

Bat Mitigation Plan

Survey site:

Corner of 119 Raby Street and 20-28 Barnhill Street, Manchester M14 4SY

Client:

Caddick Construction

Report date:

21/10/2025

Project:

This report is prepared to inform a planning application for the proposal described as: Erection of six residential blocks, following demolition of existing buildings and structures, to provide a total of 212 dwellings (Use Class C3) comprising: one 10-storey building accommodating 86 apartments; four buildings of 5 to 6 storeys (including attic storeys) accommodating a total of 119 apartments; and 7 three-storey town-houses; together with ancillary communal facilities, associated access, car and cycle parking, refuse storage, landscaping, amenity space, signage, and other associated works

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited (Ltd) were commissioned by Caddick Construction to produce a Bat Mitigation Plan (BMP) for the proposed development at Corner of 119 Raby Street and 20-28 Barnhill Street, Manchester M14 4SY (hereafter referred to as the site) in order for works at the site to comply with The Conservation of Habitats and Species Regulations 2017 (as amended) and maintenance of the Favourable Conservation Status (FCS) of bats within the region.

The site has been subject to the following previous ecological assessment of relevance to this report:

- Preliminary Ecological Appraisal (PEA) and Bat Roost Assessment (Urban Green, 2023).
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- Bat Emergence and Re-entry survey (BERS) (Arbtech Consulting Ltd 2025).

1.2 Project Description

Erection of six residential blocks, following demolition of existing buildings and structures, to provide a total of 212 dwellings (Use Class C3) comprising: one 10-storey building accommodating 86 apartments; four buildings of 5 to 6 storeys (including attic storeys) accommodating a total of 119 apartments; and 7 three-storey town-houses; together with ancillary communal facilities, associated access, car and cycle parking, refuse storage, landscaping, amenity space, signage, and other associated works (hereafter referred to as “the proposed development”). A plan showing the proposed development is provided in **Appendix 1**.

1.3 Site Context

The site is located at National Grid Reference SJ 83866 95782. The site comprises a terrace of properties along Barnhill Street in its south-eastern corner, an area of previously cleared scrubland along Princess Road in the south-western corner and an area of modified grassland making up the remaining site areas extending north. The site is located within the urban area of Moss Side on the outskirts of the city of Manchester. The surrounding landscape comprises largely of urban residential housing and commercial premises. Moss Side Park, Millenium Park and Alexandra Park are located 250m to the east, south and west of the site, linear areas of public open space are

present along the western side of Princess Road and lines of trees along Raby Street and other associated residential roads provide connectivity to wide foraging and commuting areas surrounding the site. A site location plan is provided in **Appendix 2**.

1.4 Planning Context of This Report

The client has commissioned this BMP to provide a detailed mitigation strategy with regards to bats at the site in accordance with bat survey data collected to date and the phasing of the proposed development. The aim of producing this document is to provide detail to the local planning authority to confirm that the proposals will not result in contravention of The Conservation of Habitats and Species Regulations 2017 (as amended) and that the development is also capable of maintaining of the Favourable Conservation Status (FCS) of bats within the region throughout all phases of development.

2.0 Ecological Baseline Conditions Relevant to This Report

The baseline ecological conditions relevant to this report were determined as a result of the PEA and Bat Roost Assessments (Urban Green 2023 and 2025), Bat Survey Report (Urban Green, 2023) and BERS (Arbtech Consulting Ltd. 2025)

2.1 Suitability of the Site to Support Roosting Bats

Urban Green completed a PEA and Bat Roost Assessment for this site, in May 2023. A Bat survey report was also produced in October 2023. B1-B7 were subject to a roost assessment in 2023 (recorded as housing blocks, labelled B1-B3), of the three blocks only B1 was assessed as having habitat value for bats, the remaining blocks (B2-B7) were considered 'Negligible'. B1 was considered to have 'Moderate' habitat value for roosting bats. B1 was subject to three bat activity surveys, with two dusk (August and September 2023) and one dawn survey (September 2023) completed. During the second survey on 6th September 2023 two emergences from common pipistrelles were observed from the exposed area of B1, at this time the roost was categorised as 'transitional' (non-breeding summer roost). It was assessed as being unlikely to support a maternity roost. It was recommended that any works to B1 be carried out under a 'Bat Mitigation Class Licence'.

An updated PEA and Bat Roost Assessment was carried out on B1-B7 by Urban Green Ltd in July 2025. As B1 was a confirmed roost it was assessed as having 'High' habitat value for roosting bats with B2-B7 assessed as having 'Low' habitat value. Internal inspections were not completed at this time and habitat value was assigned from an assessment of external features only. To reconfirm the roost status of B1 and assess potential bat presence within B2-B7 three surveys were recommended to characterise

the roost in B1 and a single dusk survey for B2-B7. Due to the potential harm to bats during development it was recommended that any works must be carried out under a European Protected Species Licence (EPSL).

In September 2025, Arbtech were instructed to undertake an internal inspection of B2 - B7 and single emergence survey on buildings B1-B7 to confirm the status of the transitional roost in B1 and the status of bat presence in B2 - B7. Internal inspections were conducted on B2-B7 in order to inform the survey effort and to build on previous survey effort conducted by Urban Green in 2023 and earlier in 2025. No evidence of roosting bats was identified internally in any of the buildings. The loft voids were well sealed with no light exposure. The buildings had cellars which were also well sealed with no access points identified. The rear of the properties also appeared intact with no PRFs identified.

The following buildings have been subject to emergence surveys:

- B1 – High value – 1 survey in 2025, 3 surveys in 2023
- B2 – Low value – 1 survey in 2025
- B3 – Low value – 1 survey in 2025
- B4 – Low value – 1 survey in 2025
- B5 – Low value – 1 survey in 2025.
- B6 – Low value – 1 survey in 2025
- B7 – Low value – 1 survey in 2025

Based on the survey effort conducted in 2023 and additional survey undertaken in 2025 it is considered that the roost identified in B1 in 2023 would still be present as the building is considered to be in the same material condition with bat activity recorded within this area of the site.

The following roost is present within B1:

Roost 1: Common pipistrelle - Transitional Non-Breeding Summer Roost (2023) - Within upper floors of B1.

An additional bat roost was recorded within B6, as identified by a single pipistrelle bat emergence from the building during the 2025 BERS. This roost has been assumed to be an occasional day roost / transitional non-breeding summer roost, consistent with that observed within B1, due to the nature of the buildings construction and surrounding habitat value.

The following roost is present within B6:

Roost 2: Common pipistrelle – Assumed Transitional Non-Breeding Summer Roost (2025) - Behind lead flashing below the bay window roof on the second storey of B6

Hibernation: B1 – B7 do not offer typical suitable habitat for hibernating bats, and it is considered that due to the nature of the buildings' construction would not provide stable conditions that bats require throughout the winter period. The proposed works will not impact upon hibernating bats.

2.2 Impact Assessment

The proposed development comprises the construction of six apartment blocks over a phased development with demolition of B1 – B7 required in order to facilitate the development of Blocks E and F and associated access to Block D within the site. All demolition works to B1 – B7 will be undertaken in 2027 following initial development phases to construct Block A & B (Phase 1) and Block C & Block D (Phase 2) commencing in 2026. The demolition of B1-B7 (Phase 3) would be required to facilitate the construction of Block E and Block F and provide associated access to Block D within the site under later phases of development later in 2027. The proposals would result in the destruction of the identified roosts during demolition and could result in bats being injured or killed without suitable mitigation. Predicted impacts to each roost are presented below:

Roost 1 – Destruction – 2027 - B1 is required to be demolished under Phase 3 of the development to facilitate the development of Block E

Roost 2 – Destruction – 2027 - B6 is required to be demolished under Phase 3 of the development to facilitate the development of Block F

It is anticipated that due to the location of the identified roosts being limited to the eastern extent of B1 along Raby Street and the location of the roost within B6 along Barnhill Street away from Phase 1 and Phase 2 of the development, that disturbance impacts from works associated with these phases would be negligible due to the urban and currently disturbed location of the site.

2.3 Technical Scope of this Report

Considering the results of the PEA and Bat Roost Assessments (2023 and 2025), Bat Survey (2023) and BERS (2025), the proposals will result in the destruction of all roosts present, during the demolition phase of the development. As such, this BMP provides a mitigation, compensation and enhancement strategy on the basis of avoiding, mitigating and compensating for any potential impacts to bats in accordance with the proposed development and enhancing the site for bats in perpetuity. The measures contained within this BMP are required for the local planning authority to confirm that the proposals will not result in contravention of The Conservation of Habitats and Species Regulations 2017 (as amended) and that the development is also capable of maintaining of the Favourable Conservation Status (FCS) of bats within the region.

3.0 BMP

Mitigation, compensation, and enhancement prescriptions to maintain the favourable conservation status of bats and enhance roosting opportunities at the site in perpetuity in accordance with the proposed development are detailed in **Table 1** below.

Table 1: Mitigation Prescriptions

Mitigation/ Compensation/ Enhancement	Specification
Further Survey Requirements	B1 – B7 will be subject to three bat emergence / re-entry surveys (BERS) within the peak bat activity season (May – August) 2026 in order to confirm the status and characterisation of the identified roosts and to inform a Bat Licence application for the site.
Licence Requirements	A Bat Licence application to Natural England will be required to legally permit the proposed demolition works within the site. This requirement exists independently of the planning system and is required whether planning permission is needed or not, and whether this is listed as a condition of planning or not. The type of licence to be applied for will be decided upon based on the outcome of additional BERS to be undertaken within the 2026 survey period.

	The licence can be applied for once planning permission has been granted (where required), and within 3 months of the start of demolition works. Any pre-commencement wildlife related planning conditions that require sign off from the council will need to be discharged prior to licence submission.
Mitigation and Compensation Requirements	The following mitigation and compensation measures will be delivered as part of the BMP and will be updated in line with any additional evidence observed during the required further surveys and specific licence requirements: <u>Timings</u> • Timing of destructive works to avoid the maternity season and late summer period due to the types of roost identified (May to September) • Where possible, destructive works should be timed to take place in the 'shoulder' seasons October-November or March-April, when bats are still active, however due to the limited suitability of the buildings for hibernating bats, works can continue throughout the winter period November - February <u>Pre-Demolition Mitigation Requirements</u> • The installation of 2x bat boxes or replacement bat roosts prior to works commencing to form a receptor site for any bats found during the works. Boxes may be installed within or onto new buildings, retained trees or can be pole mounted but must be in an undisturbed location and will need to be maintained in this location post-development. 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, away from artificial light. • The provision of a toolbox talk to contractors, by the Named Ecologist or an Accredited Agent, to inform them of the presence of bat roosts. • A pre-commencement inspection of the identified features / roost access points prior to removal. This should be undertaken by the Named Ecologist or an Accredited Agent using a torch and an endoscope (this may be via ladders, scaffolding or a mobile elevated platform), where safely accessible. <u>Demolition Mitigation Requirements</u> • The supervised demolition of all identified roosting features within B1, where safely accessible, and the removal of all identified roosting features on B6 by hand under the supervision of the Named Ecologist or an Accredited Agent.

	• Avoiding the use of unnecessary lighting, particularly at night, or implementing a low impact lighting strategy to avoid illumination of retained or newly created roosts or roost features. • Avoiding excessive noise or vibration disturbance e.g. from power tools or radios, within close proximity newly created roosts or roost features. • A Bat Licence does not allow for the disturbance of hibernating bats. Therefore, if any bats are found during the hibernation period or if any unexpected bat species or roost types are identified works must cease and advice must be sought from the Named Ecologist regarding the possible requirement for timing restrictions for works, the completion of further bat surveys or a modification to the licence. <u>Post-development</u> • Compensatory roost replacement will be installed on site, this will be in the form of integrated bat boxes within the new apartment blocks on site. A minimum of two bat boxes will be required to compensate for the loss of the identified roosts. The bat boxes will be a specification suitable for crevice dwelling species such as Vivara Pro Build-In Woodstone Bat Tube (integrated), Ibstock Enclosed Bat Box 'C' (integrated), or a similar alternative brand. These boxes may be installed prior to the demolition phase and can act as a suitable receptor for any bats found during works. • Post development monitoring may be required in years 2 and 4 post development. This will involve a dusk emergence survey to cover all replaced roosts, and inspection of any bat roosts where possible (This will be subject to the type of licence applied for). • A low impact lighting strategy will be adopted for the site post-development, which will include the following measures: ○ Light spill onto created roosts will be avoided ○ Light spill onto key flight paths to and from roosting sites will be avoided. ○ Light spill on to the trees and vegetation surrounding the site will be avoided ○ Use narrow spectrum light sources to lower the range of species affected by lighting. Use light sources that emit minimal ultra-violet light. ○ Avoid white and blue wavelengths of the light spectrum to reduce insect attraction and where white light sources are required in order to manage the blue shortwave length content they should be of a warm / neutral colour temperature <4,200 kelvin.
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	○ Not use bare bulbs and any light pointing upwards. The spread of light will be kept in line with or below the horizontal. ○ Light spill will be reduced via the use of low-level lighting used in conjunction with hoods, cowls, louvers and shields. Lights will also be directional to ensure that light is directed to the intended areas only. ○ External lighting will be on PIR sensors that are sensitive to large objects only (so that they are not triggered by passing bats) and will be set to the shortest time duration to reduce the amount of time the lights are on. ○ Wall lights and security lights will be 'dimmable' and set to the lowest light intensity settings. There are several products on the market that allow the control of the light intensity and the duration that the lights are on. All lighting on the developed site will make use of the most up to date technology available.
Enhancements	In addition to the installation of receptor boxes / compensatory roosts within the site. Four additional integrated bat boxes will be installed within the new buildings on site. The bat boxes will be a specification suitable for crevice dwelling species such as Vivara Pro Build-In Woodstone Bat Tube (integrated), Ibstock Enclosed Bat Box 'C' (integrated), or a similar alternative brand.
Bat box detail	<u>Integrated Bat Boxes</u> • The bat boxes will be positioned >3m above ground level within the fabric of the new buildings, with a clear flight path to and from the entrance, away from artificial light. Boxes will be installed on the southern and eastern elevations in close proximity to retained trees lines offsite. • The proposed bat boxes are designed to require no management or maintenance. Furthermore, preventing physical disturbance will increase the chances of occupation. However, it is recommended that the bat boxes are inspected annually outside the typical summer roosting period, which is between May and September inclusive. This can be undertaken by a Level 2 licenced bat worker. Bat boxes must be replaced like-for-like (insofar as is possible) if they become damaged. Indicative locations of bat boxes to be installed at the site post-development, to include compensatory roosting provision are provided within Appendix 3.

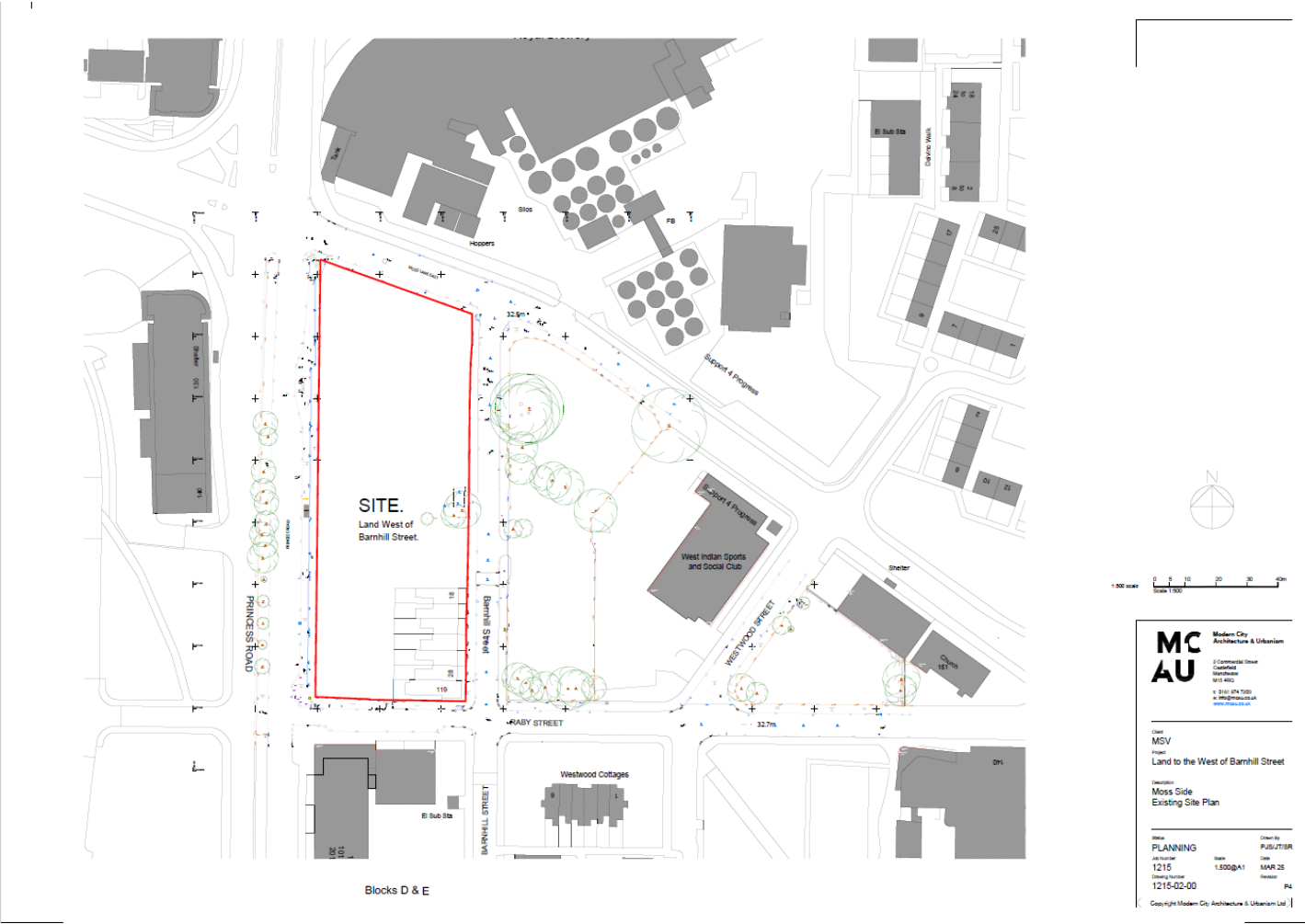


Figure 1: Vivaro Pro Integrated Bat Box (image credit: <https://www.nhbs.com/vivara-pro-build-in-woodstone-bat-box>)

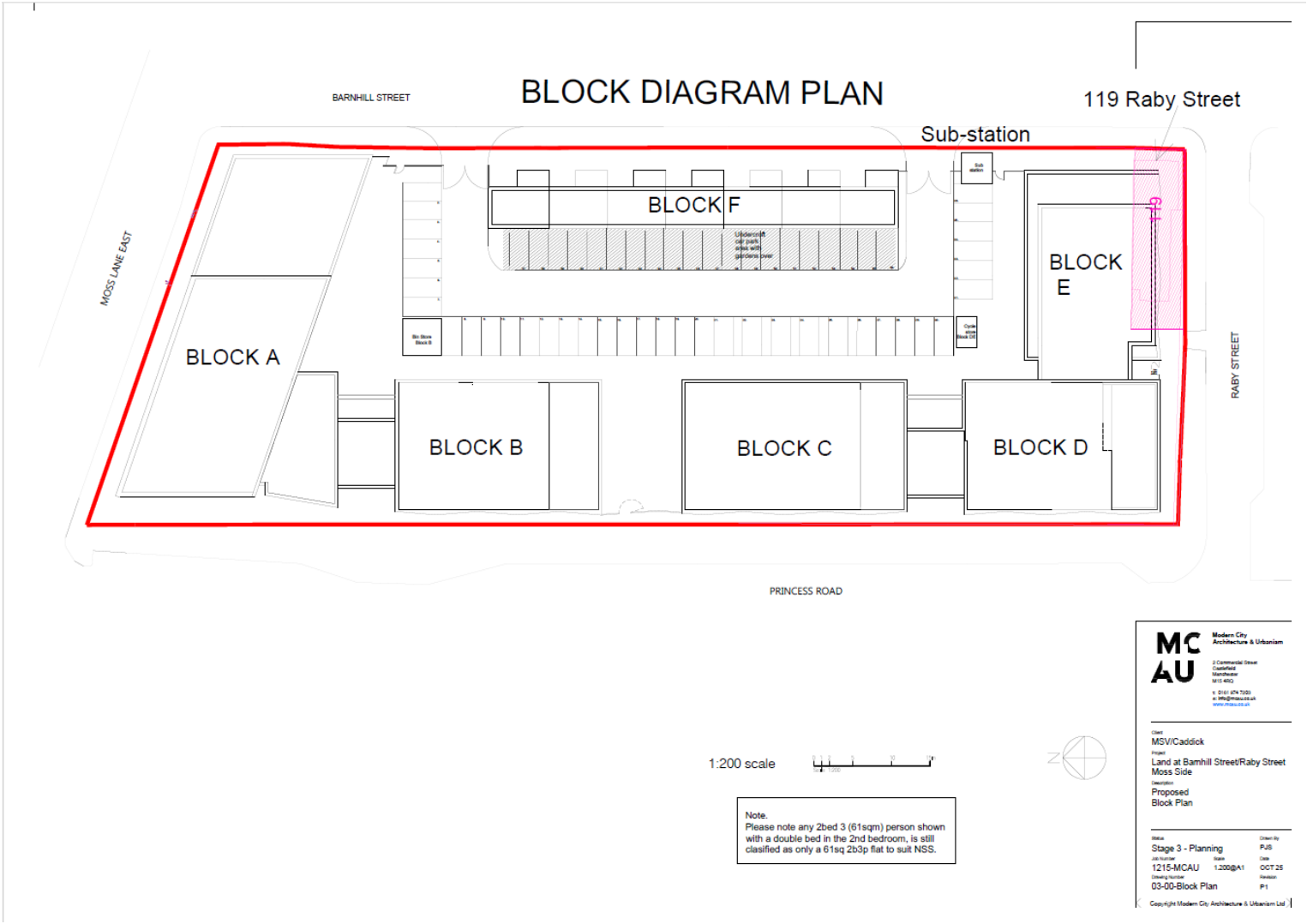
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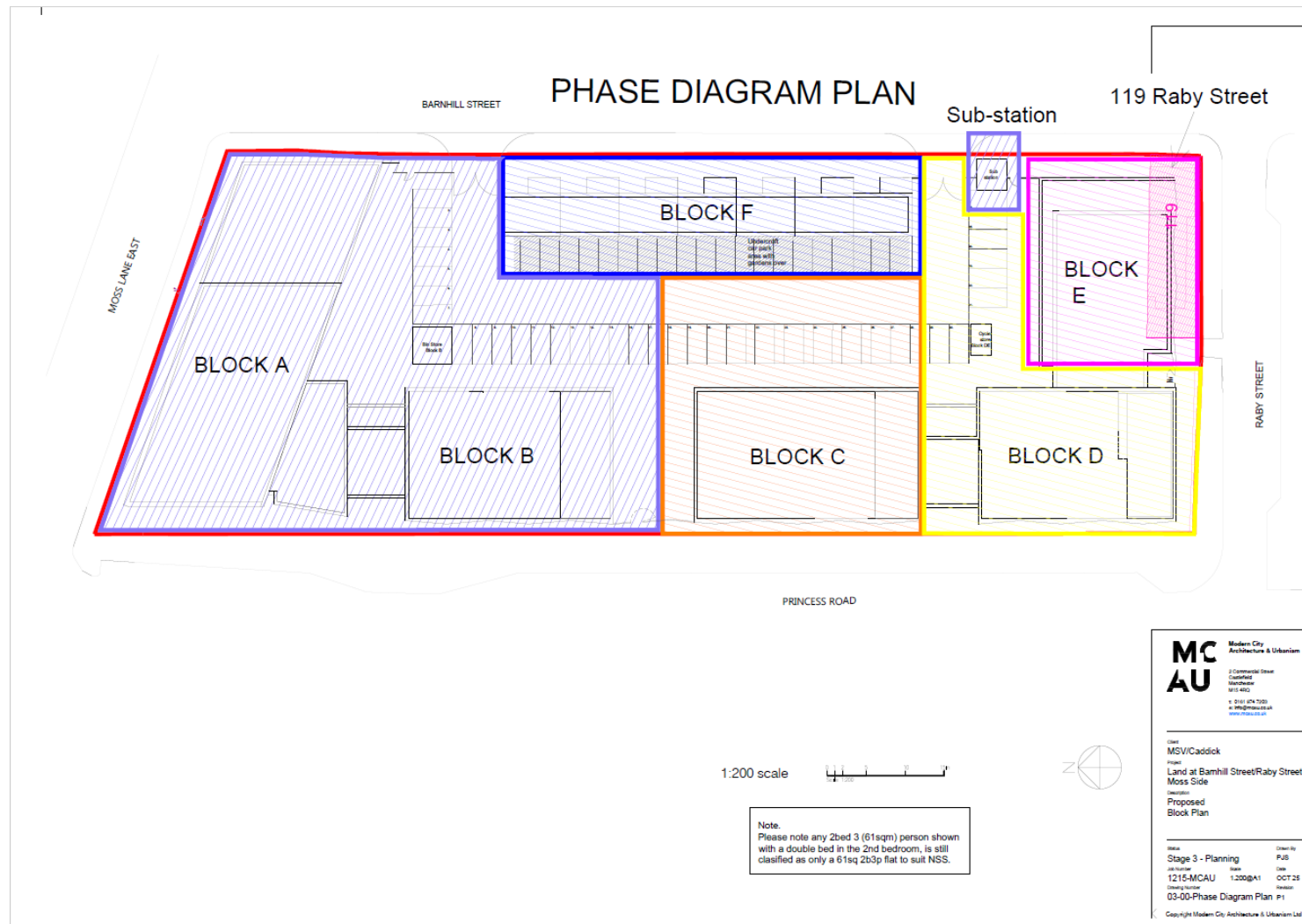
Appendix 1a: Existing Plans



Appendix 1b: Proposed Plans



Appendix 1c: Proposed Phase Plans



Appendix 2: Site Location Plan



BLOCK DIAGRAM PLAN

BARNHILL STREET

119 Raby Street

Sub-station

BLOCK F

Uppercroft car park with gardens lower

BLOCK A

BLOCK B

BLOCK C

BLOCK D

BLOCK E

MOSS LANE EAST

PRINCESS ROAD

Integrated Bat Box

1:200 scale

Note.
Please note any 2bed 3 (61sqm) person shown with a double bed in the 2nd bedroom, is still classified as only a 61sq 2b3p flat to suit NSS.

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Client: MSV/Caddick
Project: Land at Barnhill Street/Raby Street Moss Side
Drawing: Proposed Block Plan

Drawn By: PJB
Stage: 3 - Planning
Date: OCT 25
12/15-MCAU 1.2008A1
03-00-Block Plan
P1

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Appendix 5: Legislation and Planning Policy

LEGAL PROTECTION

All species of bat are fully protected under ***The Conservation of Habitats and Species Regulations 2017*** (as amended) 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 2021**

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 species of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006) 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; measurable gains in biodiversity in and around developments are incorporated; 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.

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Guidelines

This assessment has been designed to meet:

- British Standard 42020 (2013) 'Biodiversity – Code of Practice for Planning and Development'.

Proportionality

The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate.

This approach is enshrined in Government planning guidance, for example, paragraph 185 of the National Planning Policy Framework for England.

The desk studies and field surveys undertaken to provide a preliminary ecological appraisal (PEA) might in some cases be all that is necessary.

(BS 42020, 2013)

In consequence of the scale and intensity of the proposed development, this plan-led report is considered adequate and proportionate. It communicates all relevant information necessary to determine a planning application.

Version control			
Status	Issue	Name	Date
Draft	0.1	Leo Plevin BSc (Hons), MSc, MCIEEM Principal Ecologist (Level 2 Bat Licence)	16/10/2025
Final	1.0	Leo Plevin BSc (Hons), MSc, MCIEEM Principal Ecologist (Level 2 Bat Licence)	21/10/2025