



Aerial Tree Assessment

Spurr House

For

Watson Construction Ltd

Report Ref.: WAT005-001-009/001/001

April 2025

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Figure 1: Site Location

Figure 2: Ground Level Tree Assessment and Aerial Tree Assessment Survey Results

Figure 3: Photographs of Trees

1. Summary and Main Recommendations

1.1 Summary

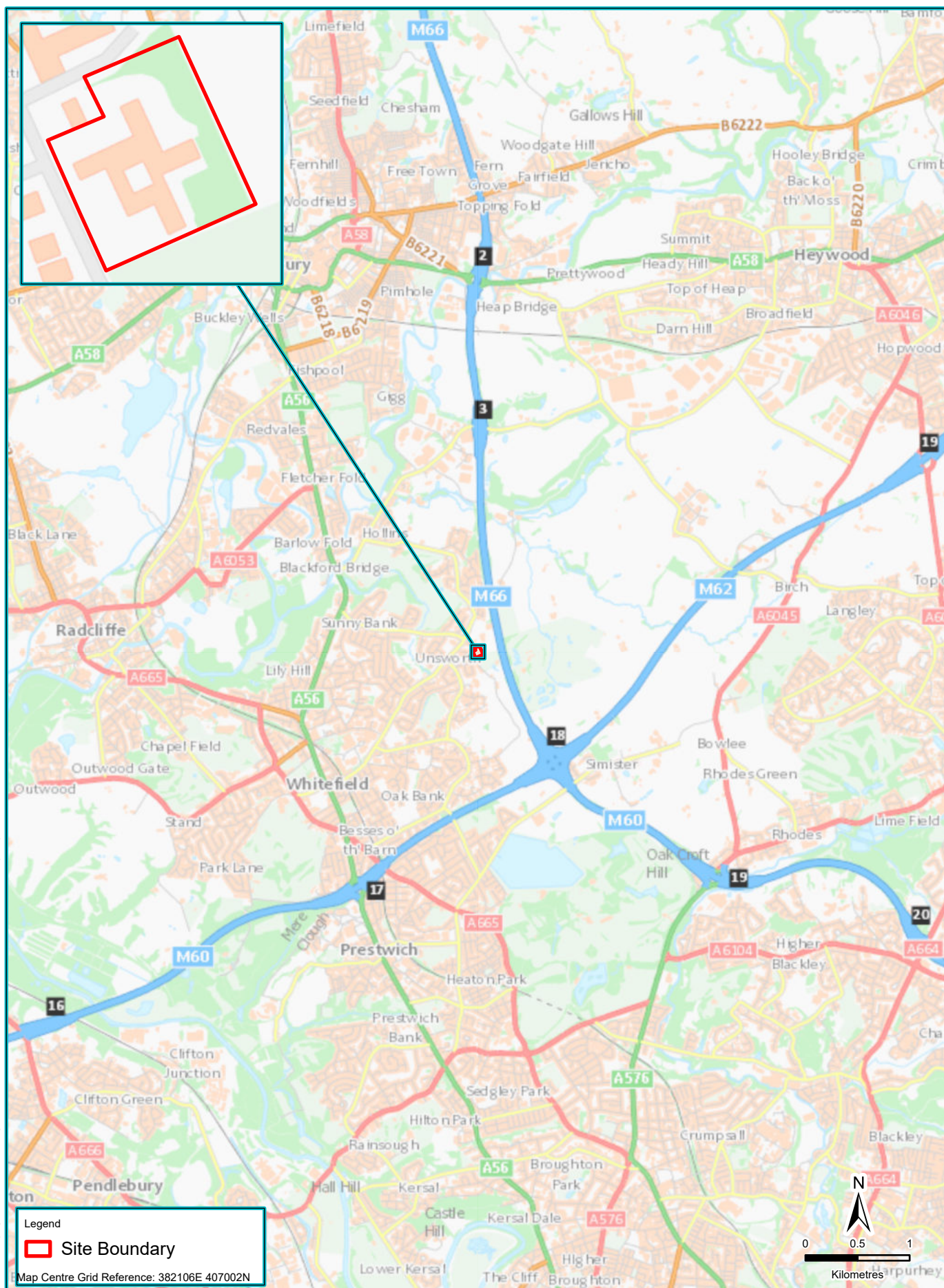
- 1.1.1 Watson Construction Ltd. is proposing the demolition of Spurr House, a former care home, on an approximately 0.68 Hectare (ha) site, to build affordable housing. The site is located near Bury, Greater Manchester and is shown on Figure 1.
- 1.1.2 Thomson Environmental Consultants (Thomson) was commissioned on 21st January 2024, to undertake an Aerial Tree Assessment of trees suitable for roosting bats at the Spurr House site.
- 1.1.3 Thomson previously carried out a Preliminary Ecological Appraisal (PEA), which included Ground Level Tree Assessment (GLTA) surveys of the site in September 2022 (Thomson, 2022a) for Gardiner and Theobald LLP, and identified two trees (T1 and T2) with bat roost suitability. T1 and T2 were found to have moderate suitability for roosting bats. Further surveys were recommended, and dusk/dawn surveys were conducted in 2022 (Thomson, 2022b) with no bats found to be roosting within these trees, with low bat activity levels on the site overall.
- 1.1.4 Thomson completed an updated GLTA survey (Thomson, 2024) that found T1 and T2 to be unchanged, however, under the new Bat Conservation Trust (BCT) guidelines (Collins, J. (ed.), 2023) they were classified as having PRF suitability. Another tree on site (T7) was also identified as having PRF suitability. A further four trees (T3 - T6) were identified on the site and were assessed as PRF-I suitability. All other trees on site were classed as having negligible potential for roosting bats.
- 1.1.5 The results of the aerial assessment were T1 (photograph 1 in Figure 3) was climbed and found to have PRF-M potential. T7 (photograph 4 in Figure 3) was assessed from the ground due to health and safety concerns of climbing this tree, and was found to have PRF-I suitability. T2 (photographs 2 and 3 in Figure 3) was also unsafe to climb, and was cautiously assumed to have PRF-M suitability. Another tree on site, T8 (photographs 5 and 6 in Figure 3), was assessed from the ground to have PRF-I suitability.
- 1.1.6 The proposed development has the potential to kill or injure bats, and destroy or damage roosts, as well as disturb bats when within their roost. The legal protection afforded to bats is summarised in Section 5 and Appendix 1. Killing or injury of bats would be an offence, as well as damage or destruction of a roosting site. Disturbance of roosting bats is also an offence.

1.2 Main Recommendations

- 1.2.1 Currently it is unknown if T3 and T8 will need to be felled. If felling is required, these trees have PRF-I potential so require a bat ecologist to check these trees for roosting bats before they can be felled. The PRF on T3 can be checked by an endoscope from the ground. T8 will require a Mobile Elevated Working Platform (MEWP) as the PRF is approximately 4m high and the tree is unsafe to climb.
- 1.2.2 T1 is approximately 10m from the proposed works area and has PRF-M potential. The tree doesn't have hibernation potential, but it is suitable for a maternity roost. There is a risk that if a maternity roost is present during the demolition or development works, bats could be disturbed by the works, thus causing an offence. Therefore, works should take place outside of the

maternity season (May - August, inclusive). If works cannot avoid the maternity season a 30m length of screening, at least 2m tall, should be placed along the woodland edge and the site so T1 is shielded from noise and light pollution. Also a buffer zone should be implemented around this tree by an Ecological Clerk of Works (ECoW) to ensure no one enters this area.

- 1.2.3 No other trees are due to be felled or pruned back. However, if this changes and other trees require felling or pruning then an ecologist must be contacted for further advice.
- 1.2.4 An ecological enhancement plan report should detail mitigation, such as bat boxes to be installed for like-for like PRF replacement.
- 1.2.5 The best practice measures below will be followed to reduce potential disturbance to bats that may be roosting within the trees on site assessed as PRF-I and PRF-M:
 - Night works should be avoided. If lighting is required the minimum amount of lighting required for the task should be used. Lights should be focused on the area of the works and cowls and hoods should be used to limit light spill upwards and into the surrounding vegetated habitats.
 - Machinery should be turned off when not in use and should not be left idling.



Client	Watson Construction Ltd		Drawing Ref	WAT005-001/406451/1	
Figure Number	1		Scale at A4	1:50,000	
Figure Title	Site Location		Drawn	SC	Checked
			Date	05/11/2024	AS

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Legend

**Ground Level Tree Assessment
Survey Results**

Overall Suitability of Tree to
Support Roosting Bats

- PRF-I
- PRF-M
- Site Boundary

Map Centre Grid Reference: 382106E 407002N

Contains Ordnance Survey data
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Drawing Ref		WAT005-001/406452/1	
Scale at A3		1:500	
Drawn	SC	Checked	AS
Date	17/04/2025	Date	17/04/2025
Client		Watson Construction Ltd	
Figure Number		2	
Figure Title			

Ground Level Tree
Assessment and Aerial Tree
Assessment Survey Results



Photograph 1: T1: PRF-M
Large cavity in trunk of tree.



Photograph 2: T2: PRF-M
PRF circled showing location of large rot/knot hole.



Photograph 3: T2: PRF-M
Close up of PRF.



Photograph 4: T7: PRF-I
Broken limb PRF circled.



Photograph 5: T8: PRF-I
Picture showing T8



Photograph 6: T8: PRF-I
Knot hole PRF circled.

Client	Watson Construction Ltd		Drawing Ref		WAT005-001-009/1/1		Thomson environmental consultants www.thomsonec.com enquiries@thomsonec.com
Figure Number	Figure Number 3		Drawn	LM	Checked	ER	
Figure Title	Photographs of Trees		Date 12/02/2025				

2. Introduction

2.1 Development Background

2.1.1 Watson Construction Ltd. is proposing the demolition of Spurr House, a large former care home, on an approximately 0.68 ha site, to build affordable housing. The development will also require the clearance of some of the grassland, scrub and woodland on site. The development will include the creation of two blocks of housing containing 38 one-bedroom, and 29 two-bedroom apartments, a road, car parking spaces and landscaping. The site is located on Pole Lane in Bury, Greater Manchester, BL9 8PX (central Grid Reference: SD 82103 06996) and is shown on Figure 1.

2.1.2 The proposals described above are hereafter collectively referred to as ‘the works’.

2.1.3 The area impacted by the works is hereafter referred to as ‘the site’. The site is in a residential area, with a motorway to the east of the site and areas of arable land, grassland and woodland in the wider area.

2.1.4 Planning permission for the development has not yet been submitted.

2.2 Ecology Background

2.2.1 A Preliminary Ecological Appraisal (PEA), including a Ground Level Tree Assessment (GLTA) was produced for Gardiner and Theobald LLP by Thomson Environmental Consultants in September 2022 (Thomson, 2022a) for a different development proposal, which planned to convert Spurr House to a school. The surveys and report identified and assessed two trees within the site with bat roost potential. T1 and T2 were found to have moderate potential. One dusk and one dawn survey for both T1 and T2 was completed, with no roosting bats found during the surveys (Thomson, 2022b). Overall, bat activity levels during the dusk and dawn surveys was found to be low on site.

2.2.2 Watson Construction Ltd was advised by Suzanne Waymont (Senior Ecologist at Greater Manchester Ecology Unit) in August 2024, that updated bat roost assessments were required, to ensure no significant condition changes have occurred since 2022.

2.2.3 Thomson completed and updated PRA and GLTA surveys (Thomson, 2024). The updated GLTA found T1 and T2 to be unchanged, however, under the new Bat Conservation Trust (BCT) guidelines (Collins, J. (ed.), 2023) they are classified as having PRF suitability. Another tree on site (T7) was also identified as having PRF suitability. A further four trees (T3 - T6) were identified on the site and were assessed as PRF-I suitability. All other trees on site were classed as having negligible potential for roosting bats.

2.3 The Brief and Objectives

2.3.1 Watson Construction Ltd commissioned Thomson Environmental Consultants on 21st January 2025 to undertake an aerial tree assessment within the development site. The brief was to:

- Carry out aerial assessment surveys for bat roosts in trees of T1, T2 and T7. Use tree climbing to assess the potential of all features located within each tree to support roosting bats. Surveyors will inspect any features with the potential to support bats using a camera, an endoscope, binoculars or a high-powered torch, as appropriate. Any evidence of bats will be recorded.
- Surveyors will work in pairs for safety purposes. All climbers will hold a full tree climbing certificate issued by City and Guilds and Lantra (CS38) to undertake canopy climbing and aerial rescue. As a minimum, one member of each team will hold a Level 2 Natural England Licence or be accredited agents.
- Following the climbing survey, a report will be provided including the methods and results of the surveys and a discussion of any legal issues and our recommendations as to how these may be overcome, including necessary avoidance, mitigation and compensation measures. The report will be supported by appropriate digitised mapping.

2.3.2 Though the quote above is for aerial assessment only. Another tree on site was identified as having roost potential during the aerial assessment survey, T8, and so a GLTA survey was completed on this tree.

2.4 Limitations

2.4.1 This report is based on the development boundary and layout shown on the site plan (drawing number B1045-02-P4) received by Rob Watson in January 2025. Subsequent changes to either may result in a requirement to reassess the potential impacts of the development, and the requirements for avoidance, mitigation and enhancement.

2.4.2 Two trees were unsafe to climb (T2 and T7) due to the presence of bracket fungus. Bracket fungus indicates the tree is not in good health and therefore branches could snap much easier than a healthy tree. This is not a major limitation as overall roost potential could be cautiously assessed from the ground and neither of these trees will be directly impacted by the works.

2.5 Surveyors

2.5.1 The survey was carried out on 5th February 2025 by Laura Meer BSc (Hons) MCIEEM Senior Ecological Consultant, BCT level 3 and Level 2 Survey Class bat licence holder (2023-11510-CL18-BAT), and Ecological Consultant Jack Crutchley MSc ACIEEM, level 1 bat licence holder and BCT level 3.

3. Methodology

3.1 Desk Study

- 3.1.1** A study area was defined as an area that encompassed the site and all land within 2km of the perimeter of the site. Records of designated sites and bat species were then sought for the study area.
- 3.1.2** Sources of information were as follows:
- The Multi-Agency Geographical Information for the Countryside (MAGIC)
 - Greater Manchester Local Records Centre (GMLRC)
- 3.1.3** To ensure records are relevant for this site, records that are older than 10 years were excluded from the desk study.
- 3.1.4** Requests for information were to the Biological Record Centre sent on 10/08/2022 with responses received by 19/08/2022.

3.2 Survey Area and Data Collection

- 3.2.1** The trees identified as having 'PRF' roost potential in the GLTA survey (Thomson, 2024) were included in the survey area. The survey area is the same as the site red line boundary and can be seen in Figure 2.
- 3.2.2** All data was recorded on the ArcGIS FieldMaps mobile mapping app.
- 3.2.3** During the survey the weather was 7 degrees Celsius, with heavy cloud cover and a light wind.

3.3 Ground Level Tree Assessment

- 3.3.1** Trees identified within the survey area were subject to detailed inspection from the ground, systematically visually surveying the tree from all possible aspects, including close to the stem and further from the base (as required). Results were recorded using a GPS enabled mobile mapper or paper form, with photographs taken to support results.
- 3.3.2** The survey searched for and recorded any PRFs which could be viewed from the ground. Those which were apparently pointing upwards were included in the assessment, as were seasonally wet features because these factors do not necessarily preclude use without further investigation. Where higher level areas of the tree were viewable from the ground, a high-powered torch was used to search for PRFs.
- 3.3.3** Features searched for included those in Table 3.2, defined according to Bat Roosts in Trees, (BTHK, 2018).

Table 3.1: PRF types that can be exploited by bats and how they form

Disease/Decay Formed PRFs	Damaged formed PRFs	Association formed PRFs
woodpecker holes	lightning strikes	fluting

Disease/Decay Formed PRFs	Damaged formed PRFs	Association formed PRFs
squirrel holes	hazard beams	ivy
knot holes	subsidence cracks	
pruning cuts	shearing cracks	
tear outs	transverse snaps	
wounds	welds	
cankers	lifting bark	
compression forks	desiccation fissures	
butt rots	frost cracks	

3.3.4 All trees with identified PRFs and requiring further assessment were photographed, numbered and the following information recorded:

- GPS coordinates
- species, height, condition (alive, dead etc)
- approximate diameter at breast height

3.3.5 Where PRFs were identified, they were recorded including PRF type, location on tree (stem or limb), height above ground and compass direction on the tree. Any evidence confirming or indicating use of a PRF was also recorded, including:

- GPS coordinates
- Bat droppings, feeding remains and corpses (with notes made on quantity, freshness and type);
- Dark staining below an access point that may be caused by bat faeces or urine;
- Staining around a hole that may be caused by the natural oils in bat fur; and
- Noises made by bats.

Contextual Information

3.3.6 For each tree, contextual information was also recorded to aid the assessment. This was distance to hedge, distance to woodland, distance to water, potential commuting corridors, potential foraging corridors, setting, surrounding area habitat quality and the level of disturbance.

Categorisation of Results

3.3.7 The suitability of potential tree roosting habitat was classified according to the broad categories in Table 3.3, based on the presence or absence of PRF.

Table 3.2: Guidelines for assessing the suitability of tree PRFs on proposed development sites for bats, to be applied using professional judgement (adapted from Collins ed 2023)

Suitability	Description
None	Either no PRFs in the tree or highly unlikely to be any
FAR	Further Assessment Required to establish if PRFs are present in the tree
PRF	A tree with at least one PRF present

3.3.8 Trees identified as 'none', with no bat roosting potential, were not recorded. Trees identified as FAR or PRF were recorded.

3.4 Tree Aerial Inspection Survey

3.4.1 Within the following method description, aerial close inspection surveys of trees with confirmed, or potential to contain, PRFs were carried out using ropes and harness, by suitably trained and qualified personnel.

3.4.2 Following assessment of the safest access route, PRFs were accessed and close inspected using an endoscope, torch and mirror (as necessary). PRFs targeted were based on Table 3.2.

3.4.3 All confirmed PRFs were classified according to the following categories in Table 3.4:

Table 3.4: Guidelines for assessing the suitability of tree PRFs on proposed development sites for bats, to be applied using professional judgement (adapted from Collins ed 2023)

Suitability	Description
None	No potential space to support roosting bats.
PRF-I	PRF is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats.
PRF-M	PRF is suitable for multiple bats and may therefore be used for a maternity colony.

3.4.4 All accessible PRFs were searched for evidence of use by roosting bats, including droppings (although these often deteriorate rapidly in trees) and bats occupying a PRF at the time of the survey.

3.4.5 During the classification visit, all PRFs were mapped within each tree (following the GLTA references) and numbered, with the following attributes recorded, and updated as necessary during subsequent visits:

- stem/limb diameter at the PRF
- no. entrances
- width of all entrances
- internal dimensions (height, width and depth) and apex shape

- internal conditions (substrate, dry, damp, wet, odour)
- presence of competitors
- presence of bats / bat droppings
- lack of evidence of use by bats
- if roosting bats present: species, number, state (torpid/awake), location in PRF, distance from entrance

3.4.6 Following completion of all PRF inspection surveys, potential roost types were recorded as far as possible according to Table 3.5. Where certainty of roost classification was low, further surveys may be recommended to enable a reliable conclusion to be drawn, if necessary.

Table 3.5: Classification of bat roost type definitions (adapted from Collins ed 2023)

Roost Type	Definition
Day roosts	Where bats shelter as individuals or small groups during the day. This term can be applied in conjunction with other roost types, typically transitional depending on the season and nature of use (see below). Perhaps most commonly applied to males during the summer season when females gather in nursery colonies. Occupancy typically throughout the active season (April - October)
Night roosts	Where bats shelter at night as individuals or a whole colony. These can be located very close to or within the same structure as day roosts. Occupancy typically throughout the active season (April - October)
Feeding roost	Used by individuals or small groups for feeding at night between foraging bouts. These are often in association with night roosts especially for species such as brown long-eared. These can also be very close to or within the same structure as a day roost. Occupancy typically throughout the active season (April - October)
Transitional roost	A roost used by bats between the summer and winter seasons, often (though not always) during a physical movement phase between summer and wintering roosts/geographical locations. This term can be applied to other roost types if they are used only during the transitional period. Indicated mainly by the time of year (typically April - early May, or September - October).

Roost Type	Definition
Maternity roost	Mainly dominated by females where they give birth to young and raise these. Maternity roost characteristic preferences differs between species, however warm conditions are generally favoured, typically larger spaces that are south facing and retain warm temperatures during the maternity season (May - August).
Hibernation roost	Where bats are found individually or in groups during winter. These classically need to have cool temperature and high humidity, although more 'cold hardy' species can be found hibernating singly/in low numbers within day roosts which are used year-round (sometimes referred to as 'winter roosts'). Typically November - March, peak season in December - February.
Satellite roost	An alternative roost found in close proximity to the main nursery colony used by a few individual breeding females to small groups of breeding females throughout the breeding season.

4. Results

4.1 Desk Study

- 4.1.1** Seven designated sites were identified within 2km of the site, the closest being Parr Brook Site of Biological Interest located 0.5km from the site, however, none of these were designated due to their bat assemblage.
- 4.1.2** Twenty two bat records were returned in the desk study within 2km of the site within the last 10 years. Species were common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*) and unidentified pipistrelle species. The closest record was of a common pipistrelle located 600m west of the site, the bat was found grounded.
- 4.1.3** There were no records of bat species returned in the desk study within 1km of the site within the last ten years.
- 4.1.4** A search on MAGIC for European Protected Species (EPS) licences granted for bats within 2km of the site returned no results.

4.2 Ground Level Tree Assessment Survey

- 4.2.1** A PRF on a tree on site was seen during the aerial inspections, that was missed in the previous GLTA survey in 2024. This is T8 (Photographs 5 and 6 in Figure 3), and is located approximately 1m from the works area. T8 could not be climbed due to the presence of bracket fungus. However, given the size of the tree and type of feature it could be accurately assessed as PRF-I potential from the ground, further survey information for T8, and the reason for the classification are given in Table 4.1 below and in Appendix 2.

Table 4.1: Summary of GLTA results

Attribute	T8
Tree species	Crack willow
Life stage and condition	Mature alive
Type of PRF 1	Broken Limb
Type of PRF 2	Knot hole
PRF1 suitability (estimated)	PRF-I
PRF2 suitability (estimated)	PRF-I
Setting	Suburban
Distance from woodland or waterbody	Within a woodland and <100m from waterbody
Level of disturbance/ lighting	Low
Tree suitability	PRF-I

Table 4.1: Summary of GLTA results

Attribute	T8
Tree species	Crack willow
Life stage and condition	Mature alive
Type of PRF 1	Brocken Limb
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PRF1 suitability (estimated)	PRF-I
PRF2 suitability (estimated)	PRF-I
Setting	Suburban
Distance from woodland or waterbody	Within a woodland and <100m from waterbody
Level of disturbance/ lighting	Low
Tree suitability	PRF-I

4.3 Aerial Tree Assessment Survey

- 4.3.1** T1 (Photograph 1 in Figure 3) was climbed and was found to have PRF-M potential. The PRF is a split in the main trunk of the tree that starts 1m high and ends approximately 6m high facing south towards the building on site. The PRF has an entrance of 7cm and is 15cm deep and 25cm wide. Due to the entrance size the tree is likely to be unsuitable for hibernation as the feature is not deep and covered enough to keep a stable temperature. However, it does have maternity roost potential. No evidence of bats was found, though this is not proof bats do not use the tree. The tree is located at the bottom of a slope, approximately 10m from the works area above.
- 4.3.2** T7 (Photograph 4 in Figure 3) was unsafe to climb as bracket fungus was present. However, the only PRF on this tree is a broken limb approximately 4m high facing west. The limb is not large enough to offer maternity or hibernation potential and was therefore assessed as PRF-I potential.
- 4.3.3** T2 (Photographs 2 and 3 in Figure 3) was also unsafe to climb due to the presence of bracket fungus. The tree is located 15m from the works area within the woodland. It would not be possible to access this tree with a MEWP due to the surrounding trees. The main PRF of this tree that could have maternity and hibernation potential is a large rot/ knot hole approximately 6m high facing west. From the ground it is unknown if this PRF is deep enough for PRF-M potential, however it cannot be ruled out, and therefore this tree is cautiously assessed as having PRF-M potential.

5. Legislation and Planning Policy Considerations

5.1.1 All UK bat species are protected by the Conservation of Habitats and Species Regulations 2017 (as amended). The Regulations make it an offence, with very few exceptions, to:

- Deliberately capture, injure or kill a bat;
- Deliberately disturb a bat in such a way as to be likely:
 - i. to impair its ability to survive, to breed or reproduce, or to rear or nurture its young; or
 - ii. to impair its ability to hibernate or migrate; or
 - iii. to affect significantly the local distribution or abundance of the species to which they belong.
- Damage or destroy a breeding site or resting place of a bat; or
- Keep, transport, sell or exchange, or offer for sale or exchange, any live or dead bat, or any part of, or anything derived from a bat.

5.1.2 In addition to the protection given to bats under the Conservation of Habitats and Species Regulations 2017 (as amended) already described, bats receive additional protection under the Wildlife and Countryside Act 1981 (as amended), which adds the following offences (with certain exceptions):

- Disturbance while it is occupying a structure or place which it uses for shelter or protection; or
- Obstructing access to any structure or place used for shelter or protection.

5.1.3 A roost is any structure or place used by bats for shelter or protection. As bats tend to re-use the same roosts year after year, the roost is protected whether or not bats are present at the time

5.1.4 The works have the potential to disturb bats whilst roosting.

5.2 Planning Policy

5.2.1 Seven species of bats have been adopted as Species of Principal Importance for the Conservation of Biodiversity in England (see Appendix 1). Under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, the Secretary of State must publish a list of species which in the Secretary of State's opinion are species of principal importance for the purpose of conserving biodiversity. Planning authorities are required to have particular regard to these species, and treat them as a material consideration in the planning process. Most protected species are also listed as species of principal importance. Species of principal importance are often referred to as 'priority species'.

5.2.2 Consideration of species of conservation concern during development projects is a requirement of the NERC Act 2006 which states that any *"public authority must, in exercising its functions, have regard ... to the purpose of conserving biodiversity"* and *"conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat."*

5.2.3 Policy EN6/3 of the Bury Unitary Development Plan (1997) states that *"the effect of land use changes on existing features of ecological or wildlife value will be taken into account when*

assessing development proposals', and that 'the Council will seek to negotiate with developers, where appropriate, to mitigate the potential effects of development on features of ecological value'.

5.2.4 Also, the Bury Council Biodiversity Strategy (2024) states that from 2024 *"The Council will expect relevant proposed developments to incorporate nesting or roosting opportunities for birds and bats"*.

5.2.5 To comply with legislation and planning policy, the avoidance, mitigation and compensation measures outlined in Section 6 in relation to bats should be adopted as part of the development proposal.

6. Recommendations

6.1 Background

- 6.1.1 The GLTA and aerial assessment surveys have identified eight trees on site that have roost potential. T1 and T2 were found to have PRF-M potential and the other six trees were found to have PRF-I potential.
- 6.1.2 Under current proposals, T3 and T8 are likely to require felling. All other trees should not be directly impacted by the development but could be impacted through disturbance from the noise and lighting caused by the enabling and development works.
- 6.1.3 The legal protection afforded to bats is summarised in Section 5 and Appendix 1. Killing or injury of bats would be an offence, as well as damage or destruction of a roosting site. Disturbance of roosting bats is also an offence.

6.2 Avoidance and Mitigation

- 6.2.1 If it is confirmed that T3 and T8 are required to be felled, these trees have PRF-I potential so require a bat ecologist to check these trees for roosting bats before they can be felled. The PRF on T3 can be checked by an endoscope from the ground as it is only 2m high. The PRF on T8 will require a MEWP as the PRF is approximately 4m high and the tree is unsafe to climb.
- 6.2.2 T1 is approximately 10m from the proposed works area and has PRF-M potential. The tree doesn't have hibernation potential, but it is suitable for a maternity roost. The tree is located down the slope from the works area and some trees act as a buffer between the works area and this tree. However, there is a risk that if a maternity roost is present during the enabling or development works, bats could be disturbed by the works, thus causing an offence. Therefore, works should take place outside of the maternity season (May - August, inclusive). If works cannot avoid the maternity season a 30m length of screening, at least 2m tall, should be placed along the woodland edge between the works site and the tree, so that T1 has extra shielding from noise and light pollution created by the works. Also, a buffer zone should be implemented around this tree by an Ecological Clerk of Works (ECoW) to ensure no one enters this buffer area.
- 6.2.3 No other trees are due to be felled or pruned back. However, if this changes and other trees require felling or pruning then an ecologist must be contacted for advice.
- 6.2.4 If, during the construction phase, works at night are necessary, any lighting used to facilitate the works should be implemented using a sensitive lighting regime. This should include the focus of lighting to be on the works area only, and directed away from suitable habitat for commuting and foraging bats, including trees, and woodland. Any light spill in the surrounding trees and habitats should be minimised to prevent disturbance to any foraging or commuting bats that may be present, and ideally night work should be avoided. Additionally, noise pollution should be kept to a minimum, and machines turned off when not in use.

6.3 Opportunities for Enhancement

- 6.3.1 It is recommended an Ecological Enhancement Plan report is completed for the development. This report should include how lighting impacts can be reduced during the operational phase of the development. It should also include location and specification of required enhancements, such as bat boxes, to be confirmed within the EEP once the felling requirements are identified.

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Appendix 1: British Bats

Introduction

A summary of the biology of British bats and the legislation and policy that protects them is provided below.

Biology

There are 18 British species of bats, belonging to two families; the horseshoe bats (*Rhinolophidae*) and vesper bats (*Vespertilionidae*). Of the 18 species, two species are horseshoe bats and belong to the genus *Rhinolophus*, the remaining 16 species are vesper bats and are sub-divided between six genera; *Myotis*, *Eptesicus*, *Nyctalus*, *Pipistrellus*, *Plecotus* and *Barbastella*. Whilst there are many differences in the biology of the different species, all share certain characteristics, and these are described below.

Roosting

Bat species utilise roost sites of varying character; some preferring tree roosts whilst others are thought to be almost entirely dependent on built structures. Most bats will have a number of available roosting sites within their range, which they move between throughout the year. They are generally faithful to their roosts and a colony of bats may use the same roost site(s) year after year.

Bats hibernate during the winter and will often gather to hibernate communally, remaining in the same hibernation roost from November to February/March. Hibernation roost sites typically have a constant low temperature and high humidity levels. Sites include caves, mines, thick-walled buildings and hollow trees. With the arrival of spring, the ambient temperature and day length increase and bats begin to leave their hibernation roosts, either moving immediately to summer roost sites or occasionally, to a transitional roost.

By June, breeding females will begin to congregate in maternity roost sites where they will give birth to and nurture their young. Male bats are also occasionally found roosting in maternity roosts but during this period they mostly roost alone. Maternity roost sites include hollowed out trees, buildings and bridges. Male bats may use similar sites but also cracks and crevices in trees, under loose tiles or even amongst dense ivy growth during the summer period. Similar sites may be used by bats for brief periods during the night when they are resting or feeding on recently caught prey. In autumn, male bats establish mating roosts and are visited by females. A variety of roost sites may be used until the bats return to their hibernation roosts.

Foraging

All British bat species feed on invertebrates, with flies, beetles, moths and other insects making up much of their diet. Areas with an abundance of insect prey, such as woodlands, scrub, wetlands, river corridors and flower rich grasslands are therefore favoured foraging sites for bats. Habitats such as intensively farmed arable land, and amenity grassland support a much lower invertebrate abundance and are therefore less favoured foraging habitats for bats.

Commuting

Bats favour roost sites in close proximity to suitable foraging habitat, however, given variation in prey availability, land-use change, and competition with other bats, for at least part of the year bats must commute between their roosts and foraging habitat.

Commuting routes tend to follow linear features in the landscape such as hedgerows, woodland edges, rivers and other watercourses, particularly when crossing areas of less favourable habitat. The distance that bats commute between roost sites and foraging areas is dependent on local geography and also the species of bat. Some species will travel up to 18km, though shorter distances are more typical.

Site Designation

All bat roosts in the UK receive protection under the following legislation:

- Conservation of Habitats and Species Regulations 2017 as amended (which replaces the Conservation (Habitats &c) Regulations 1994 as amended)
- Wildlife and Countryside Act 1981, as amended;
- The Countryside and Rights of Way Act 2000 (which amends the Wildlife and Countryside Act); and
- Natural Environment and Rural Communities Act 2006 (which amends the Wildlife and Countryside Act).

This is described in more detail under 'Species Protection' below. In addition, the most important sites for certain bat species in the UK receive further statutory protection through designation of Special Areas of Conservation (SACs) and/or Sites of Special Scientific Interest (SSSIs).

Four UK bat species, the greater and lesser horseshoe, barbastelle and Bechstein's bats, are included on Annex II of the European Community Directive of the Conservation of Natural Habitats and of Wild Fauna and Flora, referred to as the Habitats Directive. The Habitats Directive was transposed into UK law by the Conservation of Habitats and Species Regulations 2017 as amended. The Habitat Regulations, amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, now form stand-alone legislation for England and Wales, independent of the Directive. This legislation requires that areas are designated as Special Areas of Conservation (SACs) to protect populations of these 4 bat species. These sites form part of the National site network and are considered to be of international importance for the bat populations they support.

Sites designated under the Wildlife and Countryside Act 1981 (WCA) are known as Sites of Special Scientific Interest (SSSIs). SSSIs received further protection under the Countryside and Rights of Way Act 2000 (CRoW) and the Natural Environment and Rural Communities (NERC) Act 2006.

Some SSSIs are designated for the population(s) of bats that they support. The criteria for selecting SSSIs on the basis of their bat populations are provided in Guidelines for the Selection of Biological SSSIs (NCC, 1989):

- Greater horseshoe bat - all main breeding roosts and all winter roosts with 50 or more adult bats;
- Lesser horseshoe bat - all main breeding roosts containing 100 or more adult bats and all winter roosts containing 50 or more bats;
- Barbastelle, Bechstein's and grey long-eared bats - any traditional breeding roosts;

- Natterer's, Daubenton's, whiskered, Brandt's, serotine, noctule and Leisler's bats - only exceptionally large breeding roosts or those with a long history of use; and
- Mixed Roost sites - all hibernacula containing four or more species and more than 50 individuals or three species and 100 or more individuals or two species and 150 or more individuals, though these criteria may be lower in some parts of the UK.

Sites that qualify as SSSIs for the bat populations they support are considered to be of at least national importance.

Sites designated for nature conservation at the county level may also include bat populations as part of the site qualifying criteria, although the criteria used may vary from county to county. Such sites are protected through the planning system and there is generally a presumption against development that affects such sites in local authority development plans.

Planning Policy

The National Planning Policy Framework (NPPF) 2019, gives further direction with respect to biodiversity conservation and land use change / development. The NPPF encourages local planning authorities to identify, conserve and restore, ecological networks, which should benefit bats, and it also states that planning permission should be refused if significant harm to biodiversity cannot be avoided, mitigated or compensated. In addition, the Government Circular 06/05, which relates to biodiversity conservation, states that all protected species, such as bats, are a material consideration for the planning authority when considering proposed developments.

Species Protection

Legislation

All bat species are protected by the Conservation of Habitats and Species Regulations 2017 as amended. The Regulations make it an offence, with very few exceptions, to:

- Deliberately capture, injure or kill a bat;
- Deliberately disturb a bat in such a way as to be likely:
 - iv. to impair its ability to survive, to breed or reproduce, or to rear or nurture its young; or
 - v. to impair its ability to hibernate or migrate; or
 - vi. to affect significantly the local distribution or abundance of the species to which they belong.
- Damage or destroy a breeding site or resting place of a bat; or
- Keep, transport, sell or exchange, or offer for sale or exchange, any live or dead bat, or any part of, or anything derived from a bat.

In addition to the protection given to bats under the Conservation of Habitats and Species Regulations 2017 as amended already described, bats are also partially protected in England under the Wildlife and Countryside Act 1981 (as amended), which adds the following offences (with certain exceptions):

- Disturbance while it is occupying a structure or place which it uses for shelter or protection; or
- Obstructing access to any structure or place used for shelter or protection.

A roost is any structure or place used by bats for shelter or protection. As bats tend to re-use the same roosts year after year, the roost is protected whether bats are present or not, at the time.

In this context of the legislation, 'damage' would include such operations as treatment of wood with toxic preservatives or use of rodenticides near roosting bats while 'disturbance' includes any work in or affecting a bat roost.

If proposed actions, such as redevelopment of an existing building may lead to an offence under the above legislation, appropriate mitigation which seeks to avoid these impacts should be devised and implemented under licence from Natural England to allow the activity to proceed legally.

In addition to the above legislation, all bats are protected under the Bonn Convention, within which the Agreement on the Conservation of Bats in Europe (1991) or EUROBAT, establishes a mechanism for international collaboration to conserve bats and their habitats, including foraging habitats. All European bat species are covered under Appendix II of the Conservation of Migratory Species of Wild Animals (CMS).

The Hedgerow Regulations 1997 provide for the conservation of 'important' hedgerows and their constituent trees. The presence of a protected species such as bats is included in the assessment of whether a hedgerow is considered 'important' and applications to remove such hedgerows must be made to the planning authority.

UK Post-2010 Biodiversity Framework and Species of Principal Importance

Published by the Joint Nature Conservation Committee (JNCC) and the Department for Environment, Food and Rural Affairs (Defra) in July 2012, the UK Post-2010 Biodiversity Framework identifies UK-scale activities and priority works that are required to deliver the EU Biodiversity Strategy. Following a process of devolution, the framework is underpinned by country level strategies which are now largely responsible for continuing the work carried out under the former UK Biodiversity Action Plans (UK BAP). JNCC guidance dictates that UK BAP background information on priority species and habitats still remains relevant and it now forms the basis of country specific priority lists, which for England, are specified under Section 41 of the Natural Environment and Rural Communities Act 2006 (the NERC Act). Targets for England's biodiversity strategy 'Biodiversity 2020': A strategy for England's wildlife and ecosystem services, are informed by this list.

Seven species of bats (Barbastelle, Bechstein's, greater and lesser horseshoe, brown long-eared, noctule and soprano pipistrelle) have been adopted as Species of Principal Importance for the Conservation of Biodiversity in England. This places a duty on all government departments to have regard for the conservation of these species and on the Secretary of State to further, or promote others to further, the conservation of these species. Furthermore, the NPPF states that local planning authorities should promote the protection and recovery of priority species populations linked to national and local targets, which presumably means those listed under the Section 41 of the NERC Act, the former UK BAP and on Local or Regional priorities species lists.

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Appendix 2: GLTA Results

PRF in T8 was missed during the GLTA survey. Therefore, results of the GLTA of this tree are included in the aerial assessment report.

Attribute	T8
Tree species	Crack willow
Tree age	Mature
Tree height	10m
Tree diameter	1m
Tree condition	Good health
PRF 1 Type	Broken limb
PRF 1 Exposure	Moderate
PRF 1 Height and Orientation	4m south
PRF 1 Size of PRF	Approx. 5cm
PRF 2 Type	Knot hole
PRF 2 Exposure	Moderate
PRF 2 Height and Orientation	4m southwest
PRF 2 Size of PRF	Approx 5cm
Distance to hedge	<100m
Distance to woodland	Within a woodland
Distance to water	<100m
Surrounding area habitat quality	Moderate
Level of disturbance/lighting	Low