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**BAT PRESENCE / ABSENCE SURVEY**

**At**

**51–53 Richmond Street**  
Manchester  
M1 3WB

**NGR: SJ 84322 97808**

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|---------------|--------------------------------------------|
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A handwritten signature in black ink that reads 'K James'.

|                |                                |
|----------------|--------------------------------|
| Date:          | 14 <sup>th</sup> November 2022 |
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## EXECUTIVE SUMMARY

A bat scoping survey was undertaken at 51-53 Richmond Street, Manchester by United Environmental Services (UES) Ltd on the 25<sup>th</sup> July 2022. This survey found the building on site to contain a low number of potential roosting features (PRFs) suitable for use by bats. The building was assessed as having low potential to support roosting bats and a single additional bat presence / absence survey was conducted by UES on the 3<sup>rd</sup> August 2022.

The objective of this survey was to establish whether or not bats are using the building on site to roost, and if so to assess the type and importance of roosts in order to inform the planning process. The surveys were carried out to recognised guidelines, timings and weather conditions, with particular reference to Natural England and Bat Conservation Trust (BCT) publications. The development proposals involve the conversion of the existing textiles mill and warehouse into a block of residential properties, while retaining the original fabric of the building.

51-53 Richmond Street is situated in an area that provides low-quality foraging, commuting and roosting opportunities for bats. The extensive areas of hardstanding, residential and commercial high-rise buildings on all aspects of the site significantly reduce the suitability of the building to support roosting bats. The site is intersected by numerous busy and well-lit main and access roads. Small areas of managed greenspace are present within close proximity to the site and within the wider surrounding landscape. However, all are fragmented from site by urban areas. The Rochdale Canal is the only suitable corridor in close proximity and will provide some invertebrates on which bats can forage, however, it is not tree lined and doesn't provide a green corridor.

The quality of roosting habitat within the building on site is considered to be low. The buildings present a low number of external potential roosting features for bats, such as gaps surrounding the timber cladding and between a number of red bricks. Internally features are limited to crevices at the junctions between the ridge beam and rafters, gaps between the old outer shell of the internal structure and currently exposed rafters, gaps between the end rafters and rendered wall, and gaps above the redbrick gables within the loft void. Features within the internal cellar include crevices between the lateral timber joists and floorboards, alongside crevices between the floorboards and rendered walls. High levels of light ingress were observed within both the loft void and cellar, rendering the spaces broadly unsuitable for use by bats.

No bats or evidence of bats, such as droppings, were found during the internal or external building inspections. No bats were recorded during the presence / absence survey.

**No bats were found to be roosting within the building on site. Therefore, no further surveys or mitigation work is required for the development to proceed, with regards to bats.**

This report should be read in conjunction with appendices 1 to 4, which provide visual representations of the survey results and statutory and planning context.



# **1 INTRODUCTION**

## **1.1 Author, surveyors and qualifications**

This report is compiled and written by Noah Fulton BSc, UES Graduate Ecologist. Other surveyors include:

- Toby Hart BSc MCIEEM PIEMA, UES Managing Director. Toby is licensed by Natural England to disturb, take and handle all species of bats under licence numbers 2015-15898-CLS-CLS (level 3) and 2015-15899-CLS-CLS (level 4). Toby is also a registered consultant of the bat low impact class licence (RC090).
- Tom Kenwright BSc MSc, UES Senior Ecologist. Tom is licensed by Natural England to survey all species of bats by observation using an artificial light under licence number 2021-53549-CLS-CLS (level 1).

All surveyors have the knowledge, skills and experience identified within CIEEM's "Competencies for Species Survey: Bats" (2013), or were under the supervision of a surveyor with the required competencies.

## **1.2 Survey objectives**

UES was commissioned in July 2022 to conduct site surveys which include the following activities:

- Conduct internal and external building inspections to look for field signs of bats
- Confirm bat presence or likely absence by conducting emergence and re-entry surveys of the buildings
- Assess the type and importance of the roost(s), if present
- Recommend appropriate mitigation and compensation, if applicable

## **1.3 Proposed development**

The development proposals involve the conversion of the existing textiles mill and warehouse into a block of residential properties, while retaining the original fabric of the building.

## **1.4 Structure of the report**

This report sets out the methodology, results, and recommendations in relation to a specific bat survey. Recommendations are in line with statutory legislation and planning policy objectives.

The report should be read in conjunction with appendices 1 to 4, which give visual representations of the survey results.



## 2 METHODOLOGY

### 2.1 General

All surveys were carried out to recognised guidelines, timings and weather conditions, with particular reference to Natural England and BCT publications (see references for further information).

The habitats on site and in the surrounding area were assessed during a walkover survey and through studying aerial photographs, in order to gauge their suitability to support roosting, foraging and commuting bats.

### 2.2 Building inspections

The building on site was searched both externally and internally for bat presence and features associated with bat activity, as detailed in BCT guidance (Collins, 2016). An internal and external inspection was undertaken by UES as part of a bat scoping survey on the 25<sup>th</sup> July 2022, which was conducted by Noah Fulton and Toby Hart. Updated internal inspections were undertaken prior to the emergence survey conducted by Noah Fulton and Tom Kenwright on the 3<sup>rd</sup> August 2022.

#### 2.2.1 External inspection

The external inspections of the building were carried out from ground level using binoculars, and also using ladders and an endoscope to investigate suitable gaps. The objective of the survey was to find and record any signs of bat use, for example:

- Bat droppings
- Feeding remains
- Grease staining / urine marks
- Corpses or skeletons

The bat signs listed above are visible from the outside of a building. The following areas were searched, where present:

- |                           |                                                 |
|---------------------------|-------------------------------------------------|
| • Roof and ridge tiles    | • Gaps under felt                               |
| • Lead flashing           | • Cracks / holes in woodwork or behind cladding |
| • Eaves                   | • Gaps in brickwork and mortar                  |
| • Boxed soffits           | • Air bricks                                    |
| • Fascia and barge boards | • Grills                                        |
| • Window sills and panes  | • Vents                                         |
| • Walls                   |                                                 |

#### 2.2.2 Internal inspection

The internal inspections covered all of the accessible rooms and roof spaces within the building. Bats regularly utilise specific areas within roof spaces, which were searched for any field signs of bats using high-powered torches and an endoscope, where considered necessary by the licenced ecologist. The following features were searched, where present:



- Roof beams and junctions
- Gaps under felt
- Dividing walls
- Chimney breasts
- Gaps in brickwork and mortar
- Cracks / holes in woodwork
- Floor or other surfaces on which droppings could accumulate

## 2.3 Emergence and re-entry surveys

Potential roost access points were identified during the building inspections. These points were covered by a surveyor during the dusk emergence period.

Bat echolocation, flight and habitat characteristics were recorded where possible, in order to determine the species. The level and type of bat activity was also recorded to establish how bats are using the site.

### 2.3.1 Equipment

BATLOGGER M bat detectors and recorders were used during the survey. This device records bat echolocation calls across the full spectrum, with a sensitivity range of 10 – 150 kHz. The integrated heterodyne live monitoring also allows the observer to hear the echolocation calls in real time, with automatic tuning. The recordings are individually time/date, GPS and temperature stamped, and are of high enough quality to produce time expansion quality sonograms.

### 2.3.2 Weather conditions

*Table 1 - Weather conditions and survey timings*

| DATE     | SURVEY TYPE | TIMINGS       | SUNSET / SUNRISE | TEMP. | WIND              | RAIN | CLOUD COVER |
|----------|-------------|---------------|------------------|-------|-------------------|------|-------------|
| 03/08/22 | Emergence   | 20:49 – 22:34 | 21:04            | 21°C  | Very light breeze | Dry  | 60%         |

## 2.4 Survey limitations

The surveys were undertaken at an appropriate time of year and under appropriate weather conditions.

Access to the rear of the property was limited and visibility from Canal Street was poor. Although the surveyors were positioned to the front of the building during the emergence survey, one of the surveyors monitored activity to the side and rear of the property where accessible. The lack of bat activity throughout the entire survey confirms that no bats are roosting in the building.



## **3 RESULTS**

### **3.1 Habitat assessment**

51-53 Richmond Street is situated to the north-west of Canal Street within Manchester city centre. The habitats on site comprise a three storey Victorian textiles mill and warehouse building dating from the 1860's. The site is surrounded by areas of hardstanding including Richmond Street that runs from the south-west to north-east of the building, a car park to the south-west and a narrow alleyway to the rear of the building.

The immediate surrounding area (0.5km) comprises urban sprawl on all aspects of the building. The limited pockets of greenspace are largely isolated from the site by high-rise buildings, very busy and well-lit main and access roads, and other areas of hardstanding. The Rochdale Canal is located 20m south-east of the site and is considered to be the only commuting corridor within the immediate area that could act as a potential corridor for bats and provide adequate invertebrate communities on which bats can forage. Sackville Garden is located 60m south-east of the site containing areas of intensively manicured amenity lawns and a limited number of interspersed broadleaved trees. However, it is bordered on all aspects by hardstanding. Other enclosed areas of greenspace within the immediate vicinity include Vimto Park located 230m south-east of site. The surrounding buildings will provide a number of alternative roosting opportunities, although they are similarly isolated from any suitable commuting corridors.

In the wider surrounding area (2km), the habitats are similar in composition; with urban sprawl extending on all aspects of the building forming Manchester city centre. Numerous isolated pockets of greenspace are present. However, these are fragmented from the site by the extensive areas of hardstanding, buildings and busy streets.

In summary, the habitats on site and within the surrounding landscape provide low quality foraging, commuting and roosting opportunities for bats.

### **3.2 Building inspections**

#### **3.2.1 External inspection**

51-53 Richmond Street, Manchester is a three-storey semi-detached Grade II listed former textiles mill and warehouse (see Appendix 3 – Photographs 1 and 2). The building has a pitched roof structure with south-western and north-eastern facing gables. The building rises a single storey above the attached building present to the north-east. The concrete roof and ridge tiles were observed to be in good condition with no potential roosting features suitable for use by bats on the north-western facing pitch. The tiles on the south-eastern pitch are obstructed by the surrounding buildings and could not be viewed in their entirety. The end tiles present on both gables are well sealed with no missing mortar or observed cavities. The eaves of the building on both the north-western and south-eastern aspects are sealed to the redbrick and covered by guttering that restricts any access into the internal structure. The external redbrick walls are generally in good condition with a number of suitable gaps present (see Photograph 3). An area of rendering is present on the south-western aspect where a building destroyed in the Manchester Blitz once connected to an adjacent structure. The north-western aspect of the building contains a number of single pane glass windows that are all well sealed, alongside a timber cladded loading bay with numerous cavities surrounding the frame (see Photographs 4 and 5). A metal door that provides access to the basement is also present on the same aspect and is well sealed in its entirety.



**No bats or evidence of bats was observed during the external inspection undertaken as part of the bat scoping survey on the 25<sup>th</sup> July 2022, or during the updated external inspection conducted prior to the emergence survey on the 3<sup>rd</sup> August 2022.**

### **3.2.2 Internal inspection**

A single open loft void is present which covers the entirety of the building. The floor to ridge beam height is approximately 4m, 10m in length and 9m in width (see Photographs 6 and 7). A bitumen roof lining is present within the internal structure which covers both pitches. Numerous gaps were observed where the membrane overlaps (see Photograph 8). The building has a traditional rafter and purlin construction with numerous suitable crevices at the junctions between the ridge beam and rafters (see Photograph 9). Wooden trusses are present throughout the building and are in good condition with no suitable crevices or features within the wood itself. Damaged wooden laths and plaster on the south-eastern aspect provide a PRF for bats (see Photographs 10 and 11). Rendered redbrick gable walls are present on the south-western and north-eastern aspects that contain no suitable features. Although numerous gaps are present between the end rafters and walls (see Photographs 12 and 13), and alongside a number of gaps at the top of the redbrick itself. Rendered redbrick is also present beneath the pitches containing no features. There are high levels of light ingress into the internal void via the six windows present on the north-western aspect (see Photograph 14). This renders the roof space broadly unsuitable to support roosting bats. A small timber clad toilet block is present in the south-western corner of the void, containing a low number of PRFs under the end rafters (see Photograph 12).

A cellar is present below the building that has approximately the same dimensions as the main building (see Photographs 15 and 16). The cellar was observed to be damp. Numerous crevices are present between the lateral timber joists and floorboards above which provide PRFs for bats (see Photograph 17). Numerous knot holes were observed within a section of cladding on the north-western aspect that provide suitable access points (see Photograph 18). The rendered walls are in good condition with no suitable features for use by bats. A number of crevices were observed between the floorboards and rendered walls (see Photograph 19). Similarly, to the loft void, high levels of light ingress was observed through three windows on the north-western aspect of the building which render the cellar broadly unsuitable for use by bats.

**No bats or evidence of bats was observed during the internal inspection undertaken as part of the bat scoping survey on the 25<sup>th</sup> July 2022, or during the updated internal inspection conducted prior to the emergence survey on the 3<sup>rd</sup> August 2022.**

### **3.3 Activity summary**

No bat activity was recorded despite conducting the survey during the peak bat season and in favourable weather conditions.



## **4 EVALUATION AND RECOMMENDATIONS**

### **4.1 Evaluation of results**

51-53 Richmond Street is situated in an area that provides low-quality roosting, foraging and commuting opportunities for bats. The site is encased on all aspects by extensive areas of hardstanding including an extensive network of well-lit and busy main and access roads, pathways and parking facilities. The site is also bordered by residential and commercial high-rise buildings that will provide numerous alternative roosting opportunities although the area is, in general, isolated from any green corridors. The Rochdale Canal is located within close proximity and will provide some invertebrates on which bats can forage although it is not treelined and lacks suitable connectivity to higher-quality habitats. Habitats are similar in composition within the surrounding landscape; urban with a small number of isolated managed landscaped parks.

The Victorian textiles mill and warehouse on site was assessed as having low potential to support roosting bats, due to a low number of external and internal PRFs. However, no bats or evidence of bats, such as droppings, were found during the internal or external building inspections. No bats were recorded during the presence / absence survey, and no bats were recorded roosting in the building on site.

### **4.2 Mitigation and compensation measures**

No bats were found to be roosting within the building on site. Therefore, no further surveys or mitigation work is required for the development to proceed, with regards to bats.



## 5 CONCLUSION

51-53 Richmond Street is situated in an area that provides low-quality foraging, commuting and roosting opportunities for bats. The extensive areas of hardstanding, residential and commercial high-rise buildings on all aspects of the site significantly reduce the suitability of the building to support roosting bats. The site is intersected by numerous busy and well-lit main and access roads. Small areas of managed greenspace are present within close proximity to the site and within the wider surrounding landscape. However, all are fragmented from site by urban areas. The Rochdale Canal is the only suitable corridor in close proximity and will provide some invertebrates on which bats can forage, however, it is not tree lined and doesn't provide a green corridor.

The building on site was assessed as having low potential to support roosting bats due to the low number of external and internal PRFs present. No evidence of bat activity was found during the building inspections and no bats were recorded roosting within the building during the emergence survey.

As no bats were found to be using the building on site to roost, no further mitigation or compensation measures are required with regards to bats.



## 6 REFERENCES

Chartered Institute of Ecology and Environmental Management (2013). *Competencies for Species Survey: Bats*.

Ministry of Housing Communities and Local Government (2021). *National Planning Policy Framework*.

Collins, J. (ed.) (2016). *Bat Surveys for Professional Ecologists: Good Practice Guidelines*. (3<sup>rd</sup> ed.) The Bat Conservation Trust, London.

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

Mitchell-Jones, A.J. & McLeish, A.P. (2004). *The Bat Workers Manual*. (3<sup>rd</sup> ed.) JNCC



## **APPENDICES**

### **Appendix 1 – Site plan**



51-53 Richmond Street,  
Manchester

Site Plan

--- Building

● Surveyors



## Appendix 2 – Aerial photographs



**51-53 Richmond Street,  
Manchester**

Close aerial photograph

— Survey boundary





**51-53 Richmond Street,  
Manchester**

Wide aerial photograph

 Survey boundary





## Appendix 3 – Photographs



Photograph 1 – The north-west corner of 51-53 Richmond Street.



Photograph 2 – The south-east facing rear of the building.



Photograph 3 – Gaps in the brickwork.



Photograph 4 – Gaps surrounding the loading bay.



Photograph 5 – Gaps surrounding the loading bay.



Photograph 6 – Internal eastern facing corner.



Photograph 7 – Internal south-west aspect.



Photograph 8 – Gaps where the bitumen membrane overlaps.



Photograph 9 – Junctions between the ridge beam and rafters.



Photograph 10 – Damaged wooden laths and plaster.



Photograph 11 – Damaged wooden laths and plaster.



Photograph 12 – Gaps beneath the end rafters.



Photograph 13 – Gaps beneath the end rafters.



Photograph 14 – Light ingress within the loft void.



Photograph 15 – The north-eastern corner of the cellar.



Photograph 16 – The south-western corner of the cellar.



Photograph 17 – Crevices at the junctions between the lateral rafters and floorboards.



Photograph 18 – Knotholes within the cladding.



Photograph 19 – Crevices between the floorboards and rendered walls.



## **Appendix 4 – Statutory and planning context**

## Ecological assessments

Ecological assessments play an important part within the planning context; they include an initial assessment which highlights any specific interests of a site. From the initial site assessment, the surveyor assesses the suitability of habitats within the site to support protected species and makes recommendations for further survey works if required. The following paragraphs provide a brief interpretation of the legislative protection that is relevant to the findings of this report.

## Bats

In the United Kingdom, all species of bat and their roosts are afforded full protection under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (known as the “Habitats Regulations”). The Wildlife and Countryside Act is the domestic implementation of the Convention on the Conservation of European Wildlife and Natural Habitats (the Bern Convention) and was amended by the Countryside and Rights of Way Act 2000. This makes it an offence to:

- Deliberately, intentionally or recklessly kill, injure or capture a bat
- Deliberately, intentionally or recklessly disturb a bat while it is occupying a structure or place that it uses for shelter or protection
- Deliberately, intentionally or recklessly damage, destroy or obstruct access to any place that a bat uses for shelter or protection (even if the bat is not present at the time)
- Keep, transport, sell or exchange, or offer for sale or exchange any live or dead bat, any part of a bat or anything derived from a bat

Under UK law, a bat roost is *any structure or place which any wild [bat] ... uses for shelter or protection*. As bats often reuse the same roosts, legal opinion is that a roost is protected whether or not the bats are present at the time of the activity taking place.

Penalties for offences include fines of up to £5000, plus up to six months imprisonment, for each offence committed.

If an activity is likely to result in any of the above offences, a licence can be applied for to derogate from the protection afforded. These licences must provide appropriate mitigation and are issued by Natural England.

A Natural England mitigation licence application requires a Mitigation Method Statement and, in many cases, a Reasoned Statement of Application. The Mitigation Method Statement contains details of the proposed mitigation works. The Reasoned Statement needs to provide a rational and reasoned justification as to why the proposed development meets the requirements of the Conservation (National Habitats & c.) regulations 1994, namely Regulations 44(2)(e), (f) or (g), and 44(3)(a).

The National Planning Policy Framework 2021 (NPPF) provides guidance on the interpretation of the law in relation to the natural environment and development.

The Natural Environment and Rural Communities (NERC) Act 2006 lists the following bat species as species of principle importance under Section 41:

- Barbastelle *Barbastella barbastellus*
- Bechstein’s bat *Myotis bechsteinii*
- Noctule *Nyctalus noctula*
- Soprano pipistrelle *Pipistrellus pygmaeus*
- Brown long-eared bat *Plecotus auritus*
- Greater horseshoe *Rhinolophus ferrumequinum*
- Lesser horseshoe *Rhinolophus hipposideros*

Section 40 requires every public body in the exercising of its functions ‘have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity’ (all biodiversity and not just section 41 species and habitats); therefore making these bats a material consideration in the planning process and requiring a detailed ecological bat survey before planning permission can be granted.

## Planning policy

National Planning Guidance is issued in the form of the National Planning Policy Framework 2021 (NPPF). The most relevant section is 15: Conserving and enhancing the natural environment.

Key relevant principles stated in 15: Conserving and enhancing the natural environment are;

- 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;
  - e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
  - f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- 179.** To protect and enhance biodiversity and geodiversity, plans should:
- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity<sup>61</sup>; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation<sup>62</sup>; and
  - b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity
- 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<sup>63</sup> 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.