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- Protected species survey & licensing
- Habitat survey
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For the attention of: James Halstead Plc

Date: 18th March 2026

Dear Alan Tinker / Rebecca Ward,

Preliminary Bat Roost Assessment: Polyflor, Radcliffe New Rd, Whitefield, Manchester M45 7NG

PENNINE ecological have been commissioned to undertake a Preliminary Bat Roost Assessment (PRA) at the above site. The purpose of this study is to address any potential issues in relation to bats resulting from the proposals which will see the total demolition of the building subject to assessment.

A PRA was undertaken on the 6th March 2026. The sites grid reference is SD 79537 06424, and the location is shown below;

Figure 1.1: Aerial image of the buildings at Polyflor.



1. Desk Top Study:

A desk top consultation study with Greater Manchester Local Record Centre (GMLRC) was not undertaken for this study. However, searches for statutory sites and bat licence records were undertaken as follows;

Statutory Designated Sites:

Details of statutory sites were sought from the Natural England web site search:

<http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx>

There are no statutorily designated sites within 2km of the site.

The Natural England (NE) Impact Risk Zone tool was also reviewed and consultation with NE **would not** be required for this type of development.

Figure 2: IRZ summary for proposal site

Impact Risk Zones for Sites of Special Scientific Interest

For local planning authorities to determine if a proposed development is likely to affect a terrestrial Site of Special Scientific Interest and when to consult Natural England.

NATURAL ENGLAND

Have Your Say on Natural England's Impact Risk Zones Tool

Natural England has launched a [new survey](#) to gather feedback on the revamped SSSI Impact Risk Zones tool one year on from its launch.

Does the proposed development match any of the descriptions below?

- **Infrastructure:** Airports, helipads and other aviation proposals.
- **Air Pollution:** Livestock & poultry units with a floorspace > 500m², slurry lagoons > 750m² & manure stores > 3500 tonnes.
- **Combustion:** General combustion processes >50MW energy input. Including: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/combustion.

It is considered that the proposal site does not match any of the descriptions outlined in the IRZ.

There are two locally designated statutory sites within 2km of the site. The Springwater Park (LNR) is located approximately 170m north of the site boundary. The Chapelfield (LNR) is located approximately 400m southwest of the site boundary.

Impacts will be confined to the immediate demolition zone and both LNR are considered to be outside of the Zone of Influence for this proposal.

Non-Statutory Designated Sites

There is one non-statutory designated site within 500m radii of the site.

Sailors Brow & Springwater Park Site of Biological Interest (SBI) is located approximately 170m north of the site.

The site is separated from the SBI by residential areas and the A665 Radcliffe New Road. Based on these habitats there is considered to be very limited ecological connectivity between the SBI and the demolition site. Works are confined to the immediate area which is surrounded by factory buildings. Impacts are not anticipated to extend beyond the application boundary.

European Protected Species Mitigation Licences:

Details of European Protected Species Mitigation Licences (EPSML) for bats was sought from the Natural England web site search:

<http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx>

There is one EPSML in relation to bats within 500m radii of the site. The licence is associated with a property approximately 360m north west of the site. The licence permitted the destruction of a common pipistrelle breeding roost. The licence expired in 2012.

2. Bat Ecology and Legislation:

Bats are comprehensively protected by European legislation.

All British bats and their roosts¹ are afforded protection under Schedule 5 of the Wildlife & Countryside Act (1981) (as amended) and are listed in Schedule 2 of The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579). When dealing with cases where a European Protected Species (EPS) (all UK bats) may be affected, a planning authority is a competent authority within the meaning of the Regulation 7 of the Regulations, that has a statutory duty as the local authority to have due regard to the provisions of the Regulations in the exercise of its functions.

Section 15, Paragraph 193 of the National Policy Planning Framework (as revised in December 2024) states:

193. 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 improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Use of Buildings by Bats:

a) Summer breeding roost.

b) Hibernation.

¹ The term roost is generically referred to as a place that bat/s use for the any of the above reasons, however it should be noted that under the Conservation of Habitats and Species Regulations (2019) (EU Exit) (Regulation 43 (d) the term roost is not used but refers to "a breeding site or resting place of such an animal" and is afforded legal protection. The roost, breeding site or resting place of bats, which ever terminology is used is legally protected whether or not bats are in occupation

c) Transitional or temporary roost.

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.

Up to ten bat species have been regularly recorded in Greater Manchester, most of which use built structures. The most frequently encountered species are Pipistrelle species; their abundant status in Greater Manchester is reflected throughout the UK.

3. Survey Methodology

A daytime survey was conducted on the 6th March 2026. The buildings were inspected internally and externally for evidence of bats and potential places / points of internal access that may be of value to bats. Close focusing binoculars were used to identify places that are frequently used by bats as roosts or as access into roost chambers.

During the survey, the surrounding habitat was evaluated in relation to bats as very often roost selection is closely correlated with the surrounding habitat.

The daytime survey was conducted by Mr. Patrick Leatham (MCIEEM) and Mr. Luke Pilling (QCIEEM).

Patrick has over 13 years' experience undertaking preliminary roost assessments (PRA's), bat transect surveys, hibernation checks and dusk / dawn emergence surveys. Patrick is an accredited agent on Mr Stuart Macphersons Class 2 bat licence (2021-10079-CL18-BAT).

Luke Pilling has three years' experience undertaking a suite of PRA's and dusk emergence surveys.

Constraints:

The basement area of the building was deemed unsafe by the client and therefore inaccessible during the survey. Where possible, photographs were taken from safe locations to provide visual reference. Consideration of the suitability of this area for bats has been completed on a precautionary approach.

There are considered to be no limitations associated with this assessment.

4. Bat Survey Results

Building Assessment

The property subject to assessment comprises a collection of former factory buildings measuring approximately 40 m by 45 m at their longest and widest points, with an estimated height of 12–15 m.

The buildings are constructed of red brick laid in an English bond pattern. Overall, the structures are in very poor condition, with large areas of structural damage present across all areas.

Examination of a section of collapsed wall revealed the internal structure of the brickwork is solid and does not contain internal cavities. The only voids present are superficial holes within the external brickwork. Several of these were noted, most prominently on the southern elevation of the eastern building, where multiple large holes in the brickwork were observed.

The roof structure comprises a combination of slate tiles and corrugated roofing sheets. The roof was also found to be in very poor condition, with extensive sections missing. This was particularly evident on the north-western and south-western sections, where large portions of the roof covering were absent, leaving the interior exposed to rainfall. There are a number of superficial gaps within the roof but these appeared to be exposed and water leaking in. The majority of gaps were considered unsuitable for bat roosting.

The fascia boards consist of a combination of timber and lead flashing. Localised gaps were present along the timber fascia boards on the south and east elevation, however, the majority of these areas beneath the fascia boards were cluttered (pipes and wires) and damp which would be unfavourable.

During the survey, large numbers of pigeons were observed occupying the roof spaces. The associated accumulation of droppings and disturbance makes these areas less favourable for use by roosting bats.

Based on these observations, the dwelling was assessed as having '**Low**' bat roost suitability with all of the PRFs confined to the southern elevation of the building.

The suitable PRF features are shown on Figure 4.1 below:

Figure 4.1 :Potential Roost Feature Locations



Hibernation Assessment

The buildings contained an underground basement in the southern section of the building. The basement was inspected from a distance due to health and safety restrictions. The basement was predominantly concrete walled with steel supports. Cavities suitable for bats are likely to be limited due to the walls being predominantly concrete. There are potentially cavities which could support small numbers of bats.

Due to the damaged roof and numerous openings within the building, water ingress has occurred, resulting in standing water and damp conditions throughout the basement. This is likely to provide humidity conditions suitable for bat hibernation.

In the absence of a comprehensive survey, as a precaution, the basement is considered to provide '**Low**' hibernation suitability for bats.

Habitat Assessment

The immediate surroundings of the site comprise other industrial / factory buildings, which generate heightened levels of noise disturbance. A small 'mill pond' is located to the south of the building, reportedly used for cooling purposes and supporting ornamental fish (koi). While this feature may provide a limited local water source for foraging bats, the surrounding industrial setting reduces its overall suitability.

More suitable habitats are present north of the site, where dense scrub vegetation occurs along the adjacent railway corridor. These areas may provide shelter and moderate commuting and foraging opportunities for bats. In addition, Hollinhurst Playing Fields are located to the south of the site, comprising extensive grassland areas bordered by scattered trees and scrub, which may offer moderate foraging potential for local bat species.

Overall, the habitats associated with the site and locally are considered to be of '**Low**' suitability for bats.

Figure 4.2: Extract taken from Collins, BCT (2023); Good Practice Guidelines (4th Edition) - Table 4.1

Table 4.1. Guidelines for assessing the potential suitability of proposed development sites for bats, based on the presence of habitat features within the landscape, to be applied using professional judgement.		
Potential suitability	Description	
	Roosting habitats in structures	Potential flight-paths and foraging habitats
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging bats).
Negligible ^a	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions ^b 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 and not a classic cool/stable hibernation site, but could be used by individual hibernating bats ^c).	Habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions ^b and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions ^b and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.
^a Negligible is defined as 'so small or unimportant as to be not worth considering, insignificant'. This category may be used where there are places that a bat could roost or forage (due to one attribute) but it is unlikely that they actually would (due to another attribute). ^b For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance. ^c Evidence from the Netherlands shows mass swarming events of common pipistrelle bats in the autumn followed by mass hibernation in a diverse range of building types in urban environments (Korsten <i>et al.</i>, 2016 and Jansen <i>et al.</i>, 2022). Common pipistrelle swarming has been observed in the UK (Bell, 2022 and Tomlinson, 2020) and winter hibernation of numbers of this species has been detected at Seaton Delaval Hall in Northumberland (National Trust, 2018). This phenomenon requires some research in the UK, but ecologists should be aware of the potential for larger numbers of this species to be present during the autumn and winter in prominent buildings in the landscape, urban or otherwise.		

5. Bird Survey Results

No current or historic bird nesting evidence was recorded within the buildings. A number of feral pigeon were seen foraging within the open roof areas of the building. No nesting was recorded.

The building provides limited opportunity for nesting birds.

6. Recommendations

Bats (Summer Breeding Roost)

Bats are comprehensively protected under European legislation (Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019).

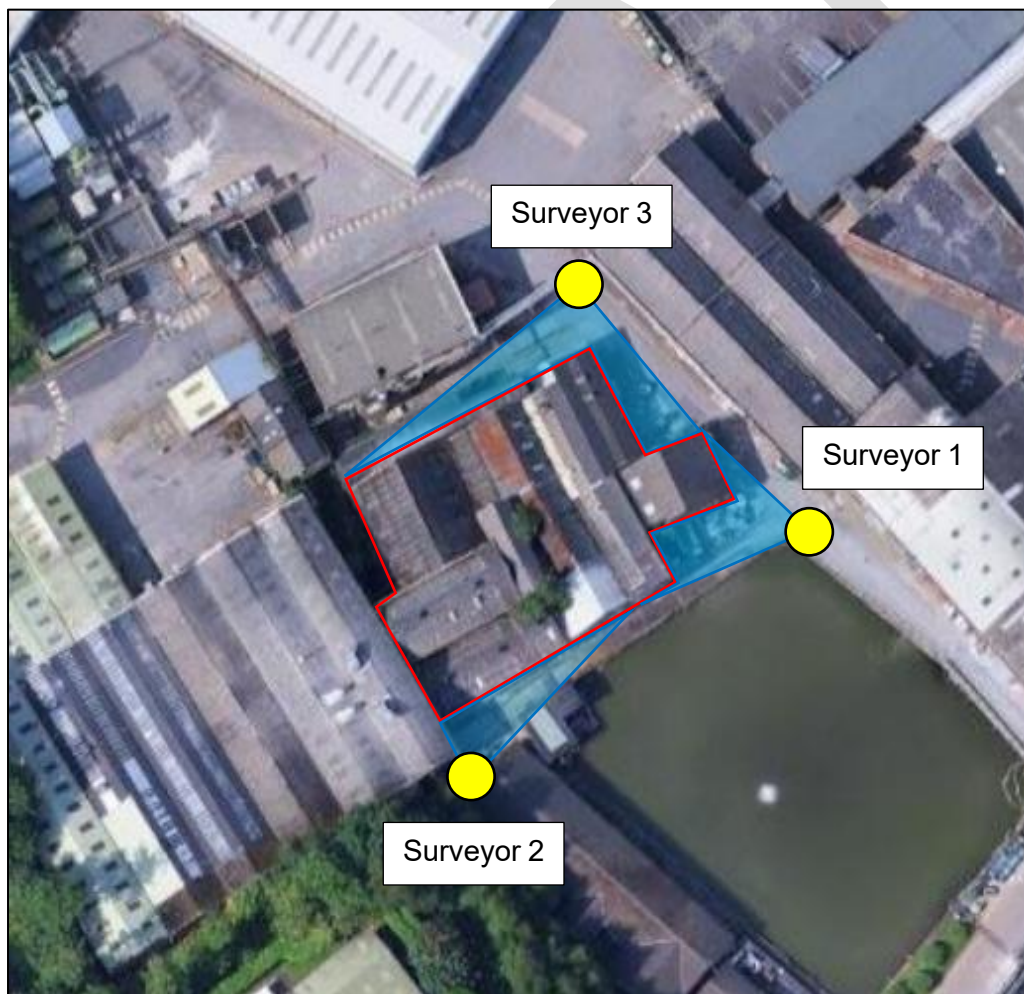
The buildings at Polyflor was assessed to have '**Low**' bat roost suitability.

The habitats associated with the site and surrounding area are of '**Low**' suitability for bats. The sites habitats are capable of supporting bat assemblages of 'site' ecological value.

It is recommended that one dusk emergence surveys are undertaken to determine the presence / absence of bats within the building.

The number of surveyors and potential surveyor locations shown in figure 6.1 below.

Figure 6.1: Potential Surveyor Locations



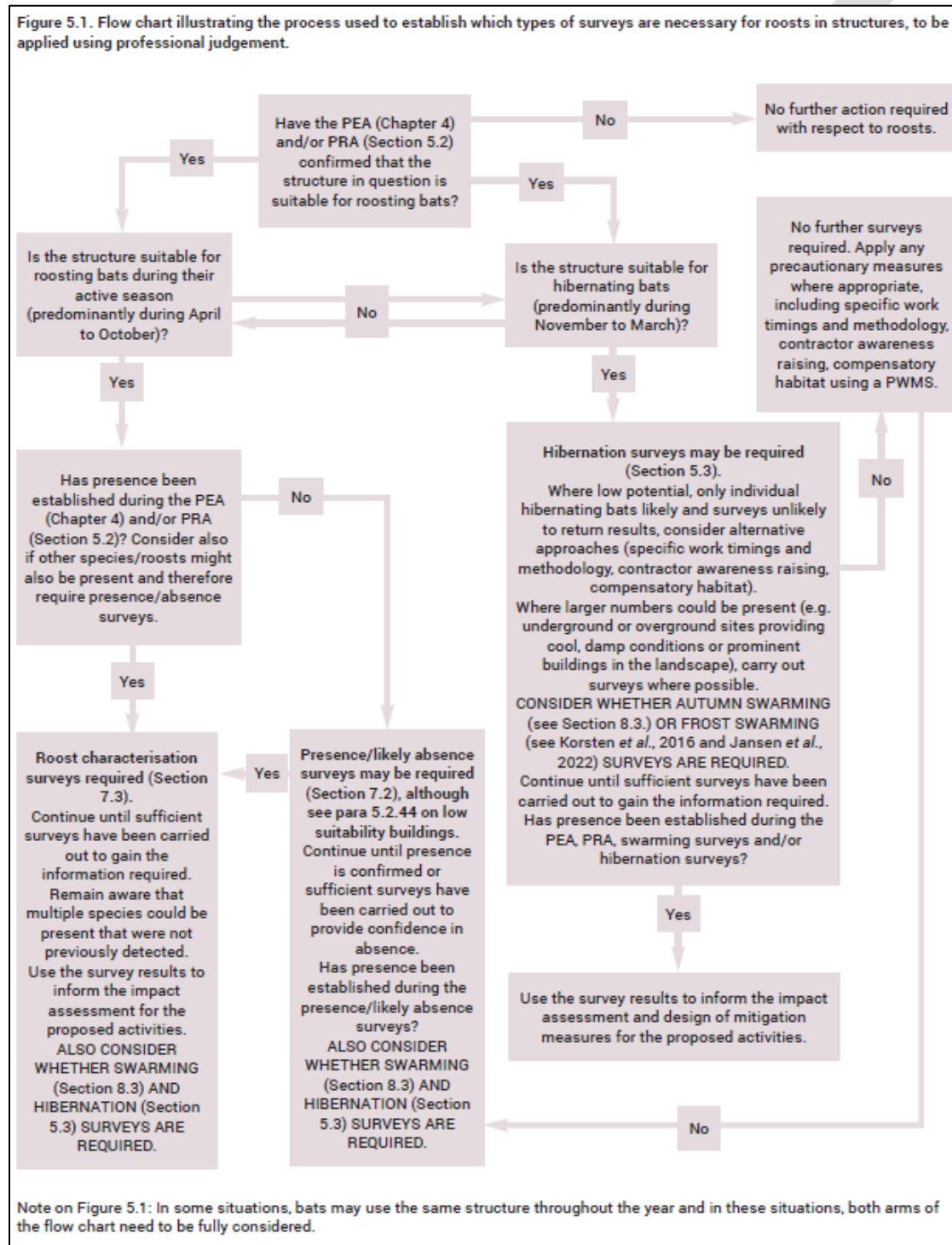
Bats (Hibernation)

The basement within the buildings at Polyflor is considered to be of 'Low' suitability for hibernating bats.

The demolition is proposed for the summer months (to commence as soon as possible) and will take approximately 2-3 weeks to complete. All works will be undertaken outside of the hibernation window for bats. As such, there will be no impact on individual bats which may potentially use the building for hibernation purposes.

No further surveys are required in relation to hibernating bats (refer to BCT guidance below).

Figure 5.1: Extract taken from Collins, BCT (2023); Good Practice Guidelines (4th Edition) – Figure 5.1



Birds

There are no requirements for further survey or assessment.

If you require clarification on any issue, please contact me at the above address.

Yours faithfully

Patrick Leatham

Patrick Leatham BSc (Hons), MCIEEM.

Site Photographs: 6th March 2026



Photograph 1: View of the southwestern elevation. Large areas of the roof exposed and missing.



Photograph 2: View of the southwestern elevation. Large areas of the roof exposed and missing.



Photograph 3: View of the raised lead flashing along the southern elevation (PRF1).



Photograph 4: Overview of the southwestern elevation (PRF1).



Photograph 5: View of the southeastern elevation (PRF2).



Photograph 6: View of large holes in the damaged wall along the southern elevation (PRF2).



Photograph 7: View of the eastern elevation.



Photograph 8: View of the eastern elevation.



Photograph 9: View of the northern elevation.



Photograph 10: View of the entire roof missing within the northwestern section.



Photograph 11: View of the western area of the buildings.



Photograph 12: View of the internal area of the western section of the building. Interior was flooded and damp throughout.



Photograph 13: View of the cellar which was damp throughout.



Photograph 14: View of flooded interior of the structure.



Photograph 15: View of exposed roof within the middle area of the site.



Photograph 16: View of exposed brickwork which shows there are no internal cavities within the brick walls.