to proceed.

Bats are also afforded more general protection in England (and Wales) within the Natural Environment and Rural Communities Act (NERC Act) 2006. This imposes a duty on all public bodies, including local authorities and statutory bodies, in exercising their functions, "to have due regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity" [Section 40 (1)]. It notes that "conserving biodiversity includes restoring or enhancing a population or habitat" [Section 40 (3)]. Consequently, attention should be given to dealing with the modification or development of an area if aspects of it are deemed important to bats, such as roosts, flight corridors and foraging areas.

Section 41 (S41) of this Act requires the Secretary of State to publish a list (in consultation with NE) of habitats and species which are of principal importance for the conservation of biodiversity in England. The S41 list is used to guide decision-makers such as public bodies including local and regional authorities, when carrying out their normal (e.g. planning) functions. The S41 list includes 65 habitats of principal importance and 1,150 species of principal importance.

Seven species of bat are listed under Section 41 of the NERC Act 2006; soprano pipistrelle, brown long-eared bat, greater horseshoe bat *Rhinolophus ferrumequinum*, lesser horseshoe bat, barbastelle *Barbastella barbastellus*, Bechstein's bat *Myotis bechsteinii* and noctule.

BIRDS

The W&CA makes it an offence to take, damage or destroy the nest of any wild bird while that nest is in use or take or destroy an egg of any wild bird. In addition, any it would cause an offence under this Act to intentionally do the following to a wild bird listed in Schedule 1:

- Disturbs any wild bird while it is building a nest or is in, on or near a nest containing eggs or young; or
- Disturbs dependent young of such a bird.

REVISED NATIONAL PLANNING POLICY FRAMEWORK

A revised NPPF was issued on 20th July 2021 (Ministry of Housing Communities and Local Government, 2021) and currently supplements government Circular 06/2005, *Biodiversity and*

Geological Conservation: Statutory Obligations and their Impact within the Planning System (Office of the Deputy Prime Minister, 2005).

Circular 06/2005 states that the presence of protected species is a material consideration in the planning process. Paragraph 174 of the NPPF also states that:

'Planning policies and decisions should contribute to and enhance the natural environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland*
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures*
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

The conservation and enhancement of wildlife is also specifically reference re: development within the National Parks or the Broads.

Paragraph 180 then goes on to confirm that:

When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.*

Regarding EclA's and HRA's – any sites identified, or required, as compensatory measures for adverse effects on any Natura 2000/habitats site should also be given the same level as protection as the pSPA's and cSAC's themselves. In addition, when an application is being determined, Paragraph 182 clarifies that:

“The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.”

Paragraph 185 is also relevant as;

Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:...

- c) *limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.*

THE GREATER MANCHESTER LOCAL PLAN

The Greater Manchester Local Plan collates various planning policy documents which consider a wide range of important planning issues such as housing, employment, retail, the environment, and transport. The Local Plan plays a crucial role in prioritising and shaping development in Greater Manchester up until 2037.

Greater Manchester Local Plan 2019 to 2037 Adopted on 20 th July 2021	
Policy N1 Design	Retention of significant biodiversity, landscaping features, and creation of new biodiversity areas that take into account relevant local information and evidence.
Policy N2 Climate Change	Climate change is a key theme throughout the plan. The main aims include de-carbonising the city region through new and existing developments; the delivery of renewable and low carbon energy schemes; mitigation for environmental challenges, including climate change; water based measures to adapt and reduce the impacts of climate change; and measures to help achieve a circular and zero-waste economy.
Policy N4 Strategic Green Infrastructure	The protection and enhancement of key strategic green infrastructure, informed by a suite of policies to protect and enhance network green infrastructure. This includes protecting and enhancing sites of ecological value.
Policy N5 River Valleys and Waterways	New developments must be designed to ensure river corridors and their associated habitats are integrated within development, enhanced wherever possible, are sustainably managed long term and opportunities to address the Water Framework Directive failures are considered.

THE GREATER MANCHESTER BIODIVERSITY ACTION PLAN

The Greater Manchester Biodiversity Action Plan aims to ‘*promote the conservation, protection and enhancement of biological diversity in Greater Manchester for current and future generations*’. All bat species are considered to be of conservation importance in Greater Manchester. Objectives for bats in Greater Manchester are to:

- Determine the current distribution of bats in Greater Manchester;
- Maintain the distribution and range of bat populations and habitats in Greater Manchester and prevent further losses and fragmentation; and
- Increase the distribution and abundance of bats and suitable habitats in Greater Manchester without reducing the area of other valuable habitats and species.

APPENDIX D – DESK STUDY EXTRACT

APPENDIX E – DETAILED SURVEY NOTES

Building Number	Building Description	PRF	Grading	Hibernation (Y/N)	Photograph
B1	It was a two-storey building constructed of red brick with pitched and hipped roof clad in interlocking concrete tiles. The roof was relatively new and in good condition. The ground floor windows and doors were obscured by metal roller shutters that were tightly fitted. The first-floor windows were intact with no broken windows and were tightly fitted to the brickwork and lintels. There was a barge board present below the guttering on the northwest, east and southeast facades. The southwest façade was a gable. To the rear of the property	Barge boards on northwest, east and southeast facades with gaps suitable for roosting and access to the wall head. No roof cap ends on southeast gable. Significant brickwork cracks on northwest extension. (No internal access, therefore increased survey effort recommended)	Moderate	Y	

Building Number	Building Description	PRF	Grading	Hibernation (Y/N)	Photograph
	(northwest façade) was a single storey extension that was in poor repair.				
B2	A row of terrace residential properties which were occupied at the time of survey. The building was two-storey building constructed of brick with some properties rendered and some not. The roof was pitched and hipped and clad in slate tiles. Chimney stacks were present and constructed from brick with lead flashing. The windows were uPVC and tightly fitted to the brickwork and lintels.	Potential gaps under the eaves on the eastern façade. Gaps under lead flashing around chimney stacks. (No internal access, therefore increased survey effort recommended)	Moderate	N	  

Building Number	Building Description	PRF	Grading	Hibernation (Y/N)	Photograph
B3	Building 3 was of similar construction to Building 2 and constructed from brick with some properties rendered. The roof was pitched and hipped and clad in slate tiles. Brick chimney stacks were also present. There was no internal access or access to the eastern façade of the building	Slipped tile on eastern façade. Gap above window lintel on western façade. (No internal access, therefore increased survey effort recommended)	Moderate	N	
B4	The building was small in size and constructed from red brick with a flat concrete roof. There were no windows present, and the door was formed from timber. There was no internal or rear access due to dense vegetation. The lower portion of the door were vent slats and could form an access	Vent slats on timber door. Brick air vents. (No internal access, therefore increased survey effort recommended)	Low	Y	

Building Number	Building Description	PRF	Grading	Hibernation (Y/N)	Photograph
	point. Brick air vents were also noted.				
B5	An 'L' shaped residential dwelling. The building was a two-storey building and constructed of red brick with a pitched and hipped slate tiled roof. A number of tiles were noted to be slipped or poorly fitted. A gable was present on the western façade that was clad in hanging tiles, some of which were damaged or slipped. The windows and doors were uPVC and tightly fitted. There was no rear or internal access to the building.	Numerous slipped and poorly fitted roof tiles. Hanging tiles in poor state of repair. (No internal access, therefore increased survey effort recommended)	High	N	

Building Number	Building Description	PRF	Grading	Hibernation (Y/N)	Photograph
B6	An 'L' shaped residential dwelling. The building was a three-storey building, one section of the building the third storey was within the roof void and the other section of the building was three storeys and a roof void. There were multiple two storey and single storey extensions attached to the building. The building was multiple residential dwellings that looked to be occupied at the time of survey. The building was constructed from brick with some areas rendered. The roof was pitched and clad in a mixture of tiles as some areas of the roof looked to have been re-roofed. The	Damage to north gable end. Gaps between different styles of tile. (No internal access, therefore increased survey effort recommended)	Moderate	N	

Building Number	Building Description	PRF	Grading	Hibernation (Y/N)	Photograph
	windows were uPVC and tightly fitted.				
B7	A workshop / warehouse style building constructed from brick with a pitched corrugated asbestos roof. There was only access to the southern façade of the building and no internal access. The door was a metal roller door.	Damage to brickwork on eastern corner of southern façade. Gap under asbestos. (No internal or rear access, therefore increased survey effort recommended)	Moderate	N	  

Building Number	Building Description	PRF	Grading	Hibernation (Y/N)	Photograph
B8	Demolished building with only concrete footprint remaining.	N/A	N/A	N/A	
B9	A single-story cricket club, with areas of flat roof. There was no access inside or close to and around the building as such a thorough assessment was not carried out.	Single story cricket club building with areas of flat roof. (No internal access or access close to and around the building, therefore increased survey effort recommended)	Moderate	Unknown	N/A