

United Environmental Services Ltd

1 Booths Park,
Chelford Road,
Knutsford,
Cheshire
WA16 8QZ

www.ues.org.uk

enquiries@ues.org.uk

01565 757788



BAT PRESENCE / ABSENCE SURVEY

At

Land off Cropper Road

Blackpool

Lancashire

FY4 5LB

NGR: (SD) 334565 432442

Prepared for: Breck Homes Ltd. / Eden Land and Development, % 13

Darwin Court Blackpool

Written by: Amanda Beck, UES Assistant Ecologist

Approved by: Toby Hart, UES Managing Director

A handwritten signature in black ink, appearing to read 'Toby Hart', is positioned above the date and reference information.

Date: 20th August 2021

UES reference: UES03391/04



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 Building inspections	5
2.3 Emergence survey.....	6
2.4 Survey limitations.....	7
3 RESULTS.....	8
3.1 Habitat assessment	8
3.2 Building inspections	8
3.3 Activity summary.....	12
4 EVALUATION AND RECOMMENDATIONS	13
4.1 Evaluation of results.....	13
4.2 Mitigation and compensation measures	13
5 CONCLUSION.....	14
6 REFERENCES	15
APPENDICES.....	16
Appendix 1 – Site plan.....	16
Appendix 2 – Aerial photograph.....	17
Appendix 3 – Photographs	18
Appendix 4 – Results.....	19
Appendix 5 – Statutory and planning context.....	20



EXECUTIVE SUMMARY

A bat presence / absence survey was undertaken by United Environmental Services (UES) Ltd. at Land off Cropper Road, Blackpool on 3rd August 2021. This follows a bat scoping survey which found a number of buildings on site to have low potential for roosting bats.

The objective of the surveys was to establish whether or not bats are using the buildings 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 include the construction of 65 residential units with associated gardens, driveways and an access road. The development proposals also include the construction of four commercial units; one convenience store, one office / stores and two retail units with associated car parking and access roads.

Land off Cropper Road is situated in an area that provides moderate quality habitat for foraging and commuting bats. The local area to the north and west comprises coastal and floodplain grazing marsh with hedgerows and tree lines. These habitats will provide dark commuting corridors and foraging opportunities for bats. Habitats to the east and south deteriorate in quality as residential housing and commercial buildings dominate.

Following the bat scoping survey buildings 1 - 8, 10 – 11 and 14 - 17 were assessed as having negligible potential to support roosting bats and no further surveys were required. Buildings 9, 12 and 13 contained a number of potential roosting features that could be used by a low number of bats on an occasional basis, such as gaps in internal and exterior breeze blocks, holes in brickwork, gaps under exterior bargeboards and crevices where corrugated sheeting met. However, no evidence of bats, such as droppings or feeding remains were found during the initial external and internal building assessments. As such, Building 9, 12 and 13 were assessed as having low potential to support roosting bats.

Common pipistrelle *Pipistrellus pipistrellus* was the only species of bat recorded during the presence / absence survey. Bat activity was reasonably high although it predominantly comprised a low number of individual common pipistrelle foraging along the site boundaries and within the vicinity of the site.

No bats were found to be roosting within Buildings 9, 12 or 13 on site and all other buildings were assessed as having negligible potential to support roosting bats. Therefore, no further survey or mitigation work is required for the proposed development to proceed, with regards to roosting bats.

This report should be read in conjunction with appendices 1 to 5, 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 Amanda Beck Cert/He, DIP, Assistant Ecologist at UES. Amanda is licensed by Natural England to disturb all species of bats via the use of artificial light, under licence number 2018-38295-CLS-CLS (level 1). Other surveyors include:

- Emily Clark BSc PGdip ACIEEM, UES Senior Ecologist. Emily is licensed by Natural England to disturb, take and handle all species of bats under licence number 2019-39350-CLS-CLS (level 2).
- James Stubbs, UES student work placement.

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 2021 to conduct a site survey which include the following activities:

- Conduct an internal and external building inspections to look for field signs of bats
- Assess the suitability of the buildings for use by roosting bats
- Confirm bat presence or likely absence by conducting an emergence survey of the buildings (where necessary)
- 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 include the construction of 65 residential units with associated gardens, driveways and an access road. The development proposals also include the construction of four commercial units; one convenience store, one office / stores and two retail units with associated car parking and access roads.

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 5, 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 buildings on site were searched both externally and internally for bat presence and features associated with bat activity, as detailed in BCT guidance (Collins, 2016). This was conducted on 19th July by Emily Clark and Amanda Beck.

2.2.1 External inspection

The external inspections of the buildings 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 can be visible from the outside of a building. The following areas were searched:

- Roof and ridge tiles
- Window and door frames
- Window lintels
- Windowsills and panes
- Walls
- Gaps under and in woodwork facias
- Gaps/ crevices in stonework and mortar

2.2.2 Internal inspection

The internal inspections covered all of the accessible areas and roof spaces within the buildings.

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:

- Roof beams and junctions
- Gaps in stonework and mortar
- Window and door frames



- Crevices between stone walls and roof.
- Floor or other surfaces on which droppings could accumulate

2.3 Emergence survey

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.

Anabat Walkabout bat detectors were used during the survey. This allowed the observer to hear bat echolocation calls and see the sonograms in real time, aiding identification. All registrations were automatically recorded onto a memory card and time/date stamped. The device can record and display both zero crossing and full spectrum bat echolocation calls and has a built-in GPS and mapping system.

A Canon XA11 Professional Video Camera was used in conjunction with an infra-red LED illuminator to monitor part of the exterior of the buildings. Footage of the survey is recorded and reviewed post-survey. An Anabat Walkabout bat detector was placed next to the infra-red camera during the survey. This allowed the camera to record bat echolocation calls. All registrations were automatically recorded onto a memory card and time/date stamped. The device can record and display both zero crossing and full spectrum bat echolocation calls and has a built-in GPS and mapping system.

2.3.2 Weather conditions

Table 1 - Weather conditions and survey timings

DATE	SURVEY TYPE	TIMINGS	SUNSET/	TEMP.	WIND	RAIN	CLOUD COVER
03/08/21	Emergence (focussing on Buildings 9, 12 and 13)	20:49 – 22:36	21:06	18°C	Gentle breeze	Dry	10%



2.4 Survey limitations

Internal access could not be arranged to Buildings 8, 13 - 16 and as such internal inspections were not carried out. External inspections were undertaken and internal inspections of all other buildings were undertaken, therefore sufficient information was gathered to make a robust assessment as to the potential for the buildings to support roosting bats.



3 RESULTS

3.1 Habitat assessment

Land off Cropper Road is located on the outskirts of Blackpool, Lancashire, approximately 4km from the town centre. Habitats on site include numerous commercial buildings, hardstanding, improved grassland, poor semi-improved pasture, bare ground, tall ruderal, dense scrub, ephemeral short perennial, hedgerows and scattered trees. There is also a dry ditch located immediately adjacent to the north-western site boundary. The areas of dense scrub, tall ruderal, grassland and scattered trees on site, will provide some foraging and commuting opportunities for bats. However, the large areas of hardstanding and buildings offer limited potential for foraging and commuting bats. Furthermore, the eastern section of the site is well-lit with large floodlights, reducing the suitability of this area of the site for foraging and commuting bats.

The immediate surrounding area comprises pasture fields intersected with numerous ditches, which are mapped as priority habitat coastal and floodplain grazing marsh on the UK governments Multi Agency Geographic Information Centre (MAGIC) website. The periodically inundated pasture and ditches, containing standing brackish water, will provide a variety of invertebrates on which bats can forage. However, habitats to the east are of lower quality due to the presence of large residential and commercial areas, with well-lit roads.

In the wider surrounding area, habitats to the north and west are of lower quality due to the suburban areas of Blackpool, with numerous residential houses and well-lit busy roads. However, habitats to the east and south are more rural, with large areas of improved pasture fields intersected with drains, pockets of woodland and unlit roads.

3.2 Building inspections

3.2.1 External inspection

For the purposes of this report, the buildings have been numbered 1 – 17, a site plan of the buildings is included at Appendix 1. All buildings will be demolished under the current proposed plans. The majority of the buildings are detached but Buildings 9, 10 11 are connected and Buildings 12 and 13 are connected.

Building 1 is a wooden storage shed located immediately adjacent to the eastern site boundary (Photo 1), it is approximately 2m x 3m in size. The building has a pitched roof which is lined with bitumen roofing felt. The walls are constructed from wooden timber panels which have been painted. There are glass windows present on the western aspect of the building. Overall the shed is in excellent condition and tightly sealed.

Building 2 is an electricity control building, approximately 2m high, with an area of 4m². The building has a mono-pitched roof, clad with interlocking concrete tiles (Photo 2). A low number of gaps were noted on the eastern aspect of the building, where the end roof tiles have mortar missing, however these were fully inspected using a high-powered torch and no evidence of roosting bats was recorded. There are wooden barge boards present on all aspects of the building which are in poor condition, with gaps noted behind the barge boards (Photo 3). However, these were fully inspected using a high powered torch and no evidence of roosting bats was recorded. The walls are constructed from breeze blocks, which are generally in excellent condition, however a brick was noted to be missing on the northern aspect of the building, allowing access internally. There is one wooden door on the southern aspect of the



building which was tightly sealed. The building is located immediately adjacent to Cropper Road within the eastern section of the site. This area is extremely well lit with floodlights and street lighting, reducing the suitability of the building for roosting bats.

Buildings 3 and 4 are wooden summer houses which are currently on sale. Building 3 is similar to Building 1 in design and construction, but approximately 3m x 4m (Photo 4). Building 4 is a hexagon shaped shed constructed from wood with decorative bitumen felt roof tiles (Photo 5). The buildings are in excellent condition, with no suitable PRFs for bats. Furthermore, the buildings are located within the eastern section of the site and this area is extremely well lit with large floodlights, further reducing the suitability of the building for roosting bats.

Buildings 5, 6 and 7 are concrete garages and garden rooms which are currently on display (Photos 6, 7 and 8). The buildings are pre-fabricated and constructed from concrete which has been rendered. The roofs are pitched and constructed from corrugated metal sheeting. There are plastic barge boards present on all aspects of the buildings, all of which are tightly sealed. The two garage buildings have metal roller shutter doors, while the garden room has UPVC doors and windows. Overall, the buildings are in excellent condition with no PRFs noted. Furthermore, the buildings are located within the eastern section of the site and this area is extremely well lit with large floodlights, further reducing the suitability of the building for roosting bats.

Building 8 is similar to Buildings 6 and 7 in design and construction. The building is a garage constructed from concrete which has been rendered with pebble dash. There is a roller shutter door on the northern aspect of the building which is constructed from metal. The sides of the building are extremely cluttered due to the proximity of the surrounding buildings. The building is in excellent condition with no PRFs noted.

Buildings 9 and 10 are a row of interconnected buildings which are split into separate businesses. **Building 9** is constructed from a mixture of brick and breeze block and is located on the western aspect of Building 10. The building has a pitched roof, clad with corrugated metal sheets, which are in excellent condition (Photo 10). There is a wooden boxed soffit and wooden cladding on the western aspect of the building. The wooden cladding is in excellent condition and tightly sealed but there are gaps where the boxed soffit meets the wall and wooden cladding (Photo 11 and 12). The gaps were inspected with a high powered torch and endoscope, but due to the size and shape of the feature it could not be fully inspected. A small number of gaps were noted in the brickwork on the southern aspect of the building (Photo 13), but these were fully inspected with a high-powered torch and found to be superficial. Similarly, one gap was noted in the breeze block wall on the northern aspect of the building, where mortar was missing (Photo 14), but this gap was fully inspected using an endoscope and no evidence of roosting bats was recorded.

Building 10 is constructed from a mixture of brick and breeze block. The building has three pitched roofs, which are clad with corrugated metal sheeting (Photo 15). The most southern roof is constructed from plastic sheeting and metal poles, to form a polytunnel style roof (Photo 16). The walls on the western aspect are clad with wooden timber cladding (Photo 17), which is tightly sealed and in excellent condition. There is a single storey extension on the eastern aspect of the building. The extension has a mono-pitched roof which is clad with concrete, inter-locking tiles which are in excellent condition and tightly sealed. The walls of the building are in excellent condition with no PRFs noted. The eastern aspect of the building is extremely well-lit due to the presence of large floodlights within the adjacent car park, further reducing its suitability for use by roosting bats.



Building 11 is a garden centre, attached to the southern aspect of Building 10. The two roofs are constructed from plastic sheeting and metal poles, to form polytunnel style roofs (Photos 18 and 19). The eastern and western aspects have wooden timber walls, which are in excellent condition. The northern and southern aspects are constructed from metal poles and either glass or plastic. The building is in excellent condition with no PRFs noted.

Building 12 is a single storey horse stables located within the western section of the site. The building is currently used to house horses and as such, is subject to regular disturbance. The building is constructed from a timber frame with corrugated metal exteriors, see Photo 20 and 21. The roof is lined with a mixture of wooden cladding and corrugated asbestos sheets, some of which are slightly lifted. As such, there are small cavities between the wooden cladding and corrugated asbestos sheets. These gaps provide some roosting opportunities for bats, however the roosting potential of these features is limited due to their small size, the exposure to light and frequent disturbance. There is bitumen flashing present on the southern aspect of the building which is slightly lifted and will provide opportunities for a small number of bats to roost occasionally. Furthermore, there are wooden barge boards present on the western aspect of the building which are slightly lifted; these were fully inspected with a high powered torch and no evidence of roosting bats was recorded. The eastern aspect of the building is open fronted with large open doorways and windows, allowing access into the internal areas of the building (Photo 22).

Building 13 is a large barn constructed from corrugated metal sheeting with a corrugated metal roof (Photo 23). The roof is generally in good condition but there is asbestos flashing present on the northern and southern aspects of the building, which are slightly lifted and may provide occasional roosting opportunities for a small number of bats. There are wooden barge boards present on the western and eastern aspects of the building which are also lifted in places (Photo 24). Finally, there are small gaps where the corrugated metal sheet walls overlap; these were fully inspected and no evidence of roosting bats was identified. There are no windows in the building and the door is a large wooden sliding barn door, which is tightly sealed.

Buildings 14 and 15 are two metal steel storage containers (Photos 25 and 26). The buildings have flat roofs constructed from corrugated metal. Metal roller doors are present on the northern aspect of Building 14 and eastern aspect of Building 15. The buildings are in excellent condition and tightly sealed with no PRFs noted for bats.

Building 16 is a garage constructed from brick with a corrugated metal roof, which are in excellent condition (Photo 27). It has a roller shutter door which is constructed from metal. There are plastic barge boards present on all aspects of the building which are tightly sealed. The building is in excellent condition with no PRFs noted.

Building 17 is a small dog kennels constructed from a timber frame with wooden exteriors and housed four dogs at the time of the survey. The kennel is approximately 5m x 2m and approximately 3m high. On the eastern aspect of the building the wall is constructed from wood and metal wire with a metal door. The building is in poor condition but no PRFs were noted. Furthermore, the building is subjected to high levels of disturbance due to the presence of dogs, reducing its suitability for bats.

No bat droppings or other field signs of bats were found during the external building inspection.



3.2.2 Internal inspection

Buildings 1, 3 and 4 have a similar internal construction, with no loft void and the roofs are unlined. The internal walls and roofs are constructed from wood which are in excellent condition and tightly sealed. No internal PRFs were noted.

Building 2 has no loft void but the roof is constructed from a wooden timber frame, which is lined with bitumen roofing felt. The roofing felt is in poor condition and ripped in several places (Photo 28). The internal breeze block walls are generally in good condition but there is access into the building via a missing brick on the northern aspect. However, no evidence of roosting bats was recorded within the building and due to the height and location of the building it is considered to offer limited suitability to roosting bats.

Buildings 5, 6, 7 have a similar internal construction, with no loft void. The roofs are constructed from corrugated metal and the walls are plasterboard or breezeblock, which are in good condition. No internal PRFs were noted.

Building 9 is currently used as a kitchen to serve the café and, as such, is subjected to high levels of disturbance. There is no internal loft void present and the walls are in good condition. No internal PRFs were noted.

Building 10 has one enclosed loft space. The loft space is located within the northern pitched roof and is currently used for storage. The western section of the roof is a typical purlin rafter construction, with additional tie posts, creating a cluttered environment (Photo 29). The eastern section of the loft void is a queen post construction, constructed from a mixture of timber and steel beams. The only internal walls are located on the eastern and western aspects of the building. The walls are constructed from breeze blocks and a small number of gaps were noted where mortar was missing (Photo 30). These gaps were fully inspected and no evidence of roosting bats was recorded. A small number (5) of mouse droppings were recorded within the western section of the building, on the floor. Light ingress was noted at the eaves of the building but limited PRFs were noted within the loft and no evidence of roosting bats or nesting birds was recorded.

A wooden ceiling has been installed below the central pitch of the building, which has no loft hatch, see Photo 31. Therefore, this section of the building could not be fully inspected, but it is anticipated to be a similar to the northern and southern sections of the building. The internal walls of the building are exposed brick or clad with wood or plastic panelling, all of which is in excellent condition.

There is one partial loft present within the south-facing roof pitch. The area has been partially converted and is currently used for storage. The floor is boarded and the room is accessed via a staircase, allowing light into the eastern section of the room. The roof is constructed from unlined corrugated metal and is a trussed design, see Photo 32. The trusses are constructed from a mixture of wood and metal poles, as such the area is relatively cluttered. Breeze block walls are present at the eastern and western gable ends, but the eastern gable end is covered in a plastic sheet. No internal PRFs were noted but two cats were present and anecdotal evidence suggests they utilise the area to sleep, reducing the suitability of the area for roosting bats due to the predation threat.

There is no loft void present within the most southern roof of the building. The building is extremely well lit and the polytunnel style roof does not provide any suitable PRFs for bats.



Building 11 has no internal loft void and the building is extremely light due to the plastic and glass roof and walls. The polytunnel style roofs do not provide any suitable PRFs for bats and no internal PRFs were noted.

Building 12 has no loft void but internal walls are constructed from corrugated metal, some of which are lined with wooden boards, see Photo 33. As such, there are small cavities between the internal wooden boards and exterior corrugated metal walls. Additional internal PRFs were noted on the roof where the asbestos corrugated sheets overlap and between the wooden timber frame. However, the building is well lit and subject to high levels of disturbance, reducing its suitability for roosting bats.

Building 13 has no loft void and is currently used for the storage of arcade equipment. A full internal inspection of the building was not possible at the time of the survey due to safety concerns relating to ongoing activities inside the building. Sufficient information was gathered from the open entrance of the building, to make an adequate assessment of the building's potential to support roosting bats. The roof is a typical purlin rafter construction, constructed from steel beams. The majority of the roof is unlined and constructed from corrugated metal sheeting, but some sections have been lined with plastic boards, see Photo 34. As such, there may be small cavities between the corrugated metal roof and plastic boards. A number of skylights are present in the roof, allowing a large amount of light into the building. Furthermore, the building is well-lit with large LED linear pendent lights. The walls of the building are constructed from corrugated metal sheeting.

Buildings 14 and 15 – an internal inspection of Buildings 14 and 15 was not possible, but as they are metal storage containers, s internal PRFs are anticipated to be limited due to the construction design of the containers.

Building 17 is constructed from wooden timber frame and wooden boards. Internally the kennels is in a state of disrepair but no internal PRFs were noted. Furthermore, the building is subject to high levels of disturbance due to the dogs, further reducing its suitability for bats.

Buildings 8 and 16 were not inspected internally. However, the buildings are similar in design and construction to Buildings 6 and 7 and are therefore anticipated to be similar internally. Therefore, due to the design of the buildings, internal PRFs will be limited.

No bat droppings or other field signs of bat activity were observed during the internal inspections.

3.3 Activity summary

Table 2 – Bat activity summary

DATE	SURVEY TYPE	SPECIES	NOTES
03/08/21	Emergence	Common pipistrelle	A low number of foraging common pipistrelle were recorded throughout the survey. Bats were observed commuting and foraging along the trees lines on the northern and western site boundary.



4 EVALUATION AND RECOMMENDATIONS

4.1 Evaluation of results

The parcel land off Cropper Road provides limited foraging and roosting opportunities for roosting bats as large areas of the site are impacted by light pollution and comprise hardstanding car parks, although areas of tall ruderal, dense scrub and hedgerows provide some foraging and commuting habitat. The areas surrounding Land off Cropper Road, particularly to the north and west provide superior habitat for foraging bats due to the large areas of coastal and floodplain grazing marsh. However, habitats in the east are dominated by residential housing and commercial buildings with busy and well-lit roads.

Following the bat scoping survey buildings 1 - 8, 10 – 11 and 14 - 17 were assessed as having negligible potential to support roosting bats and no further surveys were required. Buildings 9, 12 and 13 were assessed as having low potential to support roosting bats. However, no bat field signs such as droppings, were found during the external building inspections or the internal building inspections which were undertaken where possible.

Only one bat species was recorded during the presence / absence survey: common pipistrelle. A low number of bats were frequently observed and recorded commuting and foraging along the tree lines in the north and south of the site, and along the conifer hedgerow. Bats were also noted foraging over adjacent offsite fields to the north.

No bats were recorded roosting in the buildings on site.

4.2 Mitigation and compensation measures

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



5 CONCLUSION

Land off Cropper Road is situated in an area that provides moderate quality habitat for foraging and commuting bats due to the nearby coastal and floodplain grazing marsh, in addition to hedgerows and lines of trees.

Buildings 9, 12 and 13 were assessed as having low potential for roosting bats due to the presence of small crevices such as cracks in the brickwork. No field signs of bats, such as droppings, were found during the external building inspections. Furthermore, no bats were recorded roosting in the buildings during the subsequent bat presence / absence survey. Bat activity during the survey was reasonably high, although was dominated by a low number (approximately three) of foraging common pipistrelle.

No bats were found to be using Buildings 9, 12 or 13 on site to roost and all other buildings on site were assessed as having negligible potential to support roosting bats. Therefore, no further survey, mitigation or compensation measures are required for the development to proceed, with regards to roosting bats.



6 REFERENCES

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

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

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

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

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






APPENDICES

Appendix 1 – Site plan



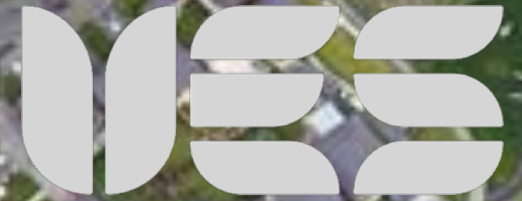
**Land off Cropper Road,
Blackpool**

Site Plan

-  Building with negligible potential
-  Building with low potential
- B1** Building numbers
-  Bat flight path




Appendix 2 – Aerial photograph



**Land off Cropper Road,
Blackpool**

Close aerial photograph

 Development boundary



**Land off Cropper Road,
Blackpool**

Wide aerial photograph

 Site location





Appendix 3 – Photographs



Photo 1 – Northern and western aspects of Building 1.



Photo 2 – Northern and western aspects of Building 2, which is located within the northern corner of the site.



Photo 3 – View of gaps in the wooden barge boards on the southern and eastern aspects of Building 2.



Photo 4 –Eastern aspect of Building 3.



Photo 5 – Southern aspect of Building 4.



Photo 6 – Southern and eastern aspects of Building 5.



Photo 7 – Southern aspects of Building 5, 6 and 7.



Photo 8 – Northern aspects of Building 5 and 6.



Photo 9 – Northern aspect of Building 8.



Photo 10 – Southern aspect of Building 9.



Photo 11 – Western aspect of Building 9, view of wooden boxed soffit and wooden cladding.



Photo 12 – Example gaps where the wooden boxed soffit meets the wall on Building 9.



Photo 13 – Southern aspect of Building 9, gaps in brickwork which were fully inspected and found to be superficial.



Photo 14 – Northern aspect of Building 9, with one gap recorded in where mortar is missing.



Photo 15 – Eastern aspect of Building 10.



Photo 16 – Eastern aspect of Building 10.



Photo 17 – Western aspect of Building 10.



Photo 18 – Eastern aspect of Building 11.



Photo 19 – Northern aspect of Building 11.



Photo 20 – Western aspect of Building 12.



Photo 21 – Southern aspect Building 12.



Photo 22 – Eastern aspect of Building 12, open fronted stables.



Photo 23 – Northern aspect of Building 13.



Photo 24 – Western aspect of Building 13.



Photo 25 – Building 14, located immediately adjacent to the western site boundary.



Photo 26 – Building 15, located immediately adjacent to the western site boundary.



Photo 27 – Northern aspect of Building 16.



Photo 28 – Internal view of Building 2.



Photo 29 – Internal view of the northern section of Building 10.



Photo 30 – View of gap where mortar is missing between breeze blocks on wall within the northern section of Building 10.



Photo 31 – Internal view of central section of Building 10.



Photo 32 – Internal view of southern section of Building 10.



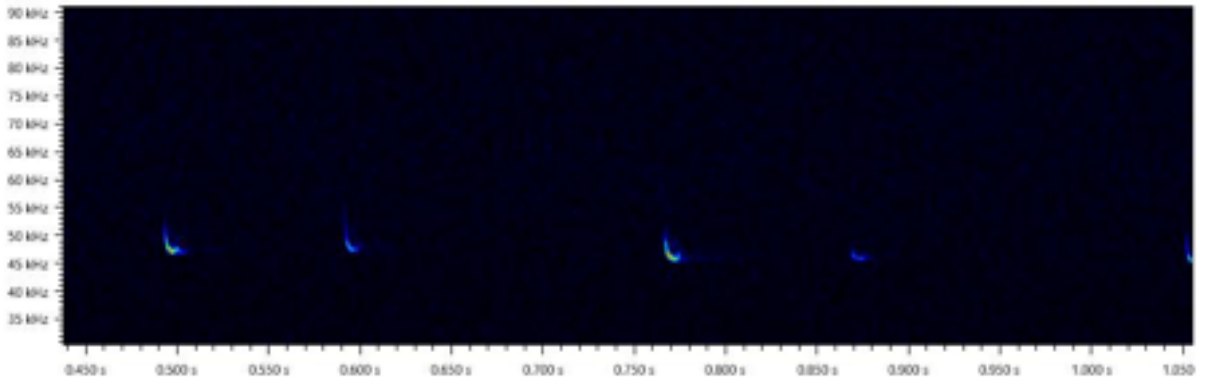
Photo 33 – Internal view of Building 12.



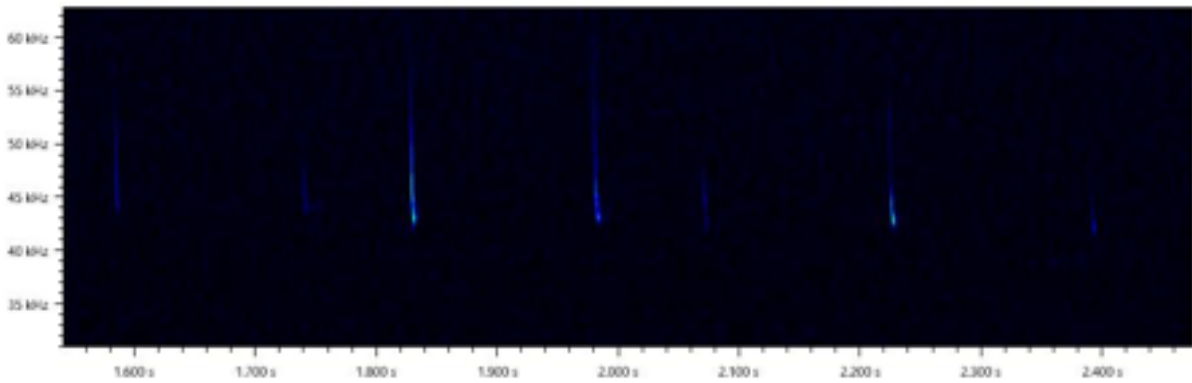
Photo 34 – Internal view of Building 13.



Appendix 4 – Results



Sonogram 1. Common pipistrelle bat observed foraging at 21:33 on the 3rd of August 2021.



Sonogram 2. Common pipistrelle bat heard but not seen at 22:14 on the 3rd of August 2021.



Appendix 5 – 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 biodiversity⁶¹; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation⁶²; 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 reasons⁶³ 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.