

Brunswick Mill
Bradford Road, Manchester
Bat Survey
2023



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Client	Maryland Securities Limited
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Executive Summary

Development Details

The client is proposing residential development at Brunswick Mill, Bradford Road, Manchester, hereafter referred to as the 'site'.

This report describes the ecological features of the site and its surroundings and assesses the potential impacts of the development on the ecological interest. Recommendations are provided so that the development is compliant with biodiversity policy and legislation.

Ecological Interest

The site has a low level of ecological interest. Surveys in 2021 recorded a single Common Pipistrelle bat emerging from the site on one occasion. No evidence of roosting bats was recorded during the current survey.

Outcomes

It is concluded that the site does not currently support a bat roost. The proposed development is unlikely to result in any impacts to bats or their roosts. Works should be undertaken with due caution and should a bat be identified at any stage, works should pause and a suitably qualified ecologist should be contacted to advise on how to proceed.



1. Introduction

1.1 Project Brief

- 1.1.1 Rachel Hacking Ecology Limited (RHE) was commissioned in 2023 by Maryland Securities Limited to provide ecology consultancy support for a proposed development at Brunswick Place, Bradford Road, Manchester, hereafter referred to as the 'site'. The site is located at O.S. grid reference: SJ 85854 98728 (see Figure 1).



Figure 1 showing the site location

Description of Development

- 1.1.2 Full planning permission was granted by Manchester City Council in May 2021 for: Refurbishment, removal/demolition, repair and reconfiguration of Brunswick Mill to create work spaces, retail and community uses (Use Class E and Use Class F2) (2034 sqm) at the ground floor and creation of 153 residential apartments (Use Class C3a) with the upper floors following demolition works together with the erection of a part 6, part 8 storey building to form 100 residential apartments (Use Class C3a) and a 5 storey buildings to form 24 residential apartments (Use Class C3a) (277 apartments in total across the 3 buildings) with associated car parking, roof top amenity space, access and servicing, landscaping, pedestrian access to the Ashton Canal and other associated works (planning reference 130394/FO/2021).

Relevant Planning History

- 1.1.3 A bat survey undertaken in 2021¹ recorded a single Common Pipistrelle bat emerging from the mill.

1.2 Scope of Work

- 1.2.1 The Client commissioned Rachel Hacking Ecology to carry out the following works:
- Undertake an external and internal assessment of the building on the site affected by the development proposals.
 - Undertake a dusk emergence bat survey.

1.3 Aims of the Survey

- 1.3.1 The aims of the survey were to:
- Assess the current status of roosting bats;
 - Inform mitigation requirements.

¹ RHE (2021) Bat Emergence and Transect Surveys at Brunswick Mill, Bradford Road, Manchester. May-August 2021.



2. Methods

2.1 Daytime Bat Survey

- 2.1.1 The exterior of the site was surveyed from the ground using binoculars and a high-powered torch. Features offering potential access to roosting bats were recorded. Such features may include suitable gaps in roof coverings, gaps behind external cladding/facia and gaps in masonry.
- 2.1.2 Evidence indicating the presence of roosting bats was also searched for. This may include bat droppings on walls, windows or on the ground below roost entrances or staining from fur oil around roost entry points.
- 2.1.3 The interior of the site was surveyed to identify any evidence indicating use by roosting bats. Such evidence may include bat droppings, feeding remains, urine splashes, live or dead bats and staining from fur oil on timbers.

2.2 Assessment Criteria

- 2.2.1 Interpretation of survey findings and assessment of roosting potential was undertaken using professional judgement and criteria described in published guidance^{2,3}.

2.3 Site Visit Information

Surveyor Details

- 2.3.1 The survey was led by Ben Crossthwaite (Senior Ecologist). Ben has six years' professional experience of undertaking similar surveys and holds a level 2 class survey licence (Reference 2020-48541-CLS-CLS). Ben was assisted on the dusk survey by Joel Hacking, Steve Smith and Pip Watt.
- 2.3.2 The location of the surveyors during the dusk survey is shown in Figure 2.

² Collins, J. (Ed.) (2016) *Bat Surveys for Professional Ecologists-good practice guidelines*. 3rd edn. The Bat Conservation Trust, London.

³ Mitchell-Jones, A. J. (2004) *Bat Mitigation Guidelines*. English Nature, Peterborough.

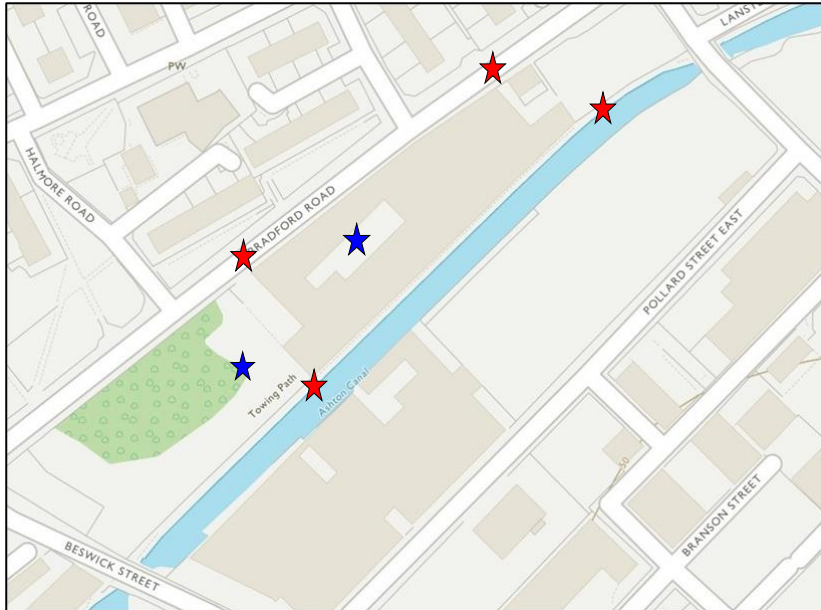


Figure 2 showing the surveyor locations (red stars) and cameras (blue stars) during the dusk survey

Site Conditions

- 2.3.3 The weather at the time of the survey was dry with 100% cloud cover, light wind (BS 2) and an average temperature of 14°C. The site conditions were appropriate for a full assessment to be undertaken.

3. Results

3.1 Survey Constraints

3.1.1 Field survey results are valid for a limited duration and no investigation can provide a complete description and characterisation of a site. The composition of habitats and species can change depending on environmental variables and the mobility of species, so the results of a study become less reliable over time. In some cases, surveys that are 3 years old may be acceptable for a project assuming that habitats have not significantly changed in the intervening period, but for protected species it is likely that survey data will need to be no more than 18 months old.

3.1.2 Table 1 shows the survey constraints and how these were mitigated.

Table 1. Survey constraints and mitigated response.	
Constraint	Mitigated Response
Not all floors could be accessed during the internal inspection.	The interior of the building is generally open and draughty and unlikely to support roosting bats. The dusk survey enabled observation of any bats emerging.

3.2 Habitat Appraisal

3.2.1 The site is located in an urban environment. The Aston Canal is adjacent offering suitable commuting habitat. Parks are present within 200m, offering suitable foraging opportunities.

3.3 External Survey

3.3.1 External conditions were very similar to those previously recorded. Areas of damaged brickwork and missing windows offer potential access points.

3.4 Internal Survey

3.4.1 No roof voids are present and parts of the roof are missing. Internally, the building is open, well-lit and draughty. No evidence of bat activity was found within the mill building.



3.5 Dusk Emergence Survey

- 3.5.1 No bats were recorded emerging from the site during the survey.
- 3.5.2 Low levels of Common Pipistrelle foraging activity were recorded throughout the survey.



4. Assessment

4.1 Interpretation of Results

- 4.1.1 The results of the survey indicate that the site does not currently support roosting bats. Previous surveys recorded a single bat emerging during one of the visits. It is concluded that the site was used by an opportunistic bat on one occasion.
- 4.1.2 The proposed development is unlikely to result in any impacts to bats or their roosts and no further surveys are recommended.



5. Recommendations

5.1 Mitigation Measures

- 5.1.1 Although the survey concluded that the site does not currently support a bat roost, it is not always possible to prove absence of roosting bats. Bats can roost in suitable features opportunistically and are not always identified during surveys. Works should therefore proceed with due caution. Should a bat/bats be identified at any time, work should pause in that area and a suitably qualified ecologist contacted to attend site and advise how to proceed.
- 5.1.2 This report is considered to be valid for two years. After this, a suitably qualified ecologist should be consulted to assess its validity. An assessment update may be required.



Appendix 1: Planning Policy & Legislation

National Policy

The National Planning Policy Framework (NPPF 2021) describes the Government's planning policy for England and how it should be applied. Within this framework, the requirements in relation to biodiversity are included within several policies. The two most relevant to individual planning decisions are Paragraphs 174 and 180, shown below:

- 174. Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - a. protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - b. recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
 - c. maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - d. minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; etc...

- 180. When determining planning applications, local planning authorities should apply the following principles:
 - a. if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
 - b. development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;



- c. development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- d. development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 places a duty on every public authority to have regard to conserving biodiversity. Section 41 of the same Act requires that the Secretary of State must publish a list of the living organisms and types of habitats that are of 'Principal Importance' for the purpose of conserving biodiversity. The Secretary of State must take steps, as appear reasonably practicable, to further the conservation of those living organisms and habitats in any list published under this section. The list of species and habitats of principal importance currently includes 943 species and 56 habitats.

Legislation

All bat species are protected under the Conservation of Habitats and Species Regulations 2019 (Amendment) (EU Exit), which make is an offence to:

- Deliberately kill, injure or capture a bat;
- Deliberately disturb bats;
- Damage or destroy a breeding site or resting place of a bat.

The Wildlife & Countryside Act 1981 (as amended) contains further provisions making it an offence to intentionally or recklessly:

- Obstruct access to any structure or place which any bat uses for shelter or protection; or
- Disturb any bat while occupying a structure or place which it uses for that purpose.

Proposed development works that are likely to disturb or destroy bats or their roosts will need to obtain a licence from the relevant Statutory Nature Conservation Organisation (e.g., Natural England) prior to work commencing.

