

Prepared for: Onward Homes

Site: Pennington Street, Levenshulme, M12 4QJ.

Aerial Inspection of Tree for Bats.

NAME OF SITE:	Pennington Street, Levenshulme
PROJECT No:	12754
CLIENT NAME:	Onward
SPECIALIST:	Amenity Tree Care Ltd
DATE PREPARED:	02.03.2026
PREPARED BY:	Simon Brain
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1.0 Introduction

Site description, location, context, previous reporting and development proposal

- 1.1 Amenity Tree Care was commissioned by the client to undertake an aerial inspection of one Rowan (*Sorbus acuparia*, T7 as identified in the Arboricultural Impact Assessment) tree at the above site following the tree being identified as part of the Ground Level Tree Assessment (GLTA) process as having suitable features to support roosting bats. The Tree will need to be removed by the current proposals to turn the site into a housing development and accommodate a new access road.

- 1.2 The site is located within the central area of Levenshulme, Manchester in a highly urbanised area. The Preliminary Ecological Assessment assigned the following habitats to the site. Modified Grassland (g4), and individual trees.

An updated survey following the Bat Conservation Trust Survey Guidelines, 2023 (BCT, 2023) is required; this includes an aerial inspection to categorise PRF type (PRF-I / PRF-M) and determine further survey effort if required and based on the findings of this inspection.

- 1.3 The purpose of this report is to establish the potential of the affected tree to offer foraging and roosting potential/features for protected bat species.
- 1.4 The objective of the report is to assess those tree habitats affected by development to support roosting bats, and to rate (PRF-I / PRF-M) potential of the trees to offer shelter for bats.
- 1.5 The objectives include the provision of any applicable mitigation measures and / or further survey recommendations in relation to the extent and use of the site by protected species as is required by the current BCT guidelines section (Collins, J. (ed) (2023) Bat Surveys for Professional Ecologists: Good practice Guideline (4th Edn).

2.0 Methodology

- 2.1 Summary of survey methods

- 2.2 An external inspection walkover (GLTA) was carried out on the habitats and trees in relation to their potential features which could be used by bat species and assessment of potential roost features rated PRF-I and PRF-M in accordance with the 2023 BCT guidelines, Section 6: Surveying trees and woodlands for bats (and, in particular, 6.5). This was carried out on 26th of February 2026 by Ryan Whitmarsh acting as an accredited agent under Simon Brain's Natural England Class 2 Bat Survey Licence (2015-17334-CLS-CLS).

- 2.3 The following signs may indicate a bat roosting within trees. Droppings can be found internally within PRFs and may be found externally around roost features on bark, or below the entrances to roost sites. Evidence of access and egress by bats to a roost

site may include droppings below the entrance to the roost site or staining around the access to the roost feature. Where bats are present in large numbers there may be evidence of urine stains. Typical roost features can include cavities in the trunk or branches, hazard beams, woodpecker holes, loose and lifted bark, fluting, cracks, splits, crevices and thick ivy covering.

2.4 Pre-existing data on local bat species:

The closest granted Natural England European Protected Species Licence (EPSL) was for bat species approximately 880m from the proposed development site to the north (C-PIP-2016).

Greater Manchester Ecological Unit have confirmed the closest bat roost is approximately 700m from site with various signs of bats throughout the search area particularly the southern boundary. The data collation period spans over 3 decades from 1989-2019 and include.

- Common Pipistrelle
- Myotis spp
- Noctule
- Pipistrelle sp
- Soprano Pipistrelle

Image 1: Overlay of proposals with tree data and T7 highlighted in red



3.0 Results (refer to Appendix 2 for PRF images)

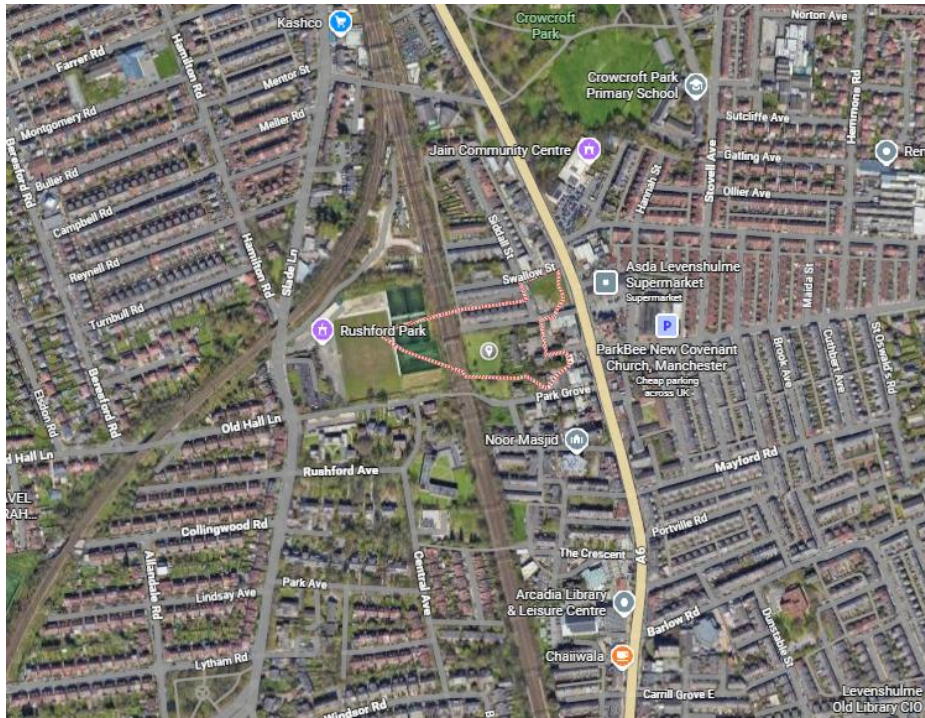
GLTA feature located on the northern aspect of the stem at 2.5m above ground level.

A north-facing circular cavity was recorded at 2.5 m above ground level on a semi-mature rowan. The entrance measured approximately 5 cm × 5 cm, extending 30 cm vertically with an internal width of 6 cm and a flat apex. The feature was dry, clean, and colonised by woodlice. No evidence of bat use was identified (e.g. droppings, urine staining, scratch marks, or characteristic odour). In accordance with Bat Conservation Trust (2023) guidance, the feature is classified as PRF-M.

4.0 Assessment and Summary

- 4.1 In accordance with Table 7.1 of the Bat Survey Guidelines (BCT 2023), three further climbing inspections will be required (per PRF-M) within the optimal survey season for bats which is May-August. These surveys should be undertaken with at least 3-week intervals in-between survey visits.
- 4.2 An assessment was made of the habitat that surrounds the survey area and its' suitability for foraging and commuting bats. Bats use key features in the landscape such as hedgerows, rivers, ponds and woodland edges to navigate from one area to another. These features are also used by bats to forage for insects. The landscape that surrounds the proposed development site was considered sub-optimal for bat activity. A railway line is located directly to the west but is lacking in interconnecting habitat features such as established trees and hedgerows. Garden habitats provide the most suitable foraging opportunities and the site itself contains limited foraging opportunities in the form of individual trees.

The wider landscape of the site



5.0 Recommendations and mitigation

5.1 The tree has been assessed as having a suitable feature for roosting bats and classified PRF-M. This tree will require further survey effort in accordance with Table 6.3 of the Bat Survey Guidelines.

5.2 Mitigation measures and mitigation licences

Mitigation measures and the need for Natural England licensing cannot be determined until the recommended surveys on the above trees have been completed or design changes are made to the proposal to avoid impacts (direct and indirect) on trees that have been classified as PRF-M.

Appendix One: Legislation

All bat species in the UK are fully protected under The Conservation (Natural Habitats, &c.) Regulations 2010 (as amended) through their inclusion on Schedule 2 of the Act. Regulation 41 prohibits:

Deliberate killing, injuring or taking (capture) of bats
Deliberate disturbance of bats in such a way as to:

impair the ability to survive, breed, or rear or nurture their young; or

affect significantly the local distribution or abundance of bat species; or impair their ability to hibernate or migrate

Damage or destruction of a bat breeding site or resting place i.e. roost

☐ Keeping, transporting, selling, exchanging or offering for sale whether live or dead or of any part thereof.

All bat species in the UK are also protected under the Wildlife and Countryside Act 1981 (as amended) through their inclusion on Schedule 5. Under this Act, it is an offence to:

☐ Intentionally or recklessly disturb any bat while it is occupying a structure or place which it uses for shelter or protection

☐ Intentionally or recklessly obstruct the access to any place of shelter or protection used by bat(s)

☐ Sell, offer or expose for sale, possess or transport a bat(s) for the purpose of sale.

A European Protected Species Mitigation (EPSM) License issued by the relevant countryside agency (e.g. Natural England) will need to be applied for to allow derogation from the relevant legislation i.e. for works liable 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, hibernate, migrate). 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.

Conservation (Natural Habitats) Regulations 2010

The species protection provision of the EC Habitats Directive 1992, as implemented by the Conservation of Habitats and Species Regulations 2010, comprises three “derogation tests” which must be applied by the Local Planning Authority when deciding whether to grant planning permission for a development that could harm a European Protective Species. The three tests are:

- ☐ The activity to be licensed must be for imperative reasons of overriding public interest or for public health and safety.
- ☐ There must be no satisfactory alternative; and,
- ☐ Favorable Conservation Status (FCS) of the species must be maintained.

It is the responsibility of the applicant to submit sufficient information to address these tests when applying for planning permission. For development activities, an EPSM License application can only be obtained after planning permission has been granted. However, the granting of planning permission does not guarantee that a license will be issued by the relevant countryside agency.

National Planning Policy Framework (2021)

The National Planning Policy Framework (NPPF) (2021) sets out the Government's national policies on different aspects of planning in England. Section 10 paragraphs 109 to 125 details planning policies on the conservation and enhancement of the natural environment. Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

In summary:

The planning system should contribute to and enhance the natural and local environment by: 'minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.' (NPPF Section 10, para 109)

When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- ☐ If significant harm 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 (Section 10, para 118).
- ☐ Proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted (Section 10, para 118).
- ☐ Development proposals where the primary objective is to conserve or enhance biodiversity should be permitted (Section 10, para 118).
- ☐ Opportunities to incorporate biodiversity in and around developments should be encouraged (Section 10, para 118).

7 Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss (Section 10, para 118)

□ Potential Special Protection Areas and possible Special Areas of Conservation, listed or proposed Ramsar sites and sites identified or required as compensatory measures for adverse effects on European sites, should be given the same protection as European sites (Section 10, para 118).

□ The presumption in favour of sustainable development (para 14) does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined (Section 10, para 119)

□ Planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation (Section 10, para 125).

Local planning authorities must take account of the conservation of protected species when determining planning applications. The presence of protected species is a material consideration when assessing a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. This requirement has important implications for bat surveys as it means that, where there is reasonable likelihood of bats being present and being affected by the development, surveys must be carried out before planning permission is considered' (BCR 2012). In order for the Local Planning Authority to adequately assess a development proposal against National and

Local Planning Policy, full comprehensive ecological surveys need to be carried out and suitable mitigation strategies compiled prior to the submission of any planning application. This information will be reviewed by the Local Planning Authority in consultation with the relevant countryside agency and other conservation bodies.

Any developer should, in the first instance, consult the relevant Local Plans to assess the suitability of their proposal (refer to NPPF Section 10 paras 113 to 117).

Natural Environment and Rural Communities Act 2006 (NERC)

Part 3, Section 40 of the NERC Act 2006 states that 'every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity', otherwise known as the Biodiversity Duty. Under Section 41 of the Act, the Secretary of State must publish a list of the living organisms and types of habitat which in the Secretary of State's opinion are of principal importance for the purpose of conserving biodiversity. This list is based on those species listed in the UK Biodiversity Action Plan (BAP) as priority species. The S41 list replaces the list published under Section 74 of the Countryside and Rights of Way (CROW) Act 2000.

Biodiversity Action Plan

Biodiversity Action Plans (BAPs) set out actions for the conservation and enhancement of biological diversity at national, regional and local level. They consist of both Habitat Action Plans (HAPs) and Species Action Plans (SAPs) and species and habitats listed within these are defined as being of Principal Importance for the Conservation of Biodiversity under Section 41 of the NERC Act 2006. Local authorities must consider these species and habitats when determining planning application.

Appendix Two: Images

T7: *Sorbus acuparia* (PRF location highlighted in red).



Endoscopy Image.

