
Albion Mill, Bury

Preliminary Roost Assessment (Bats)

Compiled by Ecology Services Ltd.

on behalf of

Bracknell Properties Ltd.

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1.0 Introduction

- 1.1 Ecology Services Limited was commissioned by Bracknell Properties in January 2025 to undertake a Preliminary Roost Assessment (PRA) of structures/buildings at Albion Mill, Albion Street, Bury, BL8 2AD hereinafter referred to as 'the site'. The centre of the site is located by National Grid Reference (NGR) SD 79581074. The location and boundary of the site is shown on Figure 1.

Site Description

- 1.2 The site is located within the town centre of Bury and contains a metal building (B1) used for car storage with adjacent buildings comprising of a mill building and a large chimney. To the west of B1 is a canalised watercourse with scrub and trees.

Proposals

- 1.3 It is understood that proposed development activities at the site include the demolition of B1, part of Albion Mill rear and the subsequent creation of car parking spaces. The development proposals are shown on Figure 2.

Survey Objectives

- 1.4 The aim of the preliminary roost assessment was to:
- Undertake a visual inspection of the site to establish baseline conditions;
 - Complete an assessment to ascertain if potential or evidence of use existed for bat species; and
 - Determine if there are requirements for further and/or more detailed surveys.
 - Consider the potential for year-round usage including the temperature and humidity conditions likely to be present within the structure during the winter period and the suitability in this respect for it to be used by hibernating bats.
- 1.5 The purpose of this report is to state the survey methodology, present the results of the survey undertaken, evaluate the findings, assess the impacts of the proposals and make recommendations concerning the protection of bat species that may be present at this site. Where possible the report will aim to provide sufficient information to allow a local authority to assess fully the potential impacts of the proposed development on roosting bats.

2.0 Planning Policy and Legislation

- 2.1 This section provides a brief overview of planning policy and legislation relevant to bats in the England. Further information is provided in Appendix 1.

Planning Policy

- 2.2 The National Planning Policy Framework (NPPF, 2023) places a clear responsibility on Local Planning Authorities (LPAs) to contribute to conserving and enhancing the natural and local environment. LPAs should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species (e.g. Species of Principal importance, Local Biodiversity Action Plan species); and identify and pursue opportunities for securing measurable net gains for biodiversity. In accordance with the NPPF, local planning policy and guidance, development proposals should provide integrated improvement for biodiversity at the site and seek to maintain and enhance opportunities for bats. The Office of the Deputy Prime Minister (ODPM) Circular 06/2005 provides administrative guidance on the application of the law in relation to planning and nature conservation.

- 2.3 Protected species within England such as bats, are a 'material consideration' in the determination of a planning application. Therefore, an LPA is unlikely to determine an application until all relevant information relating to protected species or habitats is submitted to fully inform the application. Relevant information includes adequate surveys and, where required, mitigation strategies, which will need to be submitted to inform a planning application.
- 2.4 The local planning authority (LPA) has a duty to ensure that protected and priority species (e.g. Species of Principal Importance, Biodiversity Action Plan species) are fully considered in a planning decision. Therefore, up to date survey information and, where required, mitigation strategies adequate to assess the impacts of the proposals and to demonstrate that opportunities for species using the site can be maintained, must be provided in support of a planning application.

Legislation

- 2.5 All bats and their roosts receive strict protection under the Wildlife & Countryside Act 1981 (as amended) and the Conservation of Habitats & Species Regulations 2017 (as amended)¹. In brief, this legislation makes it an offence to: kill, injure or capture a bat; to destroy, damage or obstruct access to a bat roost; or to disturb a bat occupying a roost. A Local Authority is a 'competent authority' within the context of Regulation 7 of the Conservation of Habitats & Species Regulations 2017 (as amended) when dealing with planning applications where a European Protected Species (EPS) (all bat species) may be affected. Therefore, planning decisions should only be made when European Protected Species and their habitats are fully taken into account.
- 2.6 Where proposed works are likely to contravene the legislation protecting bats, a Natural England licence must be applied for, and approved, before works can proceed.
- 2.7 Section 40 of the Natural Environmental and Rural Communities (NERC) Act 2006 (as amended) places a statutory duty on public authorities, in exercising their functions, to further the conservation and enhancement of biodiversity in England. Species of Principal Importance for the conservation or enhancement of biodiversity in England, identified by the Secretary of State in consultation with Natural England, are listed under Section 41 of the NERC Act. The Local Planning Authority and government bodies (e.g. Natural England) will expect the overall design of the development to further the conservation and enhancement of populations of these species. Seven bat species are listed as 'Species of Principal Importance' under Section 41 of the NERC Act 2006 (as amended):
- Noctule (*Nyctalus noctula*)
 - Soprano pipistrelle (*Pipistrellus pygmaeus*)
 - Lesser horseshoe (*Rhinolophus hipposideros*)
 - Greater horseshoe (*Rhinolophus ferrumequinum*)
 - Barbastelle (*Barbastella barbastellus*)
 - Bechstein's (*Myotis bechsteinii*)
 - Brown long-eared (*Plecotus auritus*)

¹ The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 continue the same provision for European protected species, licensing requirements and protected areas after Brexit.

3.0 Methodology

Desktop Study

- 3.1 Ecological data and records searches were undertaken by contacting the sources listed in Table 1.

Table 1: Ecological Desktop Study Sources

Source of information	Information supplied
Greater Manchester Local Biodiversity Action Plan (LBAP)	Identification of LBAP species known to occur in the region.
Natural Environment and Rural Communities (NERC) Act 2006 (as amended)	Review of Species of Principal Importance known to occur in the region.
Multi Agency Geographical Information for the Countryside (MAGIC) website	Statutory protected sites designated for their bat interest within 2km of the site. Records of bat roosts relating to Natural England EPS licences within 2km of the site.
National Biodiversity Network (NBN) Atlas	Records of bats and bat roosts within 5km of the site.

- 3.2 Data search areas have been determined based upon assessment of habitats within the site and within the immediate surrounding habitats, the potential Zone of Influence of the project, and surveyors' knowledge of bat species that may be present.
- 3.3 No site-specific data search has been undertaken for bats. In some cases, for Preliminary Roost Assessments of buildings in low impact / small-scale scenarios, such as an extension to a residential property, loft conversions (full or partial), installation of Velux/dormer windows, single modern agricultural or similar building conversion or demolition, it may be acceptable to not undertake a data search with the Local Environmental Records Centre or other relevant sources (CIEEM, 2020). In this instance a data search was not considered necessary due to the small-scale nature of the proposed works.

Preliminary Roost Assessment (PRA) Survey

- 3.4 Each building/ structure was categorised according to its level of suitability; any evidence of roosting bats found during the inspection and suitability and quality of the surrounding habitat (see Appendix 2, Table 4.1).
- 3.5 The preliminary roost assessment followed the methodology set out in the Bat Conservation Trust's 'Bat Surveys for Professional Ecologists: Good Practice Guidelines' (Collins (ed.), 2023).
- 3.6 An interior and exterior inspection of the buildings/structures was undertaken to search for any potential roosting features and evidence of roosting bats. Signs surveyed for included droppings, dead bats, feeding remains (beetle, moth and butterfly remains), urine staining and grease marks around crevices and down walls, odour (ammonia type smell) and any noises such as scratching and audible bat calls. An Explorer Premium 8803AL (9mm) endoscope and a ladder were used to check accessible features. A Clulite Long Ranger LED Pistol Light (1200 lumens) and close focusing binoculars were used to better assess any features of interest not accessible. Photographs were taken for later review.

Buildings/Structures

- 3.7 Preliminary roost assessments of buildings and structures can be undertaken at any of the year and can provide conclusive results, which can save expense and time for a planning

applicant. The optimum time to investigate the presence of bats is usually during their active season when signs of presence can be more easily located, although this is dependent on the type of roost being inspected.

Personnel

- 3.8 The PRA inspection survey was undertaken by Senior Consultant Ecologist Miss. C. Wood MSc, BSc (Hons), ACIEEM, who holds a Bat Class Licence Level 1 (Registration number 2021-51184-CLS-CLS).

Timing

- 3.9 The PRA inspection survey was conducted on the 28th January 2025.
- 3.10 The daytime survey was conducted at a time when bats will be in a state of torpor/hibernating characterised by a lower metabolic heart rate, body temperature and slowed breathing due to a lack of food. Bats will roost on their own or in small groups at suitable hibernation sites. Presence of bats may be identified although evidence of bat occupation such as droppings and urine stains may be less obvious. However, depending upon species and roost location, it is possible to locate evidence of previous bat occupation even if the roost is only used seasonally.

Weather Conditions

- 3.11 Weather conditions during the survey were reasonable with no appreciable rain or wind affecting survey.

Roost Status

- 3.12 If evidence of a bat roost is recorded during the surveys, the status of the roost is evaluated based on its function. This requires sufficient survey effort to determine the species and numbers of roosting bats present, the time of year that the roost is used and characteristics of the roost itself. The Bat Conservation Trust's 'Bat Surveys for Professional Ecologists: Good Practice Guidelines' (Collins (ed.), 2023) details types of bat roosts which may be defined in several ways, as below:
- Day roost – where individual bats or small groups of bats, rest or shelter in the day.
 - Night roost – where bats rest or shelter in the night but are rarely found during the day.
 - Feeding roost – where individual or few bat/s rest or feed during the night.
 - Transitional roost – used for short periods of time by few or occasionally small groups of bats on waking or prior to the hibernation period.
 - Swarming site – large numbers of males and females gather during late summer to autumn.
 - Mating sites – where mating takes place from late summer and through winter.
 - Maternity roost – where females give birth and raise their young.
 - Hibernation roost - where bats may be found during winter. To have a constant cool temperature with high humidity.
 - Satellite roost – an alternative roost used by individual to small numbers of breeding females over the breeding season. Usually close to main nursery colony.
- 3.13 Roost selection is often closely correlated with presence of suitable foraging habitat within a reasonable commuting distance from the roost. Different roost sites are used throughout the active season which is most dependent upon roost microclimate and abundance of invertebrate prey nearby. Weather conditions can also affect the ability of bats to successfully forage. All British bats are insectivorous.

Limitations

- 3.14 The preliminary roost assessment was conducted outside of the active season of bats and when maternity colonies will not be in occupation as a result the presence of droppings, on external elevations, which may have been deposited during the summer months, tends to be more unlikely due to the effects of wind and rain.
- 3.15 Access to the western elevation of the building was not possible due to dense scrub and a canalised watercourse, access to the northern elevation of the building was not possible as there is another building located directly to the north.
- 3.16 Overall, there are limitations to the survey undertaken and these have been taken into consideration when conclusions, impacts and recommendations have been made.

4.0 Results and Evaluation

Desktop Study

National Status

- 4.1 There are 18 species of bat that are native to the United Kingdom. The latest Review of the Conservation Status of British Mammals (2018) has shown that where change could be assessed with reasonable confidence there have been increases in the geographical range and population status of two species of UK bat (greater and lesser horseshoe bat) and decrease in the geographical range of one species (grey long-eared bat *Plecotus austriacus*).
- 4.2 Increases in population were also identified in the following species: Bechstein's, Daubenton's (*Myotis daubentonii*), Natterers (*Myotis nattereri*), serotine (*Eptesicus serotinus*) and brown long-eared although it is noted that the reliability of the results is poor.
- 4.3 Population data was not available for; Alcahloe (*Myotis alcathoe*), whiskered (*Myotis mystacinus*), Brandt's (*Myotis brandti*), Leisler's (*Nyctalus leisleri*), noctule, Barbastelle and Nathusius pipistrelle (*Pipistrellus nathusii*).
- 4.4 Population estimates were given for common pipistrelle (*Pipistrellus pipistrellus*) and soprano pipistrelle however could not be reliably compared to the results from Harris et al. (1995) as the two species had not been identified as separate species at the time of the survey. Pipistrelle species (*Pipistrellus spp.*) remain the commonest species of bat in the UK.
- 4.5 Serotine and barbastelle are considered vulnerable and Leisler's and Nathusius' pipistrelle, near threatened in Britain and England in the Red List for Britain's Terrestrial Mammals (Mathews and Harrower, 2020).

Regional Status

- 4.6 The north west of England appears to be a stronghold for Whiskered and Brandt's, both of which are reasonably rare in southern England.

Local Status

- 4.7 Greater Manchester Local Biodiversity Action Plan (LBAP) lists nine bat species recognised as being resident in Greater Manchester (refer to Appendix 3) in a combined species action plan.

Designated Sites

- 4.8 There are no statutory or non-statutory protected sites designated on the basis of their interest for bats that are located within the vicinity of the site and which could be adversely affected by the proposed development of the site.

Records Data Search (MAGIC)

- 4.9 Records of European Protected Species mitigation licences for bats within 2km of the site include;
- 2015-8936-EPS-MIT, common pipistrelle, dating between 2015-2020, pertaining to the destruction of a resting place, located 345m south.
 - 2015-8936-EPS-MIT-1, common pipistrelle, dating between 2015-2020, pertaining to the destruction of a resting place, located 345m south.
 - EPSM2012-5060, common pipistrelle, dating between 2013-2015, pertaining to impact/destruction of a breeding site, located 550m south west.
 - EPSM2012-4607, common pipistrelle, dating from 2012, pertaining to the destruction of a resting place, located 900m north east.
 - 2018-33380-EPS-BDX (1), common pipistrelle, dated from 2018, pertaining to the damage/destruction of a resting place and breeding site, located 1.1km south west.
 - 2019-40402-EPS-BDX, common pipistrelle, dated from 2019, pertaining to the damage/destruction of a resting place and breeding site, located 1.1km south west.

Preliminary Roost Assessment

Habitat Assessment

- 4.10 The site is located in an urban setting within the town of Bury. The site includes B1 - a metal building used for car storage with adjacent buildings including Albion Mill comprising multiple buildings and a tall, brick chimney. Directly to the west of the building is a canalised watercourse with scrub and trees present.
- 4.11 Land surrounding the site comprises industrial properties including the wider Albion Mill and other industrial buildings. The River Irwell is located approximately 155m east of the site and a fishing pond is located approximately 80m south. In the wider landscape the River Irwell riparian corridor leads to other areas of suitable foraging habitat including woodlands and grassland, such as Kirklees Valley Local Nature Reserve (LNR), approximately 1.7km north. Elton reservoir is also located approximately 1km south.
- 4.12 Overall, habitats within the immediate and wider surrounds of the surveyed buildings are considered of low value for foraging and commuting bats. Where suitable habitats are present in close proximity to buildings/structures/trees then there is generally an increased use of these for roost sites due to a higher abundance of food and better access to food sources.

Buildings/ Structures

- 4.13 A description of the buildings/ structures can be found in the Table 2 below and overleaf. Photos of buildings/structure with annotations showing locations of potential roosting features are provided in Appendix 4.

Table 2: Description of Buildings/ Structures.

Building 1
Description:
A metal building used for storing cars. The building is open to the south with no door and no windows present, it was damp and light internally. The building walls are comprised of corrugated metal sheeting, with some areas of plastic sheeting where the metal is damaged on the western elevation. There is an HGV trailer directly to the south and stored items to the east. There are buildings directly adjacent to the east and north. Internally the roof is timber structure with a metal corrugated sheet roof. There is no roof void.
Roost potential signs:
The roof structure does not contain any areas of roosting potential. Some of the wooden posts of the timber frame had minor gaps present. These were assessed and found to be very narrow and shallow and also cobwebbed and cluttered and would only provide very limited roosting potential. There were no grease stains or other rubbing marks which would have been caused by bats accessing these areas. There was debris on the ground and inside the building showing the area had not been cleaned prior to arrival. No droppings or any other evidence of the presence of bats was identified which suggested present or historic use. The building has been assessed as containing negligible bat roosting potential.

4.14 An assessment of the winter roosting potential has been undertaken as detailed in (Collins (ed.), 2023). Building 1 is a 'non-classic' roosting site. Building 1 is open and unheated throughout the year resulting in varying temperature and humidity conditions which are considered unsuitable to provide ideal hibernating conditions. In addition to this, habitat connectivity within the immediate and local area is very limited. Whilst it is entirely possible that bats, particularly pipistrelle species, could unexpectedly be present (Korsten et al., 2015), the potential is considered to be **negligible**.

4.15 Building 1 was found to contain **negligible** potential to support roosting bats and no further emergence surveys were deemed to be required for this building.

Summary and Evaluation

4.16 From the results of the preliminary roost assessment Building 1 was found to hold **negligible** bat roost potential when considering the lack of suitable potential roosting features.

4.17 The construction of Building 1 would indicate that the building contains **negligible** suitability to support hibernating bats. It is considered that the stable conditions required to support hibernating bats, such as consistent temperatures and humidity are not present. No further hibernation surveys are required.

4.18 Habitats within the immediate and wider surrounds are considered to be of low value for foraging and commuting bats.

5.0 Impacts and Recommendations

Buildings

5.1 Building B1 at Albion Mill, Bury has been found contain **negligible** potential suitability for bat species and no evidence of past or present use of the building by roosting bats was found during the survey. An assessment of habitats both within and surrounding the site has been undertaken and a desktop study conducted in relation to bats. Following review of all the

information collated it is considered that there are no apparent implications in relation to the proposed demolition and roosting bats.

- 5.2 In line with current biodiversity net gain requirements, it is recommended that the following enhancements should be incorporated within overall design. At this site it is recommended that two bat boxes should be installed on retained buildings within the site.
- 5.3 As bats are mobile creatures and can form new roosts at any time, if works are not started within one year of this report (i.e. January 2026), then it may be necessary to repeat certain surveys.

Safeguards and Enhancement Measures

- 5.4 If at any time a bat/s or evidence of bat/s is/are suspected or found, all works must cease immediately and advice should be sought from either Natural England or the acting consultant. If a bat roost is found then the works would be delayed until such a time adequate survey data is obtained that is sufficient to support a Natural England licence that will derogate from legal protection afforded to roosting bats.
- 5.5 Lighting schemes should be designed in accordance with best practice and ensure there are no detrimental impact upon bat roosting and foraging habitats.

Other: Breeding Birds

- 5.6 The site also contains suitable breeding bird habitat.
- 5.7 The Wildlife and Countryside Act (WCA) 1981 (as amended) states that all wild birds are protected at all times against killing or injury. Under the WCA, it is an offence to kill, injure or take any wild bird, to take damage or destroy the nest of any wild bird, or to take or destroy the egg of any wild bird. It is good practice to carry out any works outside of the breeding bird season that might affect nests and result in an offence being committed. The breeding bird season is generally considered to be between March to August inclusive.
- 5.8 It is good practice to remove all affected breeding bird habitat during the winter months prior to works starting to prevent delays. If suitable breeding bird habitat is affected during the breeding bird season, then an assessment by an Ecologist for breeding birds should be undertaken prior to works. If breeding birds are found, it is likely that works will have to be delayed until breeding has ceased.

6.0 Conclusion

- 6.1 To conclude, this report details the findings of the PRA survey that has been undertaken at this site.
- 6.2 All completed surveys have been undertaken by suitably experienced surveyors at the appropriate time of year and in line with current guidance (Collins (ed.) (2023).
- 6.3 No evidence of roosting bats was observed.
- 6.4 There are no apparent implications with regards to roosting bats and the proposed development at this time.

7.0 References

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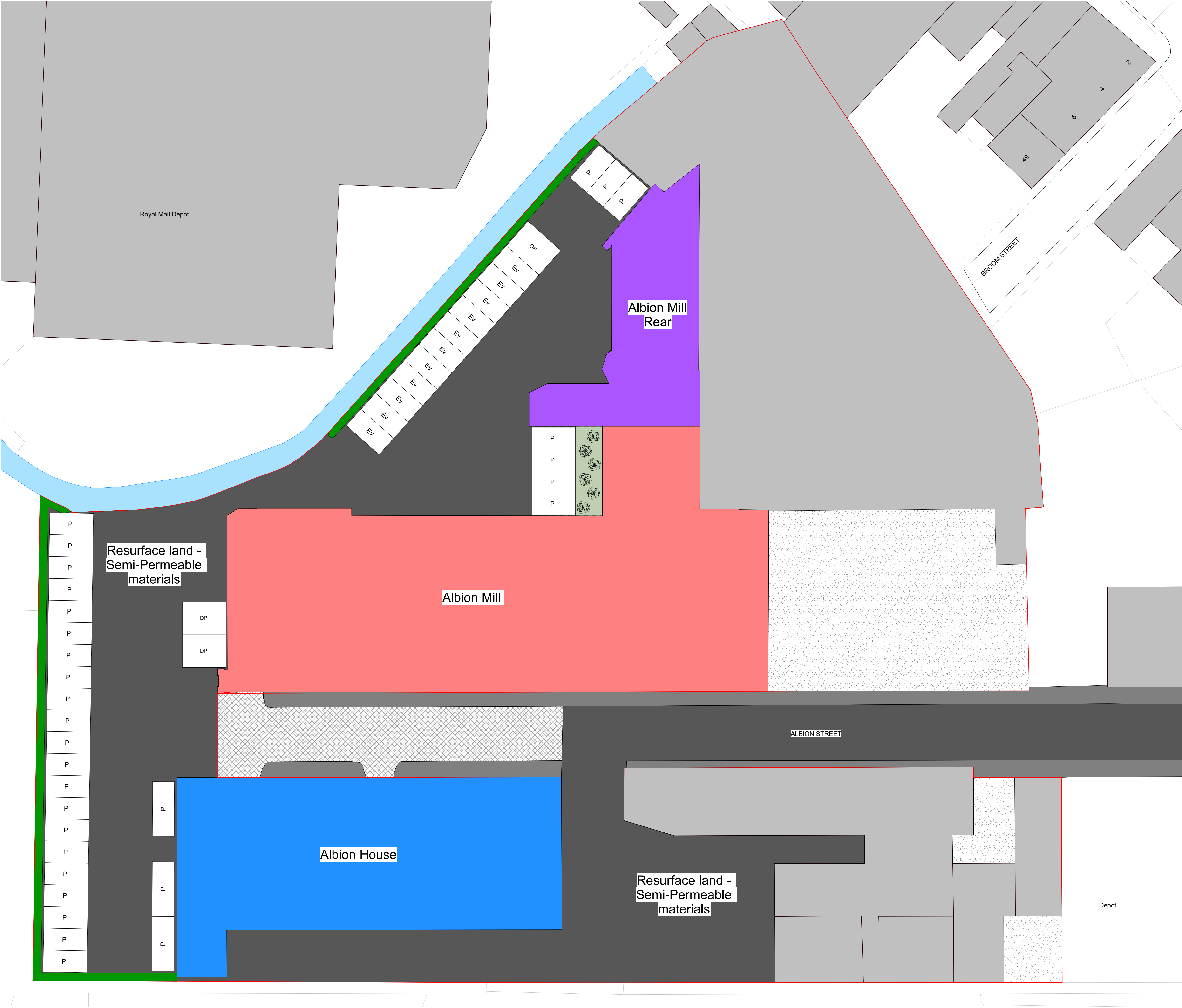
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Figure 2:
Development Proposals Plan



1

Site - Proposed

1 : 200

North

1:200

051020m

Site Key

Hard Landscaping

Neighbouring Properties

Tarmac / asphalt

Cobbled Road

Public Path

Existing Building

P

Parking

Ev

Electrical Charing Parking

DP

Disabled Parking

Legend - Boundaries

Site Boundary

Site Boundary determined using OS DATA

Parking provisions

Total Bays 45
Standard Bays - 31
Electric Charging Bays - 11
Disabled Bays - 3

No.	Description	Date
PROJECT	Albion Mill	
TITLE	Site - Proposed	
CLIENT		
STATUS	PLANNING	
DRAWN BY	DATE	SCALE (@ A1)
CB	13/05/2024	As indicated
PROJECT NUMBER	DRAWING NUMBER	REV
GSS23089.5	503	
GOLD SKETCH		
S T U D I O S		
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Appendix 1: **Planning Policy and Legislation**

Disclaimer: Appendix 1 is a guide to legislation and procedure relating to biodiversity in England. It is general guidance and it does not give specific advice in relation to any site, species or project. It represents Ecology Services Ltd interpretation of legislation and procedure as at the time of writing report. Readers should note that legislation and procedure changes continually and is interpreted on a case-specific basis. Nothing in Appendix 1 should be construed as an offer of advice or legal opinion.

Planning Context

National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF, 2023) places a clear responsibility on Local Planning Authorities (LPA) to contribute to conserving and enhancing the natural and local environment. LPAs should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species (e.g. Species of Principal importance, Biodiversity Action Plan species); and identify and pursue opportunities for securing measurable net gains for biodiversity. The Office of the Deputy Prime Minister (ODPM) Circular 06/2005 provides administrative guidance on the application of the law in relation to planning and nature conservation.

A Local Planning Authority (LPA) has a duty to ensure that protected species and habitats within the UK are a 'material consideration' in the determination of a planning application. Therefore, an LPA is unlikely to determine an application until all relevant information relating to protected species or habitats is submitted to fully inform the application. Relevant information includes adequate surveys and, where required, mitigation strategies, which will need to be submitted in support of a planning application.

Statutory Protection Afforded Bats

The Conservation of Habitats & Species Regulations 2017 (as amended), also known as the Habitats Regulations, lists all UK bat species on Schedule 2 which places an obligation to implement strict protection for these species. This legislation makes it an offence to:

- deliberately kill, injure or capture a wild bat;
- deliberately disturb* a bat;
- damage or destroy a breeding site or resting place of a bat.

*Disturbance, as defined by the Conservation of Habitats & Species Regulations 2017 (as amended), is that which is likely to:

- impair their ability –
 - to survive, to breed or reproduce, or to rear or nurture their young; or
 - in the case of animals of a hibernating or migratory species, to hibernate or migrate.
- affect significantly the local distribution or abundance of the species to which they belong.

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 continue the same provision for European protected species, licensing requirements and protected areas after Brexit.

All UK bats and their roosts are afforded further protection through their inclusion on Schedule 5 of the Wildlife & Countryside Act 1981 (as amended), which makes 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;

- intentionally or recklessly obstruct access to a structure or place which a bat uses for shelter or protection.

Regulation 12 the Conservation of Habitats and Species Regulations 2017 (as amended) requires the appropriate authority in England and Wales to designate as Special Areas of Conservation such sites as the authority considers to be of national importance which contribute significantly to the maintenance, or restoration at favourable conservation status in the natural range of the species listed in Annex II of the EC Habitats Directive. Four bat species (greater horseshoe, lesser horseshoe, Bechstein's and barbastelle) are listed under Annex II.

When dealing with planning applications where a European Protected Species (EPS) (all UK bats) may be affected, a Local Authority is a 'competent authority' within the meaning of regulation 7 of the Conservation of Habitats & Species Regulations 2017 (as amended). The local authority must therefore exercise their functions under the provisions made within the 2017 Regulations (as amended), and planning decisions should only be made when European Protected Species and their habitats are fully taken into account.

Licensing of Works Affecting Roosting Bats

Where a bat roost is likely to be affected by development then a licence to derogate from the legal protection would be required. Licence applications are processed and issued by Natural England and can only be applied for once planning permission (if required) has been granted.

Natural England may grant a licence for the purposes specified in paragraph 55 of the Regulations. The purposes are:

- 55(2)(e) preserving public health or safety or other imperative reason of overriding public interest including those of a social or economic nature and beneficial consequence of primary importance for the environment.
- 55(2)(f) preventing the spread of disease.

Natural England must not grant a licence under paragraph 55 unless it is satisfied that:

- 55(9)(a) there is no satisfactory alternative; and
- 55(9)(b) the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable status in their natural range.

In December 2016, Natural England introduced four policies for European Protected Species (EPS) licensing. The policies were revised in January 2022. The policies seek to achieve better outcomes for EPS and reduce unnecessary costs, delays and uncertainty that were inherent in the current system. In brief, the four policies are:

- **Policy 1.** Reduce mitigation measures for impacts on EPS
- **Policy 2.** Location of compensation habitats
- **Policy 3.** Let EPS use temporary habitats
- **Policy 4.** Alternative sources of evidence to reduce standard survey requirements

Policy 1 allows compensation for EPS impacts to be delivered without the need to relocate or exclude populations where: exclusion or relocation measures are not necessary to maintain the conservation status of the local population; the avoid-mitigate-compensate hierarchy is followed; and compensation provides greater benefits to the local population than would exclusion and/or relocation. This policy can be used to reduce mitigation measures, such as exclusion or relocation of EPS, by increasing compensation. This policy allows killing of EPS and destruction of their habitat without needing to exclude or relocate individual animals.

Policy 2 allows for the provision of off-site compensation measures where the licensing tests are met, the avoid-mitigate-compensate hierarchy is followed, there are good reasons for maximising development on the site of EPS impacts and where an off-site solution provides greater benefit to the local population than an on-site solution.

Policy 3 relates to developments, such as mineral extraction, which temporarily create habitat which is likely to attract EPS and enables works to proceed without the exclusion of EPS where the conservation status of the local population would not be detrimentally affected. On completion of development, such sites must contribute to the conservation status of the local population as much as or more than the land use which preceded development. The measures to achieve this should be set out in a management plan and secured by a legal agreement.

Under **Policy 4** Natural England may accept a lower than standard survey effort where: the costs or delays associated with carrying out standard survey requirements would be disproportionate to the additional certainty that it would bring; the ecological impacts of development can be predicted with sufficient certainty; and mitigation or compensation will ensure that the licensed activity does not detrimentally affect the conservation status of the local population of any EPS.

Natural Environmental and Rural Communities (NERC) Act 2006

Section 40 of the Natural Environmental and Rural Communities (NERC) Act 2006 (as amended) places a statutory duty on public authorities, in exercising their functions, to conserve and enhance biodiversity in England. Species of Principal Importance for the conservation of biodiversity in England, as identified by the Secretary of State in consultation with Natural England, are listed Section 41 of the NERC Act. The Local Planning Authority and government bodies (e.g. Natural England) will expect the overall design of the development to have regard for the conservation of these species. Seven bat species are listed as Species of Principal Importance under Section 41 of the NERC Act (refer to Section 2).

Appendix 2:

Guidelines for Assessing and Categorising Habitat & Roosting Suitability for Bats

Table 4.1. Guidelines for assessing the potential suitability of proposed development sites for bats, based on the presence of habitat features within the landscape, to be applied using professional judgement (Taken from the Bat Conservation Trust Bat Surveys for Professional Ecologists: Good Practice Guidelines, (Collins (ed.) (2023)).

Potential Suitability	Description	
	Roosting habitats in structures	Potential flight-paths & foraging habitats
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices /suitable shelter at all ground/underground levels).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/ protection for flight-lines, or generate/ shelter insect populations available to foraging bats).
Negligible ¹	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically, at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions ² 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 but could be used by individual hibernating bats ²).	Habitat that could be used by small numbers of 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) of a patch of scrub.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions ¹ and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back to gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions ³ and surrounding habitat. These structures have the potential to support high conservation roosts, e.g. maternity or classic cool/stable hibernation site.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broad-leaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.
¹ Negligible is defined as ‘so small or unimportant as to not be 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). ² For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance.		

³Evidence 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.

In addition to Table 4.1, if suitable potential features are present assessment of hibernation potential shall also be undertaken. None or very limited (negligible) shall be treated as LOW. Sites with PRFs such as cellars, tunnels and underground site (classic sites) shall be treated as HIGH and non-classic sites shall be treated as MODERATE, depending upon what can be surveyed at the site. The assessment shall include; the surrounding habitats which may reduce, maintain or increase survey effort based on the quality and connectivity of habitats and any presence of known roosts within or adjacent to the site or the immediate area.

Appendix 3:

Population Statuses of Bat Species in Greater Manchester

National Status

There are 18 species of bat that are native to the United Kingdom.

The latest Review of the Conservation Status of British Mammals (2018) has shown that where change could be assessed with reasonable confidence there have been increases in the geographical range and population status of two species of UK bat (greater and lesser horseshoe bat) and decrease in the geographical range of one species (grey long-eared bat). Increases in population were also identified in the following species: Bechstein's, Daubenton's, Natterers, Serotine and brown long-eared although it is noted that the reliability of the results is poor. Population data was not available for; Alcaho, whiskered, Brandt's, Leisler's, noctule, Barbastelle and Nathusius pipistrelle.

Population estimates were given for common and soprano pipistrelle however they could not be reliably compared to the results from Harris et al. (1995) as the two species had not been identified as separate species at the time of that survey. *Pipistrellus* spp. remain the commonest species of bat in the UK despite their decline.

The State of Bats 2017 report produced by the Bat Conservation Trust used results from multiple survey types (hibernation, roost, waterway and field) of the National Bat Monitoring Programme (NBMP) to compile population trends between 1999, 2001 or 2002 to 2016. The report identified statistically significant (95% accuracy) population increase in Great Britain in the following species; greater horseshoe (hibernation and roost surveys), lesser horseshoe (hibernation and roost surveys), Daubenton's (hibernation surveys), Natterers (hibernation surveys), common pipistrelle (field surveys), soprano pipistrelle (field surveys). Significant decreases in population in Great Britain were identified in common pipistrelle (roost surveys), soprano pipistrelle (roost surveys) and brown long-eared (roost surveys).

These trends reflect relatively recent changes to bat populations since the 1990s. It is generally considered that prior to this there were significant historical declines in bat populations dating back to at least the start of the 20th century, although evidence is fragmented and few data were collected in a systematic way.

Serotine and barbastelle are considered vulnerable and Leisler's and Nathusius' pipistrelle, near threatened in Britain and England in the Red List for Britain's Terrestrial Mammals (Mathews and Harrower, 2020).

Local Status

There are nine bat species listed as being resident in Greater Manchester; these are as follows:

- Common pipistrelle (*Pipistrellus pipistrellus*)
- Soprano pipistrelle (*Pipistrellus pygmaeus*)
- Brown long-eared (*Plecotus auritus*)
- Whiskered (*Myotis mystacinus*)
- Natterer's (*Myotis nattereri*)
- Daubenton's (*Myotis daubentonii*)
- Noctule (*Nyctalus noctula*)
- Leisler's (*Nyctalus leisleri*)
- Serotine (*Eptesicus serotinus*)

Limited information regarding the trends and local status of bat species in Greater Manchester is known. Generally, there is considered to be an overall decline in bat species across Greater Manchester although anecdotal evidence suggests that the reduction of pollution may have led to an increase in some areas, although as yet there is no definitive evidence to support this. All bat species within the Greater Manchester area are considered to be of conservation importance.

Within the ten districts of Greater Manchester Pipistrelle and Daubenton's have been recorded. Historic information regarding Pipistrelle species may be misleading given the fact the species were only recently split into two sibling species. These being the Common Pipistrelle and the Soprano Pipistrelle and records are shown prior to this split. It may therefore be considered that Common Pipistrelle is the more recorded of the two species as this more common out of the two Pipistrelle species.

The remaining bat species have been found present, or are considered likely to be present in the following districts:

- Manchester and Stockport – Serotine and Whiskered, with unconfirmed records of Leisler's and Brown long-eared in Manchester.
- Bury – Whiskered, Noctule and Brown long-eared with unconfirmed records of Serotine bats.
- Wigan and Bolton – Whiskered, Noctule and Brown long-eared with confirmed Natterer's bats in Bolton but unconfirmed in Wigan.
- Rochdale and Salford – Noctule with confirmed Brown long-eared in Salford but unconfirmed in Rochdale.
- Trafford – Whiskered, Leisler's, Noctule and Brown long-eared.
- Tameside – Whiskered.

Appendix 4:
Site Photographs



Photo 1: (28.01.25) Southern elevation of Building 1.



Photo 2: Eastern elevation of Building 1.



Photo 3: Western elevation of Building 1.



Photo 4: Internal view of Building 1.



Photo 5: North-eastern corner of Building 1.



Photo 6: Wooden posts internally.