

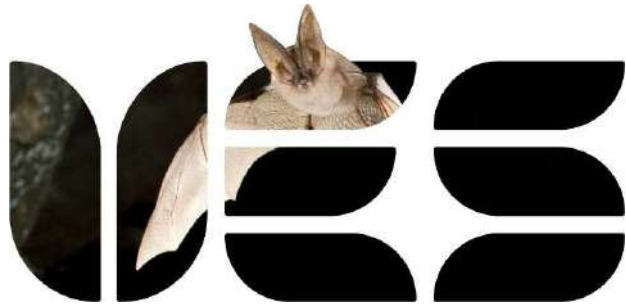
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BAT GROUND LEVEL TREE ASSESSMENT

At

Land off Chapman Street

Gorton

Manchester

Greater Manchester

M18 8LS

NGR: SJ 88837 96323

Prepared for:	Centrepont
Written by:	Josh Howard, UES Graduate Field Ecologist
Approved by:	Mark Halliwell, UES Senior Ecologist



Date: 24th September 2025
UES reference: UES04947/04



CONTENTS

EXECUTIVE SUMMARY	3
1 INTRODUCTION	4
1.1 Author, surveyors and qualifications	4
1.2 Survey objectives	4
1.3 Proposed development.....	4
1.4 Structure of the report.....	4
2 METHODOLOGY	5
2.1 General.....	5
2.2 Ground-level tree assessment	5
2.3 Survey limitations	6
3 RESULTS.....	7
3.1 Habitat assessment.....	7
3.2 Tree assessment.....	7
4 EVALUATION AND RECOMMENDATIONS	10
4.1 Evaluation of results	10
4.2 Mitigation and compensation measures.....	10
5 CONCLUSION.....	12
6 REFERENCES	13
APPENDICES.....	14
Appendix 1 – Survey Results.....	14
Appendix 2 – Tree plan	15
Appendix 3 – Photographs	16
Appendix 4 – Statutory and planning context.....	17



EXECUTIVE SUMMARY

This report is written by Josh Howard BSc, Graduate Field Ecologist at United Environmental Services Ltd (UES). It provides an assessment of the potential impacts on bats as a result of the tree works associated with the development of a parcel of land off Chapman Street, Gorton. The development proposals include the construction of a residential apartment block with 34 no. self-contained apartments for single occupancy use.

All fourteen trees within the survey area were subject to a ground-level assessment of bat roosting potential by UES on the 31st July 2025. Potential roosting features (PRFs) were identified and inspected where possible using binoculars and a high-powered torch. All PRFs were assessed and categorised according to their suitability to support roosting bats, as detailed in Bat Conservation Trust (BCT) guidance (Collins, 2023).

The proposed development site generally provides low quality habitat for foraging and commuting bats. Commercial and residential buildings in the immediate surrounding area may provide alternative roosting opportunities for bats, for example in loft spaces and within gaps and crevices externally. However, the site has poor connectivity to the immediate surrounding area due to the limited areas of greenspace and lack of linear features such as hedgerows and lines of trees in proximity to the site.

No evidence of roosting bats was observed within any of the trees on site. With the exception of T1, all trees lacked PRFs. In accordance with BCT guidelines, no further survey work is required for the trees that were found to contain an absence of PRFs and were subsequently assessed as 'None'. As such, these trees can be felled or subject to arboricultural works without restriction, with regards to bats. See Appendix 1 - Survey results for applicable tree numbers.

T1 has been assessed as containing a PRF suitable for supporting individual bats (PRF-I) and should therefore be subject to soft-felling techniques or a pre-felling inspection as detailed in section 4.2.1 of this report.

Any external lighting installed as part of the development should be designed to be bat friendly and avoid overspill onto the nearby vegetation and any installed bat boxes.

The report should be read in conjunction with appendices 1 to 4, which provide a visual representation of the survey results and further guidance.



1 INTRODUCTION

1.1 Author, surveyors and qualifications

This report has been compiled and written by Josh Howard BSc, UES Graduate Field Ecologist. Other surveyors include:

- Mark Halliwell MBiol, UES Senior Ecologist. Mark is licensed by Natural England to disturb, take and handle all species of bats under licence number 2023-11661-CL18-BAT (level 2).
- Toby Leverett BSc MSc, UES Graduate Ecologist.

All surveyors have the knowledge, skills and experience identified within CIEEM's "Competencies for Species Survey: Bats" (2013).

1.2 Survey objectives

UES was commissioned in July 2025 to conduct site surveys which include the following activities:

- Undertake a ground level tree assessment to assess the suitability and potential for the trees on site to be used by roosting bats
- Recommend further surveys, mitigation and compensation, where appropriate

1.3 Proposed development

The development proposals include the construction of approximately thirty-four self-contained apartments for single occupancy use, as part of an Independent Living Scheme. All trees onsite will be removed to facilitate the proposed development.

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 provide a visual representation of the survey results and further guidance.



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 also assessed in order to gauge their suitability to support roosting, foraging and commuting bats.

2.2 Ground-level tree assessment

A ground-level assessment of all trees on site was undertaken by Mark Halliwell and Toby Leverett on the 31st July 2025. Using binoculars and a high-powered torch, trees were inspected on all aspects and assessed for their potential to support roosting bats, based on the number and quality of PRFs present, as detailed in BS8596:2015 Surveying for Bats in Trees and Woodland and Bat Conservation Trust (BCT) 4th Edition guidance (2023).

Types of PRFs, as described in Bat Roosts in Trees (Bat Tree Habitat Key, 2018) are listed in Table 1 below.

Table 1 – Types of PRFs found in trees

DISEASE & DECAY FEATURES	DAMAGE FEATURES	ASSOCIATION FEATURES	OTHER FEATURES
Woodpecker holes	Lightning strikes	Fluting	Bat boxes
Squirrel holes	Hazard beams	Ivy	Bird boxes
Knot holes	Subsidence cracks		
Pruning cuts	Shearing cracks		
Tear-outs	Transverse snaps		
Wounds	Welds		
Cankers	Lifting bark		
Compression forks	Desiccation fissures		
Butt rots	Frost cracks		

Based on the quality of features present, trees have been classified as per the BCT 4th Edition guidance (2023):

- None – Either no potential roosting features (PRFs) in the tree or highly unlikely to be any.
- FAR – Further assessment required to establish if PRFs are present in the tree.
- PRF – a tree with at least one PRF present.

Trees assessed as “PRF” are further categorised where possible as either:

- PRF-I – PRF is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats.



- PRF-M – PRF is suitable for multiple bats and may therefore be used by a maternity colony.

Where accessible, PRFs at ground level were inspected with an endoscope by the licensed ecologist, in order to identify any roosting bats or field signs of bats and to inspect the internal conditions of the PRF. Field signs of bats include:

- Scratches, staining or droppings around entry points or within a cavity
- Presence of bat-fly cases
- Odour
- Smoothing of surfaces around cavity
- Audible chattering / squeaking at dusk or in warm weather (during the active season)

2.3 Survey limitations

No limitations were encountered during the survey.



3 RESULTS

3.1 Habitat assessment

The proposed development site has an area of approximately 0.2ha and generally provides low quality habitat for foraging and commuting bats. The site comprises a central area of sparsely vegetated urban land demarcated by mixed scrub and a non-native ornamental hedgerow, which is enveloped by modified and other neutral grassland. A total of fourteen trees are present within the development boundary, all of which were subject to a detailed assessment.

The immediate surrounding area comprises a predominantly urban environment with a high coverage of residential and commercial buildings. These buildings may provide alternative roosting opportunities for bats, for example in loft spaces and within gaps and crevices externally. The site has poor connectivity to the immediate surrounding area due to the limited areas of greenspace and lack of linear features such as hedgerows and lines of trees in proximity to the site. There are small pockets of greenspace and linear features to the west of the development site that could provide low levels of commuting opportunities for bats, especially where these connect to better features such as the railway line embankment that runs to the west and also to the north of the site. In summary, the immediate surrounding area generally provides low quality habitat for foraging and commuting bats.

In the wider surrounding area, the railways will provide ideal dark corridors for commuting bats, especially where these connect to areas of higher quality habitat such as grassland, scrub and treelines. Areas of higher quality habitat in the wider area include greenspaces such as Fairfield Golf Club, Debdale park, Reddish Vale Country Park, and Gorton Reservoirs. Most of these areas of better-quality habitat are located to the east and the south of the development site. These areas will provide an abundance of invertebrates and therefore good quality habitat for foraging and commuting bats, along with potential roosting opportunities in mature trees. In summary, the wider surrounding area provides moderate quality habitat for foraging and commuting bats, with the presence of higher quality habitat that is fragmented in the landscape as a result of the intervening built-up areas. However, habitat quality increases notably further south towards Reddish Vale Country Park as the landscape becomes more suburban.

3.2 Tree assessment

All trees on site were subject to a detailed inspection from ground level to determine their potential for supporting roosting bats.

The trees assessed onsite consist of a mixture of lime *Tilia* sp. and ash *Fraxinus excelsior*, along with a single wild cherry *Prunus avium* and crab apple *Malus sylvestris*. All trees are situated within an area of modified grassland which borders the development site, surrounded by roads and built-up areas including commercial and residential buildings.

T1 is a crab apple measuring approximately 5.5m high with an approximate DBH of 30cm (see Appendix 3; Photograph 1). The following PRF was identified during the inspection:

1. A weld located approximately 3.5m high within the eastern aspect of the trunk. The PRF forms a peak / wedge shape (see Photograph 2).

As a result, the tree has been assessed as PRF and contains a feature that has been assessed as **PRF-I**. No evidence of roosting bats was found within the tree during the inspection.



T2 is a wild cherry measuring approximately 5m in height with an approximate DBH of 40cm (see Photograph 3). The tree appears to have been previously coppiced. The tree has no potential roosting features, with only superficial flaking bark features noted. The tree has therefore been assessed as **'None'**.

T3 is a healthy lime sp. tree measuring an approximate 8m in height with an approximate DBH of 45cm (see Photograph 4). No PRFs were identified during the survey. Therefore, T3 has been assessed as **'None'**.

T4 is a healthy lime sp. tree measuring an approximate 8m high with an approximate DBH of 45cm (See Photograph 5). The tree features a single callus roll at ground level which was fully inspected and deemed superficial (see Photograph 6). Therefore, T4 has been assessed as **'None'**.

T5 is a mature ash tree featuring dieback which has resulted in a small amount of deadwood (see Photograph 7). The tree measures approximately 13m in height and has an approximate DBH of 55cm. No PRFs were identified during the survey, with the knot hole on the northern aspect found to be superficial. As such, T5 has been assessed as **'None'**.

T6 is a mature ash tree featuring dieback which has resulted in a small amount of deadwood (see Photograph 8). The tree measures approximately 13m in height and has an approximate DBH of 55cm. No PRFs were identified during the survey, with the knot hole on the eastern aspect found to be superficial (see Photograph 9). As such, T6 has been assessed as **'None'**.

T7 is a mature ash tree featuring dieback which has resulted in a small amount of deadwood (see Photograph 10). The tree measures approximately 13m in height and has an approximate DBH of 55cm. No PRFs were identified during the survey. As such, T7 has been assessed as **'None'**.

T8 is a mature ash tree featuring dieback which has resulted in a small amount of deadwood (see Photograph 11). The tree measures approximately 13m in height and has an approximate DBH of 55cm. No PRFs were identified during the survey, with a knot hole on the southwestern aspect found to be superficial. As such, T8 has been assessed as **'None'**.

T9 is a mature ash tree featuring dieback which has resulted in a small amount of deadwood (see Photograph 12). The tree measures approximately 13m in height and has an approximate DBH of 55cm. No PRFs were identified during the survey. As such, T9 has been assessed as **'None'**.

T10 is a mature ash tree featuring dieback which has resulted in a small amount of deadwood (see Photograph 13). The tree measures approximately 13m in height and has an approximate DBH of 55cm. No PRFs were identified during the survey. As such, T10 has been assessed as **'None'**.

T11 is a mature ash tree featuring dieback which has resulted in a small amount of deadwood (see Photograph 14). The tree measures approximately 13m in height and has an approximate DBH of 55cm. No PRFs were identified during the survey. As such, T11 has been assessed as **'None'**.

T12 is a mature ash tree featuring dieback which has resulted in a small amount of deadwood (see Photograph 15). The tree measures approximately 13m in height and has an approximate DBH of 55cm. No PRFs were identified during the survey. As such, T12 has been assessed as **'None'**.



T13 is an early mature lime sp. measuring an approximate 12m in height and with an approximate DBH of 30cm (see Photograph 16). No PRFs were noted in the tree as it is in good condition and at a relatively early age of growth such that no features have developed. T13 has therefore been assessed as '**None**'.

T14 is an early mature lime sp. measuring an approximate 12m in height and with an approximate DBH of 30cm (see Photograph 17). No PRFs were noted in the tree as it is in good condition and at a relatively early age of growth such that no features have developed. T14 has therefore been assessed as '**None**'.

Please refer to Appendix 1 for full details of all trees and Appendix 2 for the tree locations.



4 EVALUATION AND RECOMMENDATIONS

4.1 Evaluation of results

The proposed development site generally provides low quality habitat for foraging and commuting bats. The site comprises a central area of sparsely vegetated urban land demarcated by mixed scrub and a non-native ornamental hedgerow, which is enveloped by modified and other neutral grassland. A total of fourteen trees are present within the development boundary, all of which were subject to a detailed assessment. Commercial and residential buildings in the immediate surrounding area may provide alternative roosting opportunities for bats, for example in loft spaces and within gaps and crevices externally. However, the site has poor connectivity to the immediate surrounding area due to the limited areas of greenspace and lack of linear features such as hedgerows and lines of trees in proximity to the site.

T1 has been assessed as PRF and contains a feature that has been assessed as 'PRF-I', due to the presence of a weld approximately 3.5m high within the eastern aspect of the trunk. No evidence of roosting bats was found within the tree during the inspection.

All remaining trees on-site have been assessed as 'None' due either having a complete absence of PRFs or PRFs which were found to be superficial upon inspection from ground level. No evidence or field signs of roosting bats was observed within any of the trees during the inspections.

4.2 Mitigation and compensation measures

4.2.1 Mitigation

In accordance with BCT (2023) guidelines, no further survey work is required for trees that have been assessed as 'None'. As such, Trees T2-T14 can be felled or subject to arboricultural works without restriction, with regards to bats. However, prior to any pruning, crown lifting, felling or other arboricultural works, tree T1 must be subject to soft felling techniques or a pre-commencement inspection due to the presence of a single 'PRF-I' feature on the tree.

Soft felling techniques involve cutting the tree in sections and lowering any section containing PRFs to the ground. Once lowered to the ground, the PRFs should be left facing upwards overnight, before being removed from the site at a minimum of 24 hours later. Alternatively, the features associated with these trees could also be inspected with an endoscope to confirm bat absence immediately prior to the felling of the tree. In the unlikely event that a roosting bat is observed, works must stop immediately until a licence can be secured from Natural England to allow the removal of the bat from the roost.

Inappropriate lighting can sever commuting corridors, degrade foraging habitat and deter bats from roosting. As such, any external lighting in use during the construction works and operational phase of the development should be designed to avoid light spill onto nearby vegetation and any installed bat boxes.

4.2.2 Compensation and enhancement

A minimum of one bat box will be required to provide compensation for the loss in potential roosting opportunities provided by the single tree which contains a roosting feature for individual bats (T1 crab apple tree), with reference to BCT guidance (Collins, 2023).



Examples of bat boxes that could be affixed to the new building on site include:

- Schwegler 1FF box (affixed to trees or buildings)
- Schwegler 2F box (affixed to trees or buildings)
- Schwegler 2FR bat tube (installed in connected pairs or threes into the external walls of buildings)

Bat boxes affixed to, or installed into the external walls of buildings should be installed just below the eaves / roof height. It should be noted that care must be taken when installing any new lighting to ensure that light spillage onto bat boxes is minimised. This may require the use of cowling or relocation of the bat box, with the specific location of the box to be determined based on the finalised layout of the site and lighting arrangement. Once a bat inhabits a bat box, they may only be disturbed by a licensed bat worker.

4.2.3 Birds

Due to the potential for breeding birds to utilise the site, any arboricultural work, tree felling, or vegetation clearance should be carried out outside of the nesting bird season and should not be undertaken from March to August inclusive. If this is not possible and works need to commence during this period, a breeding bird nest check should be undertaken immediately prior to the commencement of works by a suitably qualified ecologist and an ecological clerk of works appointed to oversee the works if considered necessary.



5 CONCLUSION

The proposed development site generally provides low quality habitat for foraging and commuting bats. The site comprises a central area of sparsely vegetated urban land demarcated by mixed scrub and a non-native ornamental hedgerow, which is enveloped by modified and other neutral grassland. A total of fourteen trees are present within the development boundary, all of which were subject to a detailed assessment. Commercial and residential buildings in the immediate surrounding area may provide alternative roosting opportunities for bats, for example in loft spaces and within gaps and crevices externally. However, the site has poor connectivity to the immediate surrounding area due to the limited areas of greenspace and lack of linear features such as hedgerows and lines of trees in proximity to the site.

One tree (T1) on site has been assessed as having a PRF suitable for individual bats (PRF – I) and should therefore be subject to soft-felling techniques or a pre-commencement inspection as detailed in section 4.2.1 of this report.

All other trees (T2 – T14) have been assessed as ‘None’, and in accordance with BCT guidelines, no further survey work is required.

The provision of bat boxes onsite will provide an enhancement in the availability of roosting opportunities for bats and compensate for the loss of potential roosting opportunities provided by tree T1.

Any external lighting in use during the construction and operational phases of the development should be designed to avoid overspill onto nearby vegetation and any installed bat boxes.



6 REFERENCES

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

Collins, J. (ed.) (2023). *Bat Surveys for Professional Ecologists: Good Practice Guidelines*. (4th ed.) The Bat Conservation Trust, London.

Ministry of Housing, Communities & Local Government (2024). *National Planning Policy Framework*.

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

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Bat Tree Habitat Key (2018). *Bat Roosts in Trees*.



APPENDICES

Appendix 1 – Survey Results

Appendix 1 - Survey results

Site: Land off Chapman Street, Job no: UES04947/04
Gorton

Date: 31/07/2025

Surveyors: Mark Halliwell & Toby
Leverett

Table 1 – Summary of trees surveyed

Tree ref / GPS	Species	Age Dead/ alive	Height (m) / DBH	Description of PRF(s) & position in tree	Tree assessment (None, FAR, PRF)	PRF classification (PRF-I/PRF-M)	Surrounding habitat context	All aspects of tree seen? Y/N	Climbable (only if qualified)	Photo no.	Notes from inspection of PRF(s)
T1 / SJ 88824 96319	Crab apple <i>Malus sylvestris</i>	Mature / alive	5.5m / 30cm	A weld present approximately 3.5m high within the eastern aspect of the trunk.	PRF	PRF - I	Situated within modified grassland surrounded by main roads and built up areas including commercial and residential buildings.	Y	Y	1 & 2	PRF-I no further survey needed
T2 / SJ 88824 96341	Wild cherry <i>Prunus avian</i>	Mature / alive	5m / 40cm	N/A	None	N/A	Situated within modified grassland surrounded by main roads and built up areas including commercial and residential buildings.	Y	Y	3	N/A
T3 / SJ 88851 96344	Lime Sp., <i>Tillia</i>	Mature / alive	8m / 45cm	N/A	None	N/A	Situated within modified grassland surrounded by main roads and built up areas including commercial and residential buildings.	Y	Y	4	N/A

T4 / SJ 88852 96342	Lime Sp., <i>Tillia</i>	Mature / alive	8m / 45cm	N/A	None	N/A	Situated within modified grassland surrounded by main roads and built up areas including commercial and residential buildings.	Y	Y	5 & 6	N/A
T5 / SJ 88855 96325	Ash <i>Fraxinus excelsior</i>	Mature / alive	13m / 55cm	N/A	None	N/A	Situated within modified grassland surrounded by main roads and built up areas including commercial and residential buildings.	Y	Y	7	N/A
T6 / SJ 88856 96321	Ash <i>Fraxinus excelsior</i>	Mature / alive	13m / 55cm	N/A	None	N/A	Situated within modified grassland surrounded by main roads and built up areas including commercial and residential buildings.	Y	Y	8 & 9	N/A
T7 / SJ 88856 96319	Ash <i>Fraxinus excelsior</i>	Mature / alive	13m / 55cm	N/A	None	N/A	Situated within modified grassland surrounded by main roads and built up areas including commercial and residential buildings.	Y	Y	10	N/A

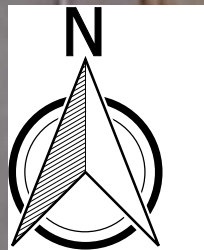
T8 / SJ 88855 96315	Ash <i>Fraxinus excelsior</i>	Mature / alive	13m / 55cm	N/A	None	N/A	Situated within modified grassland surrounded by main roads and built up areas including commercial and residential buildings.	Y	Y	11	N/A
T9 / SJ 88852 96309	Ash <i>Fraxinus excelsior</i>	Mature / alive	13m / 55cm	N/A	None	N/A	Situated within modified grassland surrounded by main roads and built up areas including commercial and residential buildings.	Y	Y	12	N/A
T10 / SJ 88848 96308	Ash <i>Fraxinus excelsior</i>	Mature / alive	13m / 55cm	N/A	None	N/A	Situated within modified grassland surrounded by main roads and built up areas including commercial and residential buildings.	Y	Y	13	N/A
T11 / SJ 88847 96307	Ash <i>Fraxinus excelsior</i>	Mature / alive	13m / 55cm	N/A	None	N/A	Situated within modified grassland surrounded by main roads and built up areas including commercial and residential buildings.	Y	Y	14	N/A



T12 / SJ 88841 96306	Ash <i>Fraxinus excelsior</i>	Mature / alive	13m / 55cm	N/A	None	N/A	Situated within modified grassland surrounded by main roads and built up areas including commercial and residential buildings.	Y	Y	15	N/A
T13 / SJ 88839 96304	Lime Sp., <i>Tillia</i>	Early mature / alive	12m / 30cm	N/A	None	N/A	Situated within modified grassland surrounded by main roads and built up areas including commercial and residential buildings.	Y	Y	16	N/A
T14 / SJ 88834 96305	Lime Sp., <i>Tillia</i>	Early mature / alive	12m / 30cm	N/A	None	N/A	Situated within modified grassland surrounded by main road and built up areas including commercial and residential buildings.	Y	Y	17	N/A



Appendix 2 – Tree plan



Ground Level Tree Assessment Plan

Site: Land off Chapman
Street, Gorton
NGR: SJ 88838 96321
Author: James Stubbs
Date: 24/09/2025



Key

- "PRF-I" assessed tree (T1)
- "None" assessed trees (T2-T14)
- Survey boundary

MAP DATA FROM ©2025 GOOGLE, IMAGERY FROM ©2025 GOOGLE

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Appendix 3 – Photographs



Photograph 1 – T1 crab apple containing a single PRF.



Photograph 2 – Weld PRF-I feature present within T1.



Photograph 3 – T2 previously coppiced wild cherry.



Photograph 4 – T3 healthy lime sp., with no PRFs.



Photograph 5 – T4 healthy lime sp., with a single superficial PRF.



Photograph 6 – T4 callus roll PRF, inspected and deemed superficial.



Photograph 7 – T5 mature ash featuring dieback and deadwood, along with superficial knot hole.



Photograph 8 – T6 mature ash featuring minor dieback and deadwood.



Photograph 9 – Superficial knot hole on the eastern aspect of T6.



Photograph 10 – T7 mature ash featuring dieback and deadwood.



Photograph 11 – T8 mature ash featuring dieback and deadwood.



Photograph 12 – T9 mature ash featuring dieback and deadwood.



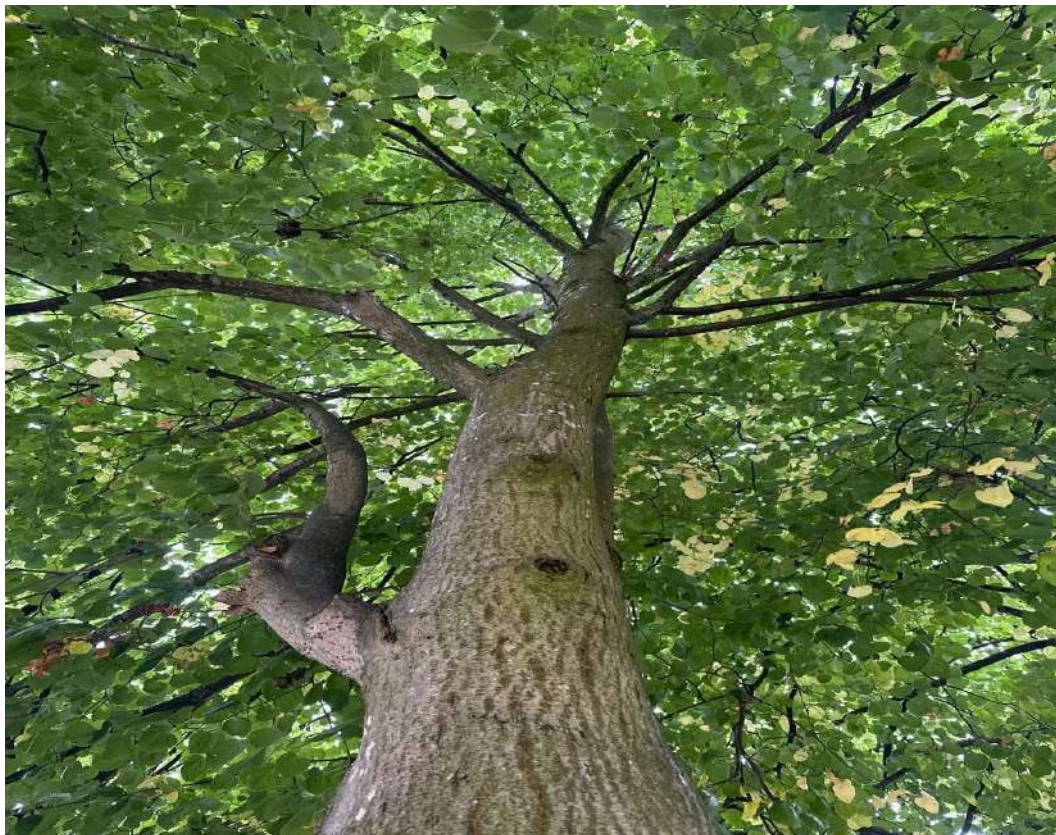
Photograph 13 – T10 mature ash featuring dieback and deadwood.



Photograph 14 – T11 mature ash featuring dieback and deadwood.



Photograph 15 – T12 mature ash featuring dieback and deadwood.



Photograph 16 – T13 early mature lime sp., with no PRFs.



Photograph 17 – T14 early mature lime sp., with no PRFs.



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 Amendment (EU exit) Regulations 2019 (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 2024 (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.

Birds

All wild birds, their nests and young are protected throughout England and Wales by the Wildlife & Countryside Act 1981 (as amended). It is illegal to kill, injure or take any wild bird, or damage or destroy the nest or eggs of breeding birds. The legislation applies to all bird species, common and rare.

In addition to the protection afforded to all wild birds, more vulnerable species listed on Schedule 1 of the Act receive enhanced protection when breeding. Schedule 1 species, including their dependent young, are protected from intentional or reckless disturbance whilst at or near the nest, in addition to the protection afforded the more common species.

The NERC Act offers further protection to the nests of some species that regularly re-use their nests, even when the nests are not in use.

The leading governmental and non-governmental conservation organisations in the UK have reviewed the population status of 244 UK bird species. "Birds of Conservation Concern 4: the Red List for Birds" is the most recent publication summarising their findings. Three lists, Red, Amber and Green, have been produced based on the most up-to-date evidence available and criteria include conservation status at global and European levels and, within the UK: historical decline, trends in population and range, rarity, localised distribution and international importance. These lists are a valuable resource when considering conservation priorities.

Planning policy

National Planning Guidance is issued in the form of the National Planning Policy Framework 2024 (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;

- 187.** 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 and incorporating features which support priority or threatened species such as swifts, bats, and hedgehogs;
 - 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.
- 192.** 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 biodiversity⁶⁸; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation⁶⁹; 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

- 193.** 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 reasons⁷⁰ 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.