

Pioneer Mill, Milltown Street, Radcliffe M6 2TW

DAYTIME BAT WALKOVER SURVEY AND ASSESSMENT AND RESULTS OF DUSK EMERGENCE SURVEY 1

July 2026

ERAP (Consultant Ecologists) Ltd Reference: 2026-123

ERAP (Consultant Ecologists) Ltd
Building N2
Chorley Business and Technology Centre
East Terrace
Euxton Lane
Euxton
Chorley
PR7 6TE

Tel: 01772 750502

mail@erap.co.uk
www.erap.co.uk



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Document Control

Survey	Surveyors ¹	Survey Date(s)
Bat Walkover Survey and Preliminary Roost Assessment (PRA)	Victoria Burrows B.Sc. (Hons) M.Sc. CEnv MCIEEM Principal Ecologist	22 nd May 2026 17 th June 2026
Dusk Emergence Survey 1 / Scoping Survey	Victoria Burrows and seven assistant surveyors	17 th June 2026
Reporting	Personnel	Date
Author	Victoria Burrows B.Sc. (Hons) M.Sc. CEnv MCIEEM Principal Ecologist	3 rd July 2026
Signature		
Checked	Amy Sharples B.Sc. (Hons) M.Sc. ACIEEM	6 th July 2026
Revised and issued	Victoria Burrows	6 th July 2026
Report issued to	Ashworth Demolition	
Version Number	1	
¹ Licence reference numbers Bats Victoria Burrows, Natural England Class Survey Licence (bats, Level 2) Registration Number 2025-84635-CL18-BAT Barn owl Victoria Burrows Natural England Class Survey Licence Registration Number 2026-87467-CL29-OWL		

SUMMARY

- i. ERAP (Consultant Ecologists) Ltd was commissioned by Ashworth Demolition to carry out the relevant scope of licensed bat survey to inform the imminent and essential demolition works at the fire damaged buildings at Pioneer Mill, Milltown Street, Radcliffe M26 2TW.
- ii. This report presents the results of a desktop study, data search, a preliminary roost assessment (PRA) of the buildings carried out on 22nd May 2026 and one dusk emergence survey carried out on 17th June 2026.
- iii. The surveys were carried out by an appropriately licensed, qualified and experienced ecologist with seven assistants and is in accordance with standard, recognised survey guidelines namely the *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn)* (Collins, J. (ed), 2023).
- iv. No evidence of the use of the buildings by roosting bats was detected during the daytime preliminary roost assessment., although it is acknowledged that this survey approach in isolation is limited for health and safety reasons.
- v. Buildings B1 and B5 are assessed to be of ‘negligible’ suitability for use by roosting bats; no further survey is required at these buildings to inform the demolition.
- vi. As outlined in **Section 3.2**, given the fire damaged conditions present, the exposed conditions as a result of stripped roof slates, the on-going activities at the site as the tenants have been permitted to recover their property from within the buildings, buildings B2, B3, B4, B6, B7 and B8 are assessed to have ‘low’ suitability for use by roosting bats. The dusk emergence survey on 17th June 2026 detected low numbers (1-2 bats) leaving the window apertures at buildings B6 and B8.
- vii. No evidence of activity to indicate the presence of a maternity roost (for example, a high number of passes / accumulations of droppings / high frequency of confirmed and possible emergence behaviour) was detected at the site.
- viii. Due to the observations of bats entering and / or leaving window apertures at buildings B6 and B8 during Dusk Emergence Survey 1 on 17th June 2026 the result of the survey for buildings B6 and B8 is inconclusive. To address this it is recommended that a pre-works dawn re-entry survey is carried out at buildings B6 and B8 in July / August 2026. The objective of this survey will be to determine the presence / absence of roosting bats, to address the survey limitations of the extent of the buildings and the inability to access the whole of the interior and to have further confidence in a negative result.
- ix. **Table 4.1** provides a summary of the survey results and the relevant guidance for each building.
- x. Other ecological considerations in relation to the demolition works at the site comprise:
 - Presence of invasive non-native plant species namely Japanese Knotweed, Giant Hogweed and Indian Balsam on the margins of the site. Further guidance on biosecurity is provided in **Section 4.2**;
 - Detection of use of B4: brick chimney by nesting swift and kestrel. Guidance in relation to compliance with relevant wildlife legislation and recommendations for compensatory measures are provided in **Section 4.3**;
 - Requirement to implement best practice in relation to protection of off-site habitats including the River Irwell during works.

1.0 INTRODUCTION

1.1 Background and Rationale

- 1.1.1 ERAP (Consultant Ecologists) Ltd was commissioned by Ashworth Demolition to carry out the relevant scope of licensed bat survey to inform the imminent and essential demolition works at the fire damaged buildings at Pioneer Mill, Milltown Street, Radcliffe M26 2TW (hereafter referred to as the 'site'). The Ordnance Survey (OS) grid reference at the centre of the site is SD 79198 07154. An aerial image of the site and its surrounding habitats (as recorded in 2023) is appended at **Figure 1** (source image: ESRI World Imagery).
- 1.1.2 Following an extensive fire at the mill buildings in September 2025 parts of the buildings (refer to **Figures 1 and 2**) were removed for health and safety reasons. Since September 2025 the buildings have remained in a vacant condition, although there have been reported frequent events of unauthorised access which has resulted in the stripping and theft of the ridge copings and slates from the damaged buildings.
- 1.1.3 Ashworth Demolition is now present at the site and works to prepare the external perimeter of the buildings for the demolition such as the clearance of debris and internal strip of some of the buildings has commenced. Once permitted the intention is to demolish the mill buildings in their entirety.

1.2 Scope of Works

- 1.2.1 The scope of ecological works undertaken to date has comprised:
 - b. A desktop study and data search for known ecological information at the site and the local area;
 - c. A daytime bat walkover survey for bats, which has comprised an assessment of the suitability of the habitats within the site and the surrounding area for foraging and commuting bats and a licensed preliminary roost assessment of the buildings followed by the relevant scope of bat activity survey;
 - d. A general ecological walkover survey including surveys for relevant¹ protected species;
 - e. The identification of any potential ecological constraints on the demolition and the specification of the scope of mitigation and ecological enhancement required in accordance with wildlife legislation, planning policy guidance and other relevant guidance; and
 - f. The identification of any further surveys or precautionary actions that may be required to inform the demolition works.

¹ In accordance with *Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and Their Impact on the Planning System* (Office of the Deputy Prime Minister, 2005) developers should not be required to undertake surveys for protected species unless there is reasonable likelihood of the species being present and affected by the proposals. In this instance (for example) as there are no ponds within or adjacent to the site; there has been no requirement to consider great crested newt (*Triturus cristatus*) or other amphibian species.

The proximity of the site to the River Irwell is acknowledged, the site is bordered by a low concrete block wall which lies at the top of the river bank. The demolition works will not extend beyond the buildings and hardstanding associated with the mill site and, as such, other than the implementation of best practice (refer to **Section 4.4**) it is advised that further surveys for riparian fauna such as otter (*Lutra lutra*) and water vole (*Arvicola amphibius*) was not required under the scope and rationale of this assessment.

2.0 METHOD OF SURVEY

2.1 Desktop Study and Data Search

2.1.1 The following sources of information and ecological records were consulted:

- MAGiC Maps: A web-based interactive map which brings together geographic information on key environmental schemes and designations, including details of statutory nature conservation sites;
- Ancient Tree Inventory (Woodland Trust, 2026): An online database of ancient and veteran trees;
- Greater Manchester Nature Network; the published Local Nature Recovery Strategy (LNRS); and
- Greater Manchester Local Record Centre (GMLRC) which comprised a request for bat records within a 1 kilometre radius of the site.

2.2 Survey Personnel

2.2.1 The surveys were co-ordinated and site was assessed for its suitability to support roosting bats by Victoria Burrows, Natural England Class Survey Licence WML CL18 (Bat Survey Level 2), Registration Number 2025-84635-CL18-BAT. The surveyor's qualifications and experience meet the criteria as defined in *Technical Guidance Series Competencies for Species Survey: Bats* (CIEEM, 2013).

2.3 Daytime Bat Walkover Survey

Habitat Assessment for Commuting / Foraging Bats

2.3.1 Habitats within and adjacent to the site were assessed for their value and suitability for commuting and foraging bats in accordance with Table 4.1 of *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn)* (Collins, J. (ed), Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn), 2023). Reference has been made to the categories, descriptions and examples presented in **Table 2.1**.

Table 2.1: Consideration of Suitability of Foraging and Commuting Habitat for Bats

Suitability	Potential Flight Paths and Foraging Habitats
None	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 as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	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	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.

Suitability	Potential Flight Paths and Foraging Habitats
High	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).	

Preliminary Roost Assessment (PRA) of the Buildings

- 2.3.2 The survey area comprised building B1 to B8 as annotated on **Figures 1 and 2**.
- 2.3.3 The PRA was carried out by Victoria Burrows on 22nd May 2026. The weather conditions were dry and sunny with a light breeze (Beaufort scale 2) and an air temperature of 21°C. Prior to the dusk emergence survey on 17th June 2026 an updated inspection of the external elevations of the buildings was carried out to search for accumulations of bat droppings.
- 2.3.4 The PRA was carried out in accordance with standard methods as outlined in the *Bat Mitigation Guidelines* (Mitchell-Jones A. , 2004), the *Bat Workers' Manual 3rd Edition* (Mitchell-Jones & Mcleish, 2004) and *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn)* (Collins, J. (ed), 2023).
- 2.3.5 Where access was possible, an inspection of the external surfaces, walls and roofs of the buildings was carried out to find potential bat roosting habitat or accesses into internal areas where roosts may be present. Searches for evidence of bat presence in the form of droppings, urine stains, feeding signs, grease marks and other evidence were carried out.
- 2.3.6 A list of equipment used is detailed in **Table 2.2**.

Table 2.2: Survey Equipment used during Daytime Bat Survey

Ladders
LED Lenser P14 torch
Canon Ixus digital camera
8x20 binoculars
Ridgid Micro Inspection Camera Borescope CA-300

- 2.3.7 The suitability of each building has been assessed in accordance with Table 4.1 of *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn)* (Collins, J. (ed), 2023), taking into account any presence of gaps suitable for access by bats, features suitable for use by roosting bats within the building (including crevice dwelling species and species which can roost in the open in roof voids), and the suitability of the surrounding habitats for use by foraging and commuting bats. The suitability of each building has been informed by the following categories as presented in **Table 2.3**.

Table 2.3: Suitability Categories for Roosting Habitats in Buildings

Suitability	Description
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).
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.
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).
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).
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.
^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.	

2.4 Bat Activity Surveys

Dusk Emergence Survey 1 / Scoping Survey

- 2.4.1 Given the time of year (i.e. within the bat maternity season) and the extent of the buildings it was considered a priority to carry out at least one dusk emergence survey within the optimum season (i.e. late May to early July) to determine the presence / scope out likely absence of a maternity roost. The level of bat activity detected during a survey at the optimum time of year, the diversity of bat species recorded and the conditions present during a dusk survey (such as presence of lighting) would be used to inform the extent of further surveys required to inform the demolition.
- 2.4.2 Dusk Emergence Survey 1, supplemented by night vision aids (NVAs), was completed at the buildings assessed to be of ‘low’ suitability for use by roosting bats (B2 to B4 and B6 to B8) on 17th June 2026. The survey was conducted under suitable conditions. The date of the survey, surveyors, equipment used and weather conditions are presented in **Table 2.4**.
- 2.4.3 The dusk emergence survey commenced at least 15 minutes before sunset and continued until at least 1.5 hours after sunset.

- 2.4.4 Surveyors, experienced in conducting bat surveys, were positioned at suitable locations to maximise the coverage of the buildings and / or potential roost features identified during the daytime bat walkover survey / preliminary roost assessment to determine any entry or emergence by roosting bats. Any bat emergence or re-entry activity was recorded, with brief notes relating to bat activity at each survey position collated at the end of the survey.
- 2.4.5 Recording bat detector units² were used to record and analyse echolocation calls after the survey using Anabat Insight bat call analysis software.
- 2.4.6 Night vision aids (NVA)³, supplemented with additional infra-red lighting (comprising Nightfox XB5 torches and infra-red floodlights), as needed, were used at the surveyor positions presented in **Table 2.4**. Footage was subsequently reviewed using VLC Media Player to determine any emergence / re-entry at the building.
- 2.4.7 Surveyor positions and NVA locations are annotated on **Figure 2**. Photographs showing each survey position from the darkest point of the survey are appended at **Photos 25 to 32** in **Section 6.3**.

Table 2.4: Dusk Emergence Survey Date, Weather Conditions and Surveyors

Date	17 th June 2026
Sunset time	21:41
Start and end time	21:26 until 23:11
Weather	Dry and calm (Beaufort scale 0)
Air temperatures	18°C at 21:00 falling to 16°C at 23:00
Survey Position	Surveyor, Detector and NVA
1	Victoria Burrows Anabat Scout and TK612 Gen2 thermal camera
2	Julia Rigby Anabat Scout and TK612 Gen2 thermal camera
3	Oscar Caunce Anabat Scout and Canon XA60 camcorder
4	Stuart Laverick Anabat Scout and TK612 Gen2 thermal camera
5	Leah Hart Anabat Scout and Canon XA60 camcorder
6	John Harrison-Bryant Anabat Scout and Canon XA60 camcorder
7	Caitlyn Horrocks Anabat Scout and Canon XA60 camcorder
8	Natalie Coffey Anabat Scout and TK612 Gen2 thermal camera

2.5 Survey and Reporting Limitations

- 2.5.1 The preliminary roost assessment / daytime survey was restricted due to the inability to access the internal areas of all of the buildings for health and safety reasons. This limitation has been addressed by the scope of bat activity survey and methods to be applied during the demolition.
- 2.5.2 Dusk Emergence Survey 1 was completed under suitable conditions. With the use of the night-vision aids (NVA) as much of the elevation of each building as possible was surveyed. However, due to the distances

² i.e. Anabat Scout units.

³ Canon XA60 camcorders set to infra-red and Guide TK612 Gen2 thermal camera.

involved to view the top of the brick chimney (B4), for example, it is important to identify this as a survey limitation. As outlined in **Section 4.1** the presence of a maternity roost at the site has been reasonably discounted. Where the results of Dusk Emergence Survey 1 have been inconclusive in relation to the detection of other roost types (particularly day roosts of single / low numbers of bats) this has been identified and further survey is recommended.

2.6 Evaluation Methods

- 2.6.1 Government advice on wildlife, as set out in the NPPF and associated government circulars has been taken into consideration. Legislation relating to protected species, such as those listed under Schedule 5 of the *Wildlife and Countryside Act 1981* (as amended) and *The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019*, is referenced where applicable, and any impacts to protected species are evaluated in accordance with current guidance.

3.0 SURVEY RESULTS

3.1 Desktop Study and Data Search

Statutory Designated Sites for Nature Conservation and SSSI Impact Risk Zones

- 3.1.1 The site and adjoining land have no statutory designation for nature conservation.
- 3.1.2 The site lies within a Site of Special Scientific Interest (SSSI) Impact Risk Zone for the Ashclough SSSI located 2.8 kilometres to the west of the site. The SSSI Impact Risk Zone requires the Local Planning Authority to consult with Natural England on likely risks from the following development categories (Natural England, 2026):
- a. **Infrastructure:** Airports, helipads and other aviation proposals.
 - b. **Minerals, Oil and Gas:** Planning applications for quarries, including: new proposals, Review of Minerals Permissions, extensions, variations to conditions etc. Oil and gas exploration / extraction.
 - c. **Air Pollution:** Livestock and poultry units with a floorspace greater than 500m², slurry lagoons greater than 750m² and manure stores greater than 3500 tonnes.
 - d. **Combustion:** General combustion processes greater than 50 megawatt energy input. Including: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis / gasification, anaerobic digestion, sewage treatment works, other incineration / combustion.

- 3.1.3 The proposals do not comprise any of the listed development categories and the impact risk zone advises:

'You do not need to consult Natural England on the proposed development at this location.

The Impact Risk Zones for Sites of Special Scientific Interest (SSSI IRZs) indicate that at the location selected, the proposed development is unlikely to have a harmful effect on terrestrial Sites of Special Scientific Interest (SSSIs) and the Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites that they underpin.

Therefore, you do not need to consult Natural England on the likely impacts of development on terrestrial SSSIs and the SACs, SPAs or Ramsar sites that they underpin.'

Non-statutory Designated Sites for Nature Conservation

- 3.1.4 The site has no non-statutory designation for nature conservation, called 'Sites of Biological Importance' or 'SBIs' in Greater Manchester.
- 3.1.5 The Sailor's Brow & Springwater Park SBI lies 90 metres to the south of the site; this is discussed further in **Section 4.4**.

Local Nature Recovery Strategy

- 3.1.6 The site has no allocation / designation on the Greater Manchester Nature Network Map (the published LNRS).

Priority Habitats Inventory

- 3.1.7 The Priority Habitats Inventory⁴ was checked via MAGiC Maps. No Priority Habitats are identified at the site by the inventory.

Ancient Tree Inventory

- 3.1.8 No ancient or veteran trees are identified at the site by the inventory.

Reported Records of Bat Species

- 3.1.9 Reported records of bat species, as provided by GMLRC, for a 1 kilometre radius from the centre of the site are summarised in **Table 3.1**. Data have been requested and will be inserted here, when available.

Table 3.1: Records of Bat Species Within a 1 kilometre Radius from the Centre of the Site

Taxon Group	Species Name and Designations ¹ and Notes

3.2 Daytime Bat Walkover Survey

Habitat Assessment for Commuting / Foraging Bats

- 3.2.1 The majority of the Pioneer Mill site supports limited vegetation, with the areas of vegetation (namely invasive non-native plant species) confined to the site margins. It is acknowledged that tall buildings with large elevations and surface areas can warm in the sunshine and attract invertebrates and prey for bats. For the above reasons the land within the surveyed area is assessed to be of 'low' suitability for use by foraging and commuting bats in accordance with the categories in **Table 2.1**.
- 3.2.2 The Pioneer Mill site lies within a meander of the River Irwell which is bordered by stretches of areas of secondary Willow woodland, tall-forb vegetation and scrub with good connectivity to the open water at the river and the areas of marshy grassland and scattered scrub and woodland beyond, particularly to the east. Habitats bordering the site are assessed to be of 'high' suitability for use by foraging and commuting bats, particularly those species typically associated with urban areas and riparian habitats such as common

⁴ A spatial dataset that describes the geographic extent and location of Natural Environment and Rural Communities Act (2006) Section 41 habitats of principal importance.

pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*) and possibly *Myotis* species.

Preliminary Roost Assessment (PRA) of the Buildings

- 3.2.3 **Table 3.2** presents a description of the remaining buildings at the site and an assessment of their suitability for use by roosting bats. The location of each building is annotated on **Figures 1** and **2** and photographs are appended at **Section 6.1**.

Table 3.2: Description of each Building and Result of Assessment of Suitability for use by Roosting Bats

Building Reference	Description	Identified Potential Roost Features (PRFs)	Bats / Evidence of Roosting Found?	Suitability Assessment ⁵
B1	Single storey brick north lights building with extensive fire damage. Building is enclosed by a brick parapet wall at the eastern elevation and is exposed at the western elevation due to the demolition of the adjacent fire damaged building. Frequent holes and damage in roof due to fire and theft of roof coverings.	No suitable PRFs. Timber fascia either tightly fitted to elevation walls or removed due to fire. Roof slates and ridge copings have been removed due to fire damage and / or theft to create exposed conditions.	None	Negligible
B2	Two storey brick building with a slate covered roof. The majority of the slates on the west-facing roof pitch have been stripped to expose the battens and the roof void beneath. External brickwork appears to be intact.	The suitability of the PRFs such as the roof void and gaps between the slates is significantly reduced by the presence of large holes in the roof which has created exposed conditions.	None	Low
B3	Single storey brick building with a pitched corrugated sheet covered roof. Western and eastern elevation walls are obscured by the adjoining walls of B2 and B5.	PRF limited to the fascia at the wall top at the north-facing gable end.	None	Low
B4	Tall brick chimney.	Possible gaps in brickwork; not possible to check due to height of chimney.	None	Low
B5	Single storey steel framed building with single-ply elevation walls.	No suitable PRFs.	None	Negligible
B6	Three storey brick mill building with north-lights roofs obscured by a parapet wall at the ends. External brickwork appears to be intact; no significant cracks or crevices were noted.	Possible opportunities for roosting bats between slates / beneath ridge copings but limited due to extensive damage to the roof. Gaps present between lintels at window apertures which may provide opportunities for single / low numbers of bats.	None	Low

⁵ In accordance with the criteria at **Table 2.3**.

Building Reference	Description	Identified Potential Roost Features (PRFs)	Bats / Evidence of Roosting Found?	Suitability Assessment ⁵
B7	Single storey brick north lights building with extensive fire damage. Building is enclosed by a brick parapet wall at the eastern elevation and meets the eastern elevation of B6 at the western end. Frequent holes and damage in roof due to fire and theft of roof coverings.	Timber fascia either tightly fitted to elevation walls or removed due to fire. Roof slates and ridge copings have been removed due to fire damage and / or theft to create exposed conditions.	None	Low
B8	Three storey brick mill building with north-lights roofs obscured by a parapet wall at the ends. External brickwork appears to be intact; no significant cracks or crevices were noted. Eastern / riverside elevation of the building not accessible to view.	Possible opportunities for roosting bats between slates / beneath ridge copings but limited due to extensive damage to the roof. Gaps present between lintels at window apertures which may provide opportunities for single / low numbers of bats.	None	Low

3.3 Bat Activity Survey

Dusk Emergence Survey 1: 17th June 2026

- 3.3.1 The survey data are appended at **Section 6.2**.
- 3.3.2 No confirmed roosts were detected at buildings B2, B3, B4, B6 and B7. The updated inspection of the external elevations of the buildings did not detect any bats or any bat droppings.
- 3.3.3 Surveyor 2 reported one common pipistrelle entering building B6 via a window aperture on the western elevation at 22:26 (45 minutes after sunset). A single bat subsequently exited the building via a window aperture on the western elevation at building B6 at 22:28. Both observations were confirmed by examination of the NVA footage. There is no way of determining whether the recorded activity was the same bat.
- 3.3.4 Surveyor 3 reported single common pipistrelle exiting the window apertures at the southern elevation of building B8 at 23:06 and 23:08; this was confirmed by examination of the NVA footage. These events occurred 85 and 87 minutes after sunset; it is not known whether the bats entered the building elsewhere (B8 has frequent large holes in the roof and sections of collapse / damage).
- 3.3.5 No other emergence or re-entry activity was reported by the surveyors and subsequent review of the NVA footage did not detect any other bat emergence or re-entry.
- 3.3.6 Only two species of bat were recorded during the survey period as summarised below:
- Common pipistrelle were detected between 22:07 and 23:17 with the first bat detected 26 minutes after sunset. A total of 442 call sequences were recorded during the survey.
 - Soprano pipistrelle were detected between 22:32 and 23:05 with the first bat detected 51 minutes after sunset. A total of 3 call sequences were recorded during the survey.

3.4 Other Ecological Considerations

Invasive Plant Species

- 3.4.1 An abundance of Giant Hogweed (*Heracleum mantegazzianum*), Japanese Knotweed (*Fallopia japonica*) and Indian Balsam (*Impatiens glandulifera*), all invasive non-native plant species listed on Schedule 9 of the *Wildlife and Countryside Act 1981* (as amended) is present at the site.
- 3.4.2 During the daytime bat walkover survey ERAP (Consultant Ecologists) Ltd advised personnel from Ashworth Demolition in relation to the hazards associated with phytophotodermatitis which can occur when skin is exposed to the sap present in Giant Hogweed.
- 3.4.3 Further guidance in relation to non-native invasive plant species (INNS) as the proposed demolition works is presented in **Section 4.2**.

Nesting Birds

- 3.4.4 During the daytime bat walkover survey on 22nd May 2026 evidence (adult feeding young) of use of a hole in the brick wall at building B1 by nesting blue tit (*Cyanistes caeruleus*) was observed. A re-inspection on 17th June 2026 did not detect any evidence of current use and it is likely that the young birds have fledged.

- 3.4.5 Evidence of use of the brick chimney (B4) by nesting swift (*Apus apus*) and kestrel (*Falco tinnunculus*) was recorded during Dusk Emergence Survey 1 on 17th June 2026.

4.0 EVALUATION, ASSESSMENT AND RECOMMENDATIONS

4.1 Bats

Roosts

- 4.1.1 Buildings B1 and B5 are assessed to be of 'negligible' suitability for use by roosting bats; no further survey is required at these buildings to inform the demolition.
- 4.1.2 As outlined in **Section 3.2**, given the fire damaged conditions present, the exposed conditions as a result of stripped roof slates, the on-going activities at the site as the tenants have been permitted to recover their property from within the buildings, buildings B2, B3, B4, B6, B7 and B8 are assessed to have 'low' suitability for use by roosting bats.
- 4.1.3 No evidence of activity to indicate the presence of a maternity roost (for example, a high number of passes / accumulations of droppings / high frequency of confirmed and possible emergence behaviour) was detected at the Pioneer Mill site on 17th June 2026.
- 4.1.4 The building does not have any underground features or cellars and its structural condition is not likely to provide thermally stable conditions for regular / long-term use by roosting bats in the hibernation season or features of a 'classic' hibernation roost.
- 4.1.5 Due to the observations of bats entering and / or leaving window apertures at buildings B6 and B8 during Dusk Emergence Survey 1 on 17th June 2026 the result of the survey for buildings B6 and B8 is inconclusive. To address this it is recommended that a pre-works dawn re-entry survey is carried out at buildings B6 and B8 in July / August 2026. The objective of this survey will be to determine the presence / absence of roosting bats, to address the survey limitations of the extent of the buildings and the inability to access the whole of the interior and to have further confidence in a negative result.

Summary of Results

- 4.1.6 **Table 4.1** presents a summary of the results and guidance provided in the paragraphs above.

Table 4.1: Summary of Results of Licensed Bat Survey and Guidance to Date

Building Reference	Suitability Assessment	Requirement for Further Survey	Guidance
B1	Negligible	None	Proceed with demolition in accordance with the Precautionary Working Method Statement (PWMS).
B2	Low	Based on the presence of a partially intact slate roof it is recommended that B2 is covered by the dawn re-entry survey in July 2026.	Complete dawn re-entry survey. If no roost is detected then proceed with demolition in accordance with the PWMS.
B3	Low	None	Proceed with demolition.
B4	Low	None	Proceed with demolition in accordance with the PWMS.
B5	Negligible	None	Elevation of building already removed; steel frame remains.
B6	Low	Dawn re-entry survey in July 2026.	Complete dawn re-entry survey. If no roost is detected, then proceed with demolition in accordance with the PWMS.
B7	Low	None	Proceed with demolition in accordance with the PWMS.
B8		Dawn re-entry survey in July 2026.	Complete dawn re-entry survey. If no roost is detected, then proceed with demolition in accordance with the PWMS.

Further Survey / Detection of a Roost / Natural England Licence

- 4.1.7 A dawn re-entry survey, as recommended for buildings B2, B6 and B8, can be an effective way to detect the presence (or otherwise) of a roost at a complex building or where there are access restrictions.
- 4.1.8 Dawn re-entry survey must be conducted from approximately 2 hours before sunrise and will extend until around 15 minutes after sunrise.
- 4.1.9 If the further survey confirms the presence of roosting bats at the building(s) it is advised that an appropriate Natural England mitigation licence will be required to complete works. Due to the conditions present and the rationale for the demolition it is considered that an appropriate and proportionate mitigation strategy is feasible and that the three tests of Regulation 55 of *The Conservation of Habitats and Species Regulations 2017* (as amended), as outlined below, can be satisfied.

Test 1 (Purpose Test) - Demonstration that the proposals are for the purposes of ‘preserving public health or public safety or other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment’ [Regulation 55 (2)(e)];

Test 2 (No Satisfactory Alternative Test) - Demonstration that ‘there is no satisfactory alternative’ including consideration of alternative solutions and the implications of the ‘do nothing’ option [Regulation 55(9)(a)]; and

Test 3 (Favourable Conservation Status Test) - Demonstration that ‘the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range’ [Regulation 55(9)(b)].

Precautionary Working Method Statement (PWMS)

Timing of Works

- 4.1.10 Based on the likely absence of a maternity roost and use by bats in the hibernation season there is no timing restriction on the date of the commencement of works (provided the relevant consents are in place, the Natural England licence is in place (if needed) and the mandatory actions in relation to nesting birds is adhered to).

Toolbox Talk

Prior to the commencement of works the licensed ecologist will inform all contractors of the following:

- a. The wildlife legislation and protection afforded to bats and their roosts;
- b. The presence of the Natural England licence (if relevant) and the associated method statement and the need to abide by the content;
- c. The licensable actions (if relevant);
- d. Good working practices (i.e. lifting (rather than sliding) of ridge copings and roof slates and turning to check for the presence of bats before discard or stacking);
- e. The requirement to wear gloves at all times;
- f. The presence of any provisions for roosting bats such as bat boxes installed in advance of the works and the need for them to remain undisturbed;
- g. The protocol to be followed if a bat is discovered when the licensed ecologist is not on site.

Detection of a Bat

- 4.1.11 If at any time during the works a bat is discovered or suspected when the licensed bat surveyor is not on site all contractors must withdraw from the area and ERAP (Consultant Ecologists) Ltd (01772 750502) or the Bat Conservation Trust must be contacted for further guidance.

Compensatory Provisions for Roosting Bats

- 4.1.12 To compensate for the loss of a substantial mill building which, prior to the fire damage, may have supported more frequent potential roost features it is recommended that at least six bat boxes are installed on suitable trees in the Willow scrub / woodland bordering the Pioneer Mill site. An ecologist should advise on the siting of the bat boxes.
- 4.1.13 Bat boxes should be installed to the following guidelines (Bat Conservation Trust, 2024)
- a. At least 4 metres above the ground (where safe installation is possible);
 - b. Sheltered from strong winds and exposed to the sun for part of the day (usually south or south-west). Ideally several bat boxes will be installed to provide a variety of different thermal options for bats. Grouping a number of boxes each with a different aspect can achieve this; while a number of boxes is preferable to one, a single box is still viable and may be used by roosting bats;
 - c. Located close to unlit linear features, such as lines of trees or hedgerows; and
 - d. Installed where the bat box entrance is not cluttered or impeded by branches, or accessible to predators (such as cats) by large branches underneath them.

- 4.1.14 Suitable bat boxes are the Schwegler 1FF, Greenwood's Ecohabitats single or double cavity boxes and Schwegler 1FD, see **Insert 1**.



Insert 1: Schwegler 1FF, Greenwood's Ecohabitats single cavity and Schwegler 1FD bat boxes

4.2 Invasive Non-Native Plant Species

- 4.2.1 To minimise the risk of introduction of invasive species to the site *and* the spread of invasive species around the site and into the adjacent habitats, all machinery / plant to be brought to the site must be clean. Wheels / tracks of machinery / plant must have been pressure washed before use at the site.
- 4.2.2 No excessive remnant soil or plant material from other sites must be present on the machinery / plant or in the tyre treads as this may increase the risk of spread of non-native and invasive plant species e.g. Japanese Knotweed, Indian Balsam and Giant Hogweed.
- 4.2.3 Machinery operating at the site and within the areas of invasive plant species must be pressure washed / cleaned of soil and plant material prior to removal from the site and operation elsewhere.

4.3 Nesting Birds

Compliance with Relevant Wildlife Legislation

- 4.3.1 All wild birds are protected under the *Wildlife and Countryside Act 1981* (as amended) while they are breeding. Any demolition that will affect buildings with confirmed use by nesting birds (i.e. B4: chimney) and those suitable for use by nesting birds should be scheduled to commence outside the bird nesting season. Commencement of works in the nesting season must be informed by a pre-works nesting bird survey, carried out by a suitably experienced ecologist. The bird breeding season typically extends between March to August inclusive.
- 4.3.2 If breeding birds are detected the ecologist will issue guidance in relation to the protection of the nesting birds in conjunction with the scheduled works. This may involve cordoning off an area of the site until the young birds have fledged.

Compensatory Measures for Nesting Birds

- 4.3.3 It is understood that that works involve the demolition of the brick chimney (B4) used by nesting swift and kestrel. The works at Pioneer Mill involve the demolition of the buildings only. It is therefore difficult to accommodate compensatory measures for use by nesting swift and kestrel and no new buildings will be constructed. The following measures are therefore suggested.

Swift

- 4.3.4 The swift (*Apus apus*) has recently been added to The Birds of Conservation Concern Red list (Stanbury, et al., 2021) owing to the recorded recent declines and its identified status as a high conservation priority.
- 4.3.5 If the high (approximately 5 metres high) boundary brick wall, particularly at the southern site boundary, will be retained as part of the works or the steel framed building to the west of the main Pioneer Mill site will remain it is suggested that these structures provide an opportunity for the installation of four swift boxes to compensate for the loss of the chimney.
- 4.3.6 Suitable boxes are illustrated at **Insert 2**.



Insert 2: No. 17 Schwegler Swift Nest Box (Single Cavity)

Kestrel

- 4.3.7 The high brick wall at the southern site boundary may also be suitable for mounting a kestrel nest box (refer to **Insert 3**).



Insert 3: Schwegler Kestrel Nest Box 28

- 4.3.8 Alternatively, it is recommended that a pole mounted box is installed in site, particularly at the boundary with the river and connectivity to the fields beyond. Pole mounted boxes are known to have been successfully used by nesting kestrel in the Penwortham area of South Ribble, as illustrated below.



Insert 4: Example of a pole-mounted kestrel nest box

4.4 Demarcation of Working Area / Best Practice

- 4.4.1 To minimise the risk of adverse effects of the demolition works on habitats and the riparian habitats at the River Irwell beyond the site boundary including the habitats associated with the Sailor's Brow & Springwater Park SBI which lies 90 metres to the south it is essential that the following actions are implemented:
- Demarcation of the demolition zone by appropriate fencing (completed);
 - Storage of arisings and demolition materials away from the river.
 - Use of silt barriers, as needed, around the base of any stockpiles to control any concrete fines run-off and to trap any sediment and further minimise the risk of sediment from entering the river;
 - Use of water and dust suppression methods to mitigate dust from the stockpile of crushed concrete during dry conditions;
 - Storage of all plant and fuel (bundled fuel tank) away from the river; and
 - Availability of spill kits near to the areas of stored fuel.

5.0 REFERENCES

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6.0 APPENDIX: TABLES, PHOTOGRAPHS AND FIGURES

6.1 Photographs: Daytime Survey



Photo 1: Northern elevation of B1



Photo 2: Sealed timber fascia at northern elevation of B1



Photo 3: No gaps / potential roost features (PRFs) at doorway apertures at B1



Photo 4: Sealed brickwork at B1



Photo 5: Sealed concrete blockwork and removed slates on roof at B1



Photo 6: Example of conditions inside B1 showing frequent damage to roof and exposed conditions



Photo 7: Northern elevations of B2 (right) and B3 (left)



Photo 8: Southern elevation of B2 and sections of B7 with removed roof slates



Photo 9: Northern elevations of B5 (left), B4 (chimney), B3 (centre) and B2 (right)



Photo 10: B4 (chimney) and sections of B7 with removed roof slates



Photo 11: Building B4 (chimney)



Photo 12: Northern elevations of B5 (left) when intact, B3 (centre) and B2 (right)



Photo 13: Southern elevation and roof of B6



Photo 14: Southern and eastern elevations of B5 and southern elevation (part) of B7

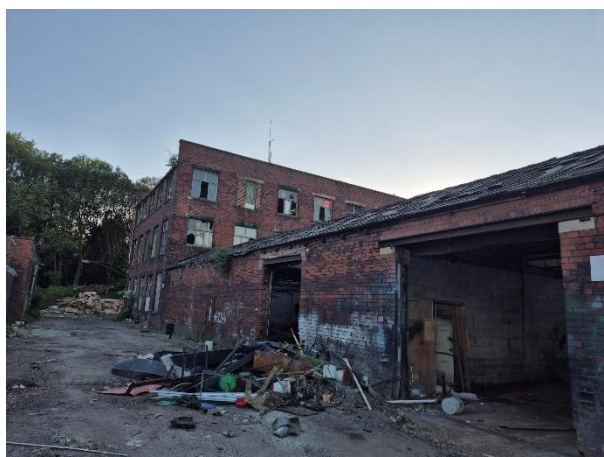


Photo 15: Southern and eastern elevations of B5 and southern elevation and roof (part) of B7 showing removed roof slates



Photo 16: Western elevation of B6



Photo 17: Western and southern elevations of B6

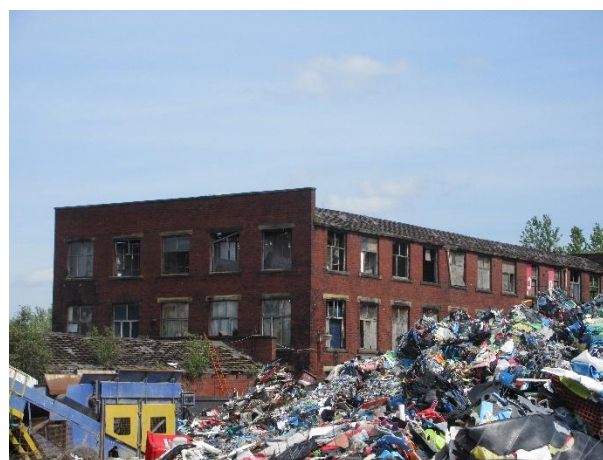


Photo 18: Western and southern elevations of B8 showing removed roof slates



Photo 19: Gap between sections of B7



Photo 20: Example of conditions inside B7



Photo 21: Example of conditions inside B7; feral pigeon present



Photo 22: Example of conditions inside B7



Photo 23: Japanese Knotweed and Giant Hogweed at site boundary near River Irwell



Photo 24: Hole in brick wall at B1 used by nesting blue tit

6.2 Survey Data from Bat Activity Surveys

Table 6.1: Dusk Emergence Survey 1, 17th June 2026, Sunset Time 21:41, Start Time 21:26

Survey Position 1: Victoria Burrows

Time	Species	Notes
22:37 until 23:10	Common pipistrelle	No emergence detected. Foraging activity detected around building B6. Bright lights at new footpath to bridge over river illuminated at 22:15.
The Anabat Scout made the following recordings: 30 call sequences of common pipistrelle between 22:37 and 23:10.		

Survey Position 2: Julia Rigby

Time	Species	Notes
22:07 until 23:12	Common pipistrelle	Foraging activity detected around building B6.
22:26	Common pipistrelle	1 bat entered building B6 via window aperture at western elevation.
22:28	Common pipistrelle	1 bat exited building B6 via window aperture at western elevation
22:32 until 22:46	Soprano pipistrelle	Brief pass, heard not seen Foraging activity detected around building B6.
The Anabat Scout made the following recordings: 104 call sequences of common pipistrelle between 22:07 and 23:12. 2 call sequences of soprano pipistrelle at 22:32 and 22:46.		

Survey Position 3: Oscar Counce

Time	Species	Notes
22:25 until 23:11	Common pipistrelle	Foraging activity detected around buildings B7 and B8
23:06	Common pipistrelle	One bat left building B8 via the window aperture on the southern elevation. 85 minutes after sunset. Entered building elsewhere?
23:08	Common pipistrelle	One bat left building B8 via the window aperture on the southern elevation. 87 minutes after sunset. Entered building elsewhere?
The Anabat Scout made the following recordings: 41 call sequences of common pipistrelle between 22:25 and 23:11.		

Survey Position 4: Stuart Laverick

Time	Species	Notes
22:30 until 23:13	Common pipistrelle	No emergence detected. Foraging activity detected around chimney (B4).
23:05	Soprano pipistrelle	Brief pass, heard not seen
The Anabat Scout made the following recordings: 43 call sequences of common pipistrelle between 22:30 and 23:13. 1 call sequence of soprano pipistrelle at 23:05.		

Survey Position 5: Leah Hart

Time	Species	Notes
22:30 until 23:13	Common pipistrelle	Foraging activity detected around northern elevations of buildings B2 and B3.
23:05	Soprano pipistrelle	Brief pass, heard not seen
The Anabat Scout made the following recordings: 43 call sequences of common pipistrelle between 22:30 and 23:13. 1 call sequence of soprano pipistrelle at 23:05.		

Survey Position 6: John Harrison-Bryant

Time	Species	Notes
22:35 until 23:17	Common pipistrelle	No emergence detected. Foraging activity detected around western elevation of building B2 and northern elevation of B7.
The Anabat Scout made the following recordings: 76 call sequences of common pipistrelle between 22:35 and 23:17.		

Survey Position 7: Caitylyn Horrocks

Time	Species	Notes
22:35 until 23:10	Common pipistrelle	No emergence detected. Foraging activity detected around building B7
The Anabat Scout made the following recordings: 71 call sequences of common pipistrelle between 22:35 and 23:10.		

Survey Position 8: Natalie Coffey

Time	Species	Notes
22:32 until 23:10	Common pipistrelle	No emergence detected. Foraging activity detected around buildings B7 and B6.
The Anabat Scout made the following recordings: 77 call sequences of common pipistrelle between 22:32 and 23:10.		

6.3 Photographs: NVA Views: Dusk Emergence Survey 1



Photo 25: Survey Position 1 at B6

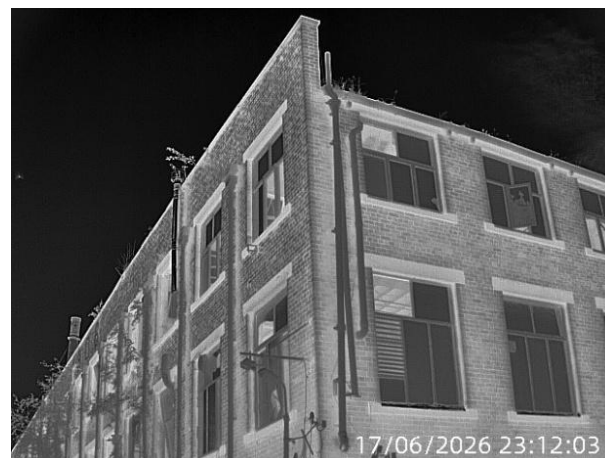


Photo 26: Survey Position 2 at B6



Photo 27: Survey Position 3 at B8



Photo 28: Survey Position 4 at B4



Photo 29: Survey Position 5 at B2 and B3



Photo 30: Survey Position 6 at B2 and B4



Photo 31: Survey Position 7 at B7



Photo 32: Survey Position 8 at B6

6.4 Figures

Figure 1: Aerial Image of the Site and Surrounds



Figure 2: Plan to Show Buildings and Surveyor / NVA Positions Used on Dusk Emergence Survey 1: 17th June 2026

