Louisa Street Works, Louisa Street, Openshaw, Manchester M11 1AD

BAT ACTIVITY SURVEYS & MITIGATION STRATEGY

Version 2
June 2023

ERAP (Consultant Ecologists) Ltd ref: 2023-107

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Document Control

Survey Type:	Surveyors[1]	Survey Date(s)
Updated daylight survey and	Victoria Burrows B.Sc. (Hons) M.Sc. CEnv MCIEEM Principal Ecologist	2nd May 2023
First dusk emergence survey (split over two nights)	Victoria Burrows and five assistants	2nd May 2023 3rd May 2023
Second dusk emergence survey	Victoria Burrows and six assistants	2nd June 2023
Reporting	**Personnel**	**Date**
Author	Victoria Burrows B.Sc. (Hons) M.Sc. CEnv MCIEEM Principal Ecologist	16th May 2023
Signature(s)		
Checked	Rachel Brown B.Sc. (Hons) Graduate Ecologist	18th May 2023
Revised and issued	Victoria Burrows	18th May 2023
Updated	Victoria Burrows Survey data from bat activity survey on 2nd June 2023 inserted and report updated	3rd June 2023
Report issued to	Westchurch Homes	
Version Number	2	

[1] *Licence reference numbers*
Bats
Victoria Burrows Natural England Class Survey Licence (bats, Level 2) Registration Number 2015-10390-CLS-CLS
Barn owl
Victoria Burrows Natural England Class Survey Licence Registration Number CL29/00061

SUMMARY

Introduction and Scope

i. A daylight licensed bat survey, carried out in January 2023, of buildings B1 to B4 at the former Louisa Street Works, Louisa Street, Openshaw, assessed the buildings to be of 'moderate' suitability for use by roosting bats. ERAP (Consultant Ecologists) Ltd was commissioned to carry out the relevant scope of updated licensed bat survey and assessment and bat activity surveys to comply with relevant survey guidelines and to determine the presence / absence of roosting bats.

ii. The survey was required to inform a planning application (Manchester City Council reference 134775) proposing the demolition of all buildings and redevelopment of the derelict site to housing.

iii. This report presents the results of updated internal and external inspections and dusk emergence surveys carried out in May and June 2023. The surveys were carried out by a licensed, qualified and experienced ecologist (and assistants) and are in accordance with recognised survey guidelines. The scope of works carried out has been approved in principle by the Greater Manchester Ecology Unit.

Results of Survey and Assessment

iv. No evidence of the current or previous use of the buildings B1 to B4 by roosting bats was detected during the daylight licensed bat surveys carried out in January 2023 (as reported in the *Preliminary Ecological Appraisal* (Ascerta, January 2023)) or by ERAP (Consultant Ecologists) Ltd in May 2023.

v. A common pipistrelle bat day roost (maximum of two bats) was detected behind the timber fascia on the western elevation of building B1 on 2nd May 2023; this is **Roost 1** (refer to **Figure 2**).

vi. No other bat roosts have been detected. Common pipistrelle was the only species recorded flying over the site during the survey.

vii. The demolition works will unavoidably disturb bats and will destroy Roost 1. In accordance with relevant wildlife legislation and the protection afforded to bats and their roosts, works at / near to Roost 1 must only be carried out under a relevant Natural England European Protected Species Mitigation licence issued under Regulation 55 of *The Conservation of Habitats and Species Regulations 2017* (as amended). **Section 5.2** of this report presents a bat mitigation strategy to demonstrate how the proposals can be achieved whilst seeking to avoid an adverse effect on the favourable conservation status of common pipistrelle and by ensuring there is no net loss of roosting opportunity at the site in the long-term.

viii. Subject to the avoidance of lighting and / or implementation of an appropriate lighting strategy there is minimal risk of an increase in disturbance to roosting / foraging bats at the site. Recommendations in relation to lighting are presented at **Section 5.2**.

Conclusion

ix. It is advised that the proposals at Louisa Street Works can be achieved in accordance with wildlife legislation, planning policy, Natural England guidance and best practice in relation to roosting bats.

x. The comprehensive bat mitigation strategy outlined in **Section 5.2** demonstrates that mitigation for roosting bats and conservation of roosting and foraging opportunities at the site in the long-term is entirely feasible. The 'three tests' of *The Conservation of Habitats and Species Regulations 2017* (as amended) can be met. An appropriate Natural England licence will be required to facilitate the works.

1.0 INTRODUCTION

1.1 Background and Rationale

1.1.1 Westchurch Homes has submitted a planning application proposing the demolition of the existing buildings (B1 to B4) and redevelopment of the site to housing (Manchester City Council reference: 134775).

1.1.2 A *Preliminary Ecological Appraisal and Daytime Building Inspection* (Ascerta, January 2023) report, hereafter referred to as the 'PEA' did not detect any evidence of the current or previous use of the buildings by roosting bats (although the internal areas of the buildings were not accessed). The PEA originally assessed buildings B1 and B2 to have 'high' suitability for use by roosting bats and buildings B3 and B4 to have 'moderate' suitability for use by roosting bats.

1.1.3 Following correspondence between Ascerta and the Greater Manchester Ecology Unit (GMEU) in mid-April 2023, all buildings were subsequently assessed to be of 'moderate' suitability for use by roosting bats.

1.1.4 Bat activity presence / absence surveys are required at buildings B1 to B4 to comply with the guidance outlined in *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn)* (Collins, J. (ed), 2016) and to ensure the presence of protected species is appropriately considered as part of the planning application and decision making process.

1.1.5 To comply with Table 7.3 of the *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn)* (Collins, J. (ed), 2016), a minimum of two bat activity surveys are required at buildings with 'moderate' suitability for use by roosting bats.

1.2 Scope

1.2.1 This report presents:

a. The results of updated external and internal survey at buildings B1 to B4 carried out in May 2023;

b. The results of the first dusk emergence survey carried out on 2nd and 3rd May 2023;

c. The results of the second dusk emergence survey carried out on 2nd June 2023; and

d. A Bat Mitigation Strategy informed by the results of the daylight and bat activity survey.

2.0 METHOD OF SURVEY

2.1 Updated Daylight Bat Survey and Assessment

Survey Date and Conditions

2.1.1 The updated daylight survey and assessment was carried out on 2nd May 2023. The weather conditions were dry with a light air (Beaufort scale 1) and an air temperature of 14°C.

Surveyor

2.1.2 The daylight licensed bat survey and assessment was carried out by Victoria Burrows (Natural England Class Survey Licence WML CL18 (Bat Survey Level 2), Registration Number 2015-10390-CLS-CLS). Victoria's qualifications and experience meet the criteria as defined in the *Technical Guidance Series Competencies for Species Survey: Bats* (CIEEM, 2013).

Guidelines

2.1.3 The survey was carried out in accordance with standard methodology including the *Bat Mitigation Guidelines* (Mitchell-Jones, 2004), the *Bat Workers' Manual 3rd Edition* (Mitchell-Jones & Mcleish, 2004) and *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn)* (Collins, J. (ed), 2016). Where deviation from the guidelines was considered to be appropriate and proportionate, supporting rationale and evidence used to inform the assessment and decisions are presented in this report.

Daylight Survey: Buildings

2.1.4 Inspection and assessment of the external surfaces, walls and roofs of the buildings were carried out to find potential bat roosting habitat or accesses into crevices or areas where roosts may be present. Searches for evidence of bat presence in the form of droppings, urine stains, feeding signs, grease marks and other evidence were carried out.

2.1.5 Where required, ladders were used to gain closer inspections of specific features at the buildings.

2.1.6 The internal survey involved an examination of the accessible areas to find roosting bats and / or evidence of previous use of the buildings by bats such as droppings and prey remains.

2.1.7 The suitability of the buildings for use by roosting bats has been re-assessed / validated in accordance with Table 4.1 of *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn),* (Collins, J. (ed), 2016), taking into account any presence of gaps suitable for access by bats, features suitable for use by roosting bats within the building (including crevice dwelling species and species which can roost in the open in roof voids), and the suitability of the surrounding habitats for use by foraging and commuting bats.

Equipment

2.1.8 A list of equipment used / available for use is provided below.

Table 2.1: Survey Equipment Used / Available for Use During Daylight Bat Survey

Ladders
LED Lenser P14 torch
Canon Ixus digital camera
8x20 binoculars
Ridgid Micro Inspection Camera Endoscope CA-300

2.2 Bat Activity Surveys

2.2.1 Based on the results of the PEA, the updated daylight survey and assessment and the current conditions at the site, the survey area of the dusk emergence surveys comprised the buildings B1 to B4.

2.2.2 Surveyors, experienced in conducting bat surveys, were positioned at suitable locations to determine any entry into or exit from the buildings by roosting bats, refer to **Figures 2** and **3**, appended.

2.2.3 Heterodyne detectors were used to determine any bat species or group (*Myotis* species often cannot be reliably separated to species via their echolocation calls, for example). Recording bat detector units[1] were used to record and analyse echolocation calls after the survey using Anabat Insight call analysis software.

2.2.4 The dusk emergence survey commenced at least 15 minutes before sunset, and continued until at least 1.5 hours after sunset.

[1] i.e. Anabat Express and Anabat Scout

2.2.5 Any bat emergence or re-entry activity was recorded. The survey was conducted under suitable conditions. The date of the survey, surveyors and equipment used and weather conditions present are presented below.

2.2.6 Night vision aids (NVA)[2] , supplemented with additional infra-red lighting (comprising Nightfox XB5 torches and infra-red floodlights) were used at the surveyor positions described in **Table 2.2** and shown on **Figures 2** and **3**. Footage was subsequently reviewed using VLC Media Player to determine any emergence / re-entry at the buildings. Dusk emergence surveys were appropriate at this site owing to the need to make access arrangements with a third party. The use of NVAs and the completion of dusk emergence surveys is in accordance with *Interim Guidance Note: Use of night vision aids for bat emergence surveys and further comment on dawn surveys* (Bat Conservation Trust, May 2022) which states:

'The 4th edition of the survey guidelines will therefore transition away from the standard use of dawn surveys, particularly as a method for presence/absence surveys, in favour of dusk surveys supported by NVAs.'

2.2.7 Owing to the publicly accessible nature of some of the survey positions NVA were not used in all positions during the survey. Positions where NVAs were not used are typically illuminated by the street lights and, as such, visibility was maintained towards the end of the survey.

Table 2.2: Dusk Emergence Survey Dates, Weather Conditions and Surveyors

Date	**2nd May 2023**	**3rd May 2023**	**2nd June 2023**
Sunset time	20:41	20:42	21:28
Start time	20:20	20:20	21:15
End time	22:10	22:10	23:02
Weather	Dry, with a light air (Beaufort scale 1)	Dry with a light breeze (Beaufort scale 2)	Dry with a light air (Beaufort scale 1)
Air temperatures	13ºC at 20:30 falling to 11ºC at 22:15	10ºC at 20:30 falling to 8ºC at 22:15	14ºC at 21:30 falling to 12ºC at 23:00
Survey Position	**Surveyor, Detector and NVA**	**Surveyor, Detector and NVA**	**Surveyor, Detector and NVA**
1	Leah Hart Anabat Scout Nightfox Red	-	Marie Pickering Anabat Scout
2	Victoria Burrows Anabat Express Nightfox Red	-	Victoria Burrows Anabat Express Canon XA60
3	Marisa Hensey Anabat Scout Nightfox Red	-	Marisa Hensey Anabat Scout Nightfox Red
4	Danielle Rowlands Anabat Scout Nightfox Red	-	Danielle Rowlands Anabat Scout Canon XA60
5	-	Vin Greenall Anabat Scout	Vin Greenall Anabat Scout
6	-	Victoria Burrows Anabat Scout	Aidan Pickering Anabat Scout
7	-	Leah Hart Anabat Scout	Natalie Coffey Anabat Scout Canon XA60

Note: The surveys on 2nd and 3rd May 2023 are classed as one survey

[2] Nightfox Red infra-red binoculars

2.3 Bird Species

2.3.1 The buildings were searched internally for current evidence of use by nesting birds on 2nd May 2023. Bird species observed and heard during the daylight survey and the dusk emergence surveys were recorded.

2.4 Survey Limitations

2.4.1 All efforts were made to access as much of the internal areas of the buildings as possible, however, as evidenced by the photographs at **Section 8.1** local internal areas of building B1 and B4 were not accessible for closer examination owing to the poor condition of the structures and for health and safety reasons.

2.4.2 No other survey limitations were experienced.

3.0 SURVEY RESULTS

3.1 Updated Daylight Survey

3.1.1 The habitats / conditions within the site remain as described in the PEA. For completeness a description of the buildings is presented below. Photographs are appended at **Section 8.1**.

B1

3.1.2 Refer to **Photos 1** to **7**. B1 is a dilapidated two story brick building with a pitched bitumen felt covered roof. Brick parapet walls with stone / concrete copings are present at the gable ends. A perpendicular section of pitched roof at the front (east facing) roof pitch is slate covered. The brick chimney stacks have lead flashing at the base and a timber fascia is present at the roofline on the western elevation.

3.1.3 The brick elevation walls are mortared and the window and doorway apertures are either covered with plywood boards or are open and unglazed.

3.1.4 The interior of the building is damaged as a result of exposure to the elements and vandalism. The roof void was not accessed, although views beyond the suspended ceiling tiles on the first floor confirmed that the roof void is unlined and uninsulated.

3.1.5 The following features with suitability for use by individual / low numbers of crevice roosting bats were detected:

a. Gaps in the brick work where the mortar pointing is missing;

b. Gaps around the timber window frames (i.e. between the frame and brick walls);

c. Behind the timber fascia at the western elevation; and

d. At the roof (including between the slate covered roof section and possibly beneath the lead flashing at the base of the chimney stack).

3.1.6 No bats or evidence of use of B1 by roosting bats was detected.

B2

3.1.7 Refer to **Photos 8** to **11**. B2 is a single storey brick gatehouse building with a pitched slate covered roof with brick parapet walls at the gable ends. All slates and ridge copings appear to be tightly sealed; no missing, lifted or slipped slates were observed.

3.1.8 Gaps with suitability for access by individual bats were detected at the roof verge and in holes / gaps between the bricks, particularly on the northern elevation. A timber fascia is present at the eastern (Louisa Street) elevation.

3.1.9 Although the southern elevation of the building faces the off-site park to the south this elevation is clad with a corrugated metal sheet and is obscured by the dense trees and shrubs to the south which limit the accessibility for bat access.

3.1.10 No bats or evidence of use of B2 by roosting bats was detected.

B3

3.1.11 Refer to **Photos 12** to **19**. B3 is a workshop building in operational use. The building is a single storey brick building with a pitched sheet covered roof that meets brick parapet walls. A small, single storey extension is present off the northern elevation. The extension is constructed in brickwork walls with a pitched, corrugated metal roof. Large gaps are present between the roof and walls as well as at the gable ends of the roof. A large loading entrance with metal shutter is present off the western elevation and small gaps were identified between the shutter and brickwork walls. The windows are single-glazed and sit within metal frames with metal mesh grills present.

3.1.12 Opportunities for bat access around the exterior are present at gaps behind the fascia at the eastern and western gable ends and at gaps in the external brickwork.

3.1.13 As reported at B2, the southern elevation is clad with a metal corrugated sheet and is obscured to bat access by the presence of the dense trees and shrubs in the off-site parkland to the south.

3.1.14 The underside of the sheet covered roof is unlined and uninsulated. No gaps suitable for bat access were found on the internal side of the brick walls / at the wall tops.

3.1.15 No bats or evidence of use of B3 by roosting bats was detected.

B4

3.1.16 Refer to **Photos 20** to **30**. B4 is a long narrow two storey brick building with a pitched corrugated sheets and felt covered roof. A dilapidated timber framed feature is located along the ridge.

3.1.17 Features around the exterior with suitability for use by low numbers of bats were detected at the brick walls, particularly at the eastern elevation. Large loading entrances with metal shutters are present off the western and eastern elevations and small gaps were identified between the shutter and brickwork walls.

3.1.18 Examination of the underarch of the bricked up former window apertures at the southern elevation confirmed these features are sealed, however.

3.1.19 Sections of the interior of B4 are light inside due to the presence of skylights. The internal side of the walls are typically well mortared and where internal doorway apertures have been blocked with concrete blocks the walls have been well-mortared and no gaps are present at the top (which can provide a honeycomb of gaps which has been recorded to be use by roosting bats at other sites). No other gaps or features with suitability for bat access were detected.

3.1.20 No bats or evidence of use of B4 by roosting bats was detected.

Summary

3.1.21 No bats, bat droppings or other evidence to indicate the current or previous use of the buildings by roosting bats was detected on 2nd May 2023.

3.1.22 The ‘moderate’ suitability assessment at buildings B1 to B4 (particularly for individual / low numbers of crevice roosting bat species), as determined between Ascerta and GMEU, is considered to be appropriate based on the conditions present at the buildings and the presence of parkland habitats to the south (i.e. habitats assessed to be suitable for use by foraging bats in the urban context of the local area).

3.2 Bat Activity Survey

Dusk Emergence Surveys: 2nd and 3rd May 2023

3.2.1 **Tables 8.2** and **8.3** appended, provide a summary of the observations made during the dusk emergence survey and the results of the recording bat detectors.

3.2.2 One common pipistrelle was observed emerging from behind the timber fascia at the western elevation (northern end) of B1 at 20:55 (14 minutes after sunset) (refer to **Photo 6**). The bat flew southwards towards the off-site park to the south. During the dusk emergence survey on 3rd May 2023 two common pipistrelle bats were recorded flying along the western elevation of B1 to the south at 20:55. The bats were not observed entering the site from the wider area and it is advised that these two bats are likely to have emerged from behind the timber fascia. The gap behind the fascia at B1 is identified as 'Roost 1: Common pipistrelle day roost' and is annotated on **Figure 2**.

3.2.3 No other bat re-entry or emergence was observed by the surveyors on 2nd and 3rd May 2023. Review of the NVA footage did not identify any emergence (or entry) activity.

3.2.4 Brief common pipistrelle passes were detected between 20:51 and 22:07 on 2nd May 2023 and between 20:55 and 21:06 on 3rd May 2023, refer to **Tables 8.2** and **8.3**, appended.

3.2.5 Common pipistrelle was the only bat species recorded and was associated with bats flying over the site and foraging along the trees at the southern site margin (associated with the off-site parkland). No other bat species was detected or recorded by the recording detectors.

3.2.6 No bats were heard by Surveyor 5 (or recorded by the detector) positioned at the eastern elevation of B4; this street is well illuminated by the security lighting around the off-site cash and carry building to the north (artificial illumination can deter bat activity).

Dusk Emergence Survey: 2nd June 2023

3.2.7 **Table 8.4** appended, provides a summary of the observations made during the dusk emergence survey and the results of the recording bat detectors.

3.2.8 No bat emergence or re-entry activity was recorded. Review of the NVA footage did not identify any emergence (or entry) activity.

3.2.9 Common pipistrelle was the only bat species recorded and was associated with bats flying over the site and foraging along the trees at the southern site margin (associated with the off-site parkland) and along the trees at the western site boundary. No other bat species was detected or recorded by the recording detectors.

3.3 Bird Species

3.3.1 With the exception of feral pigeon (*Columba livia domestica*) in buildings B1 and B4; no current evidence of use of the buildings by nesting birds was detected.

4.0 EVALUATION AND ASSESSMENT

4.1 Description of Proposals

4.1.1 The proposals comprise the demolition of buildings B1 to B4 (as confirmed by the *Demolition Plan* (Westchurch Homes, 2022)) and redevelopment of the site to housing.

4.1.2 The *Arboricultural Impact Assessment* (Bowland Tree Consultancy Ltd, 2022) identifies that six trees (T1, T2 and T3: Common Lime and T4, T5 and T6: Goat Willow) and 1 tree group (Cherry) which lie within the construction zone will be removed (the PEA has confirmed that none of these

trees have features with suitability for use by roosting bats; all are assessed to be of 'negligible' suitability). Trees on the site's periphery will be retained and incorporated into the site layout.

4.2 Bat Status

Roosting Bats

4.2.1 A common pipistrelle roost (Roost 1) was detected at B1 with a maximum of two bats emerging from behind the timber fascia at the western elevation. At this stage it is advised that a day roost is likely.

4.2.2 As described in **Section 3.1**, the vacant and dilapidated buildings do not provide optimum conditions for use by a maternity roost. No evidence to indicate that the buildings are used by a roost of a high conservation significance as defined by Figure 4 of the *Bat Mitigation Guidelines* (Mitchell-Jones, 2004)[3] has been found.

4.2.3 The demolition works at B1 will disturb bats and will destroy Roost 1. In accordance with relevant wildlife legislation and the protection afforded to bats and their roosts, works at / near to Roost 1 must only be carried out under a relevant Natural England European Protected Species Mitigation licence issued under Regulation 55 of *The Conservation of Habitats and Species Regulations 2017* (as amended). It is advised that mitigation for the day roost in accordance with relevant Natural England guidance and licensing requirements are entirely feasible within the remit of the proposals, refer to **Section 5.2**.

4.2.4 In accordance with the *Bat Mitigation Guidelines* (Mitchell-Jones, 2004) and current Natural England guidance the destruction of a day roost used by a low number of a common species[4] of bat is a 'low' scale impact.

Foraging Bats

4.2.5 Subject to the avoidance of lighting and / or implementation of an appropriate lighting strategy there is minimal risk of an increase in disturbance to roosting / foraging bats at the site. Recommendations in relation to lighting are presented at **Section 5.2**.

5.0 RECOMMENDATIONS AND ECOLOGICAL ENHANCEMENT

5.1 Introduction

5.1.1 The presence of a bat roost does not preclude the proposals. However, the works must only be carried out under an appropriate Natural England licence granted under Regulation 55 of *The Conservation of Habitats and Species Regulations 2017* (as amended). The licence permits the destruction / disturbance of a bat roost which would otherwise be an offence.

5.1.2 Due to the presence of only one roost used by a low number of bat(s) of a common bat species, the site is eligible to be registered under a Bat Mitigation (Low Impact) Class Licence (BMCL).

5.1.3 To achieve the licence / registration of the site the applicant must be able to demonstrate to Natural England that the following three tests of Regulation 55 of *The Conservation of Habitats and Species Regulations 2017* (as amended) will be satisfied.

Test 1: That 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 [Regulation 55 (9)(b)];

[3] i.e. no signs of a maternity roosts were detected

[4] The conservation status of common pipistrelle is reported to be favourable in the *European Community Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC) Fourth Report by the United Kingdom under Article 17 on the implementation of the Directive from January 2013 to December 2018* (JNCC, 2018).

Test 2: Demonstration that the proposals for which a licence is sought are for the purposes of '*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'* [Regulation 55(2)(e)]; and

Test 3: Consideration of '*There is no satisfactory alternative*' including the implications of the '*do-nothing*' option [Regulation 55(9)(a)].

5.1.4 The mitigation strategy outlined below aims to demonstrate that compliance with Test 1 is achievable. Tests 2 and 3 are also considered. The bat mitigation strategy outlined below demonstrates how bats will be accommodated at the site and is considered to be appropriate to inform the planning decision.

5.1.5 An application to register the site under the BMCL can only be carried out once planning permission has been obtained and all wildlife-related conditions have been discharged.

5.2 Mitigation Strategy

Introduction

5.2.1 This mitigation strategy draws on the following resources:

a. Current Natural England guidance;

b. Information presented in the *BCT Mitigation Conference Proceeding*s (BCT, January 2017) and the *Mitigation Case Studies Forum* (BCT, January 2017);

c. Implemented and monitored activities / specifications carried out by ERAP (Consultant Ecologists) Ltd at other sites; and

d. Information presented on the 'Roost' website provided by the Bat Conservation Trust.

Licensed Works

5.2.2 The licensed works only comprise actions that will directly affect (or have the risk of impacting) building B1 and the detected roost. Other works such as the demolition of buildings B2, B3 and B4 and the site clearance activities can be carried out outside the licence, as required and subject to wildlife legislation in relation to nesting birds and planning obligations.

Works to Be Carried Out Prior to Commencement

5.2.3 Prior to the commencement of works to ensure there is no net loss of roost opportunity at the site and to ensure a suitable feature is present at the site to receive any bats found during the works, one bat box will be installed on one of the trees along the western site boundary (within 110 metres of Roost 1 and within land of the same ownership), refer to **Figure 4**.

Timing of Works

5.2.4 In accordance with the BMCL there is no restriction on the timing of works at the roost (subject to the absence of nesting birds, refer to **Section 5.3**).

Toolbox Talk

5.2.5 Prior to the commencement of works the licensed ecologist will inform all contractors of the following:

a. The wildlife legislation and protection afforded to bats and their roosts;

b. The presence of the licence and the associated method statement and the need to abide by the content;

c. The licensable actions;

d. Good working practices (i.e. lifting (rather than sliding) of ridge copings and roof tiles and turning to check for the presence of bats before discard or stacking);

e. The presence of any provisions for roosting bats installed in advance of the works and the need for them to remain undisturbed;

f. The protocol to be followed if a bat is discovered when the licensed ecologist is not on site; and

g. An outline of the proposals and timescales.

Actions to be Implemented During Works

Roost 1

5.2.6 Under the Natural England licence the whole length of the timber fascia and the associated roof line (including the area where Roost 1 is located) will be removed carefully by hand and under the supervision of the licensed ecologist.

Discovery of a Bat

5.2.7 If at any time during the works a bat is discovered or suspected when the licensed bat surveyor is not on site all contractors must withdraw from the area and ERAP (Consultant Ecologists) Ltd (01772 750502) or the Bat Conservation Trust must be contacted for further guidance.

Provisions for Bats at the Redeveloped Site

5.2.8 To ensure provisions for roosting bats are accommodated at the redeveloped site bat access panels will be installed at the new properties.

5.2.9 The specifications and detail of the above is provided at **Figure 4**, appended.

Mechanism for Ensuring Implementation / Success

5.2.10 If the licensed ecologist has any concerns regarding the quality of workmanship or there is non-compliance with the Natural England licence, the Mitigation Strategy and / or guidance provided by the licensed ecologist then this will result in additional site visits to make inspections.

5.2.11 It is always the intention to ensure all parties are aware of the importance of the Natural England licence and compliance with the Mitigation Strategy and this is achieved through good communication. However, in extreme / significant cases of non-compliance the licensed bat surveyor will report the issue to Natural England and further action may be taken.

Monitoring

5.2.12 There is no post-works monitoring requirement under the BMCL.

Consideration of Tests 2 and 3

5.2.13 In consideration of the demonstration that the proposals are for imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment [Regulation 55(2)(e)] it is confirmed that the proposals seek to enhance the aesthetics of the local area by removal of the dilapidated form works buildings that are attracting anti-social activities.

5.2.14 As outlined in the *Planning Statement* (Euan Kellie, 2022):

"*The Proposed Development will provide 71no. affordable residential dwellings within Manchester's Strategic Housing Location, a key location for new residential development. Each property will provide suitable accommodation for a family, a housing priority for East Manchester. 7.3 The Site is in a highly accessible location, with an excellent level of public transport provision in the vicinity*

of the Site. Additionally, there are a wide range of amenities and services within Manchester City Centre, which is within walking and cycling distance of the Site."

5.2.15 In consideration of the alternatives to development [Regulation 55(9)(a)], it is considered that the redevelopment of this vacant and derelict site is a sustainable and effective use of the brownfield site, which reduces the need to rely on greenbelt release to meet a housing supply need.

5.2.16 The do-nothing option is not feasible as the need to secure a supply of affordable housing in an appropriate and sustainable location would not be met.

Appropriate Use of Lighting

5.2.17 In consideration of the presence of the bat roost and use of the site and the adjacent habitats by foraging bats and paragraph 185(c) in Chapter 15 (conserving and enhancing the natural environment) of the NPPF which states that development should:

"*limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation*"

any external lighting to be installed at the site must involve the use of appropriate products and screening, where necessary, to ensure no excessive artificial lighting shines over the recommended roost provisions and accesses (refer to **Figure 4**), and other habitats outside the site boundary, as lighting overspill may deter use by wildlife such as foraging bats.

5.2.18 The lighting scheme will be designed with reference to current guidance, namely:

a. *Guidance Note 8: Bats and Artificial Lighting in the UK* (Institution of Lighting Professionals & Bat Conservation Trust, 2018); and

b. *Bats and lighting: Overview of current evidence and mitigation guidance* (Stone, 2014).

5.3 Nesting Birds

5.3.1 All wild birds are protected under the *Wildlife and Countryside Act 1981* (as amended) while they are breeding. The bird breeding season typically extends between March to August inclusive.

5.3.2 If breeding birds are detected / present it is recommended that the area is left undisturbed until it is confirmed that the young birds have fledged / the nest is no longer active. Guidance from an ecologist should be sought, as needed.

6.0 CONCLUSION

6.1 The presence of one common pipistrelle bat day roost is a material consideration in connection with a planning decision. The comprehensive mitigation strategy outlined in **Section 5.2** demonstrates that mitigation for roosting bats and conservation of roosting opportunities at the site in the long-term is entirely feasible. The 'three tests' of *The Conservation of Habitats and Species Regulations 2017* (as amended) will be met and the appropriate Natural England licence will be obtained to facilitate the works.

6.2 Other actions for the protection of wildlife, namely nesting birds, will be achieved by the works.

7.0 REFERENCES

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8.0 APPENDIX 1: TABLES

8.1 Photographs

Table 8.1: Photographs (Taken May 2023)

Photo 1: Western elevation of B1	**Photo 2:** Northern and western elevations of B1
Photo 3: Western elevation of B1	**Photo 4:** Eastern and northern elevations of B1
Photo 5: Western and southern elevations of B1	**Photo 6:** Location of Roost 1 behind timber fascia at western elevation of B1 (common pipistrelle day roost) (NVA footage capture)

Photo 7: Damage of ceiling at first floor of B1

Photo 8: Norther elevation of B2

Photo 9: Gaps in brickwork and roof verge at northern elevation of B2

Photo 10: Southern elevation of B2 showing metal cladding and tree / shrub cover

Photo 11: Gaps in the brickwork at the northern elevation of B2

Photo 12: Western elevation of B3

Photo 13: Northern elevation of B3

Photo 14: Eastern and southern elevations of B3 showing overlapping fascia at gable end

Photo 15: Gaps behind overlapping sheeting / fascia at western elevation of B3

Photo 16: Holes in brickwork at B3 (western elevation)

Photo 17: Gaps between brick layers at western elevation of B3

Photo 18: Interior of B3 showing uninsulated and unlined roof covering

Photo 19: Interior of B3

Photo 20: Southern elevation and roof of B4

Photo 21: Southern elevation of B4

Photo 22: Eastern elevation of B4

Photo 23: Cracks and gaps in brickwork at eastern elevation of B4

Photo 24: Gaps behind overlapping sheet cover at eastern elevation of B4

Photo 25: Holes in brickwork at eastern elevation of B4

Photo 26: no gaps at bricked up window apertures / underrach at B4

Photo 27: No bats or suitable gaps for bat access found around the blocked up doorway apertures

Photo 28: Skylights create a light interior at B4

Photo 29: kylights create a light interior at B4

Photo 30: Well-pointed walls in interior of B4

8.2 Results of Dusk Emergence Surveys

Table 8.2: Activity Survey 1, Date: 2nd May 2023, Sunset time: 20:41, Start time: 20:20

Survey Position 1: Leah Hart (B4)

Time	Species	Notes
20:56	Common pipistrelle	Pass
21:24	Common pipistrelle	Occasional passes
22:10	End	
The Anabat Scout made the following recordings: 12 common pipistrelle passes between 20:56 and 21:59.		

Survey Position 2: Victoria Burrows (B1)

Time	Species	Notes
20:52	Common pipistrelle	Pass
20:55	Common pipistrelle	**One bat emerged from behind timber fascia at the roofline on the western elevation of B1. Flew southwards towards off-site park [Roost 1]**
21:21	Common pipistrelle	Occasional passes
21:25	Common pipistrelle	Pass
22:10	End	
The Anabat Express made the following recordings: 19 common pipistrelle passes between 20:52 and 22:06.		

Survey Position 3: Marisa Hensey (B1 and B2)

Time	Species	Notes
20:53	Common pipistrelle	Pass
20:55	Common pipistrelle	Feeding (suspected to be the bat that emerged from Roost 1)
20:55 to 21:53	Common pipistrelle	Passes
22:10	End	
The Anabat Scout made the following recordings: 28 common pipistrelle passes between 20:53 and 21:53.		

Survey Position 4: Danielle Rowlands (B3)

Time	Species	Notes
20:51	Common pipistrelle	Pass
20:53	Common pipistrelle	Feeding
20:55 to 22:07	Common pipistrelle	Passes, particularly along the tree line outside the southern site boundary
22:10	End	
The Anabat Scout made the following recordings: 46 common pipistrelle passes between 20:51 and 22:07.		

Table 8.3: Activity Survey 2, Date: 3rd May 2023, Sunset time: 20:42, Start time: 20:20

Survey Position 5: Vin Greenall (B4)

Time	Species	Notes
-	-	No bats seen or detected
22:10	End	
The Anabat Scout made no recordings of bat passes.		

Survey Position 6: Victoria Burrows (B1 and B2)

Time	Species	Notes
20:55	Common pipistrelle	Two bats flew along the western elevation of the building (towards the south) [could have emerged from Roost 1?]
20:57	-	Streetlights on Louisa Street on
22:10	End	
The Anabat Express made the following recordings: 12 common pipistrelle passes between 21:13 and 21:52.		

Survey Position 7: Leah Hart (B2 and B3)

Time	Species	Notes
20:55	Common pipistrelle	Two bats heading southwards towards off-site park
22:10	End	
The Anabat Scout made the following recordings: 6 common pipistrelle passes between 20:55 and 21:06.		

Table 8.4: Activity Survey 3, Date: 2nd June 2023, Sunset time: 21:28, Start time: 21:15

Survey Position 1: Marie Pickering (B4)

Time	Species	Notes
21:58	Common pipistrelle	Pass
22:00 to end	Common pipistrelle	Occasional passes
23:02	End	
The Anabat Scout made the following recordings: 47 common pipistrelle passes between 21:58 and 22:53.		

Survey Position 2: Victoria Burrows (B1)

Time	Species	Notes
22:00	Common pipistrelle	Pass north to south. Entered site from north and left to south flying along western elevation of B1
22:11	Common pipistrelle	Pass
22:16	Common pipistrelle	Pass
22:39	Common pipistrelle	Pass
23:02	End	
The Anabat Express made the following recordings: 7 common pipistrelle passes between 22:00 and 22:53.		

Survey Position 3: Marisa Hensey (B1 and B2)

Time	Species	Notes
22:00	Common pipistrelle	Pass north to south
22:04	Common pipistrelle	Pass
22:06	Common pipistrelle	Pass
22:11	Common pipistrelle	Pass
22:26	Common pipistrelle	Feeding
22:34 to 22:39	Common pipistrelle	Feeding
23:02	End	
The Anabat Scout made the following recordings: 34 common pipistrelle passes between 22:00 and 22:53.		

Survey Position 4: Danielle Rowlands (B3)

Time	Species	Notes
22:00	Common pipistrelle	Pass
22:02	Common pipistrelle	Feeding
22:05	Common pipistrelle	Foraging along off-site tree line to the south
22:06	Common pipistrelle	Pass
22:11	Common pipistrelle	Pass
2:19	Common pipistrelle	Pass
22:39	Common pipistrelle	Pass
22:48	Common pipistrelle	Passes, particularly along the tree line outside the southern site boundary
22:53	Common pipistrelle	Pass
22:55	Common pipistrelle	Pass
23:02	End	
The Anabat Scout made the following recordings: 21 common pipistrelle passes between 22:00 and 22:55.		

Survey Position 5: Vin Greenall (B4)

Time	Species	Notes
22:03	Common pipistrelle	Pass
23:02	End	
The Anabat Scout made one recording of a common pipistrelle at 22:03.		

Survey Position 6: Aidan Pickering (B1 and B2)

Time	Species	Notes
22:06	Common pipistrelle	Pass
23:02	End	
The Anabat Scout made the following recordings: 2 common pipistrelle passes at 22:06 and 22:26.		

Survey Position 7: Natalie Coffey (B2 and B3)

Time	Species	Notes
22:12	Common pipistrelle	Pass
22:26	Common pipistrelle	Pass
22:36	Common pipistrelle	Pass
22:55	Common pipistrelle	Pass
23:02	End	
The Anabat Scout made the following recordings: 36 common pipistrelle passes between 22:00 and 22:55.		

9.0 APPENDIX 2: FIGURES

Figure 1: Aerial Image of the Site and its Surroundings

Key to Map Symbols

Site boundary

Source: ESRI World Imagery

Figure 1:
Aerial Image of the Site and its Surroundings

Project Name:
Louisa Street, Openshaw M11 1AD

Central Grid Ref: SJ 88575 97632	**Reference No.** ERAP Ltd. 2023-107

Version & Date: v1 (RB) 18/05/2023

Scale: 1:2,000 at A4

0 20 40 60 80 100 m

Z:\Current Jobs\2023\2023-107 Louisa Street, Openshaw\7. Maps\ERAP Map template 1.qgs

ERAP Ltd
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Figure 2: **Building Locations, Surveyor Positions and Roost Location: 2nd and 3rd May 2023**

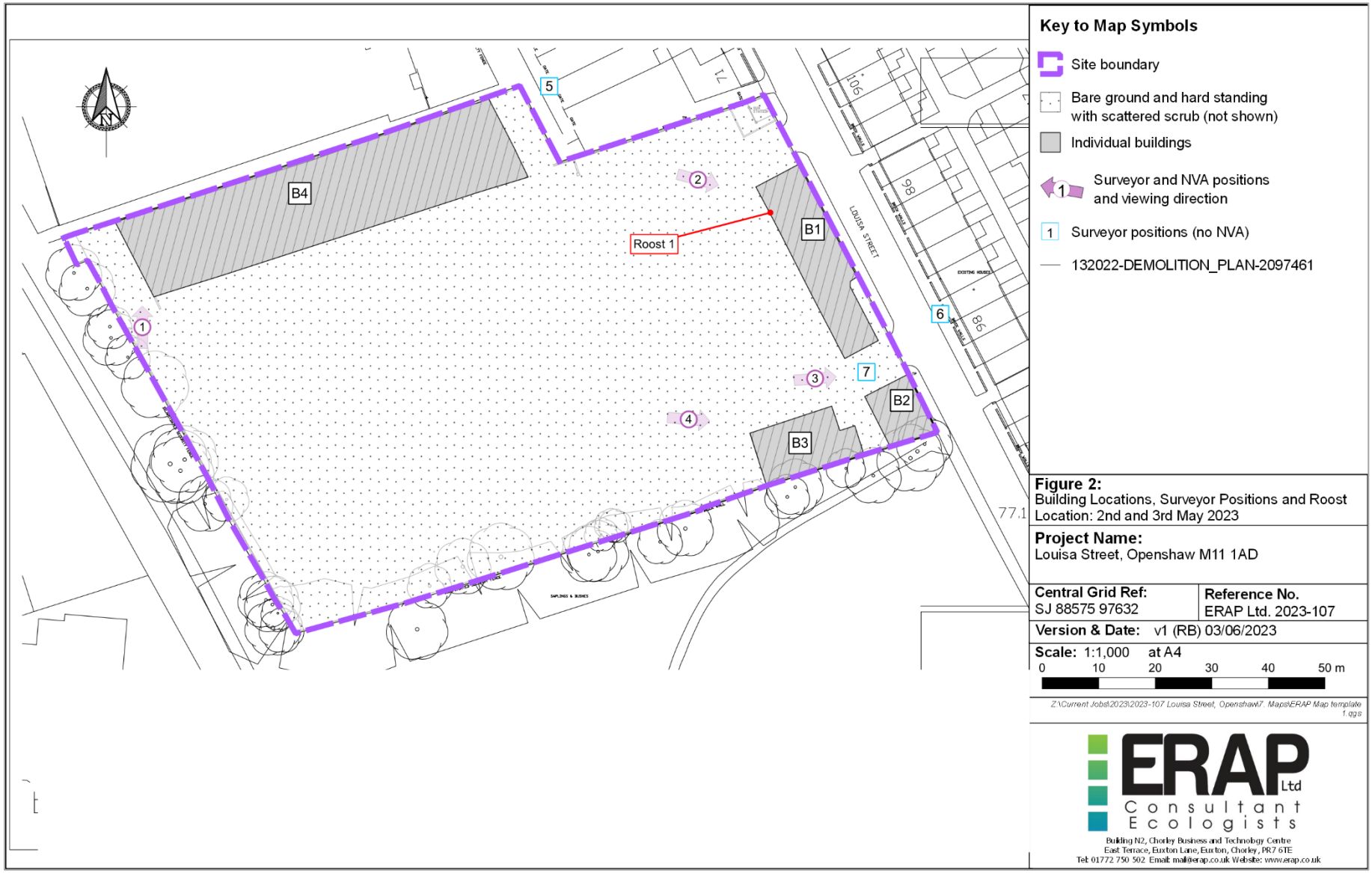

Figure 3: Building Locations and Surveyor Positions: 2nd June 2023

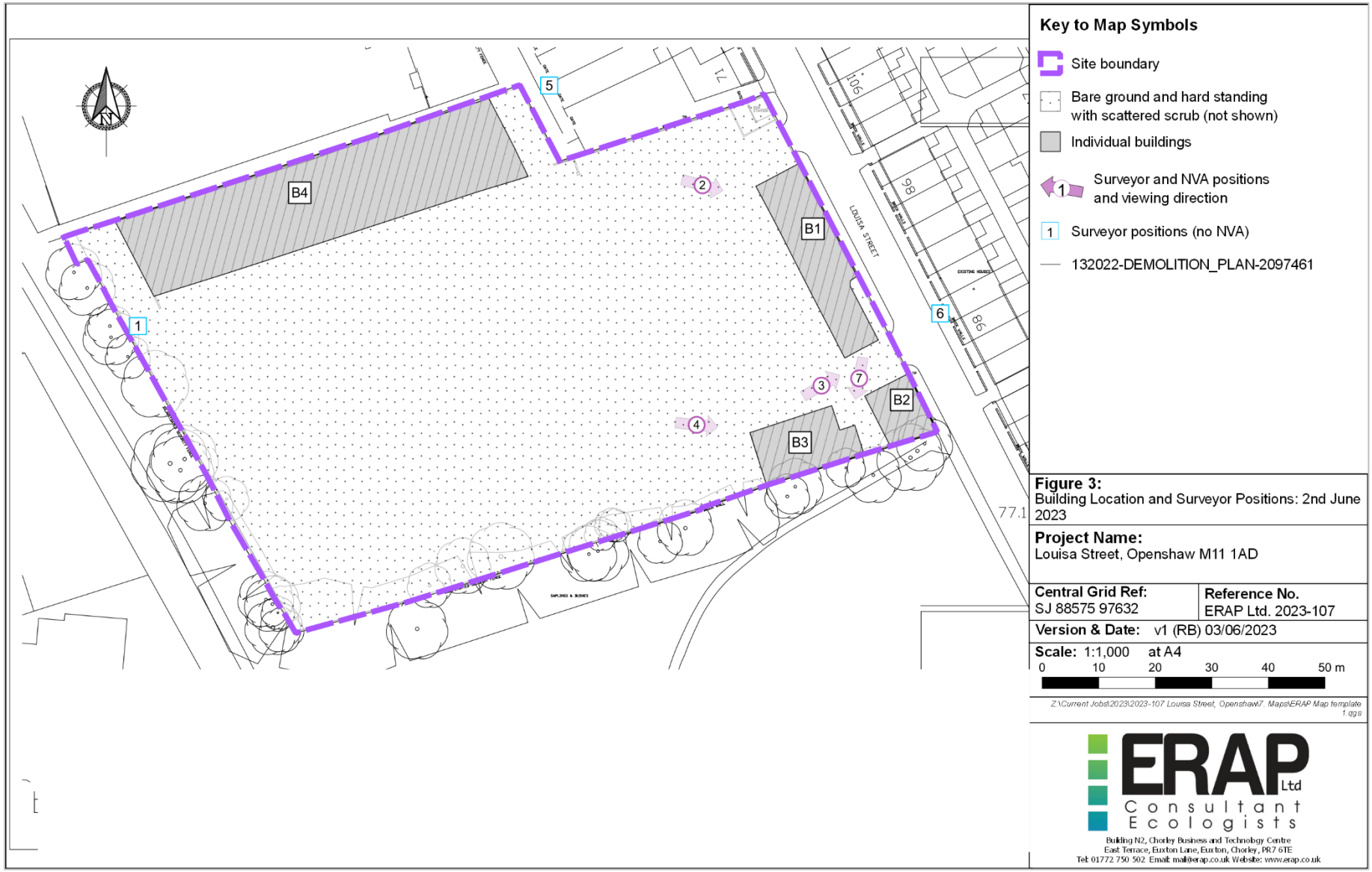

Figure 4: **Landscape Proposals (Showing Long-term Bat Roost Provisions)**

Tree Mounted Bat Box:

Number: 1

Product: Greenwood's Ecohabitats single crevice bat box to be installed on a tree prior to commencement of demolition.

Supplier: Available from https://www.greenwoodsecohabitats.co.uk/

Installation: To be attached to a tree at a height of 3- 4 metres above ground level.

Building Elevation Mounted Boxes:

Number: *8*

Product: Vivara Pro Woodstone Bat Box

Supplier: Available from www.NHBS.com

Installation: To be installed beneath the eaves of the properties, as annotated (boxes on fences to be moved to buildings)