



Preliminary Roost Assessment

Al Sunnah Mosque, Cheetham Hill, Manchester M8 9PB

Al Sunnah Mosque

Status	Issue	Name	Date
Draft	1	Sally Hall BSc (Hons), Consultant Ecologist, (accredited on Natural England class 2 bat licence 2022-10404-CL18-BAT)	21/12/2023
Reviewed	1.1	Mel Reid BSc (Hons) MRes MRSB, Senior Consultant	09/01/2024
Final	2	Sally Hall BSc (Hons), Consultant Ecologist, (accredited on Natural England class 2 bat licence 2022-10404-CL18-BAT)	09/01/2024

Arbtech's Contact Details:

Sally Hall BSc (Hons)
Consultant Ecologist
Tel: 07512 305365 Email: sallyhall@arbtech.co.uk
<https://arbtech.co.uk>

Limitations and Copyright

Arbtech Consulting Limited has prepared this report for the sole use of the above-named client or their agents in accordance with our General Terms and Conditions, under which our services are performed. It is expressly stated that no other warranty, expressed or implied, is made as to the professional advice included in this report or any other services provided by us. This report may not be relied upon by any other party without the prior and express written agreement of Arbtech Consulting Limited. The conclusions and recommendations contained in this report are based upon information provided by third parties. Information obtained from third parties has not been independently verified by Arbtech Consulting Limited.

© This report is the copyright of Arbtech Consulting Limited. Any unauthorised reproduction or usage by any person other than the addressee is strictly prohibited.

Industry Guidelines and Standards

This report has been written with due consideration to:

- Chartered Institute of Ecology and Environmental Management (2017). Guidelines for Preliminary Ecological Appraisal. 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.1. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2017). Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2020). Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- British Standard 42020 (2013). Biodiversity – Code of Practice for Planning and Development.
- British Standard 8683:2021 (2021). Process for Designing and Implementing Biodiversity Net Gain.

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.

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)

Executive Summary

Arbtech Consulting Limited was instructed by Al Sunnah Mosque to undertake a Preliminary Roost Assessment (PRA) at Al Sunnah Mosque, Cheetham Hill, Manchester M8 9PB (hereafter referred to as “the site”). The survey was required to inform a planning application for the demolition of the existing building and the construction of a new mosque with associated car parking, (hereafter referred to as “the proposed development”).

The following is work you will need to commission to comply with planning policy and legislation. Further information, along with opportunities for biodiversity enhancement, are outlined in Table 7 of this report.

Feature	Survey Results Summary	Impact Assessment	Recommendations
Roosting bats (B1)	B1 has low value for roosting bats. There are a few features suitable for small numbers of crevice dwelling bats. B1 is unsuitable for void dwelling bats due to the lack of access points into the building.	The proposed development will result in the demolition of this building. This would remove the suitable roosting features such as the gaps under the dry verge caps and the gaps under the wooden cladding, both of which could be suitable for crevice dwelling species. This could result in destruction of any bat roosts present and could cause disturbance, death or injury to bats.	One bat emergence survey is required during the active bat season (optimal May to August, suboptimal September) to confirm presence or likely-absence of a bat roost in the building. Infra-red cameras should be used as an aid. Four surveyors are required to provide full coverage of the building. If the absence of a bat roost cannot be determined during the first visit, then further surveys will be required. If bat roosts are confirmed in the building additional surveys may be required to characterise the roost and to inform an EPSL application to Natural England. Surveys should be a minimum of three weeks apart. The EPSL application requires that surveys have been undertaken within the most recent active bat season and planning permission must have been granted and all relevant wildlife-related conditions have been discharged prior to submission.

Contents

1.0 Introduction and Context.....6

1.1 Background 6

1.2 Site Location and Landscape Context..... 6

1.3 Scope of the Report 6

2.0 Methodology.....8

2.1 Desk Study 8

2.2 Field Survey 8

2.3 Breeding Birds and Other Incidental Observations..... 8

2.4 Suitability Assessment..... 8

2.5 Limitations 10

3.0 Results and Evaluation 11

3.1 Designated Sites..... 11

3.2 Historical Records 11

3.3 Field Survey Results..... 11

4.0 Conclusions, Impacts and Recommendations 19

5.0 Bibliography 22

Appendix 1: Proposed Development Plan..... 23

Appendix 2: Site Location Plan 24

Appendix 3a: PRA Plan..... 25

Appendix 3b: Proposed BERS Plan 26

Appendix 4: Legislation and Planning Policy Related to Bats 27

1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed by Al Sunnah Mosque to undertake a Preliminary Roost Assessment (PRA) at Al Sunnah Mosque, Cheetham Hill, Manchester M8 9PB (hereafter referred to as “the site”). The survey was required to inform a planning application for the demolition of the existing building and the construction of a new mosque with associated car parking, (hereafter referred to as “the proposed development”). A plan showing the proposed development is provided in Appendix 1.

The aim of the PRA was to determine the presence or evaluate the likelihood of the presence of roosting bats, and to gain an understanding of how bats could use the site for roosting, foraging or commuting. This has been undertaken with due consideration to the “Bat Surveys for Professional Ecologists —Good Practice Guidelines” publication (Collins, 2023).

To the author’s knowledge, no previous ecology reports have been produced for this site.

1.2 Site Location and Landscape Context

The site is located at National Grid Reference SD 83873 01112 and has an area of approximately 0.23ha comprising of the mosque, hardstanding and grassland. It is surrounded by residential dwellings with the river Irwell to the west and Manchester City Centre to the south. The wider landscape comprises residential areas with scattered trees and pockets of greenspace, and a small park with trees is located to the northwest which could provide foraging and commuting habitat for bats. A site location plan is provided in Appendix 2.

1.3 Scope of the Report

This report provides a description of all features suitable for roosting, foraging and commuting 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 possible constraints to the proposed development as a result of 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. To achieve this, the following steps have been taken:

- A desk study has been carried out.
- A Day-time Bat Walkover (DBW) survey, including an inspection of built structures, to determine the presence or the suitability of any features which bats could use for roosting and to assess the suitability of the site’s bat foraging and commuting habitat.

- An outline of potential impacts on any confirmed or unidentified roosts has been provided, based on the proposed development.
- Recommendations for further surveys and mitigation have been made, along with advice on the requirements for a European Protected Species Licence (EPSL) application if appropriate.
- Opportunities for the enhancement of the site for roosting, foraging and commuting bats have been set out.

2.0 Methodology

2.1 Desk Study

The desk study included a 2km radius review of statutory designated sites with bat qualifying interests and granted EPSL 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.

2.2 Field Survey

The survey was undertaken by Sally Hall BSc (Hons), (accredited on Natural England class 2 bat licence 2022-10404-CL18-BAT) on 11th December 2023.

The PRA focussed on one built structure which will be affected by the proposed development as well as providing an overview of the wider site and the surrounding landscape for bat roosting, foraging and commuting habitat.

For any surveyed buildings

A DBW survey was undertaken, comprising a non-intrusive visual appraisal was undertaken from the ground, using binoculars to inspect the external features of the building for features which bats could use for roosting, including access or egress points and for signs of bat use including droppings, scratch marks, insect remains and urine smear marks. An internal inspection of the building was also made, including the living areas and any accessible roof spaces, using a 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.

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.

2.4 Suitability Assessment

Habitats were categorised in accordance with Tables 4.1, 4.2 and 6.2 of the “Bat Surveys for Professional Ecologists—Good Practice Guidelines” publication (Collins, 2023), which are replicated in Tables 1 and 2 below.

Table 1: Guidelines for assessing the potential suitability of a built structure for bats

Potential Suitability	Roosting Habitats in Structures
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions 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 site, but could be used by individual hibernating bats).
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts e.g. maternity or classic cool/stable hibernation site.

Table 2: Guidelines for assessing the potential suitability of a site for bats

Potential Suitability	Potential Flight-Paths and Foraging Habitats
Negligible	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	Habitat that could be used by small numbers of bats as 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) or a patch of scrub.
Moderate	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 gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by 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 broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.

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. Bats are highly mobile creatures that switch roosts regularly and therefore the usage of a site by bats can change over a short period of time.

A search for historical bat records has not been undertaken. However, given the location of the site, the nature of the habitats present and the assessed suitability of the site for bats, it is not anticipated that the purchase of historical records data will add any significant weight or alter the conclusions and recommendations outlined in this report.

The loft space in B1 was not fully accessible as it was not boarded and a safe route could not be determined. The loft space was viewed from the loft hatch. Therefore, some roost features or evidence of bats (if present) may have been missed.

These limitations have been taken into account during the evaluation of the site and requirement for further surveys and mitigation.

3.0 Results and Evaluation

3.1 Designated Sites

No statutory designated sites with bat qualifying interests were identified within 2km of the site. However designated sites with suitable bat habitat within a 2km radius of the site are listed in Table 3.

Table 3: Statutory designated sites with suitable bat habitat within 2km radius of the site

Designated site name	Distance from site	Reasons for notification from Natural England
The Cliff/Kerser Dale Local Nature Reserve (LNR)	1,220m west	Habitats include woodland 70%, open water 5%, marsh 5% and semi-natural grassland 20%. home to a variety of spectacular wildlife such as woodpeckers and kingfishers which can be regularly spotted along the river. The waterbodies and woodland are likely to provide foraging and commuting habitat for bats within the local area.

3.2 Historical Records

A search of the magic.gov.uk database for granted EPSLs within a 2km radius of the site has been completed. Displaced bats from licensed 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 licensed site. EPSL records for bats are summarised in Table 4.

Table 4: Granted EPSLs for bats within 2km of the site

EPSL reference	Bat species affected	Impacts allowed by licence
EPSM2013-6051 – 1450m southwest	Common pipistrelle and soprano pipistrelle	Destruction of a resting place
EPSM2010-1888 – 1450m southeast	Soprano pipistrelle and common pipistrelle	Destruction of a resting place

3.3 Field Survey Results

The weather conditions recorded at the time of the survey are shown in Table 5. The results of the field survey are detailed in Table 6 and illustrated in Appendix 3.

Table 5: Weather conditions during the survey

Date:	11/12/2023
Temperature	8°C
Humidity	92%

Cloud Cover	100%
Wind	4mph
Rain	None

Table 6: PRA Results

Feature	Description	Photographs
<i>Figure 1</i> Bat foraging and commuting habitat	The majority of the surrounding habitat is urban, consisting of residential dwellings and regularly managed grass lawns. There are a few scattered trees within the vicinity which could be used by foraging and commuting bats.	
B1 - overview	B1 is a two-storey detached, regularly used religious building with a multi-pitch roof including a two-storey pitch and gable roof, a single-storey hipped roof, and several single-storey flat roof extensions. The roof and ridge tiles are constructed of curved interlocking concrete tiles. There are dry verge caps constructed of uPVC on the gable ends of the two-storey building. There is wooden cladding along the walls of the tiled buildings. The walls are constructed of brick and mortar. There is a single-storey extension to the south that consists of a flat bitumen lined roof, a corrugated metal roof and corrugated metal panel walls. The doors and windows are constructed of a combination of uPVC and wood.	

Figure 2	The roof and ridge tiles appear to be well sealed, with no missing or lifted tiles present or gaps underneath the ridge tiles.	
B1 – southern elevation	There is wooden cladding (red arrow) on the two-storey section of B1 which appears to be in fair condition, however it is undetermined if there are gaps that could be suitable for roosting bats underneath the cladding, due to the single-storey sections located under the cladding. The brickwork appears to be in good condition as there are no missing bricks or missing mortar. The windows and doors are constructed of uPVC and appear to be well sealed, with no gaps or damage present.	
Figure 3	The remaining sections of the southern elevation consist of metal walls and flat roof structures, all of which are well sealed and would not provide any suitable roosting features for bats.	

Figure 4

The roof and ridge tiles appear to be well sealed, with no missing or lifted tiles present.

There are gaps underneath the roof verge tiles as the gaps have not been filled in, however the drain pipe may be blocking access for bats to use these as a roosting feature, and is therefore a suboptimal feature, (see figure 5).

B1 – eastern elevation

There are gaps underneath the flat roof bitumen lining above the entrance, however as the structure is constructed of metal, it is unlikely to support roosting bats as the temperature would fluctuate, creating an unstable roosting environment.

The wooden cladding on the eastern elevation appears to be well sealed with no gaps present that could be suitable for crevice dwelling bats.

The brickwork appears to be in good condition as there are no missing bricks or missing mortar.

Figure 5

The windows and doors are constructed of uPVC and have metal wire covers over the windows, all of which appears to be well sealed, with no gaps or damage present.



Figure 6	The roof and ridge tiles appear to be well sealed, with no missing or lifted tiles present and the mortar under the ridge tiles appears well sealed.	 
B1 – northern elevation	There are gaps underneath the roof verge tiles as the gaps have not been filled in, however the drain pipe may be blocking access for bats to use these as a roosting feature. The wooden cladding appears to be in poor condition as one of the panels has come away from the wall, creating a large gap that could be used by crevice dwelling bats (see figure 7). The brickwork appears to be in good condition as there are no missing bricks or missing mortar.	
Figure 7	The windows and doors are constructed of a combination of metal and uPVC and have metal wire covers over the windows, all of which appears to be well sealed, with no gaps or damage present.	

Figure 8	The roof and ridge tiles appear to be well sealed, with no missing or lifted tiles present. The mortar underneath the ridge tiles and along the single-storey extension appears to be well sealed with no missing mortar or gaps suitable for bats present. The brickwork appears to be in good condition as there are no missing bricks or missing mortar.	
B1 – western elevation	The windows and doors are constructed of a combination of metal and uPVC and have metal wire covers over the windows, all of which appears to be well sealed, with no gaps or damage present.	
Figure 9	The remaining sections of the western elevation consist of metal walls, corrugated metal roofs and flat roof structures, all of which are well sealed and would not provide any suitable roosting features for bats. The metal material would fluctuate in temperature and not provide a stable roosting environment for bats. The exposed nature of the open extension would allow draughty conditions into the extension which would also be unsuitable for roosting bats, (see figure 8).	

Figure 10	There are dry verge caps along the gable ends of the two-storey section of B1 which are constructed of uPVC. They appear to be in poor condition as there are gaps underneath the verges where the roof lining could be seen, and this could be used as a roosting feature by crevice dwelling bats.	
Figure 11 B1 – interior	There are two loft spaces within the interior of B1. One is located within the two-storey section of B1, the other is located within the single-storey tiled section of B1. The remainder of the building has suspended ceiling tiles. The approximate internal dimensions of the two-storey loft void are: 10m (L) x 9m (W) x 1.5m (H). [Height is measured to the highest point of the loft space]. At the time of the survey the internal conditions of the loft void were recorded as: temperature = 14.6°C and humidity = 73.5%. It is constructed from modern timber beams, including the ridge beam, and the roof is lined with a breathable membrane lining. The beams may provide roosting sites for void-dwelling bats. There are a few hanging cobwebs along the loft which may suggest a lack of recent roosting activity by void-dwelling bats here. The lining appears to be in fair condition, however it appears to be damp in some areas, possibly indicating that the roof is not well sealed, allowing wet conditions into the loft void. No light could be seen entering the loft, indicating that the lining is well-sealed.	

Figure 12	The loft void is not boarded and has mineral wool insulation scattered around the void. The void is also used for storage of some personal items. The floor was searched for bat droppings where possible, however none were identified. Rodent droppings were present in small quantities, and a nest was identified within the loft void which is likely to be from a rodent as there are no access points into the loft for birds to use.	
Figure 13	The single-storey loft void has the approximate internal dimensions of: 19m (L) x 8m (W) x 1m (H). [Height is measured to the highest point of the loft space]. It is constructed of modern timber beams and the roof is completely sealed off. There is likely to be a small void between the ceiling and the roof tiles which could be suitable for crevice dwelling species, however there are no access points into the loft void itself. The void floor consists of suspended ceiling tiles. No cobwebs were observed within the void and no daylight enters the void, indicating that the ceiling is well sealed. No evidence of bats (e.g. droppings, oil staining, etc.) was identified within both loft voids of B1.	
B1 – suitability assessment	B1 has low habitat value for roosting bats. There are a few suitable features for small numbers of crevice dwelling bats such as the gap behind the wooden cladding and the gaps under the dry verge caps. B1 is unsuitable for void dwelling bats due to the lack of access points into the building that would be suitable for void dwelling bats. There is limited foraging and commuting habitat within the surrounding area as scattered trees are present, which are only likely to support individual or small numbers of foraging and commuting bats in the local area. No evidence of roosting bats or nesting birds was observed internally or externally during the survey.	

4.0 Conclusions, Impacts and Recommendations

Taking the desk study and field survey results into account, Table 7 presents an evaluation of the value of the site for bats and also details any other ecological constraints identified such as nesting birds in relation to the proposed development.

Table 7: Evaluation of the site for bats and any other ecological constraints

Feature	Survey Results Summary	Impact Assessment	Recommendations	Biodiversity Enhancement Opportunities ¹
Roosting bats (B1)	B1 has low value for roosting bats. There are a few features suitable for small numbers of crevice dwelling bats. B1 is unsuitable for void dwelling bats due to the lack of access points into the building.	The proposed development will result in the demolition of this building. This would remove the suitable roosting features such as the gaps under the dry verge caps and the gaps under the wooden cladding, both of which could be suitable for crevice dwelling species. This could result in destruction of any bat roosts present and could cause disturbance, death or injury to bats.	One bat emergence survey is required during the active bat season (optimal May to August, suboptimal September) to confirm presence or likely-absence of a bat roost in the building. Infra-red cameras should be used as an aid. Four surveyors are required to provide full coverage of the building. If the absence of a bat roost cannot be determined during the first visit, then further surveys will be required. If bat roosts are confirmed in the building additional surveys may be required to characterise the roost and to inform an EPSL application to Natural England. Surveys should be a minimum of three weeks apart. The EPSL application requires that surveys have been undertaken within the most recent active bat season and planning permission must have been granted and all relevant wildlife-related conditions have been discharged prior to submission.	To be confirmed upon completion of the surveys.
Foraging and commuting bats	There are no habitats on the site which could be used by bats	The proposed development will not result in the removal of any habitats which could be used by foraging or commuting bats.	None.	The following habitat creation and enhancement opportunities could be incorporated into the proposed development which

¹ The Local Planning Authority has a duty to ask for enhancements under the NPPF (2023).

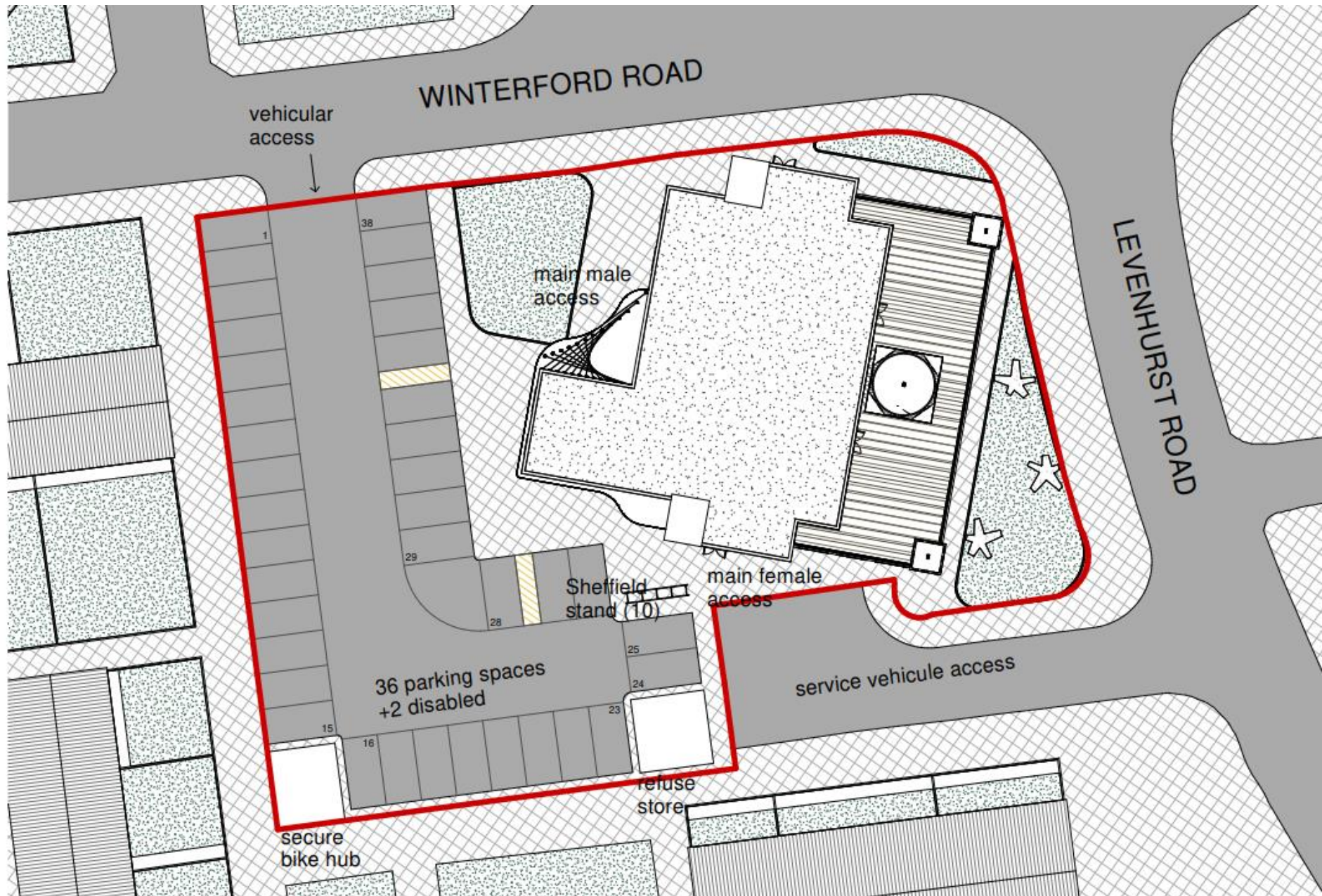
	for foraging or commuting, however there are scattered trees in the vicinity of the site which could be used by bats. The site has negligible habitat value for foraging and commuting bats.			would be beneficial for foraging bats: Planting of native tree, shrub and hedgerows to increase foraging opportunities.
Nesting birds (B1)	The building offers no opportunities for nesting birds by the nearby scattered trees could provide nesting habitat.	None.	None.	The installation of a minimum of two bird boxes mounted on poles or on the new building will provide additional nesting habitat for birds e.g. Vivara Pro Estella House Sparrow Nest Box (buildings) Vivara Pro Madrid Swift Nest Box (buildings) Schwegler 1B Nest Boxes (trees) Schwegler 2H Robin Boxes (trees) Woodstone Nest Box (buildings or trees) Or a similar alternative brand. Tree (pole mounted) 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.

				Alternatively, two integrated swift bricks (e.g. Ibstock Swift Eco Habitat or similar alternative brand) could be integrated into the fabric of the building during construction. Bricks should be positioned close together (0.6-1.0m between bricks) as swifts prefer to nest gregariously. The bricks should be placed at least 5m above ground level under the eaves of a building, on a north or east elevation, where they will be sheltered from prevailing wind, rain and strong sunlight. To be suitable for swifts, the bricks require an open aspect with no trees or large shrubs potentially obstructing the birds' flight path up to 5m from the brick. Swift bricks are a "universal nest brick" for small bird species, including red-listed species such as common swift, house sparrow, house martin, and starling.
Other ecological constraints	None identified.	N/A	N/A	N/A

5.0 Bibliography

- Collins, J. (2016). Bat Surveys for Professional Ecologists —Good Practice Guidelines, 3rd edition, Bat Conservation Trust, London.
- Garland, L. & Markham, S. (2008) Is Important Bat Foraging and Commuting Habitat Legally Protected? <http://biodiversitybydesign.co.uk/cmsAdmin/uploads/protection-for-bat-habitat-sep-2007.pdf>
- Google Earth. Accessed on 20/12/2023.
- Greater Manchester Ecology unit, (2023). Greater Manchester Biodiversity Action Plan. https://gmlrc.org/projects/gm_bap/
- Institution of Lighting Professionals (2023) and the Bat Conservation Trust. Guidance Note GN08/23 Bats and Artificial Lighting at Night. <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>
- Magic Database. <http://www.magic.gov.uk/MagicMap.aspx> Accessed on 20/12/2023.
- Manchester City Council (2012). Manchester's Local Development Framework. https://www.manchester.gov.uk/downloads/download/4964/core_strategy_development_plan
- Natural England Designated Sites View. <https://designatedsites.naturalengland.org.uk/SiteSearch.aspx> Accessed on 20/12/2023.
- Reason, P.F. and Wray, S. (2023). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Chartered Institute of Ecology and Environmental Management, Ampfield.
- Wray, S., Wells, D., Long, E., Mitchell-Jones, T (2010) Valuing Bats in Ecological Impact Assessment. IEEM In-Practice. Number 70 (December 2010). Pp. 23-25.

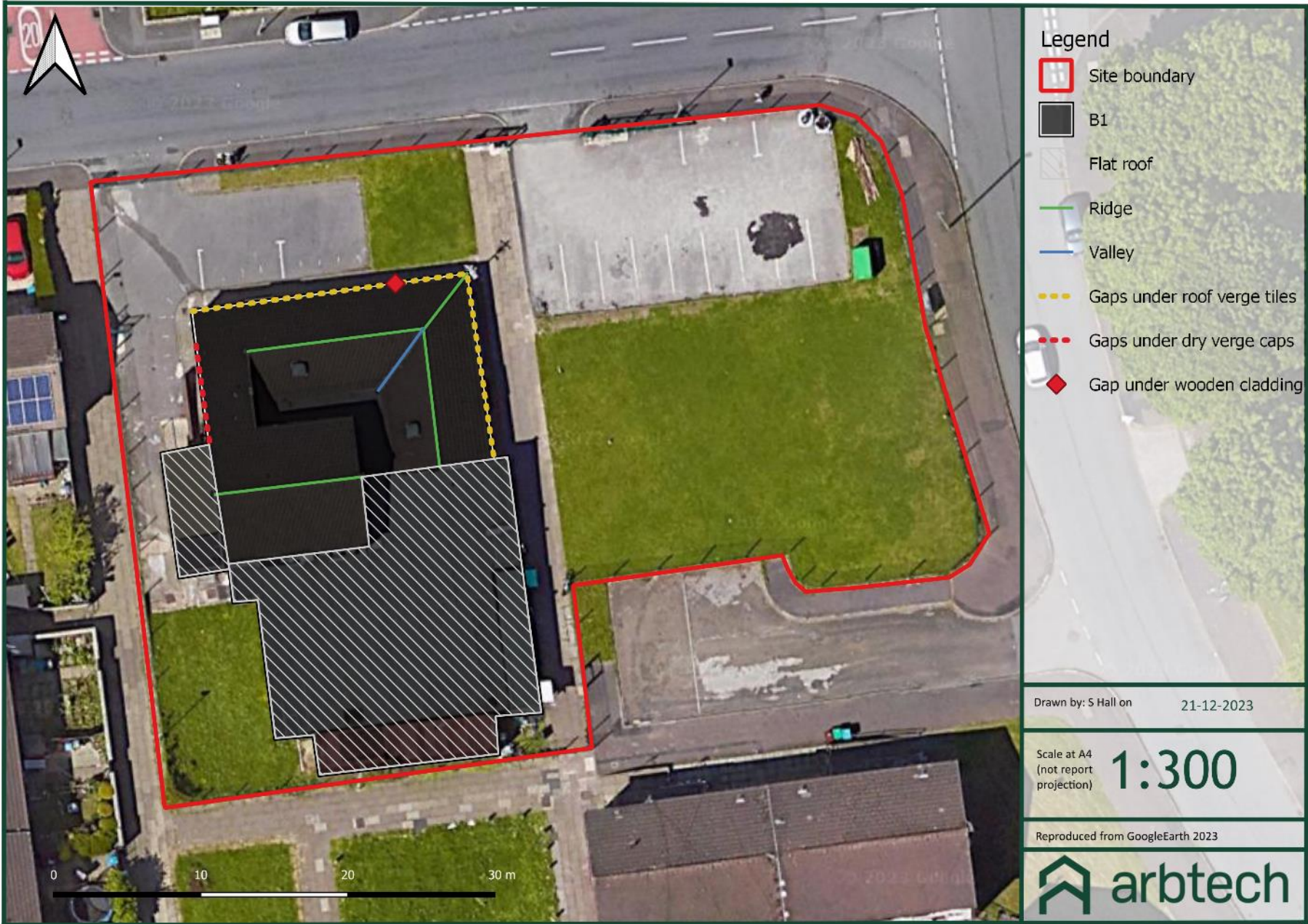
Appendix 1: Proposed Development Plan



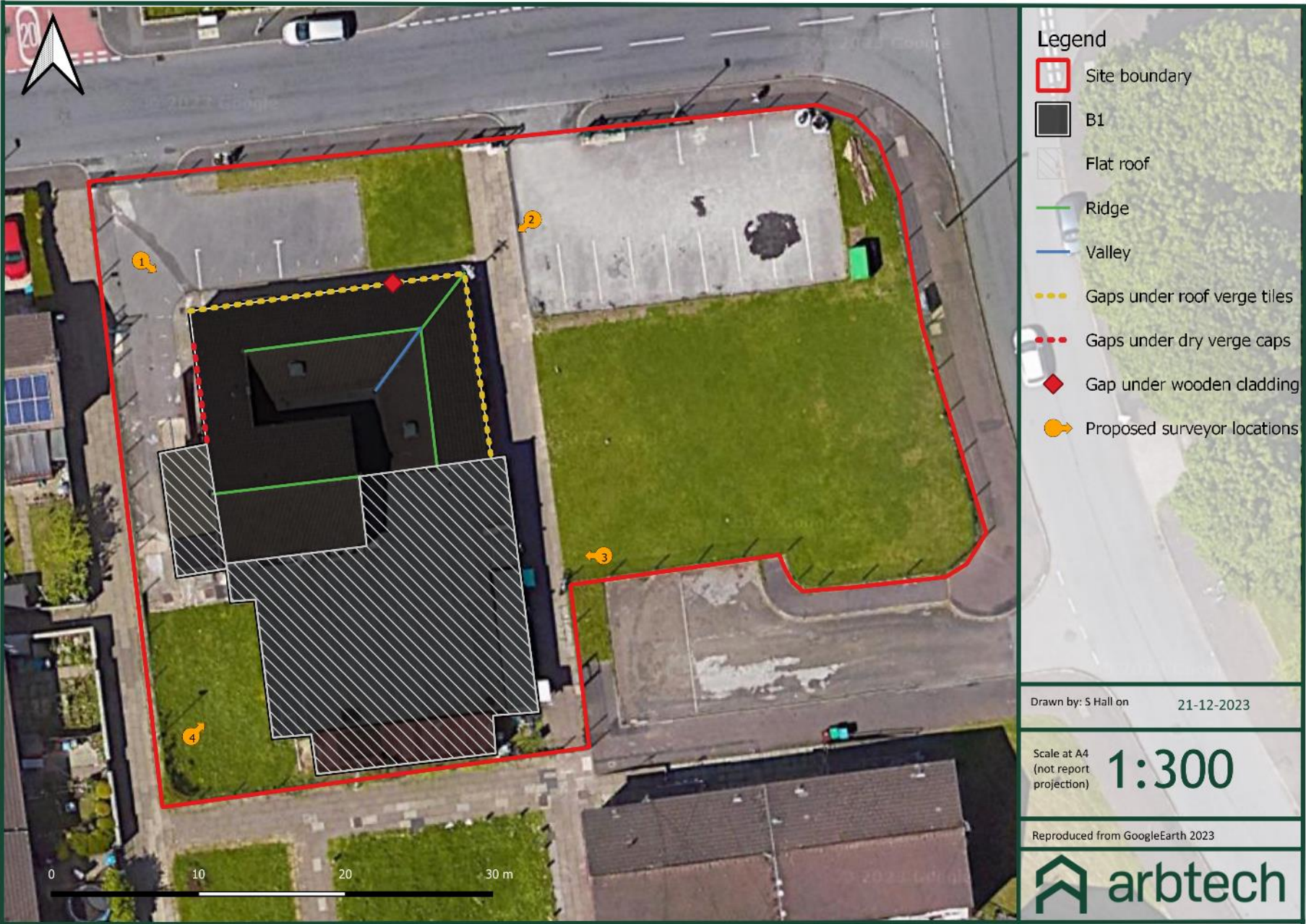
Appendix 2: Site Location Plan



Appendix 3a: PRA Plan



Appendix 3b: Proposed BERS Plan



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* (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

National Planning Policy Framework 2023

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.

Manchester's Local Development Framework (2012)

The local plan can be viewed here: https://www.manchester.gov.uk/downloads/download/4964/core_strategy_development_plan

The following planning policies have implications in relation to biodiversity and the proposed development:

- Policy EN15 – Consideration will be given to protected and priority species, as listed in the Manchester Biodiversity Strategy and included in the Greater Manchester Biodiversity Action Plan (GM BAP).
- Developers will be expected to identify and implement reasonable opportunities to enhance, restore or create new biodiversity, either on-site or adjacent to the site, contributing to linkages between valuable or potentially valuable habitat areas where appropriate

Greater Manchester Biodiversity Action Plan

The local BAP can be viewed here: https://gmlrc.org/projects/gm_bap/

The following species could be present on the site or in the surrounding area (based on the site survey and a review of the magic.gov.uk database) and are included in the plan:

- All UK bat species

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A European Protected Species Licence (EPSL) 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/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; and,
4. conserving wild animals.

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

EUROPEAN PROTECTED SPECIES POLICIES

In December 2016 Natural England officially introduced the four licensing policies throughout England. The four policies seek to achieve better outcomes for European Protected Species (EPS) and reduce unnecessary costs, delays and uncertainty that can be inherent in the current standard EPS licensing system. The policies are summarised as follows:

- Policy 1; provides greater flexibility in exclusion and relocation activities, where there is investment in habitat provision;
- Policy 2; provides greater flexibility in the location of compensatory habitat;
- Policy 3; provides greater flexibility on exclusion measures where this will allow EPS to use temporary habitat; and,
- Policy 4; provides a reduced survey effort in circumstances where the impacts of development can be confidently predicted.

The four policies have been designed to have a net benefit for EPS by improving populations overall and not just protecting individuals within development sites. Most notably Natural England now recognises that the Habitats Regulations legal framework now applies to ‘local populations’ of EPS and not individuals/site populations.