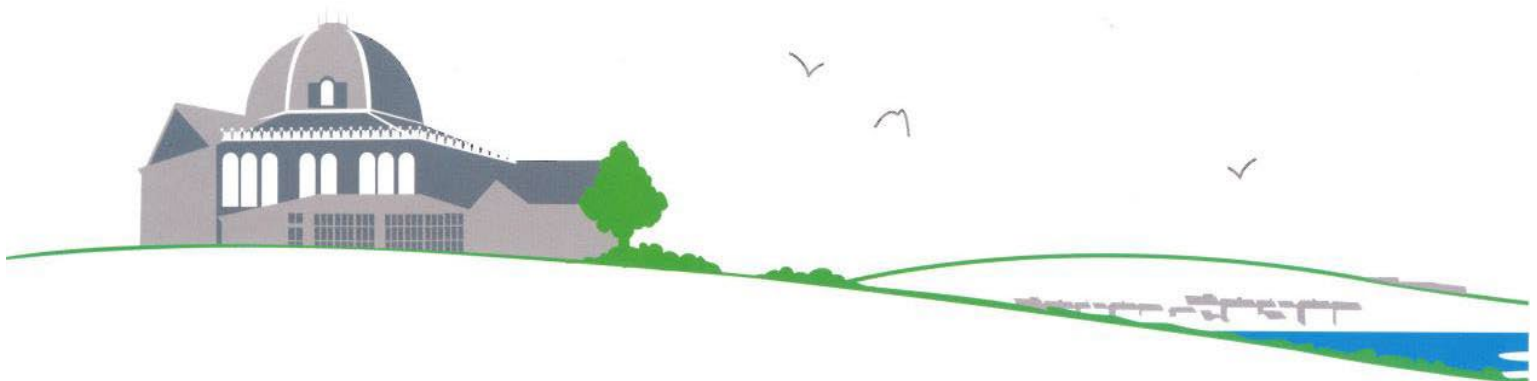




BURY COUNCIL

MILLTOWN STREET

**PRELIMINARY BAT ROOST INSPECTION AND
BAT EMERGENCE SURVEY REPORT**



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PRELIMINARY BAT ROOST INSPECTION AND BAT EMERGENCE SURVEY REPORT

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This project has been undertaken in accordance with PAA policies and procedures on quality assurance.

Signed: 

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1. INTRODUCTION

- 1.1 Penny Anderson Associates (PAA) was commissioned by Bury Council to undertake a Preliminary Roost Assessment (PRA) and emergence survey for bats of a building at the Milltown Street Cycle Bridge site in Radcliffe (approximate central grid reference SD 79137 07218).
- 1.2 This report details the methods and results of both surveys and makes any further recommendations as required.

Site Location and Context

- 1.3 The site is located within the eastern part of Radcliffe, which is south of Bury. The immediate surroundings comprise disused grassland to the east and the residential areas of Radcliffe to the north and west. The south of the site consists of an industrial area which is separated from the rest of the site by the River Irwell.
- 1.4 Based on current development proposals, a new footbridge would be installed across the River Irwell to replace an existing bridge which collapsed during flooding in 2015. The new crossing point will be slightly altered from the previous bridge and will take pedestrian and cycle traffic. To facilitate this development the building undergoing the PRA and emergence survey is due to be demolished.

Legislative Context

- 1.5 A range of international and national legislation has been established in the UK to protect important nature conservation sites and priority species. At the international level, European Union (EU) Directives require individual member states to implement their conservation provisions nationally for the benefit of Europe as a whole. These Directives have been transposed into UK law by the Conservation of Habitats and Species Regulations 2017 (amended).
- 1.6 Other international conventions include: the Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979), which requires the maintenance of populations of wild flora and fauna, giving particular protection to endangered and vulnerable species; and the Bonn Convention on the Conservation of Migratory Species of Wild Animals (1979), which requires the protection of migratory species throughout their entire range. The above conventions are implemented in England and Wales via the Wildlife and Countryside Act (WCA), 1981 (as amended) and Countryside and Rights of Way (CROW) Act 2000. This legislation also protects important habitats and sites such as Sites of Special Scientific Interest (SSSI).
- 1.7 At the national level, Biodiversity 2020 (Defra 2011) forms England's national biodiversity strategy. Building on the Natural Environment White Paper¹ published in 2011, this provides a means of delivering the UK's commitments to maintaining and protecting biodiversity. Under Biodiversity 2020, the Priority Species and Habitats referred to are those of 'Principal Importance' for the conservation of biodiversity in England as listed on Section 41 (England) of the Natural Environment and Rural Communities (NERC) Act 2006 (amended).

¹ <https://www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature>

- 1.8 More recently, the Environment Act 2021 further supports this commitment to, and strengthens the legislation in respect of, maintaining and also enhancing biodiversity in England, and Part 6 Nature and Biodiversity includes the following key areas:
- Strengthened biodiversity duty for public authorities in England;
 - Biodiversity net gain to ensure developments deliver at least 10% increase in biodiversity;
 - Local Nature Recovery Strategies to support a Nature Recovery Network;
 - Duty upon Local Authorities to consult on street tree felling;
 - Strengthen woodland protection enforcement measures; and
 - Protected Site Strategies and Species Conservation Strategies to support the design and delivery of strategic approaches to deliver better outcomes for nature.
- 1.9 Finally, the National Planning Policy Framework (NPPF 2024) provides guidance for local authorities on the content of the Local Plans and is a material consideration in determining planning applications. Briefly, with an overall focus on sustainable development, the NPPF states that developments should aim to engender positive outcomes for habitats and biodiversity, with a particular focus on the maintenance and creation of ecological networks.
- 1.10 The NPPF identifies the following principals that should be applied by local planning authorities when determining planning applications:
- 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 SSSI, 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 SSSI;
 - 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.
- 1.11 The NPPF states that the planning system should contribute to and enhance the natural environment through a range of actions, including:
- 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);
 - 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;
 - Maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

- Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swift (*Apus apus*), bats and hedgehog (*Erinaceus europaeus*);
- 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
- Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

1.12 To protect and enhance biodiversity and geodiversity, plans should:

- Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

Bat Legislation

1.13 A summary of the protected species legislation relevant to bats is presented in Appendix 1.

2. METHODS

Desk Study

- 2.1 Protected species records were obtained from the local record centre, Greater Manchester Local Record Centre (GMLRC) as part of the update Preliminary Ecological Appraisal in March 2025. The parameters of the data search were for a 1km radius around the site centre.
- 2.2 Additionally, the Multi-Agency Geographic Information for the Countryside (MAGIC²) website was reviewed to locate any European Protected Species licences (EPSL) within 1km of the site. The desk study was compiled by Assistant Ecologist Rebekah Pipes³. The desk study data obtained relevant to bats has been included in this report.

Assessment of Bat Roost Potential

- 2.3 The built structure within the site was subject to detailed inspection to assess potential to support roosting bats. This was completed by Principal Ecologist Rob Lamb (Natural England Bat Survey Class 1 Licence 2020-44441-CLS-CLS, ACIEEM⁴) on 21st May 2025 following standard methodologies based on best practice survey guidance (Collins 2023).

Preliminary Roost Assessment of Built Structures

- 2.4 The structure was inspected using close-focussing binoculars and a high-powered torch to search for potential roost features (PRF) that could be used by bats, such as small holes and crevices in soffits or beneath roof coverings, and also potential access points for bats to enter/exit internal areas such as cavity walls. A search was also made for any evidence of bat presence, such as accumulations of droppings and feeding remains or sightings of the animals themselves.
- 2.5 Once all PRF were identified, the structure as a whole was assigned to one of the same categories (as based on the criteria in Table 1), or None where no suitable features were present.

Habitat Suitability

- 2.6 The habitats within the site and immediately adjacent areas were also considered for their general suitability for commuting and foraging bats to place the site in the context of its surroundings, as this can have a bearing on the likelihood of a roost being present.
- 2.7 The assessment of habitat suitability was based on the broad criteria outlined in Table 2 (Collins 2023), combined with the professional judgement and experience of the surveyor.

² <https://magic.defra.gov.uk/MagicMap.aspx> (last accessed [30th March 2025])

³ Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM)

⁴ Associate member of CIEEM

Table 1 Bat Roost Assessment of Built Structures Criteria

Suitability	Description of Roosting Habitats
None	No features on site likely to be used by any roosting bats at any time of year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).
Negligible ⁵	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 ⁶ 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 roosts and not a classic cool/stable hibernation site, but could be used by individual hibernating bats ⁷)
Moderate	A structure 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 type 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 and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.
Confirmed Roost	A structure with evidence of bat presence, i.e. droppings, feeding remains, audible bat calls heard during daytime survey or sightings of the animals themselves, existing (reliable) record of bats roosting at the location.

⁵ 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).

⁶ For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance

⁷ 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 et al. 2016 and Jansen et al. 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.

Table 2 Bat Habitat Suitability Assessment Criteria

Suitability	Description of Commuting/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	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 commuting bats 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 commuting, 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	Continuous, high quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats, 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 known roosts.

Bat Emergence Survey

- 2.8 The survey team comprised Principal Ecologist Rob Lamb (Level 1 Bat Licence Registration No. 2020-44441-CLS-CLS), Assistant Ecologists Rebekah Pipes and Izzy Tomkinson. All members of the survey team have the necessary experience of surveys for protected species, including bats, and are appropriately qualified to carry out this work based on the CIEEM competencies for survey (CIEEM 2013).
- 2.9 Survey methodology was based on the guidelines set out in *The Bat Survey Guidelines 4th Ed.* (Collins 2023), incorporating the use of night-vision aids (NVA) as the principal visual aid for detecting bat emergences.
- 2.10 Nightfox Whisker camera (plus Nightfox Arc infra-red torch kits where needed) were deployed in view of the identified PRF. The survey commenced 15 minutes prior to sunset and continued until 1.5 hours after sunset, taking into account the typical emergence times for the species considered likely to be present.
- 2.11 All NVA deployed were paired with an Anabat Walkabout or Scout to record echolocation calls and enable sonogram analysis for species identification. Surveyors were also equipped with Anabat devices to aid identification in the field and make notes on the general bat activity observed.

- 2.12 A map showing the location of the bat equipment can be found on Figure 1.
- 2.13 A screenshot of each NVA camera view at dark is provided in Plates 1a to 1c.

Plates 1a to 1c Screenshots of Each NVA Camera View at Dark

1a Camera 1



1b Camera 2



1c Camera 2



- 2.14 Surveyors regularly checked all equipment throughout the survey to minimise technical issues and adjust visual and night-vision lighting settings of the NVA systems as required. Any issues encountered were noted and listed in the Limitations section below.
- 2.15 All NVA footage was analysed for emergences following the survey, using up to 1.5x playback speed as appropriate. Footage analysis was undertaken by Assistant Ecologist Rebekah Pipes.
- 2.16 Sonograms were analysed using specialist sound analysis software Anabat Insight. Full spectrum files were processed through the BatClassify UK Auto ID plugin of Anabat Insight to automatically analyse the dataset. The sonogram dataset was then manually reviewed to ensure confidence in the Auto ID and address any discrepancies as necessary. Sonogram analysis was undertaken by Assistant Ecologist Rebekah Pipes.

Limitations

- 2.17 The site was fully accessible and the structure sufficiently accessible to complete the inspection survey elements.
- 2.18 The emergence survey was undertaken within the peak active bat survey season, in suitable weather and temperature conditions.
- 2.19 Overall, the surveys in combination are considered to provide a robust assessment of the building in respect of roosting bats.

3. RESULTS

Desk Study

- 3.1 A review of desk study data obtained revealed breeding sites/resting places for common pipistrelle (*Pipistrellus pipistrellus*) and *Pipistrellus* species as close as 490m from the site. Numerous other record types were obtained for at least five species of bat, including common pipistrelle, Daubenton's bat (*Myotis daubentonii*), *Myotis* species, noctule (*Nyctalus noctula*) and soprano pipistrelle (*Pipistrellus pygmaeus*).
- 3.2 Where bats are not recorded, this can often be a result of a lack of survey data available, rather than an indication that bats are absent.

Habitat Suitability Assessment for Bats

- 3.3 The surrounding area was assessed to have Moderate foraging habitat suitability for bats. The structure is in proximity to the River Irwell, which has banks that have broadleaved woodland corridors extending to habitat further from the town of Radcliff to open grassland to the east and grassland, woodland and agricultural fields and hedgerows to the west. These habitats are likely to provide good habitat connectivity with the wider landscape.

Preliminary Roost Assessment of Built Structures

- 3.4 The building, which is in a state of disuse, is a small, single-storey red brick-built outbuilding (Appendix 2, Photograph 1), with the brickwork and mortar in solid condition. The roof structure was slate-tiled and pitched. It was noted that many of the tiles had fallen in on the northern aspect since the previous survey was undertaken in 2022 (PAA 2022), making some remaining PRF on the roost interior more exposed.
- 3.5 The dilapidated condition of the building created numerous Low potential PRF. PRF present externally on the structure included gaps on the underside of the eaves creating access points to the inside of the building. There were gaps between the fascia boards and overhanging roof tiles as well as between the fascia boards and the top bricks around much of the structure (Photograph 2). External PRF included external crevices between gaps under the ridge tiles and raised roof tiles.
- 3.6 No bats or evidence of their presence were found during the inspection.
- 3.7 Overall, the structure was assessed to still have **Low** potential to support roosting bats, therefore, further survey was recommended.

Bat Emergence Survey

- 3.8 The dusk emergence survey was undertaken on 21st May 2025. The findings and conditions of the survey are summarised in Table 3.

Table 3 Dusk Emergence Survey Results, 21st May 2025

Species	First Recorded	Notes
Common pipistrelle (<i>Pipistrellus pipistrellus</i>) (CP)	21:50	CP were first heard at 21:50, recorded by an Anabat walkabout position at the south of the building. No bats were observed emerging or re-entering the building. General activity was low, with several commuting passes observed by the surveyors and the NVA cameras.
Surveyors and Location. See Map (Figure 1)		
Start Time: 21:00		Sunset: 21:12
		End time: 22:45
Conditions: Dry with calm wind. 5% cloud cover decreasing to 0%		
Temperature: 15°C decreasing to 10°C. Humidity: 53% increasing to 68%.		

Bat Activity on Site

- 3.9 Common pipistrelle was first detected at 21:50, with surveyors observing several commuting passes throughout the duration of the survey. A total of 64 common pipistrelle calls were recorded, including feeding buzzes and social calls.
- 3.10 No bats were seen to emerge or interact with the building during the survey. Based on the survey findings, it is assessed that bat roosts are likely absent from the structure.

4. DISCUSSION AND RECOMMENDATIONS

Survey Summary

- 4.1 The building within the site was assessed to have **Low** potential to support roosting bats.
- 4.2 According with best practice guidelines (Collins 2023), therefore, a single activity survey was recommended to ascertain presence/absence of roosting bats on the structure.
- 4.3 The follow-on bat activity surveys found a low level of bat foraging and commuting activity for common pipistrelle species. No bats were seen to emerge from the structure.

Recommendations

- 4.4 Based on the survey findings, it is assessed that bat roosts are likely absent from the building and, therefore, no further recommendations are made in respect of roosting bats at this time.
- 4.5 A low number of common pipistrelles were recording using surrounding habitats for commuting and foraging. Works have potential to impact indirectly on bat foraging and commuting, therefore best practice measures to safeguard bat habitats must be adopted. These are detailed within the accompanying Construction Environmental Management Plan (CEMP) document.
- 4.6 In the unlikely event that bats are found during future demolition, works should stop immediately, and advice be sought from a professional bat ecologist

Survey Validity

- 4.7 The findings of the survey should be considered valid for a period of two years from the date of survey (May 2025). If works have not commenced by April 2027 (the start of the 2027 bat survey season), then the need for update surveys should be considered. This would ensure the surveys do not become outdated and that the ecological advice given is based on up-to-date information.

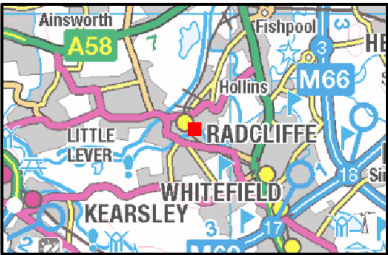
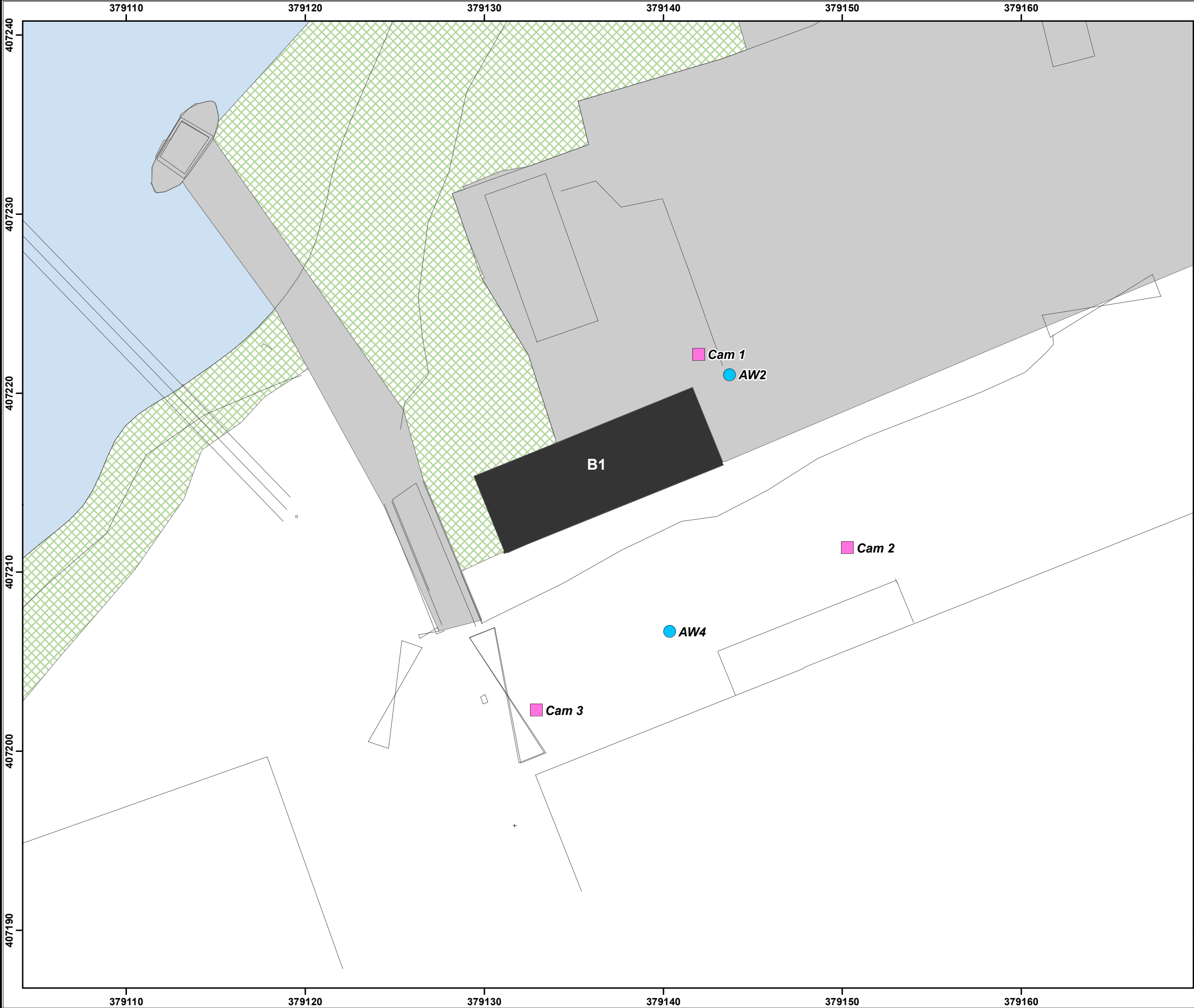
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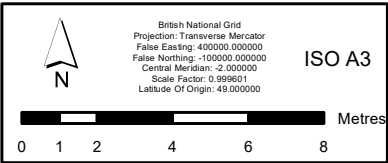
6. ABBREVIATIONS

CEMP	Construction Environmental Management Plan
CIEEM	Chartered Institute of Ecology and Environmental Management
CRoW	Countryside and Rights of Way
EPSL	European Protected Species Licence(s)
EU	European Union
GMLRC	Greater Manchester Local Record Centre
MAGIC	Multi Agency Geographic Information for the Countryside
NERC	National Environment and Rural Communities
NPPF	National Planning Policy Framework
NVA	Night-vision Aid(s)
PAA	Penny Anderson Associates Ltd
PRA	Preliminary Roost Assessment
PRF	Potential Roost Feature(s)
SSSI	Site(s) of Special Scientific Interest
WCA	Wildlife and Countryside Act

FIGURE



- Legend**
- Bat survey Equipment
- AW
 - Camera
- Habitats
- Building
 - Developed land
 - Dense scrub
 - River



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Project Name		Milltown	
Discipline		Ecology	
Title: Bat Survey Equipment Placement			
Scale 1:200		Drawing No. Figure 1	
Drawn By CC	Originator RP	Date 03/06/2025	
Grid Ref. 379,137 407,214		Revision 1.0	

APPENDICES

APPENDIX 1

Summary of the Legislation Relating to Bats

SUMMARY OF THE LEGISLATION RELATING TO BATS

All wild species of bat are protected under the Wildlife and Countryside Act (WCA) 1981, which has also been amended by later legislation, including the Countryside and Rights of Way (CROW) Act 2000. Bats are listed on Schedule 5 of the WCA and are therefore subject to some the provisions of Section 9 which, with the amendments, make it an offence to:

- Intentionally or recklessly disturb a bat while it is occupying a structure or place which it uses for shelter or protection (S9:4b).
- Intentionally or recklessly obstruct access to any structure or place used for shelter or protection by a bat (S9:4c).

There are additional offences in relation to buying and selling (S9:5) any live or dead animal of this species or anything derived from them.

Bat species are also listed under Annexes IIa and IVa of the EC Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora, also known as the 'Habitats Directive'. Inclusion on Annex IVa means they are consequently identified as European Protected Species (EPS) and protected under the Conservation of Habitats and Species Regulations 2017 (amended).

The Conservation of Habitats and Species Regulations 2017 (amended) state that a person commits an offence if they:

- (a) deliberately capture, injure or kill any wild animal of a European protected species,
- (b) deliberately disturb wild animals of any such species, in such a way as –
 - (i) to impair their ability to survive, to breed or reproduce, or to rear their young, or
 - (ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate, or
 - (iii) to affect significantly the local distribution or abundance of the species to which they belong;
- (c) deliberately take or destroy the eggs of such an animal, or
- (d) damage or destroy a breeding site or resting place of such an animal.

Under these Regulations it is an offence to damage or destroy a breeding site or resting place whether the animal is in occupation or not, and protection extends to all life stages of the animal in question. There are additional offences relating to possession, control and sale of a live or dead bat or part of such an animal.

In addition, seven native British bat species, including the soprano pipistrelle (*Pipistrellus pygmaeus*) and the brown long-eared bat (*Plecotus auritus*), are listed as 'species of principal importance' for the conservation of biodiversity in England under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (amended). In Wales, Section 7 of the Environment (Wales) Act 2016 provide a list of organisms of 'principal importance for maintaining and enhancing biodiversity' and lists several species of bat including the common pipistrelle (*Pipistrellus pipistrellus*) which is absent from England's S41 list.

Please note: the above text provides a brief summary of the legislation in relation to bats and their roosts and the original Acts, Regulations and any amendments should be referred to for the precise wording.

APPENDIX 2

Photographs

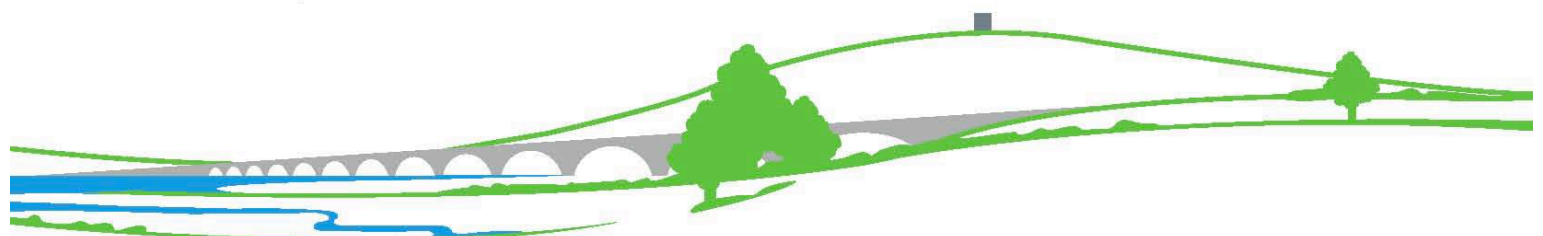


Photograph 1
Single-storey red brick-built outbuilding



Photograph 2
Gaps on the underside of eaves and between fascia boards and top bricks

Penny Anderson
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