



Preliminary Roost Assessment

33 Thomas Street, Manchester, M4 1NA

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Status	Issue	Name	Date
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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 Hannah Kernyczyj to undertake a Preliminary Roost Assessment (PRA) at 33 Thomas Street, Manchester, M4 1NA (hereafter referred to as “the site”). The survey was required to inform a planning application for a café on the ground floor with associated toilets at basement level along with a residential apartment on the first and second floor (hereafter referred to as “the proposed development”).

The following is work you will need to commission to obtain planning permission and to comply with legislation. Further information, along with opportunities for biodiversity enhancement, are outlined in Table 3 of this report.

Feature	Survey conclusions (with justification)	Foreseen impacts	Recommendations <i>Measures required to adhere to guidance, legislation and planning policies.</i>
Roosting bats	The damaged soffit box could be used by crevice dwelling bat species accessing the wall top for roosting. There could also be features associated with the roof structure which were not visible from ground level. The lack of habitat connectivity and light pollution is likely to deter all but the most urban tolerant crevice dwelling bat species (such as pipistrelles) from the area. For these reasons the site is also very unlikely to support maternity or regularly used summer roosts. The building is unsuitable for hibernation roosts. The building is concluded to have low roost value for bats.	The proposed development will not include any works to the roof structure. However, the soffit repair will result in the loss of this roost feature. Given the very limited suitability of the building overall in terms of location and habitat connectivity, bats are considered unlikely to be present externally on the building and therefore the risk of impacting bats is considered to be low.	Buildings with low roost value typically require a single bat emergence or re-entry survey to establish the presence or absence of bat roosts. However, given the very low likelihood of bats being present, the completion of further surveys is considered disproportional. Furthermore, due to the city centre location of the site there are health and safety concerns associated with night-time working in this area. To avoid impacting bats it is recommended that the soffit repairs are undertaken during the winter months (November to March) when bats are least likely to be present, thereby avoiding possible disturbance to bats. The new soffit will incorporate a gap of 15mm wide between the soffit and the wall on the southwest elevation to retain an access point for bats to reach the wall top, thereby avoiding potential roost destruction and significant modification. These measures are considered sufficient to minimise the risk to bats to an acceptably low level.

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed by Hannah Kernyczyj to undertake a Preliminary Roost Assessment (PRA) at 33 Thomas Street, Manchester, M4 1NA (hereafter referred to as “the site”). The survey was required to inform a planning application for a café on the ground floor with associated toilets at basement level along with a residential apartment on the first and second floor (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, 2016). No previous ecology reports have been produced for this site by Arbtech Consulting Ltd or, to the author’s knowledge, by any other consultancy.

1.2 Site Location

The site is located at National Grid Reference SJ 84375 98650 and has an area of approximately 0.1ha comprising a Grade II listed terraced building on Thomas Street in Manchester City Centre. 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 field survey has been undertaken, including an external and internal inspection of the building, 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 Arbtech Principal Ecologist Lizi Pimlott BSc (Hons) MSc MCIEEM MRSB (Natural England Class 2 Bat Licence: 2016-22843-CLS-CLS) on 9th February 2023.

The PRA focussed on one building 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 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

The building was categorised according to the likelihood of bats being present and the types of roost that the identified features could support. This is summarised in Table 1 below. Roost suitability is classified as high, moderate, low and negligible and dictates any further surveys required before works can proceed.

Table 1: Features of a building that are correlated with use by bats

Classification	Feature of building and its context
Moderate to high	Buildings or structures with features of particular significance for larger numbers of roosting bats e.g. mines, caves, tunnels, icehouses and cellars. Habitat on site and surrounding landscape of high quality for foraging bats e.g. broadleaved woodland, tree-lined watercourses and grazed parkland.

	Site is connected with the wider landscape by strong linear features that would be used by commuting bats e.g. river and or stream valleys and hedgerows. Site is proximate to known or likely roosts (based on historical data). Buildings with high suitability could support roosts of high conservation value such as maternity or hibernation roosts.
Low	A small number of possible roost sites or features, used sporadically by individual or small numbers of bats. Potential roost features may be suboptimal for reasons such as shallow depth, poor thermal qualities or upwards orientation with exposure to inclement weather or predators. Habitat suitable for foraging in close proximity but isolated in the landscape. Or an isolated site not connected by prominent linear features. Few features suitable for roosting, minor foraging or commuting.
Negligible	Unsuitable for use by bats.

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 biological records data search 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 biological records data will add any significant weight or alter the conclusions and recommendations outlined in this report.

The roof of the building was not visible from ground level due to the built up nature of the surroundings and the proximity to other buildings. However, the roof structure will not be affected by the proposed development and therefore this is not considered to be a significant constraint. Further justification is provided in Table 3 below.

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 Desk Study Results

A summary of desk study results is provided below.

3.2 Designated Sites

No statutory designated sites with bat qualifying interests were identified within 2km of the site.

3.3 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.

There are 17 bat EPSL records within 2km; these were granted by Natural England between 2010 and 2021. 14 of the EPSLs are for impacts to common pipistrelle roosts, two are for common and soprano pipistrelle and one is for brown long-eared bat. The closest EPSL record to site is 230m northwest and relates to common pipistrelle. The majority of the EPSL records appear to be closely associated with the railway network or watercourses including the River Irwell, Ashton Canal and Rochdale Canal which are likely to be used by bats to commute through the landscape.

3.4 Field Survey Results

The results of the field survey are illustrated in Appendix 3. The weather conditions recorded at the time of the survey are shown in Table 2.

Table 2: Weather conditions during the survey

Date: 09/02/2023	
Temperature	6°C
Humidity	81%
Cloud Cover	50%
Wind	None
Rain	None

The site is in a very urban location with minimal vegetation in the vicinity. The closest areas of greenspace which bats could use for foraging are St Michael's Flags & Angel Meadow Park located 460m north and Ancoats Green to the northeast and Pin Mill Brow to the southeast, both of which are over 800m away. Watercourses through Manchester City Centre such as Ashton Canal 580m southeast and River Irwell 600m west could be used by bats for commuting through the area. The railway network could also provide a commuting corridor; the closest railway line to the site is 100m away. The lack of connectivity between the site and potential foraging and commuting habitats as well as the extensive light spill associated with development in the city centre is likely to deter bats from the site and immediate surroundings.

The surveyed building comprises a Grade II listed terraced building with three storeys, a basement and a loft void. It has brick walls and wooden soffits, window and door frames and a pitched tile roof. There is a metal shutter door on the ground floor of the southwest elevation. On the northeast elevation is a single storey extension with whitewashed walls and a sloped corrugated metal roof.

The brickwork is in excellent condition and the window and door frames are tightly fitted. The soffits lie flush to the brickwork and the roof. The soffit on the southwest elevation has deteriorated and has a large gap in the base. There are several broken windowpanes on the second floor of the northeast elevation and there is a small gap above the metal shutter door on the southwest elevation. The roof was not visible from ground level and could not be inspected. The single storey extension is well sealed throughout.

The ground, first and second floors are well lit by windows internally. The basement is constructed of brick and opens to the ground floor via a staircase but is otherwise self-contained and sealed off. There is a single small loft void, measuring approximately 5m long and 8m deep and less than 2m high at the ridge. This was accessed by a loft hatch. The loft is uninsulated, and the loft floor was covered with rubble and debris with water damage in places, creating holes. The underside of the roof has timber beams and is lined with a membrane which was in excellent condition. Few cobwebs were present. A dark test indicated that the void was well sealed with the exception of a small area of daylight entering the eaves on the southwest elevation, which appeared to coincide with the gap in the soffit.

The broken windows and the gap in the soffit both provide potential ingress/egress points into the interior of the building. Aside from these, no external roost features were identified. However, the roof was not visible and could have raised or slipped roof tiles or ridgeline gaps that bats could exploit for roosting. As the roof is lined, any evidence of bats in this area would not be visible during the PRA. The ground, first and second floors are unsuitable for bats due to the high levels of daylight and the lack of suitable perches or roost features. A full, detailed inspection was completed, with particular focus on the loft and basement, and no evidence of bats was found internally.

No evidence of nesting birds was found internally or externally. No nesting features were identified.



Southwest elevation



Close up of soffit damage on southwest elevation



Northeast elevation with broken windows visible



Single storey extension on northeast elevation



Second floor interior



Loft void

4.0 Conclusions, Impacts and Recommendations

Taking the desk study and field survey results into account, Table 3 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 3: Evaluation of the site for bats and any other ecological constraints

Feature	Survey conclusions (with justification)	Foreseen impacts	Recommendations <i>Measures required to adhere to guidance, legislation and planning policies.</i>	Biodiversity Enhancements <i>The Local Planning Authority has a duty to ask for enhancements under the NPPF (2021)</i>
Roosting bats	There are ingress and egress points into the interior of the building, including to a loft void and basement, by way of broken windows and a gap in the soffit box. A lack of bat evidence internally during the PRA, combined with the poor connectivity to any foraging or commuting habitats and the high levels of street lighting are considered to be sufficient to conclude a likely absence of void dwelling bat species such as brown long-eared bats which tend to favour areas of tree cover and are less tolerant to urban environments and light spill. The damaged soffit box could be used by crevice dwelling bat species accessing the wall top for roosting. There could also be features associated with the roof structure which were not visible from ground level. Again, the lack of habitat connectivity and	The loft void will be retained though the loft floor will be repaired and insulated. However, the soffits and windows will also be repaired meaning the loss of potential ingress and egress points to the interior of the building. Given the likely absence of bat roosts internally, this is considered to be inconsequential to bats. The proposed development will not include any works to the roof structure. However, the soffit repair will result in the loss of this roost feature. Given the very limited suitability of the building overall in terms of location and habitat connectivity, bats are considered unlikely to be present externally on the building and therefore the risk of impacting bats is considered to be low.	Buildings with low roost value typically require a single bat emergence or re-entry survey to establish the presence or absence of bat roosts. However, given the very low likelihood of bats being present, the completion of further surveys is considered disproportional. Furthermore, due to the city centre location of the site there are health and safety concerns associated with night-time working in this area. To avoid impacting bats it is recommended that the soffit repairs are undertaken during the winter months (November to March) when bats are least likely to be present, thereby avoiding possible disturbance to bats. The new soffit will incorporate a gap of 15mm wide between the soffit and the wall on the southwest elevation to retain an access point for bats to reach the wall top, thereby avoiding potential roost destruction and significant modification. These measures are considered sufficient to minimise the risk to bats to an acceptably low level.	Biodiversity enhancements have not been proposed as the site comprises the building only, with no space for soft landscaping. Furthermore, due to the site's urban location and lack of habitat connectivity it is considered highly unlikely that bat or bird boxes, if installed on the building, would be utilised. The installation of bat or bird boxes may also be restricted due to the grade II listed status of the building.

	light pollution is likely to deter all but the most urban tolerant crevice dwelling bat species (such as pipistrelles) from the area. For these reasons the site is also very unlikely to support maternity or regularly used summer roosts. Though basements can be used by bats for hibernation, no evidence of hibernation roosts were found in the building and accessibility to the basement for bats is very limited (i.e. internal access only). The remainder to the building is not of a construction or location which would typically be associated with hibernation roosts and therefore their presence is considered extremely unlikely. Subsequently the building is concluded to have low roost value for bats.	The remainder of the renovation works are considered unlikely to impact bats and indirect impacts such as high levels of noise, vibration or lighting disturbance are not anticipated given the works will be completed by hand or using handheld tools during daylight hours.		
Foraging and commuting bats	There are no habitats on the site which could be used by bats for foraging or commuting.	The proposed development will not result in the removal, damage or light spill of any habitats which could be used by foraging or commuting bats.	None.	
Nesting birds	No evidence of nesting birds was found internally or externally. No nesting features were identified.	None.	None.	
Other ecological constraints	None identified.	None.	None.	

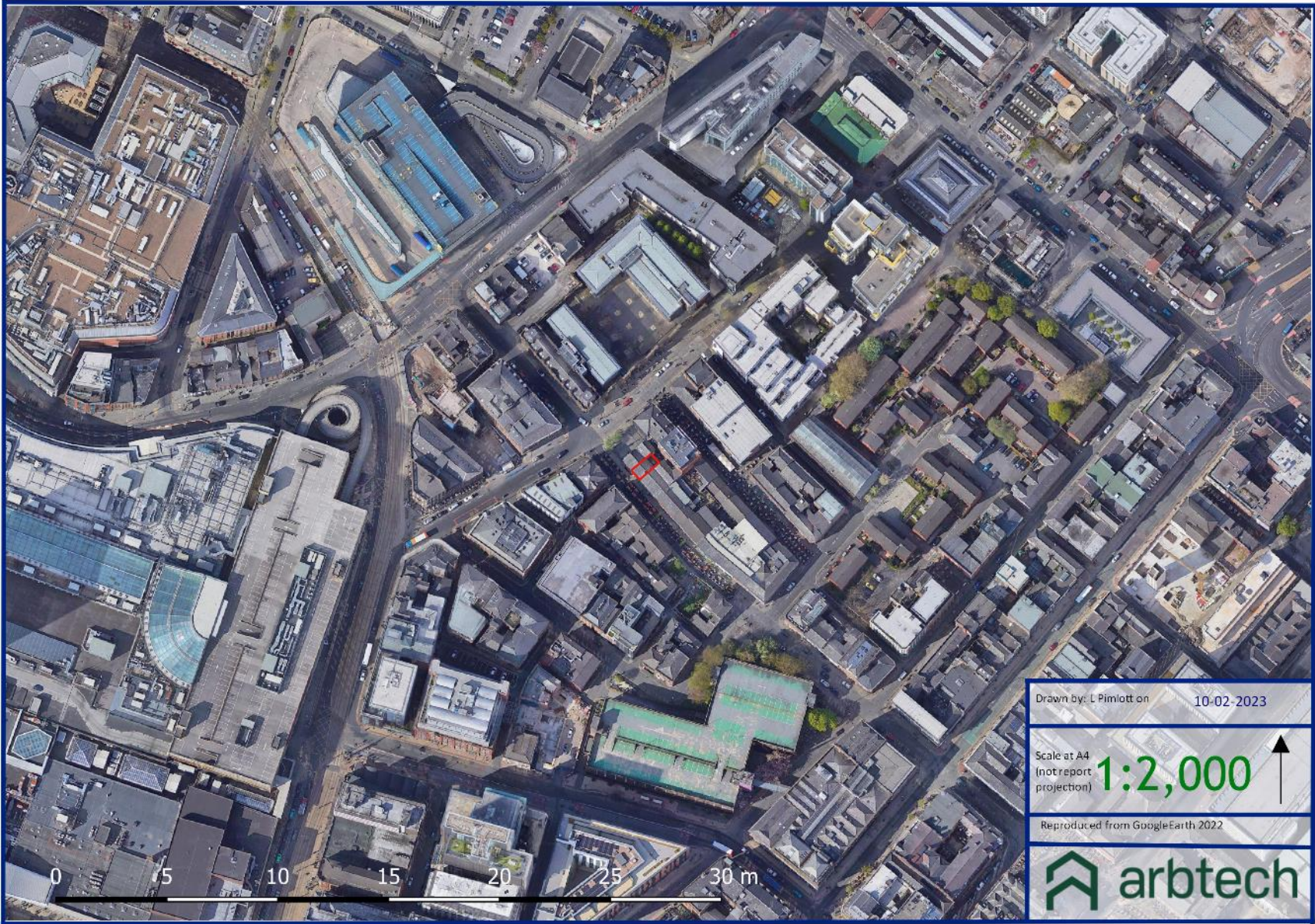
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Appendix 1: Proposed Development Plan



Appendix 2: Site Location Plan



Appendix 3: Bat Survey 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 2021

The National Planning Policy Framework promotes sustainable development. The Framework specifies the need for protection of designated sites and priority habitats and species. An emphasis is also made on the need for ecological infrastructure through protection, restoration and re-creation. The protection and recovery of priority species (considered likely to be those listed as species of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006) is also listed as a requirement of planning policy.

In determining a planning application, planning authorities should aim to conserve and enhance biodiversity by ensuring that: designated sites are protected from harm; there is appropriate mitigation or compensation where significant harm cannot be avoided; measurable gains in biodiversity in and around developments are incorporated; and planning permission is refused for development resulting in the loss or deterioration of irreplaceable habitats including aged or veteran trees and also ancient woodland.

The Natural Environment and Rural Communities Act 2006 and the Biodiversity Duty

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'.

Section 41 of the Act requires the Secretary of State to publish a list of habitats and species which are of 'principal importance for the conservation of biodiversity'. This list is intended to assist decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications. A developer must show that their protection has been adequately addressed within a development proposal.

LOCAL PLANNING POLICY

Manchester's Core Strategy

Manchester's Core Strategy (adopted July 2012) can be viewed here: https://www.manchester.gov.uk/download/downloads/id/21363/core_strategy_-_pdf.pdf

The following planning policies have implications for developers in relation to bats:

- Policy EN 15 Biodiversity and Geological Conservation - 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. Any adverse impacts on biodiversity will need to be justified against the wider benefits of the proposal, assessed against other LDF policies. Where adverse impacts are unavoidable, developers will be required to provide appropriate mitigation and/or compensation.

Manchester Biodiversity Action Plan

The Manchester Biodiversity Action Plan can be viewed here: https://gmlrc.org/projects/gm_bap/

All bat species are included in the plan.

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.