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Client: Manchester Metropolitan University

Project: All Saints Gateway Development

Report: Protected Species: Reasonable Avoidance Measures Method Statement - Bats

QUALITY ASSURANCE

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1.0 INTRODUCTION

Greengage Environmental Ltd (Greengage) was commissioned by Manchester Metropolitan University (MMU) to produce a Protected Species: Reasonable Avoidance Measures Method Statement (PS:RAMMS) for bats, ahead of refurbishment works at the All Saints West (ASW) building, part of the All Saints Gateway development located on the MMU Oxford Road campus and hereafter referred to as 'the site'.

This PS:RAMMS for bats is required to address Planning Condition 11 of granted permission (Ref: 145084/FO/2026) which states that:

"*Prior to the commencement of any external refurbishment or extension of the All Saints Library Building hereby approved, a precautionary working measures and method statement for the protection of bats shall be submitted to and approved in writing by the Local Planning Authority. The development shall then proceed in accordance with the approved statement.*"

This method statement details the PS:RAMMS for bats to discharge Planning Condition 11.

1.1 SITE DESCRIPTION

The site covers an area of 0.16 hectares (ha) comprising of predominantly hardstanding in the form of the ASW building, a former library, and footpaths. Introduced shrubs are present to the front elevation (south side) of the ASW building.

The site is centred at National Grid Reference SJ 84193 97133, OS Co-ordinates 384193, 397133, on the south side of Manchester city centre. The surrounds are highly urbanised but in close proximity to a number of small green spaces including the adjacent All Saints Park and nearby Gartside Gardens (to the east) and Hulme Park (to the west).

The wider landscape includes large trunk roads, commercial premises and residential housing associated with Manchester suburbs.

1.2 SITE PROPOSALS

Proposals for the site are to complete the remaining works associated with the wider development, specifically the repair and refurbishment of the ASW building. It is understood that the building has been sealed in advance of works commencing. Adjacent (previously adjoined) buildings to the east of the ASW have since been demolished.

1.3 ECOLOGICAL CONTEXT

Ecological surveys comprising Preliminary Ecological Appraisal (PEA) and Preliminary Bat Roost Assessment (PRA) were carried out at the site by Tyler Grange during 2023 (Tyler Grange 'Ecology Report', ref. TG Report No. 13126_R02_ECG_CW, 13th February 2023) with updates captured during further site visits in 2025 (Tyler Grange 'Ecology Report', ref. TG Report No. 13126_R06b_MF, Rev B,

19th November 2025) and most recently in 2026 (Tyler Grange 'Ecology Report', ref. TG Report No. 13126_R09a _BP, Rev a, 3rd February 2026).

The earlier reports confirmed the presence of potential roost features, including holes in brickwork and gaps in windows leading directly into the interior of the building, of low value for crevice-dwelling bats, with no direct evidence of bats recorded externally. Given the structure of the building (i.e. with no roof void), the high temperatures likely to occur inside the features recorded and the urbanised location, it was considered that overall the site was of low suitability for summer roosting bats.

The building did not have any potential to support hibernating bats due to a lack of suitable features and the constant high temperatures of the space.

It was recommended that pre-construction checks of features with low bat roost suitability were carried out by a Suitably Qualified Ecologist (SQE) prior to works commencing and be present during works on the roof area to ensure the protection of bats.

No requirement for nocturnal bat emergence surveys was made due to the low value of the features, their location being too high so as to reduce visibility for robust survey effort to be applied and with consideration to Health and Safety regarding working on busy roads and night time working within this urban publicly accessible location.

1.4 LEGISLATION AFFORDED TO BATS

All UK bats and their roosts are protected by law. Since the first legislation was introduced in 1981, which gave strong legal protection to all bat species and their roosts in England, Scotland and Wales, additional legislation and amendments have been implemented throughout the UK.

Six of the 18 British species of bat have Biodiversity Action Plans (BAPs) assigned to them, which highlights the importance of specific habitats to individual species, details of the threats they face and measures to help reverse population declines.

The Wildlife & Countryside Act 1981 (WCA) (as amended) was the first legislation to provide protection for all bats and their roosts in England, Scotland and Wales (earlier legislation gave protection to horseshoe bats only.)

All eighteen British bat species are listed in Schedule 5 of the WCA, 1981 (as amended) and under Annexe IV of the Habitats Directive , 1992 as a European protected species. They are therefore fully protected under Section 9 of the 1981 Act and under Regulation 43 of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, which transposes the Habitats Directive into UK law. Consequently, it is an offence to:

- Deliberately capture, injure or kill a bat;
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats;
- Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time);
- Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat; and,
- Intentionally or recklessly obstruct access to a bat roost.

This legislation applies to all bat life stages.

1.5 COMPETENCIES

Jennie Caddick, who prepared this PS:RAMMS - Bats, is an Associate Ecologist, holds a BSc (Hons) in Ecology and full CIEEM membership. She has 20 years consultancy experience working for a varied client base, with a focus on complex schemes where requirement for consultation and bespoke surveying has been used and holds Natural England survey licences for bats (Class 2), great crested newt, water vole and white-clawed crayfish. In addition, she has also held mitigation licences for otter.

Mike Harris, who reviewed and approved this report, has a Bachelor's degree in Environmental Biology (BSc Hons), a Natural England Great Crested Newt Licence and Dormouse Licence, is a Chartered Environmentalist (CEnv) and Full member of CIEEM. Mike has over 25 years' experience in ecological surveying and has undertaken and managed numerous ecological surveys and assessments.

This report was prepared by Jennie Caddick, reviewed by Mike Harris and authorised by Mike Harris, who confirms that the report is in line with the following:

- Represents sound industry practice;
- Reports and recommends correctly, truthfully and objectively;
- Is appropriate given the local site conditions and scope of works proposed; and
- Avoids invalid, biased and exaggerated statements.

2.0 PROTECTED SPECIES: REASONABLE AVOIDANCE MEASURES METHOD STATEMENT (PS: RAMMS) FOR BATS

2.1 POTENTIAL ROOST FEATURES

The Tyler Grange Ecology Report, 2026 described the building as the three -storey portion of the vacant All Saints Library Building offering low suitability for roosting bats.

The BCT guidance1 describes 'low' suitability for roosting bats as *'A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).'*

The following potential roost features were identified on site:

- Weep holes present throughout the building's exterior forming gaps in the brick work;
- Gaps in the mortar on the west aspect;
- Metal barge board present on the 6th floor which forms a crevice between the wall and the board itself; and,
- A boarded section of window present on the western aspect of the room and adjacent to the board, a brickwork crevice was formed along the length of the boarded panel.

The above potential roost features were identified across the wider site by Tyler Grange. Only the weep holes apply to the All Saints Gateway development site and the planning permission associated with 145084/FO/2026.

All other features were recorded within the All Saints Library site, which was demolished under planning approval 143943/FO/2025. These features therefore no longer exist.

2.2 TIMING OF WORKS

In accordance with the Bat Mitigation Guidelines[2] and Tyler Grange reporting, potential roost features were categorised as being of low value with no suitability for hibernation, swarming or maternity roosting. Therefore, hibernating bats are not expected to be present on site and summer/transitional roosting bats can be excluded if present in small numbers or otherwise safely managed. Therefore there are no restrictions to the timing of works relating to the development.

This PS:RAMMS for bats is considered to cover the safe management of works and as such the works (refurbishment of the ASW building) are not restricted to any particular month and could be undertaken at any time of year.

It is, however, recommended that the works take place during daylight hours, so no artificial lighting is required and during calm and dry weather conditions to ensure in the unlikely event bats are found that they are not exposed to harsh weather conditions.

2.3 WORKING METHODS TO AVOID HARM TO BATS

Despite likely absence of roosting bats having been identified in relation to the ASW building there is a residual low risk of roosting bats using the building at the time of the works.

Working methods to avoid harm to bats occurring have been set out below. Through the adherence to the measures set out in this PS:RAMMS for bats, in the unlikely event that bats are found during the works, the chances of bats being harmed or disturbed should be significantly reduced.

Ecological Clerk of Works

A SQE and Level 2 bat licenced Ecological Clerk of Works (ECoW) will be appointed. The ECOW role is:

- To brief site operatives prior to works commencing through delivery of a 'Toolbox talk' (see Appendix A). The Toolbox talk will detail the key actions in relation to the PS:RAMMS for bats and legislation relating to the protection of bats and their roosts;
- To undertake a detailed inspection and endoscope survey (where accessible) of potential roost features immediately prior to works at these locations taking place;
- To be available to visit site and provide advice should any evidence of roosting bats be recorded by the development team during works including works around the weep holes and/or the flat roof;
- In the event a bat or evidence of roosting bats being identified during the detailed inspection and endoscope survey, to instruct the works be postponed until Natural England have been contacted for advice and it has been determined whether a protected species licence will be required;
- In the event a bat or evidence of roosting bats is identified at any time during the works, to record the type and location of the feature prior to it being carefully replaced, and to instruct the works be postponed until Natural England have been contacted for advice and it has been determined whether a protected species licence will be required;
- In the unlikely event that a bat is injured, to carefully capture the bat in gloved hands, place the bat in a draw-string cloth bag and/or transfer to an appropriate box. The ECoW will have the details of a local experienced individual who is a registered 'bat carer' and/or the BCT Helpline contact number available, to organise where the bat can be taken to be rehabilitated and released at an appropriate time in the same location.

The proposed PS:RAMMS for bats is considered to adequately avoid the risk of disturbing or harming bats.

2.4 COMPENSATORY ROOSTING OPPORTUNITIES

To provide alternative roosting opportunity, once the existing features associated with the ASW building are no longer available, it is recommended that one 2F Schwegler Bat Box (General Purpose) or similar (as agreed with an ecologist if an alternative is necessary, e.g. due to supply issues), see Figure 2.1 should be attached to a retained building in proximity of the site, or if this is not possible, a mature tree in close proximity of the site.

Any bat box should be placed approximately 5m up from the ground on a south, south-west or west elevation and away from artificial lighting, doors and windows. The ECoW can advise on specific appropriate locations whilst on site.

Figure 2.1 2F Schwegler Bat Box (General Purpose)



3.0 SUMMARY

Greengage was commissioned by MMU to produce a PS:RAMMS for bats, ahead of refurbishment works at the ASW building, part of the All Saints Gateway development, located on the MMU Oxford Road campus in order to address Planning Condition 11 relating to permission Ref: 143943/FO/2025.

Provided the following measures below are followed, the works will adequately avoid or reduce the risk of harming or disturbing bats:

- Works to the building should take place during daylight hours, so no artificial lighting is required, and during calm and dry weather conditions;
- A Toolbox talk by a SQE acting as Ecological Clerk of Works (ECoW) and outlining the requirements of the PS:RAMMS for bats is to be delivered to contractors;
- The ECoW will undertake a detailed inspection and endoscope survey (where accessible) of potential roost features immediately prior to works at these locations taking place
- A copy of the PS:RAMMS for bats should be kept on site;
- If in the event a bat is found during the works, works must cease immediately, the roosting feature should be gently replaced and the ECoW will contact Natural England for advice; and,
- Alternative roosting provision, in the form of a bat box is to be installed nearby post development.

APPENDIX A TOOLBOX TALK

Location: ASW Building,

This PS:RAMMS relates to the ASW building on the MMU Oxford Road campus at National Grid Reference SJ 84193 97133.

What?

- There are 18 (17 breeding) species of bat in the UK and their roosts are protected by law because so many bats are endangered (due to decline in the populations, in part, due to the loss of suitable roosting places). Both UK and European legislation (under Schedule 5 of the Wildlife & Countryside Act) gives bats complete protection. Bats tend to return to the same roosts each year, so these sites are also protected whether the bats are present or not.
- It is an offence to disturb, injure or kill bats or obstruct access to, damage or destroy a roost.
- The most common UK bat is the Pipistrelle (Common and Soprano). They measure only 40 mm long and weigh approximately 5 grams.

Plate A.1 Common and soprano pipistrelle bats in hand for size reference



Why?

The ASW building supports potential roost features as identified by Tyler Grange during earlier ecological surveys carried out during 2023 (Tyler Grange 'Ecology Report', ref. TG Report No. 13126_R02_ECG_CW, 13th February 2023) with updates captured during further site visits in 2025 (Tyler Grange 'Ecology Report', ref. TG Report No. 13126_R06b_MF, Rev B, 19th November 2025) and most recently in 2026 (Tyler Grange 'Ecology Report', ref. TG Report No. 13126_R09a _BP, Rev a, 3rd February 2026).

Identification

- Places where bats may be found include holes and cracks in walls of buildings, under roof and ridge tiles and soffit and fascia boarding.
- Smooth, stained areas may be found around the entrance to roosting sites look out for bat droppings – dark brown or black, about 4 to 8 millimetres (mm) in length. They look like mouse droppings but crumble easily, as they are made up of insect fragments.
- Bats can crawl into holes only 15 mm wide.

Ecological Clerk of Works

- The person delivering this Toolbox talk.
- They will undertake an external inspection, including an inspection of the features with an endoscope (where possible) immediately prior to works.
- If bats are encountered before or during any works the ECoW will advise that the works cease and are postponed and they will contact Natural England for advice.
- Injured bats should be immediately taken into care. They will be carefully captured by the ECoW (i.e. a licensed bat ecologist) with gloved hands, placed in a draw-string cloth bag and/or transferred to an appropriate box. The ECoW will have the details of a local experienced individual who is a registered 'bat carer' and/or the BCT Helpline contact number available, to organise where the ECoW will take the bat to be rehabilitated and released at an appropriate time in the same location.

Do's

- Ensure you have read and understood the legal protection for bats.
- Stop work if a bat or evidence of bats is found during works and immediately alert a ECoW who will advise on the next steps necessary.

Do Not's

- Undertake any work at potential roost feature or on the roof without the presence of the ECoW.
- Touch or handle any bat, should they be found during the works. Only licensed bat ecologists should handle bats.

Signing Sheet

Date	Forename	Surname	Company	Position	Signature

REFERENCES

[1] *Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London. ISBN-978-1-7395126-0-6.*
[2] *Reason, P.F. and Wray, S. (2023). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.1. Chartered Institute of Ecology and Environmental Management, Ampfield.*

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