



Preliminary Roost Assessment Survey

7-9 Piccadilly, Manchester, Greater Manchester, M1 1LY

TEG Manchester Ltd

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Executive summary

Arbtech Consulting Limited was commissioned by TEG Manchester Ltd to undertake a Preliminary Roost Assessment (PRA) at 7-9 Piccadilly, Manchester, Greater Manchester, M1 1LY. The survey was completed on 18/06/2021. The development proposals are for the re-construction of the building internally and externally. A planning application is being prepared for submission to Manchester City Council.

Summary of Recommendations

B1 has negligible habitat value for roosting bats. There are no suitable roosting features on the building. No further surveys required. In the unlikely event that a bat or evidence of bats is discovered during the development, all work must stop, and a bat licenced ecologist must be contacted for further advice.

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was commissioned by TEG Manchester Ltd to undertake a Preliminary Roost Assessment (PRA) at 7-9 Piccadilly, Manchester, Greater Manchester, M1 1LY. The survey was completed on 18/06/2021. The assessment is informed by the Bat Conservation Trust publication, *Bat Surveys for Professional Ecologists – Good Practice Guidelines* (Collins, 2016). No previous reports have been produced for this site by Arbtech.

1.2 Site Context

The site is located at National Grid Reference SJ 84325 98384 and has an area of approximately 0.1ha. There is only one building (B1) within the site boundary and affected by the proposed development.

1.3 Scope of the report

This report provides a description of all features suitable for roosting bats, and evaluates those features in the context of the site and wider environment. It further documents any physical evidence collected or recorded during the site survey that establishes the presence of roosting bats. It provides information on constraints to the proposals as a result of roosting bats, and summarises the requirements for any further surveys, to inform subsequent mitigation proposals, achieve Planning or other statutory consent, and to comply with wildlife legislation.

The aim of the assessment was to determine the presence or evaluate the likelihood of the presence of roosting bats, and to gain an understanding of how they could use the site. To achieve this, the following steps have been taken:

- A desk study has been carried out.
- A field survey has been undertaken, including an external survey and internal inspection where possible.
- An outline of likely impacts on any known roosts has been provided, based on current development proposals.
- Recommendations for further survey and assessment have been made, along with advice on the requirements of a European protected species mitigation licence (EPSML) application if appropriate.

A survey plan is presented in Appendix 1, proposed plans in Appendix 2, desk study results in Appendix 3 and a summary of relevant legislation is presented in Appendix 4.

1.4 Project Description

The development proposals are for the re-construction of the building internally and externally. A planning application is being prepared for submission to Manchester City Council.

2.0 Methodology

2.1 Desk Study methodology

The desk study included a 2km radius review of statutory and non-statutory designated sites, Biodiversity Action Plan (BAP) Priority Habitats and granted EPSML records for bats held on magic.gov.uk database. An assessment of the surrounding landscape structure was also completed using aerial images from google earth and OS maps.

Existing bat records relating to the site and a surrounding 2km radius are required to conform to national guidelines. The data search is confidential information that is not suitable for public release and has been analysed and summarised for presentation in this report.

2.2 Site Survey methodology

The survey was undertaken by Louise Sawrey BSc (Hons), MRSB - (Natural England Protected Species Licence Numbers: Bats - 2019-43813-CLS-CLS) on 18/06/2021.

All features that will be impacted by the project proposals were assessed for their bat roosting and/or commuting habitat. The surveyor systematically surveyed all features suitable for-bats and signs of bat activity.

For any surveyed buildings:

A non-intrusive visual appraisal from the ground using binoculars, inspecting the external features of the building(s) for potential access and egress points, and for signs of bat use. An internal inspection of the building was also made, including the living areas of derelict or abandoned buildings and the accessible roof spaces of all buildings, using an endoscope, torch and ladders. The surveyor paid particular attention to the floor and flat surfaces, window shutters and frames, lintels above doors and windows, and carried out a detailed search of numerous features within the roof space.

For any surveyed trees:

A visual inspection from ground level using binoculars and where accessible and safe to do so, an internal inspection of potential roosting features using an endoscope, torch and ladders.

2.3 Breeding birds and other incidental observations

The surveyor also made note of any other ecological constraints observed during the survey, notably the likelihood of presence or signs of breeding birds, and the suitability of the site for barn owls *Tyto alba*.

2.4 Suitability Assessment

All affected survey features on site were categorised according to the likelihood of bats being present, in line with best practice guidelines (Collins, 2016). The features that dictate the likelihood of roosting bats are summarised in Tables 1 and 2 below. Roost suitability is classified as high, moderate, low and negligible and dictates any further surveys required before works can proceed.

Table 1: Features of a building that are correlated with use by bats

Likelihood of bats being present	Feature of building and its context
Higher	Buildings or structures with features of particular significance for roosting bats e.g. mines, caves, tunnels, icehouses and cellars. Habitat on site and surrounding landscape of high quality for foraging bats e.g. broadleaved woodland, tree-lined watercourses and grazed parkland. Site is connected with the wider landscape by strong linear features that would be used by commuting bats e.g. river and or stream valleys and hedgerows. Site is proximate to known or likely roosts (based on historical data).
Lower	A small number of possible roost sites or features, used sporadically by more widespread species. Habitat suitable for foraging in close proximity, but isolated in the landscape. Or an isolated site not connected by prominent linear features. Few features suitable for roosting, minor foraging or commuting.

Table 2: Features of a tree that are correlated with use by bats

Likelihood of bats being present	Feature of tree and its context
Higher	A tree 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.
Lower	A tree of sufficient size and age to contain potential roosting features but with none seen from the ground or features seen with only very limited roosting potential.

2.5 Limitations

It should be noted that whilst every effort has been made to describe the features on site in the context of their suitability for roosting bats, this does not provide a complete characterisation of the site. This survey provides a preliminary view of the likelihood of bats being present. This is based on suitability of the habitats on site and in the local area, the ecology and biology of bats as currently understood, and the known distribution of bats as recovered during the desk study.

There were no specific limitations to the survey.

3.0 Results and Evaluation

3.1 Desk Study Results

A summary of desk study results is provided below, full details are presented in Appendix 3.

3.2 Designated sites

Details of any statutory and non-statutory designated sites within a 2km radius of the survey site, including their reasons for notification, are provided in Table 3 below.

Table 3: Designated sites within 2km radius of the site

Designated Site Name	Distance from Site (approx.)	Reasons for Notification from Natural England
Statutory Sites		
None		
Non-statutory Sites		
Red Rose Community Forest	Within	England's Community Forests are located in and around our largest towns and cities. The aim is to deliver a comprehensive package of urban, economic, and social regeneration, creating high-quality environments for millions of people by revitalising derelict land, providing new opportunities for leisure, recreation, and cultural activities, enhancing biodiversity, preparing for climate change and supporting education, healthy living and social and economic development. Each Community Forest is a partnership between local authorities and local, regional and national partners including the Forestry Commission and Natural England. The founding basis for each Forest is a government-approved Forest Plan, a 30-year vision of landscape-scale improvement.

3.3 Landscape

A review of the designated sites, aerial photographs (Figure 1), the magic.gov.uk database and OS maps has been undertaken. Collated together, the site's local bat habitat is described below: The site is in an urban area of Manchester. The landscape is dominated by commercial buildings with no wildlife habitat in the immediate area. There are small, scattered woodland copses and tree lines further afield, which could be used for foraging and commuting.

Priority habitats within 2km of the site are listed in Table 4.

Table 4: Priority habitat inventory within 2km (Magic.gov.uk):

Habitat	Closest distance from site
Open Mosaic Habitat	~720m east
Deciduous Woodland	~1.1km north
Broadleaved Woodland	~1.1km north



Figure 1: Aerial photo of site, showing landscape structure

3.4 Historical records

Existing bat records relating to the site and a surrounding 2km radius are required to conform to national guidelines. The data search is confidential information that is not suitable for public release. Greater Manchester Local Record Centre (GMLRC) was not commissioned to provide bat records for within 2km of the site. This was primarily due to the relatively small scale of the proposed development.

Table 5: Historical records* of bats within 2km of the site

Common name	Scientific binomial	Number of records	Number of roost records	Maternity roost records
BRD not required				

*Records from the past 10 years

A search of the magic.gov.uk database for granted European Protected Species Mitigation Licences (EPSMLs) within a 2km radius of the site has been completed. Displaced bats from licenced sites <2km away from the survey site will find alternative habitat either within the mitigation measures implemented as part of the licence, or will relocate to other known roosts sites in close proximity to the licenced site. The EPSML records show that 12 bat licences have been issued within 2km of site.

Table 6: Granted EPSMLs (bats) within 2km of the site

Case reference of granted application	Approx. distance from site	Bat Species Effected	Licence Start Date:	Licence End Date:	Impacts allowed by licence
2014-6380-EPS-MIT	415m north	C-PIP	18/02/2015	16/02/2020	Destruction of a resting place
2014-490-EPS-MIT	450m southeast	C-PIP,S-PIP	23/04/2014	30/06/2017	Destruction of a resting place
EPSM2013-5644	540m northeast	C-PIP	04/07/2013	01/03/2015	Destruction of a resting place
2016-24504-EPS-MIT	685m northeast	C-PIP	15/07/2016	01/01/2018	Destruction of a resting place
2014-3531-EPS-MIT	825m northeast	C-PIP	01/10/2014	30/09/2019	Destruction of a resting place
2014-4219-EPS-MIT	790m northwest	C-PIP	27/10/2014	31/10/2020	Destruction of a resting place
2017-31569-EPS-MIT	840m northwest	C-PIP	26/10/2017	31/10/2019	Destruction of a resting place
EPSM2012-5061	915m southwest	BLE	10/12/2012	31/08/2015	Destruction of breeding site
EPSM2013-5575	1.1km southwest	C-PIP	23/05/2013	30/09/2016	Unknown
2014-3569-EPS-MIT	1.5km west	C-PIP	07/10/2014	30/11/2014	Destruction of a resting place
2015-16009-EPS-MIT	1.55km west	C-PIP	28/01/2016	27/01/2021	Destruction of a resting place
2014-4400-EPS-MIT	1.7km southeast	C-PIP	23/12/2014	30/04/2015	Damage of a resting place

3.5 Field Survey Results

One building on site was surveyed, designated as B1, and is illustrated in the map in Appendix 1. The weather conditions recorded at the time of the survey are shown in Table 7.

Table 7: Weather conditions during the survey

Date: 18/06/2021	
Temperature	18°C
Humidity	74%
Cloud Cover	40%
Wind	2mph
Rain	None

3.6 Site Feature descriptions and photos

B1 Exterior

B1 is a three -storey, concrete-built building with a flat roof. The façade on the southern elevation of the building appears to be in very good condition with no suitable roosting features for bats. The brickwork on the southern elevation appears to be in good condition with no missing mortar or cracks in which bats could roost. The doors and windows appear to be tight-fitting with no roosting features for crevice-dwelling bats such as pipistrelles. The flat roof area consists of concrete floor with metal cladding, offering no suitability for roosting bats.



B1 – southern elevation.



B1 – northern elevation.



B1 – roof area.



B1 – southern roof area.

B1 Interior

There are no loft spaces within B1. The top and middle floors are former warehouse rooms and are built from steel beams and concrete, with corrugated roof sheeting. There are large windows along the northern and southern elevations, which allow a lot of light to pass into the rooms, reducing the suitability for roosting bats. The warehouse rooms appear to be tightly sealed, with no access for roosting bats into the building. The stock room and shopfloor (ground floor) were not photographed.



B1 – upper floor.



B1 – upper floor roof structure.



B1 – middle floor.



B1 corridor.

B1 Evidence of bats

There was no evidence of bat activity located internally in B1. There was no evidence of bat use (e.g. bat droppings) found on external features. However, this kind of evidence is easily weathered away on the exterior of buildings and is rarely visible.

B1 Breeding birds and other incidental observations

There was no evidence of nesting birds located internally or externally on the survey building.

4.0 Conclusions, Impacts and Recommendations

4.1 Informative guidelines

Bats are protected under the Wildlife and Countryside Act and Conservation Regulations (see Appendix 4 for a summary of legislation protecting bats in the UK). Legislation protects all wild birds whilst they are breeding, and prohibits the killing, injuring, or taking of any wild bird or their nests and eggs. Certain species of bird, including the barn owl, are subject to special provisions; it is an offence to disturb any bird or their young during the breeding season.

There are three possible outcomes of this survey, each with specific recommendations. These are outlined below:

Confirmed bat roost

Best practice survey guidelines (Collins, 2016) recommends additional surveys for confirmed roosts. Three further surveys are required to characterise the bat roost present including species, roost type and access points to inform a European protected species mitigation licence (EPSML) application with Natural England. Surveys must be completed during the active bat season (May – September). At least two of the surveys should be completed during the optimal survey period mid-May to August, and at least one of the surveys should be a dawn re-entry survey (Collins, 2016).

Low, moderate or high likelihood of a bat roost present

Best practice survey guidelines (Collins, 2016) recommend additional surveys for features assessed as having low to high suitability for roosting bats. One, two or three further surveys are required to confirm presence or likely-absence of a bat roost, based on a low, medium or high roost likelihood evaluation. Surveys must be completed during the active bat season (May – September). If more than one survey is recommended, at least one of them should be completed during the optimal survey period mid-May to August, and at least one the surveys should be a dawn re-entry survey (Collins, 2016). If two or one further survey is recommended these surveys must be completed during the optimal survey period (mid-May to August). For low and moderate roost likelihood evaluation the survey effort recommended at this stage is iterative and if bats roosts are confirmed in the building, a further survey will be required to provide sufficient information to inform an EPSML application to Natural England.

Negligible likelihood of a bat roost present

Buildings assessed as comprising negligible suitability for roosting bats do not normally require further surveys. However, if bats are found during any stage of the development, work should stop immediately and Arbtech should be contacted for further advice.

4.2 Evaluation

Taking the desk-based assessment and site survey results into account, the following value for roosting bats has been placed on each site survey feature.

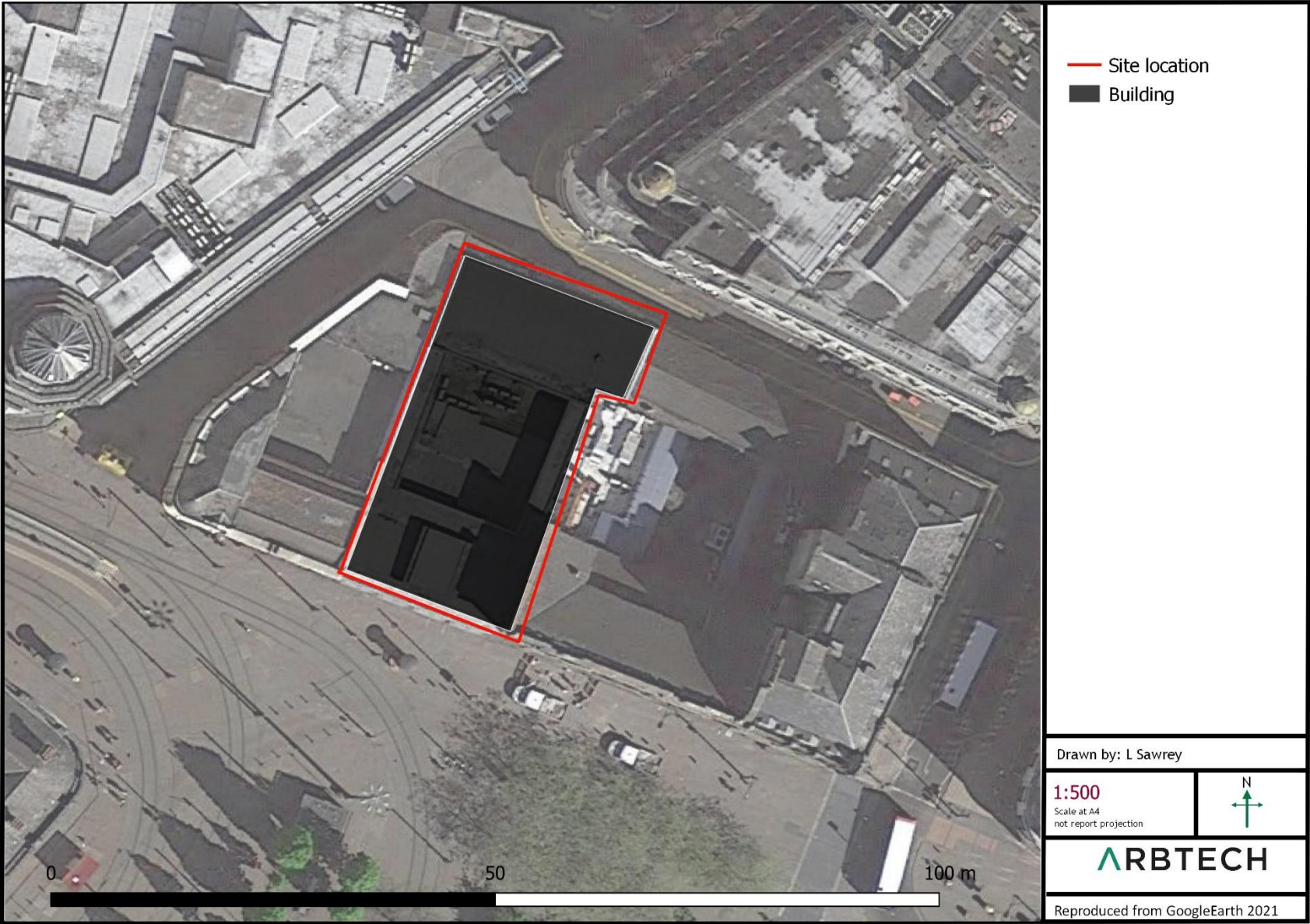
Table 8: Evaluation of the building on site.

Ref	Survey assessment conclusions (with justification)	Foreseen impacts	Recommendations	Enhancements The Local Planning Authority has a duty to ask for enhancements under the NPPF (2019)
B1 Bats	The building has negligible habitat value for roosting bats. There are no suitable roosting features on the building.	Bats are very unlikely to be roosting within the building and as such, there are not anticipated to be any impacts on bats as a result of the proposed works.	No further surveys required. In the unlikely event that a bat or evidence of bats is discovered during the development all work must stop and a bat licenced ecologist contacted for further advice.	The installation of two bat boxes on site will provide additional roosting habitat for bats e.g. - Beaumaris Bat Box - Harlech Woodstone Bat Box - Improved Crevice Bat Box Bat boxes should be positioned 3-5m above ground level facing in a south or south-westerly direction with a clear flight path to and from the entrance.
B1 Birds	No evidence of nesting birds was found during the survey.	None.	No further surveys required.	Install two bird boxes on site e.g. - Woodstone Nest Box - Woodstone Open Nest Box Or a similar alternative. Nest boxes should be positioned approximately 3m above ground level where they will be sheltered from prevailing wind, rain, and strong sunlight. Small-hole boxes are best placed approximately 1-3m above ground on an area of the tree trunk where foliage will not obscure the entrance hole.

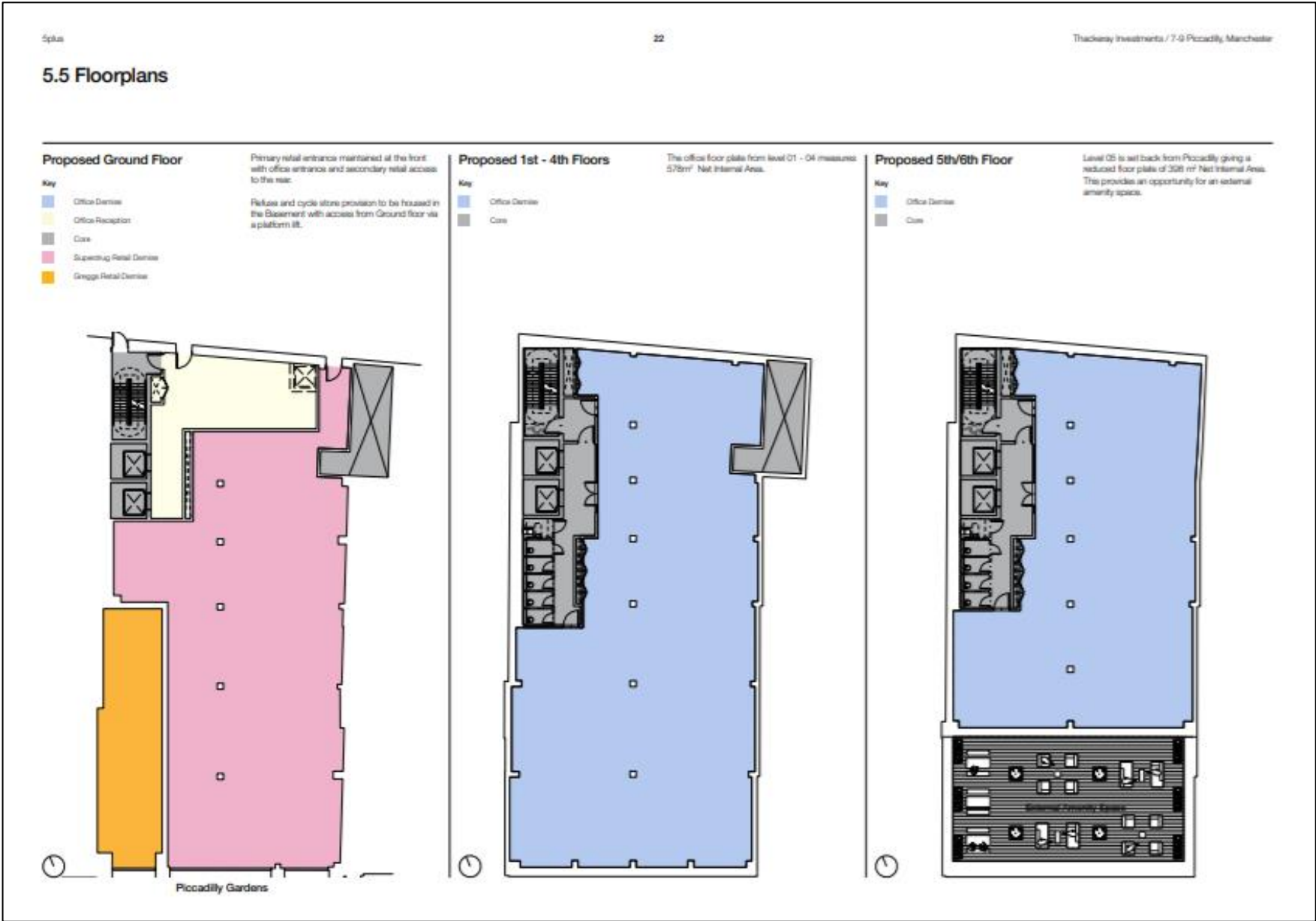
5.0 Bibliography

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- Mitchell-Jones, A.J. (2004). Bat Mitigation Guidelines. English Nature, Peterborough.
- National Planning Policy Framework (2019)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

Appendix 1: Survey Plan



Appendix 2: Proposed Site Plan

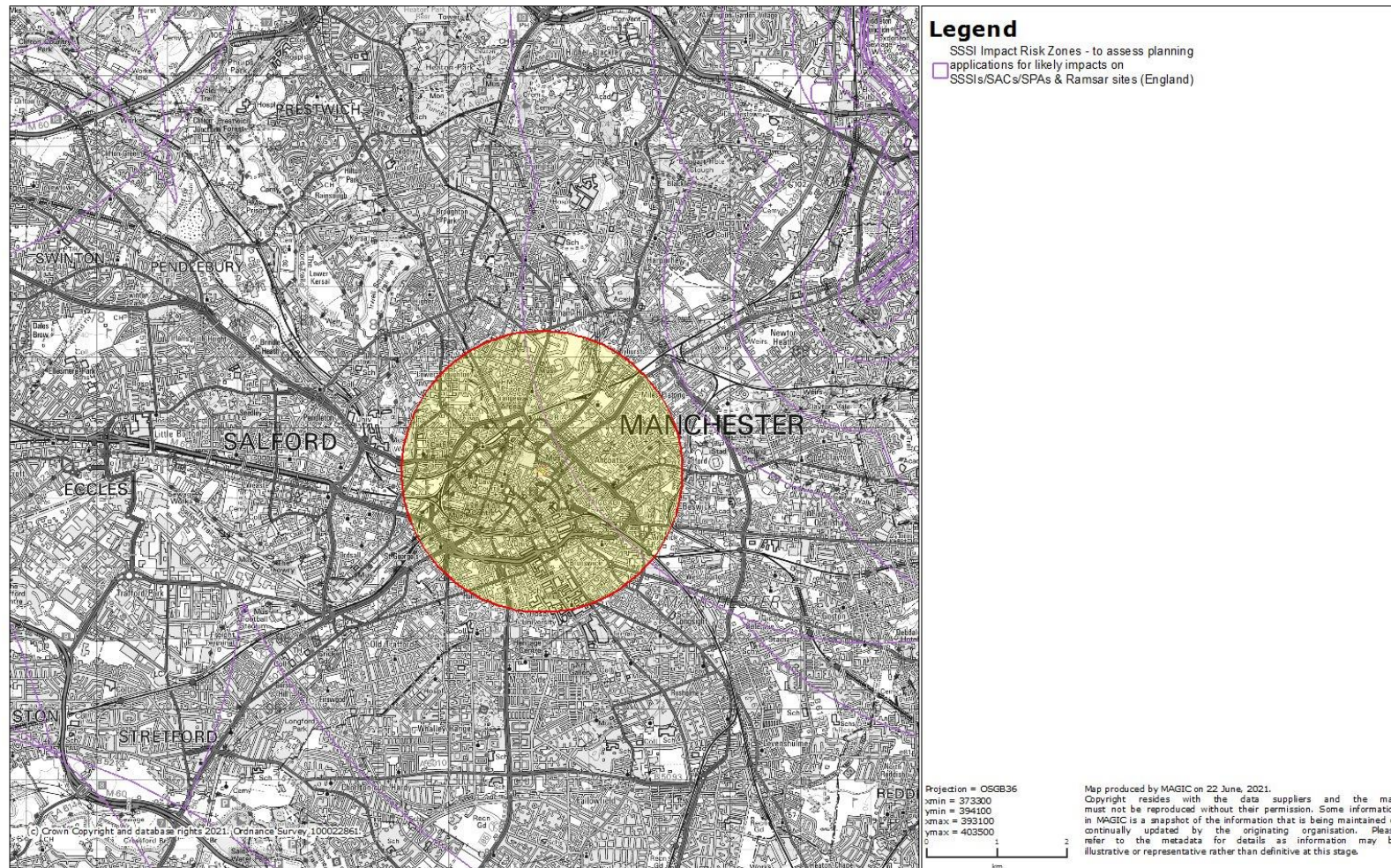


Appendix 3: Desk Study Information

Full historical records can be provided on request.

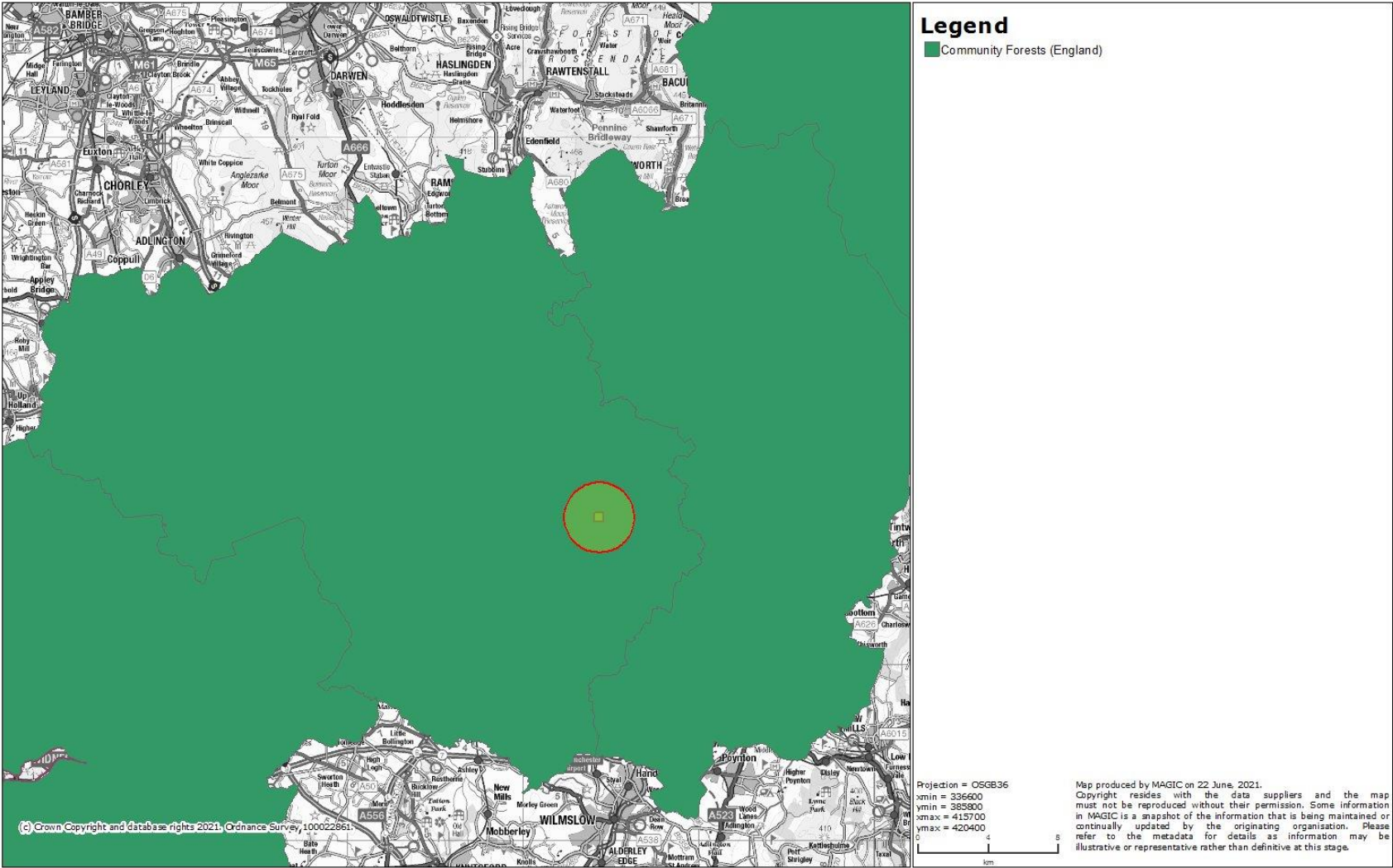
MAGiC

Statutory designations



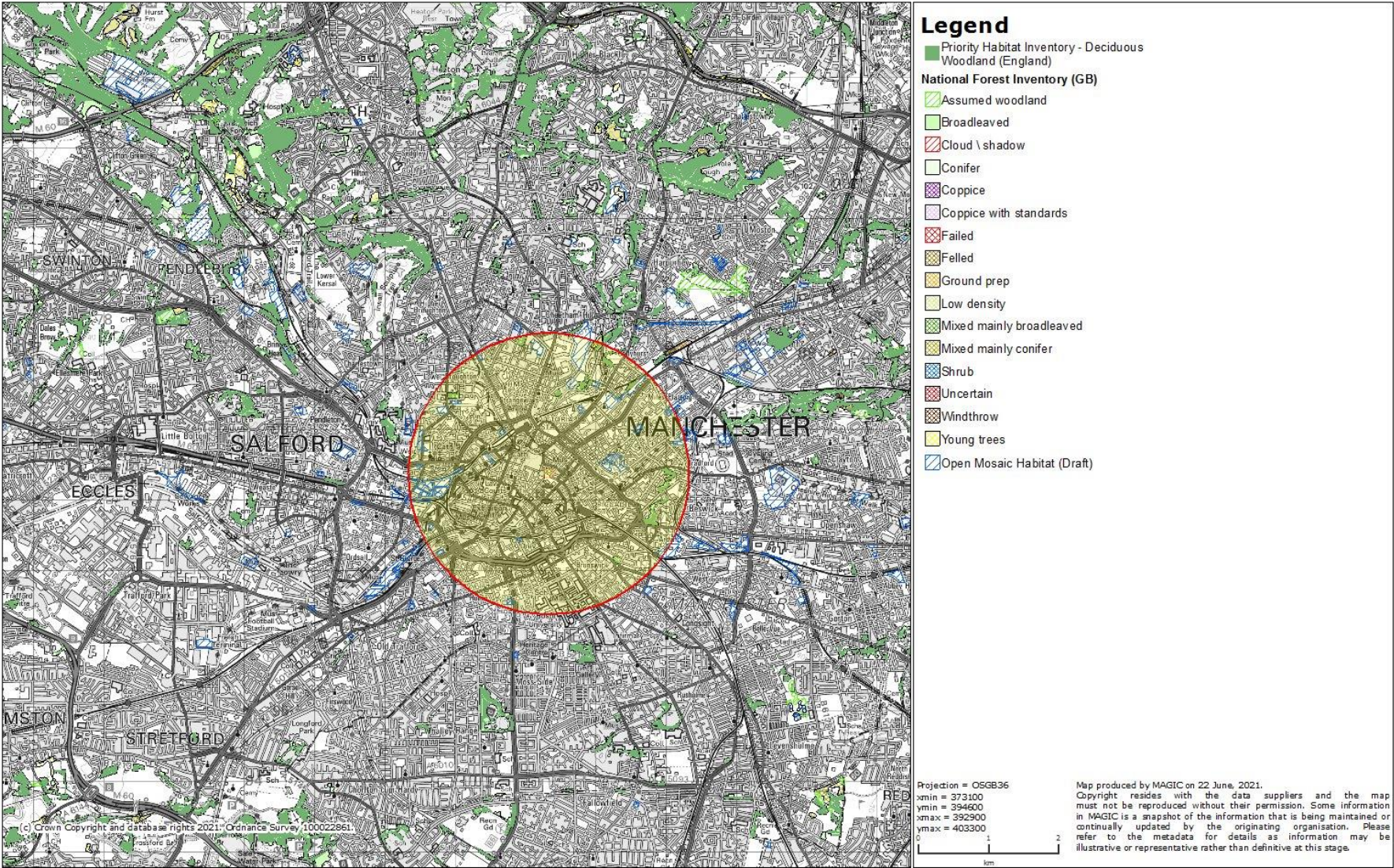


Community forests



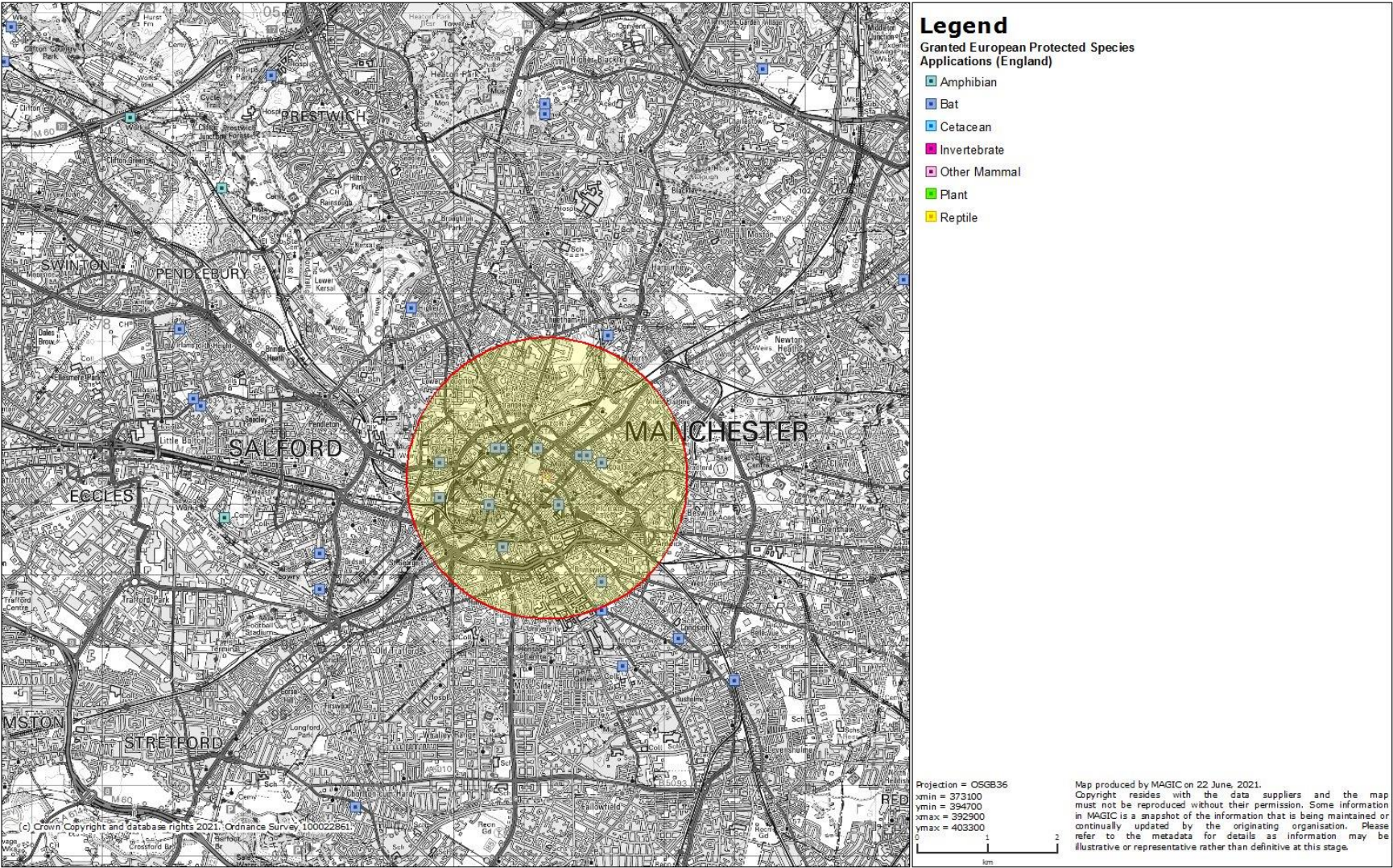


Habitats



MAGiC

EPSMLs



Appendix 4: Legislation and Planning Policy related to bats

LEGAL PROTECTION

All species of bat are fully protected under *The Conservation of Habitats and Species Regulations 2017* through their inclusion on Schedule 2.

Regulation 43: Protection of certain wild animals - offences

(1) A person is guilty of an offence if they:

- (a) Deliberately captures, injures or kills any wild animal of a European protected species,
- (b) Deliberately disturbs wild animals of any such species,
- (c) Deliberately takes or destroys the eggs of such an animal, or
- (d) Damages or destroys a breeding site or resting place of such an animal,

(2) For the purposes of paragraph (1) (b), disturbance of animals includes in particular any disturbance which is likely—

- (a) To impair their ability:
 - (i) To survive, to breed or reproduce, or to rear or nurture their young; or
 - (ii) In the case of animals of a hibernating or migratory species, to hibernate or migrate; or
- (b) To affect significantly the local distribution or abundance of the species to which they belong.

Bats are also protected under the *Wildlife and Countryside Act 1981 (as amended)* through their inclusion on *Schedule 5*. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection
- Selling, offering or exposing for sale, possession or transporting for purpose of sale

NATIONAL PLANNING POLICY (ENGLAND)

National Planning Policy Framework 2017

The National Planning Policy Framework promotes sustainable development. The Framework specifies the need for protection of designated sites and priority habitats and species. An emphasis is also made on the need for ecological infrastructure through protection, restoration and re-creation. The protection and recovery of priority species (considered likely to be those listed as UK Biodiversity Action Plan priority species) is also listed as a requirement of planning policy.

In determining a planning application, planning authorities should aim to conserve and enhance biodiversity by ensuring that: designated sites are protected from harm; there is appropriate mitigation or compensation where significant harm cannot be avoided; opportunities to incorporate biodiversity in and around developments are encouraged; and planning permission is refused for development resulting in the loss or deterioration of irreplaceable habitats including aged or veteran trees and also ancient woodland.

The Natural Environment and Rural Communities Act 2006 and the Biodiversity Duty

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'.

Section 41 of the Act requires the Secretary of State to publish a list of habitats and species which are of 'principal importance for the conservation of biodiversity'. This list is intended to assist decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications. A developer must show that their protection has been adequately addressed within a development proposal.

Effect on development works:

A European Protected Species Mitigation (EPSM) Licence issued by Natural England will be required for works likely to affect a bat roost or for operations likely to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g. survive, breed, rear young and hibernate). The licence is to allow derogation from the relevant legislation but also to enable appropriate mitigation measures to be put in place and their efficiency and success to be monitored. The legislation may also be interpreted such that, in certain circumstances, important foraging areas and/or commuting routes can be regarded as being afforded *de facto* protection, for example, where it can be proven that the continued usage of such areas is crucial to maintaining the integrity and long-term viability of a bat roost (Garland & Markham, 2008).

There are 17 species of bat breeding in England and Natural England issues licences under Regulation 55 of the Habitats Regulations to allow you to work within the law.

Licences are issued for specific purposes stated in the Regulations, if the following three tests are met:

- The purpose of the work meets one of those listed in the Habitats Regulations (see below);
- That there is no satisfactory alternative;
- That the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range

The Habitats Regulations permits licences to be issued for a specific set of purposes including:

1. ***include preserving public health or public safety or other imperative reasons of over-riding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment;***
2. scientific and educational purposes,
3. ringing or marking
4. conserving wild animals

Development works fall under the first purpose and Natural England issues bat mitigation licences for developments.