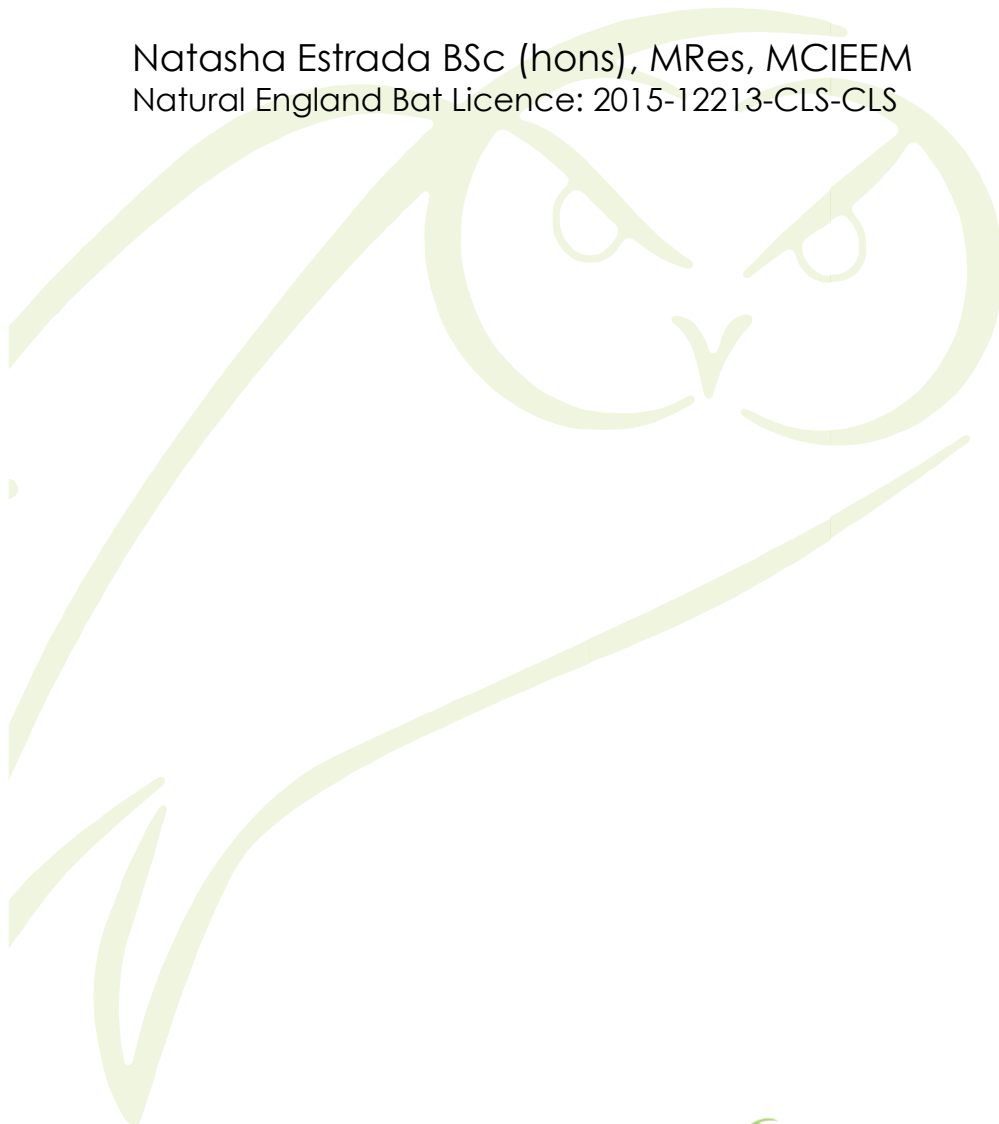


Bat Activity Survey Report	
For:	Manner (Hotspur)
Site	Hotspur Press, Cambridge Street, Manchester, M1 5QR
Report Date:	28 th September 2023
Report Reference:	SQ-1288

Lead Surveying Ecologist:

Natasha Estrada BSc (hons), MRes, MCIEEM
 Natural England Bat Licence: 2015-12213-CLS-CLS



Hotspur Press
Cambridge Street
Manchester
M1 5QR

Client:	Manner (Hotspur)
Site Name:	Hotspur Press, Cambridge Street, Manchester, M1 5QR
Grid Reference:	SJ 83844 97455
Report:	Bat Activity Report
Date of surveys:	August 16 th , September 4 th , and September 20 th 2023
Lead Ecologist:	Natasha Estrada BSc (hons), MRes, MCIEEM Natural England Bat Licence: 2015-12213-CLS-CLS

Issue:	Revision:	Stage:	Date:	Prepared by:	Approved by:
1	-	Draft for review	28 th September 2023	John Davies BSc (hons), Estrada Ecology Ltd	Natasha Estrada MRes, MCIEEM, Estrada Ecology Ltd
2	n/a	FINAL	28 th September 2023	John Davies BSc (hons), Estrada Ecology Ltd	Natasha Estrada MRes, MCIEEM, Estrada Ecology Ltd



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The contents of this report have been produced with due consideration of current best practice guidance, and in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct and guidelines, as outlined in Collins 2016.

This report should not be submitted as part of a planning application without any accompanying species-specific reports which may have been recommended herein.

Data within this report is valid for a maximum of eighteen months from the date of the last survey. After this period, an updated site visit will be required to determine a new ecological baseline.

Whilst every effort has been taken to ensure the accuracy of this report and its contents, in view of potential ecological constraints to development or the presence or absence of species, it must only be viewed as a snapshot in time and, therefore, not be viewed as definitive. Due to external factors, such as seasonality, weather etc, having the potential to affect survey results, no liability can be assumed for omissions or changes that may, or may not occur, after the date this report was produced.

Summary

Estrada Ecology Ltd was commissioned to conduct three bat activity surveys of the building at Hotspur Press at Cambridge Street, Manchester, to ascertain presence / likely absence of use by bats for roosting, and / or as a place of shelter.

A Preliminary Ecological Appraisal was conducted by Estrada Ecology Ltd on the 9th of May 2018 (*Report Ref: MCR.HH.1.2018-2*), which recorded field sign evidence congruent with use of the inside of the building by low numbers of common pipistrelle bats. The building was recorded as offering a high level of roost suitability, as assessed by a licenced bat ecologist (2015-12213-CLS-CLS). The subsequent bat activity surveys conducted in May and June 2018 (*Report Ref: MCR.HH.ACT.11.5.2018*) recorded no emerging or re-entry behaviour by bats.



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Repeat inspections of the property conducted in August 2023, prior to the commencement of the bat activity surveys recorded the previously identified external roost features to be still in situ and the building was assessed again as offering a high level of bat roost suitability, as assessed by a licenced bat ecologist (2015-12213-CLS-CLS).

Findings and recommendations

Bats and roosts

Three surveys, conducted as dusk emergence bat activity surveys, following BCT Survey Guidelines 2016 and 2023, was undertaken following suitable weather conditions, as outlined herein.

Across the survey period, a peak count of four bats, identified as common pipistrelle (*Pipistrellus pipistrellus*), were recorded emerging from the southwestern elevation of the structure. Additionally, during the first survey, two separate common pipistrelles were recorded as emerging from the interior of the building and exiting through separate windows on the southern elevation.

Low levels of non-emerging bat contacts were recorded throughout the duration of each survey. Activity included foraging and commuting along the adjacent river Medlock corridor and in the wider area to the southwest.

Based on survey evidence, the building is deemed to be used by bats for roosting or as a place of shelter. It is therefore required that a Protected Species Mitigation Licence is obtained from Natural England, prior to the onset of works within the site.

Further details are highlighted within this report.

Hibernating bats

Crevise-dwelling bats, such as pipistrelle species, use structures for shelter and protection in winter when they hibernate. During hibernation, bats need roosts that are cool and remain at a constant temperature. They are difficult to detect in hibernation, in well-concealed crevices, and leave no obvious signs of their presence. The building was assessed as offering limited opportunities for winter hibernation as recorded crevices and fissures within the structure of the building were of unsuitable depths and therefore, unable to provide the required stable temperatures and humidity levels.

Contents:

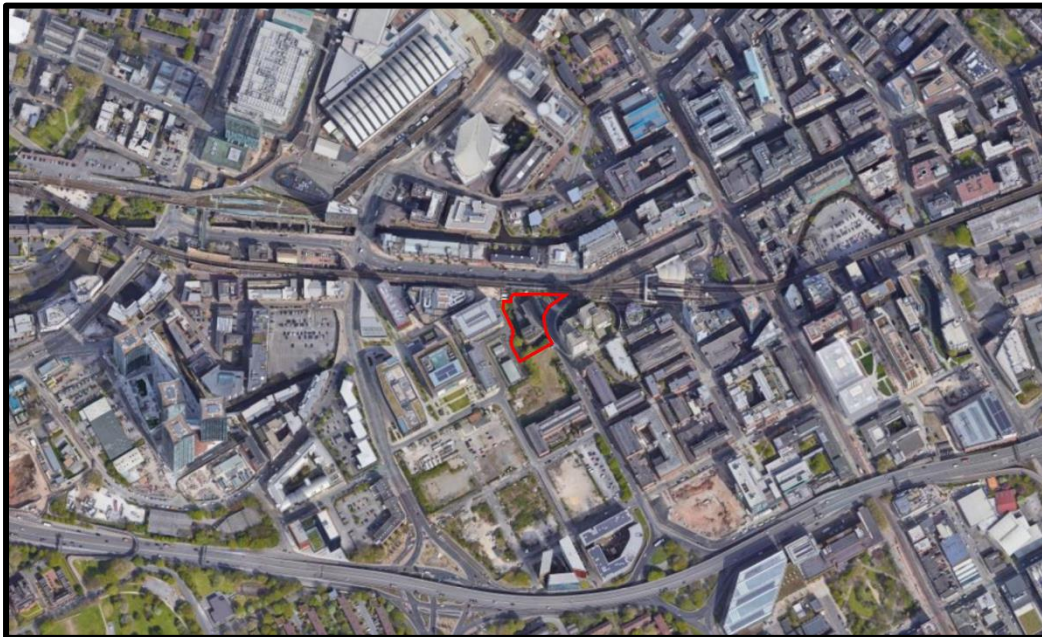
	Summary
1	Introduction and Site Description
2	Protected Species Legislation
3	Survey Objectives
4	Survey Methodology
5	Survey Findings
6	Survey and Site Assessment
7	Ecological Constraints
8	Interpretation and Evaluation
9	Assessment of Potential Impacts
10	Conclusions and Recommendations
11	Mitigation/Impact Assessment
	References



1 Introduction and Site Description

- 1.1 Estrada Ecology Ltd was commissioned to conduct three bat activity surveys on the Hotspur Press building, Cambridge Street, Manchester (hereafter referred to as the 'site') to assess for its potential to support bats and to inform a planning application for the proposed redevelopment of the site.
- 1.2 Under current proposals, it is understood the current building is planned to be demolished in parts, to facilitate redevelopment of the site for student accommodation.
- 1.3 The site is approximately 0.3 hectares in size and is located within the southern side of Manchester City Centre. The survey site's central OS grid reference is recorded as SJ 83844 97455.
- 1.4 The site is dominated by the Hotspur Press building with some peripheral areas of associated hardstanding. Self-set vegetation, namely buddleia (*Buddleja sp.*) is recorded to have colonised the southwestern aspect of the site. The river Medlock runs adjacent to the west and southern site boundaries.

Figure 1: The building in its wider setting



Google Earth (© Map Data 2023)

2 Protected Species Legislation

- 2.1 All species of bat and their breeding sites or resting places (roosts) are fully protected under The Conservation of Habitats and Species Regulations 2010 (as amended).
- 2.2 The Regulations prohibit: the deliberate killing, injuring, or taking of bats; the deliberate disturbance of any bat species, in such a way as to be significantly likely to affect:
- Their ability of to survive, hibernate, migrate, breed, or rear or nurture their young, or the local distribution or abundance of that species.
 - damage or destruction of a breeding site or resting place (roost).
 - the possession or transport of bats or any other part thereof.
- 2.3 Bats are also protected under the Wildlife and Countryside Act 1981 (as amended) through their inclusion in Schedule 5. Under the Act, they are protected from:
- intentional or reckless disturbance (at any level); obstruction of access to any place of shelter, breeding, or rest; selling, bartering or exchange of these species, or parts of.
- 2.4 Seven British bat species are listed as Species of Principle Importance (SPI) under the Natural Environment and Rural Communities (NERC) Act 2006. These are: barbastelle (*Barbastella barbastellus*); Bechstein's (*Myotis bechsteinii*); noctule (*Nyctalus noctula*); soprano pipistrelle (*Pipistrellus pygmaeus*); brown long-eared (*Plecotus auritus*); greater horseshoe (*Rhinolophus ferrumequinum*); and lesser horseshoe (*Rhinolophus hipposideros*).
- 2.5 Under the National Planning Policy Framework 2019, the presence of any protected species is a material planning consideration. The Framework states that impacts arising from development proposals must be avoided where possible, or mitigated / compensated for, and that opportunities for ecological enhancement should be sought.
- 2.6 Under certain circumstances, a licence may be granted by Natural England to permit activities that would otherwise constitute an offence. In relation to development, a scheme must have full planning permission before a licence application can be made.

3 Survey Objectives

- 3.1 The objective of these surveys was to establish how bats were using the site for roosting, or as a place of shelter; and, to identify to species level, determine the population size and nature of the roost within the property on site.
- 3.2 This report presents the findings of bat activity surveys undertaken in August and September 2023 and aims to:
- Outline any potential impacts of the proposed development on bats, as a result of the findings of the desk study and field surveys.
 - Provide recommendations for mitigation and / or compensation measures to ensure any impacts on bat activity is avoided or minimised where applicable.
 - Provide recommendations for enhancing the site for bat activity where possible; and
 - Provide recommendations for mitigation and / or compensation measures to ensure any impacts on breeding bird species is avoided or minimised.

4 Survey Methodology

4.1 Desktop study

- 4.1.1 A biological data records search was requested from Greater Manchester Ecology Unit (GMEU) for a 1 km radius from the central grid reference.
- 4.1.2 Further inspection, using colour 1: 25,000 OS base maps (www.ordnancesurvey.co.uk), MAGIC (www.magic.defra.gov.uk) and aerial photographs from Google Earth (www.maps.google.co.uk), was also undertaken to provide additional context and identify any features of potential importance for nature conservation in the wider countryside.

4.2 Preliminary Roost Assessments

- 4.2.1 A preliminary roost assessment of the property was conducted June 2018 and recorded the building as offering high roost suitability. Field sign evidence synonymous the use of the interiors of the building by low numbers of *Pipistrellus* sp. was recoded.
- 4.2.2 A pre-survey assessment of the building conducted prior to the August 2023 activity survey confirms the building still offers a high level of roost suitability, as assessed by a licence d bat ecologist (2015-12213-CLS-CLS.). No field sign evidence of bats was recorded internally or externally.
- 4.2.3 Following the classification of high roost suitability, three activity survey were recommended to be conducted on the structure to ascertain presence/likely absence of bats.

4.3 Bat activity surveys

- 4.3.1 Three bat activity survey were recommended and undertaken on dates within August and September 2023, using guidance from Collins, J., Bat Conservation Trust (BCT) Bat Surveys for Professional Ecologists, Good Practice Guidelines, 3rd Edition, 2016 and 2023.
- 4.3.2 Prior to the start of the activity survey, an external examination, where accessible, was undertaken of all cavities, holes, cracks, and fissures in the building (where applicable). Features were examined for bat field signs to identify bats in situ, potential roost sites and access points and any signs of occupation such as: scratch marks; droppings; smudge marks; discarded moth wings; and urine staining etc.
- 4.3.3 The number of surveys on the buildings is determined by their potential to support bats; any field sign evidence gathered during the initial inspection survey in June 2018 and August 2023 and any subsequent activity recorded during activity surveys.
- 4.3.4 The dusk emergence surveys commenced twenty minutes prior to sunset and continued up to two hours after sunset.
- 4.3.6 Echo Meter Touch 2 Pros paired with Bat boxes Duets were used to aid identification of the species. The survey effort was aided by the use of Nightfox Whisker infra-red cameras, which were deployed in suitable

locations and recorded footage for the duration of the survey.

Figure 2: Location of the surveyor (●) and IR cameras (▲) over the survey period.



Google Earth (© Map Data 2023)

4.4 Timings

4.4.1 The three activity surveys were conducted during suitable times and weather conditions as outlined in Table 1 below.

Table 1: Environmental conditions throughout the survey period.

Date	Sunset	Start time	End time	Weather conditions
16 th August 2023	20:36	20:15	22:00	Temp 19°C, Humidity 72%, No precipitation, wind speed 3 mph NNE
4 th September 2023	19:53	19:30	21:10	Temp 24°C, Humidity 65%, No precipitation, wind speed 3 mph east
20 th September 2023	19:13	18:56	19:45	Temp 15°C, Humidity 76%, No precipitation, wind speed 7 mph SSW

4.5 Personnel

- 4.5.1 The bat activity surveys were led by experienced ecologist Natasha Estrada BSc (hons), MRes MCIEEM (Natural England Bat Survey Class Licence 2015-12213-CLS-CLS), who has held a bat licence from Natural England for approximately eighteen years. Natasha has held multiple mitigation licences for species including Common pipistrelle, Natterer's (*Myotis nattereri*), Brown long eared (*Plecotus auritus*) and Noctule bats.
- 4.5.2 Other Surveyors include Samuel Toon BSc(hons) Natural England bat licence 2018-35446-CLS-CLS, Joanne Toller BSc (hons), John Davies BSc (hons), Jon Simpson BSc (hons), Jane Harris BSc (hons) and Daniel Noble. All surveyors are suitably experienced in bat survey work and bat identification.

5 Survey Findings

5.1 Desktop study

- 5.1.1 Bat records were commissioned from Greater Manchester Ecology Unit for a 1 km radius from the central grid reference.
- 5.1.2 Sixty-three bat records were returned within the search radius dated between 1996 and 2022. Twelve records relate to bat roosts, the nearest being 128 meters to the west of the site which is a recorded maternity roost (2011).
- 5.1.3 Species from all returned bat records include common pipistrelle and soprano pipistrelle, as well as several undefined bats and unconfirmed *Pipistrellus* species.
- 5.1.4 Consultation with Magic Map (www.magic.defra.gov.uk) recorded six granted European Protected Species Mitigation Licences (EPSML) with respect of bats within a 1 km radius from grid (Table 2).

Table 2: Granted EPSM Licences within the Search Radius

Reference	Years	Species	Purpose	Distance from Grid
EPSM2013-5575	2013 - 2016	Common Pipistrelle	Destruction of a breeding site	128 meters west
2020-45213-EPS-MIT	2020 - 2025	Common Pipistrelle	Destruction of a resting place	554 meters north
EPSM2012-5061	2012 - 2015	Brown Long-eared Bat	Destruction of a breeding site; Destruction of a resting place	648 meters northwest
EPSM2012-4767	2012 - 2013	Common Pipistrelle	Destruction of a resting place	648 meters northwest
2018-33674-EPS-MIT	2018 - 2040	Common Pipistrelle	Damage and Destruction of a resting place	797 meters northeast
2014-490-EPS-MIT	2014 - 2017	Common Pipistrelle; Soprano Pipistrelle	Destruction of a resting place	853 meters northeast

5.2 Initial inspection survey

- 5.2.1 Prior to the start of each activity survey, a visual inspection of the buildings was undertaken, where accessible.
- 5.2.2 No field sign evidence to indicate use of any structure was recorded.

5.3 Bat activity surveys

- 5.3.1 The first activity survey was conducted on the 16th of August 2023 and took place at dusk, starting 20:15.
- 5.3.2 During this survey, four common pipistrelle bats were recorded at 20:55 as emerging from the underside of the fascia on the southwestern elevation, just southward of the central staircase tower on that elevation. Furthermore, two separate instances of a single common pipistrelle emerging from two separate windows on the southern elevation were recorded at around 20:46. No further emergences were recorded on any elevation.

- 5.3.3 Bat contacts throughout the first activity survey largely centred around emerging common pipistrelle foraging along the river Medlock corridor for approximately fourteen minutes before dispersing east.
- 5.3.4 The second activity survey was conducted on the 4th of September 2023 and took place at dusk, starting 19:30.
- 5.3.5 During this survey, two common pipistrelle bats were recorded at 20:02 as emerging from the roost identified as under fascia on the southwestern elevation. No further emergences were recorded on any elevation. No further contacts from any species of bat were recorded over the survey.
- 5.3.6 The third activity survey was conducted on the 20th of September 2023 and took place at dusk, starting 18:56.
- 5.3.7 During this survey, a further two common pipistrelle bats were recorded at 19:27 and 19:31 as emerging from the roost identified under the fascia on the southwestern elevation and foraging around the river Medlock before dispersing east at 19:43. No further emergences were recorded on any elevation. No contacts from any species other than common pipistrelle bat were recorded over the survey period.
- 5.3.8 Bat contacts from non-emerging individuals across all surveys were limited to very low numbers of commuting and foraging common pipistrelle along the river Medlock on the southwestern and southern elevations of the building on site sporadically through each survey.
- 5.3.9 On all surveys, a moderate level of light splay on the west and eastern elevations was recorded, predominantly affecting the lower portions of the building.



Figure 3: Location of Identified Roosts (●) and Recorded Bat Activity



Google Earth (© Map Data 2023)

5.4 Commuting route assessment

- 5.4.1 Bats are known to utilise linear features as commuting lines to foraging grounds and between roosts. Under current proposals, no encroachment on habitat suitable for use by bats is predicted and thus no impacts. A suitable lighting scheme to prevent splay onto the river Medlock corridor will be required to be incorporated within the scheme design.
- 5.4.2 No major commuting lines or foraging grounds were recorded during the survey period over the wider site. The river Medlock which runs along the western and southern elevations of the site was recorded as being used by small numbers of common pipistrelle bats for commuting and foraging.

- 5.4.3 Field sign evidence over the survey period infers the immediate area supports low level of bats and bat activity, limited to the above-mentioned commuting / foraging individuals. No evidence was recorded at the time of survey to infer roosts within a culvert to the north and a bridge to the immediate west of the site were still active.

6 Survey and Site Assessment

- 6.1 A peak of four bats identified as common pipistrelle were recorded emerging from the southwestern aspect of the structure from underneath a section of lifted fascia. A total of six bats across all activity surveys were recorded as emerging from this feature. Furthermore, two separate common pipistrelles were recorded as emerging from the interior of the building and exiting from two separate windows on the southern elevation of the window during the first activity survey.
- 6.3 Low numbers of contacts from common pipistrelle bats were recorded over the survey periods. No contacts from any other species of bat were recorded over the survey period.
- 6.4 Based on evidence collated over the three surveys, the building was recorded as supporting bats for roosting or as a place of shelter when assessed by an experienced bat ecologist (2015-12213-CLS-CLS).
- 6.5 Based on the building being classified as a roost, it is required that a Protected Species Mitigation Licence (A13) is obtained from Natural England, prior to the onset of works. Further details are outlined within this report.
- 6.6 The buildings are considered to have very low to negligible potential for use by bats for hibernation, due to an absence of suitable crevices and cracks of a suitable depth capable of supporting a stable thermal mass which could support hibernating bats. Furthermore, it is deemed that humidity levels are likely to fluctuate.

7 Ecological Constraints

- 7.1 Due to the variable properties of bat echolocation calls and the format of frequency division recordings, it is not always possible to identify a series of echolocation calls down to species level.

- 7.2 In most cases, it is usually possible to identify to genus level which is suitable to allow potential affects to be assessed and appropriate mitigation designed.
- 7.3 All three surveys were completed at dusks. No pre-dawn surveys were conducted due to overriding health and safety concerns. This is not deemed to a constraint to the survey findings, especially in light of new guidance outlined within Collins 2023.
- 7.4 Given the location of the structure, parts were inaccessible for survey due to accessibility issues. As such, IR camera deployment was enhanced in an attempt to cover these areas.

8 Interpretation and Evaluation

- 8.1 The building is confirmed as being used by common pipistrelle bats for roosting or as a place of shelter. A protected species mitigation licence (A13) will be required from Natural England, prior to the onset of works within the site.
- 8.2 A low level of solely common pipistrelle bat activity was recorded during all surveys conducted at the site, recognised as commuting and foraging, as well as emerging.
- 8.3 Artificial light levels and splay were recorded on the eastern and part of the southern aspect of the building and covers the first two floors. The intensity of the splay is deemed to be such that could dissuade more light intolerant species of bat from using these immediate aspects.
- 8.4 The site itself holds no major foraging grounds and or commuting lines, being dominated by buildings and hardstanding with only occasional encroaching vegetation that has colonised gaps in the buildings and hardstanding.

Figure 4: Light splay on the eastern and parts of the southern aspect.

9 Assessment of Potential Impacts

9.1 Impacts on bats and their roosts

- 9.1.1 The results of the bat activity surveys confirm that the building is used by common pipistrelle bats for roosting or as a place of shelter.
- 9.1.2 The activity survey results recorded no evidence to suggest use of the survey site as a major commuting route or foraging ground.
- 9.1.3 Subject to a suitable lighting strategy to prevent splay onto the adjacent river Medlock corridor, no impacts on foraging grounds or commuting lines are predicted.

10 Conclusions and Recommendations

- 10.1 The result of the bat activity surveys confirms the building is used by common pipistrelle bats for roosting or as a place of shelter. As a result, formal mitigation is required by obtaining a protected species mitigation licence (A13) from Natural England, prior to the onset of works.
- 10.2 No impacts on major foraging lines or commuting corridors are predicted via the proposals subject to a suitable lighting strategy being implemented within the scheme to ensure no splay onto the adjacent river Medlock corridor.

11 Mitigation / Impact assessment

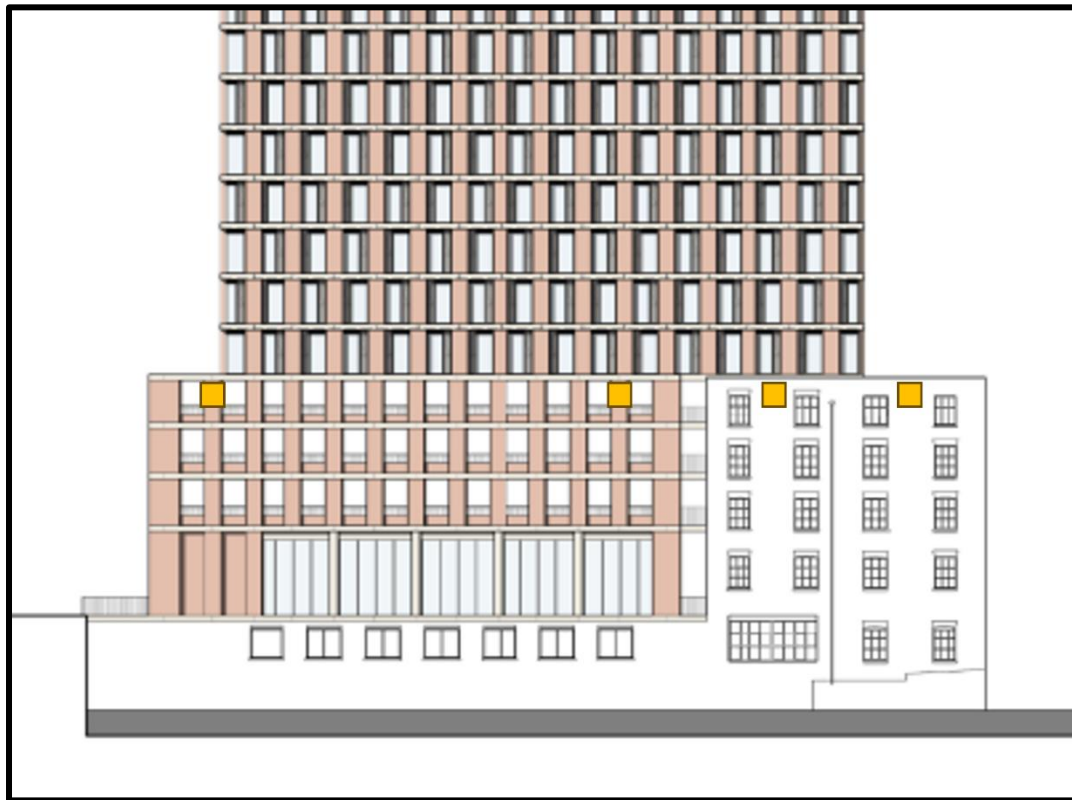
11.1 Pre, mid and long-term activity impacts

- 11.1.1 The site is identified as being used by low numbers of common pipistrelle bats for roosting or as a place of shelter. No field sign evidence to indicate use as a maternity, satellite or large bachelor roost was recorded.
- 11.2 Whilst one survey was undertaken in August 2023 with subsequent survey effort delayed into September 2023 due to prolonged heavy rainfall, the building recorded negative for bat emergence or re-entry over the 2018 survey period. Furthermore, a previous survey of the site conducted circa 2011 by Penny Anderson Associates Ltd (no longer available on Manchester City Council Planning portal but reviewed prior to the 2018 surveys) recorded no bats of any species using the structure.
- 11.1.3 The impacts of the proposals are deemed to have a low impact on bats given the likely non-breeding status and common widespread nature of Common Pipistrelles. The roosts are likely to be connected to others within the landscape. A pre-works' inspection prior to the commencement of demolition by the named ecologist on the A13 licence and the timings of the works will ensure no measurable disturbance is caused to bats.
- 11.1.4 Mid-term roost provision in the form of four Schwegler 2F bat boxes will be erected away from the development area, where possible prior to the onset of works to ensure continuous roosting provision is available during the redevelopment of the site.

11.2 Long-term impacts on roosts

- 11.2.1 None; impacts will be reduced by conducting works outside the main bat activity season (April to September inclusive). Permanent in situ roosting provision will be provided in the newly built structure capable of being retained in situ for the lifetime of the building.
- 11.2.2 Proposals should be confirmed with Natural England via the licensing process however, indicative proposals include four integrated Habitat Boxes (custom-facing) incorporated into the top walls of the lower portion of the new building on the western elevation, subject to reduced light splay, as outlined in Figure 5.

Figure 5: Proposed placement of permanent roosting provisions (■)



- 11.2.3 It is envisaged that integrated roosting provision for bats will be in situ for the long term enhancing bat use of the new building.

11.3 Post development interference impacts

- 11.3.1 No additional impacts in respect of disturbance from lighting are predicted. Any lighting erected on the building should be located in areas away from bat enhancement features.
- 11.3.2 No impacts are predicted on major commuting grounds or foraging areas. It is recommended that a lighting scheme is incorporated into the development scheme for the site to avoid additional light splay directed towards the river Medlock which exists adjacent to the western and southern aspects of the site, and which is recorded to be used by low numbers of common pipistrelle bats for commuting and foraging.

11.4 Long term impacts: Fragmentation and isolation

- 11.4.1 Proposals for the demolition and rebuild are unlikely to cause any additional isolation or fragmentation in comparison to the existing site. The site lies within an immediate urban landscape, parts of which are currently being developed.
- 11.4.2 Potential flight lines, commuting routes and foraging areas outside the boundary of the development site are not predicted to be affected by the proposed redevelopment of the site subject to avoidance of light splay onto the river Medlock corridor.

11.5 Predicted scale of impact

- 11.5.1 The overall scale of impacts at this site is judged to be low to neutral. There is unlikely to be any impact on bats at a local level, and no impact on this species at a regional or national level is predicted.
- 11.5.2 The surveys recorded low numbers of bats of a common species and in light of the non-breeding nature, likely to be categorised as roosts of lower conservation significance based on Natural England guidance.

11.6 WORKS ARE TO BE UNDERTAKEN BY THE ECOLOGIST OR SUITABLY EXPERIENCED PERSON UNDER NATURAL ENGLAND MITIGATION LICENCE.

- 11.6.1 Pre-works' endoscopic surveys will be conducted immediately prior to the commencement of works, to ensure that no bats are in situ and to ensure the identified roosts are closed down under the terms of the A13 licence.

11.7 Proposed mitigation

- 11.7.1 Guidelines state that the level of mitigation must be proportional to the ecological impact of the development. This depends on the conservation significance of the roosting sites, which is determined by species, population size and roost status. The roost and low numbers of common pipistrelle bats recorded are deemed, based on guidance to be of low conservation significance.
- 11.7.2 It is recommended that integrated bat boxes are to be located within the proposed new build as per Figure 5, avoiding light splay and obstructions.

- 11.7.3 Integrated bat boxes are normally a solid box made of insulating concrete with an internal roost space, which can be incorporated into the fabric of a building as it is built / renovated. These bat boxes are well insulated providing consistent temperatures and contains a single narrow cavity, so can be used throughout the year by crevice-dwelling species of bat.
- 11.7.4 The boxes require no on-going management and are self-contained. Droppings are released via the access panel. As they are durable and integrated into the building, it is expected that the boxes will be in situ for the lifetime of the building.
- 11.7.5 The flight path to the box should not have any light overspill in the vicinity which could deter bats from using the box. No vegetation should be allowed to grow that could impede the flight line to the integrated box. The proposed locations of integrated bat features as highlighted in Figure 5 provide access directly onto the river Medlock corridor.
- 11.7.6 It is envisaged that the proposed integrated provision is proportionate for the recorded low numbers of common pipistrelle using the existing structure.

11.8 Habitat Regulations Derogation Tests

11.8.1 **Preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment.**

- 11.8.2 The demolition of the buildings and redevelopment of the site is the only route the client can follow. The buildings in their current layout do not meet the intricate needs for functional use.

- 11.8.3 As a result, the maintenance and security of the buildings is likely to provide a financial burden on already restricted budgets should it remain in situ.

11.9 There is no satisfactory alternative.

- 11.9.1 The buildings in their current state do not meet any of the client's requirements. Retaining the buildings will continue to be a financial burden in terms of maintenance and the retention of unusable assets.

- 11.9.2 To adopt the “Do nothing” option would ultimately accelerate the cycle of decline of the buildings leading to sub optimal conditions for bats and ultimately lead to deterioration of the existing roosts.
- 11.10 The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.**
- 11.10.1 The level of impact on the site is considered low, as proportionate mitigation will be provided for the species prior to the onset of works.
- 11.10.2 The impact is low in a wider context and is not thought to contribute in any way to the reduction in abundance or distribution of any bat species or roosting habitat in a regional or national context. Therefore, the favourable conservation status of the species would not be detrimentally affected by the redevelopment of the site.
- 11.10.3 No impacts in respect of changes to the foraging and commuting landscape for bats are predicted under current plans given an adherence to a suitable lighting scheme regarding light splay towards the river Medlock.

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