Preliminary Roost Assessment

Inglemere Metals LTD, 50-62 Cowley Road, Blackpool, FY4 4NE

Inglemere Metals LTD

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Industry Guidelines and Standards

This report has been written with due consideration to:

- Chartered Institute of Ecology and Environmental Management (2017). Guidelines for Preliminary Ecological Appraisal. 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.1. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2017). Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2020). Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- British Standard 42020 (2013). Biodiversity – Code of Practice for Planning and Development.
- British Standard 8683:2021 (2021). Process for Designing and Implementing Biodiversity Net Gain.

Proportionality

> The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation, and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary, and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate.
>
> This approach is enshrined in Government planning guidance, for example, paragraph 174 of the National Planning Policy Framework for England.
>
> The desk studies and field surveys undertaken to provide a Preliminary Ecological Appraisal (PEA) might in some cases be all that is necessary.
>
> (BS 42020, 2013)

Executive Summary

Arbtech Consulting Limited was instructed by Inglemere Metals LTD to undertake a Preliminary Roost Assessment (PRA) at Inglemere Metals LTD, 50-62 Cowley Road, Blackpool, FY4 4NE (hereafter referred to as "the site"). The survey was required to inform a planning application for the demolition of buildings 1 & 3, renovation, alterations, and replacement of the roof on building 2 and alterations to the façade of building 4 (hereafter referred to as "the proposed development").

The following is work you will need to commission to obtain planning permission and to comply with legislation. Further information, along with opportunities for biodiversity enhancement, are outlined in Table 4 of this report.

Feature	***Foreseen impacts***	***Recommendations*** *Measures required to adhere to guidance, legislation, and planning policies.*
Roosting bats: B1 has negligible to very low value for roosting bats due to a lack of potential roost features. The small section of absent hanging tiles on the dormer window offers a very small amount of suitable roosting habitat, though subject to levels of noise and light that make the building undesirable for roosting bats and there is a lack of suitable habitat in the immediate landscape to support foraging and commuting bats.	Bats are very unlikely to be roosting within this building, however, the proposed development will result in the demolition of this building. This could, if present, result in destruction of any bat roosts present and could cause disturbance, death, or injury to bats.	Owing to the nature of the proposed development and the low potential for impacts to bat roosts, further bat surveys are considered to be disproportionate. It is anticipated that any risk to bats can be reduced to an acceptably low level through the implementation of a precautionary working method during and post-development. This will include the following measures: • Ecological supervision of the potential roosting features (hanging tiles on building 1 only) will be required unless demolition works are scheduled during the winter months (November to March) when bats are least likely to be present. • An inspection of the potential roost features identified (hanging tiles) in this report will be undertaken prior to works commencing, if the proposed works are undertaken during the current roosting season. • A toolbox talk will be given to contractors to make them aware ofthe possible presence of bats on the site. • The potential roost features (hanging tiles) of the buildings to be demolished or altered will be removed by hand (where a risk still remains following the pre-commencement inspection) prior to any mechanical demolition. In the unlikely event that a bat or evidence of bats is discovered during thedevelopment all work must stop and a bat licensed ecologist contacted for further advice.
Nesting birds: The building (B3) contains evidence of nesting birds with an old bird's nest observed on the second storey.	The proposed development could result in the destruction or thedisturbance and subsequent abandonment of active bird nests, if such nests are identified as being present.	An inspection of building 3 should be undertaken by a suitably qualified person prior to works commencing. Alternatively, works can be undertaken outside the nesting bird period 1st March to 31st August. All active nests will need to be retained until theyoung have fledged.

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed by Inglemere Metals LTD to undertake a Preliminary Roost Assessment (PRA) at Inglemere Metals LTD, 50-62 Cowley Road, Blackpool, FY4 4NE (hereafter referred to as "the site"). The survey was required to inform a planning application for the demolition of buildings 1 & 3, renovation, and alterations to and replacement of the roof covering on building 2 and alterations to the façade of building 4 (hereafter referred to as "the proposed development"). A plan showing the proposed development is provided in Appendix 1.

The aim of the PRA was to determine the presence or evaluate the likelihood of the presence of roosting bats, and to gain an understanding of how bats could use the site for roosting, foraging, or commuting. This has been undertaken with due consideration to the "Bat Surveys for Professional Ecologists —Good Practice Guidelines" publication (Collins, 2016).

No previous ecology reports have been produced for this site by Arbtech Consulting Ltd or, to the author's knowledge, by any other consultancy.

1.2 Site Context

The site is located at National Grid Reference SD 32853 33974 and has an area of approximately 0.1ha comprising several buildings, areas of hard standing, machinery and scrap metal/ end of life vehicles. It is surrounded by large industrial units in every direction, with residential properties in the wider vicinity. The immediate surrounds are hard standing and buildings. The wider landscape has some limited scattered trees approx. 150m to the south/south-east and green spaces 800m to the south-east and the sea is located 2.3km west of the site. A site location plan is provided in Appendix 2.

1.3 Scope of the Report

This report provides a description of all features suitable for roosting, foraging and commuting bats and evaluates those features in the context of the site and wider environment. It further documents any physical evidence collected or recorded during the site survey that establishes the presence of roosting bats. It provides information on possible constraints to the proposed development as a result of bats and summarises the requirements for any further surveys to inform subsequent mitigation proposals, achieve planning or other statutory consent and to comply with wildlife legislation.

To achieve this, the following steps have been taken:

- A desk study has been carried out.
- A field survey has been undertaken, including an external survey and internal inspection of built structures where possible, to determine the presence or the suitability of any features which bats could use for roosting and to assess the suitability of the site's bat foraging and commuting habitat.
- An outline of potential impacts on any confirmed or unidentified roosts has been provided, based on the proposed development.
- Recommendations for further surveys and mitigation have been made, along with advice on the requirements for a European Protected Species Licence (EPSL) application if appropriate.
- Opportunities for the enhancement of the site for roosting, foraging and commuting bats have been set out.

2.0 Methodology

2.1 Desk Study

The desk study included a 2km radius review of statutory designated sites with bat qualifying interests and granted EPSL records for bats held on magic.gov.uk database. An assessment of the surrounding landscape structure was also completed using aerial images from Google Earth and OS maps.

2.2 Field Survey

The survey was undertaken by Katy Perry BSc (Hons) MCIEEM, Senior Consultant (Natural England Bat Licence Number: 2020-46965-CLS-CLS (Level 1) and Accredited Agent on Natural England Bat Licence Number: 2018-37888-CLS-CLS (Level 2)) on 10th May 2022.

The PRA focused on four built structures which will be affected by the proposed development as well as providing an overview of the wider site and the surrounding landscape for bat roosting, foraging and commuting habitat.

For any surveyed buildings:

A non-intrusive visual appraisal was undertaken of the buildings from the ground, using binoculars to inspect the external features of the buildings for features which bats could use for roosting, including access or egress points and for signs of bat use including droppings, scratch marks, insect remains and urine smear marks. An internal inspection of the buildings was also made, including the living areas and any accessible roof spaces, using a torch and ladders. The surveyor paid particular attention to the floor and flat surfaces, window frames, lintels above doors and windows, and carried out a detailed search of numerous features within the roof space. An endoscope was used to complete a close-up inspection of any accessible features, where appropriate.

2.3 Breeding Birds and Other Incidental Observations

The surveyor also made note of any other ecological constraints observed during the survey, notably the likelihood of presence or signs of breeding birds, and the suitability of the site for barn owls *Tyto alba*.

2.4 Suitability Assessment

Built structures were categorised according to the likelihood of bats being present and the types of roost that the identified features could support. This is summarised in Table 1 for buildings below. Roost suitability is classified as high, moderate, low, and negligible and dictates any further surveys required before works can proceed.

Table 1: Features of a building that are correlated with use by bats

Classification	***Feature of building and its context***
Moderate to high	Buildings or structures with features of particular significance for larger numbers of roosting bats e.g., mines, caves, tunnels, icehouses, and cellars. Habitat on site and surrounding landscape of high quality for foraging bats e.g., broadleaved woodland, tree-lined watercourses, and grazed parkland. Site is connected with the wider landscape by strong linear features that would be used by commuting bats e.g., river and or stream valleys and hedgerows. Site is proximate to known or likely roosts (based on historical data). Buildings with high suitability could support roosts of high conservation value such as maternity or hibernation roosts.
Low	A small number of possible roost sites or features, used sporadically by individual or small numbers of bats. Potential roost features may be suboptimal for reasons such as shallow depth, poor thermal qualities, or upwards orientation with exposure to inclement weather or predators. Habitat suitable for foraging in close proximity, but isolated in the landscape. Or an isolated site not connected by prominent linear features. Few features suitable for roosting, minor foraging, or commuting.
Negligible	Unsuitable for use by bats.

2.5 Limitations

It should be noted that whilst every effort has been made to describe the features on site in the context of their suitability for roosting bats, this does not provide a complete characterisation of the site. This survey provides a preliminary view of the likelihood of bats being present. This is based on suitability of the habitats on site and in the local area, the ecology and biology of bats as currently understood, and the known distribution of bats as recovered during the desk study. Bats are highly mobile creatures that switch roosts regularly and therefore the usage of a site by bats can change over a relatively short period of time.

A biological records data search has not been undertaken. However, given the location of the site, the nature of the habitats present and the assessed suitability of the site for protected or notable species, it is not anticipated that the purchase of biological records data will add any significant weight or alter the conclusions and recommendations outlined in this report.

The rear of the buildings was not assessed externally due to the proximity of other buildings in the immediate landscape.

These limitations have been taken into account during the evaluation of the site and requirement for further surveys and mitigation.

3.0 Results and Evaluation

3.1 Desk Study Results

A summary of desk study results is provided below.

3.2 Designated Sites

Details of any statutory designated sites with bat qualifying interests within a 2km radius of the site, including their reasons for notification, are provided in Table 2 below

Table 2: Statutory designated sites with bat qualifying interests within 2km radius of the site

Designated site name	***Distance from site (approx.)***	***Reasons for notification from Natural England***
Marton Mere Local Nature Reserve (LNR)	1.5km north-east	This is one of two natural lakes in Lancashire. Habitats include open water, reedbeds, grassland and small pockets of woodland and scrub. The site has a range of birds with many migrants in spring. Birds include water rail, long-eared owls, terns, little gulls, waders, and warblers. Bitterns occur here and whimbrel, marsh harrier and osprey occur here occasionally. The reserve is also good for plants including orchids and invertebrates such as butterflies, moths, and dragonflies. Other animals include bats. As a large waterbody, it will provide abundant insects for foraging bats.
Marton Mere, Blackpool Site of Special Scientific Interest (SSSI)	1.5km north-east	Marton Mere is a freshwater lake situated some two miles to the east of the centre of Blackpool. The Mere is believed to occupy a kettle-hole, formed during the last glaciation over 14,000 years ago, and is thus one of only two remaining water bodies in Lancashire of natural origin, the other being Hawes Water at Silverdale which is also a SSSI. The open water and fringing habitats of Marton Mere support a wide range of waterfowl and wetland birds. As a large waterbody, it will provide abundant insects for foraging bats.

3.3 Landscape

A review of aerial photographs (Google Earth) the magic.gov.uk database and OS maps has been undertaken. Collated together, the value of the landscape for bats is described below:

The site is present within a heavily industrialised area to the south of Blackpool. In the wider landscape there are residential properties surrounding the residential area. Over 2.3km west is the sea and over 800m south-east are tree lined roads and green spaces which could be used by bats for roosting, foraging, and commuting. Large bodies of water in the wider landscape will provide abundant insect foraging for bats.

3.4 Historical Records

A search of the magic.gov.uk database for granted EPSLs within a 2km radius of the site has been completed. No EPSL records for bats have been returned within 2km of the site.

3.5 Field Survey Results

The PRA focused on four built structures which will be affected by the proposed development as well as providing an overview of the wider site and the surrounding landscape for bat roosting, foraging and commuting habitat. The results of the field survey are illustrated in Appendix 3. The weather conditions recorded at the time of the survey are shown in Table 3.

Table 3: Weather conditions during the survey

Date: 10/05/2022	
Temperature	16°C
Humidity	63%
Cloud Cover	70%
Wind	0-5mph
Rain	None

Building B1 Exterior

B1 – south-eastern elevations (pictured opposite).
B1 is a detached two-storey brick-built building which is present within an industrial estate. The brickwork of the building is in good condition with no missing mortar.

The windows of the building are UPVC and in relatively good condition on the front of the property with no gaps or means of ingress around the frames. The soffit and fascia are also UPVC and in good condition with no gaps or spaces between the brickwork and the plastic.

The door is wooden but secure allowing no ingress into the building.

The roof tiles are clay and are in very good condition, there are two broken tiles, but there are no gaps or any spaces that would allow ingress underneath the tiles.

The building is currently vacant and empty throughout, which means the light from adjacent units' spills into the uncovered windows throughout the building.

Building B1 Exterior B1 – south-eastern and south-western elevations (pictured opposite). The gable end of the property is in very good condition with no gaps in the brickwork and a secure UPVC soffit and fascia. The tiles are in good condition with no gaps underneath that would allow ingress into the building. The windows on these elevations are secure and in good condition with no gaps around the frames that would allow ingress.	
Building B1 Exterior B1 – north-eastern elevation (pictured opposite). The north-eastern gable end is also in good condition. The main roof of the building is in great condition with no slipped or missing tiles. There are three flat roofs present on the building, which are observed within this image. There is a dormer window present on the rear of the property, an extension on the north-easternelevation and another extension present on the north-western elevation. The flat roofs are bitumen felt and are in good condition, lying flush to the building with no gaps present. The bargeboards around the extensions are in good condition offering no suitable habitat for crevice dwelling bats.	

Building B1 Exterior B1 – northern elevation (pictured opposite). The rear of the property has the tree flat roofs visible on the dormer window and two extensions. These roofs are in good condition. The brickwork on the rear of the property is also in good condition. The windows on this elevation are in poor condition with some stuck open and some smashed. This could allow animals entry into the building. The vacant nature of the property, there are no curtains or blinds and therefore surrounding light enters the building freely and inclement weather would enter through the windows also.	
Building B1 Exterior B1 –northern elevation (pictured opposite). The dormer window has hanging tiles present on the front and sides. The tiles that are present are in very good condition and lie flush to each other. However, below the window which is open, there have been hanging tiles absent and there is a large, exposed section of the dormer. This could allow crevice dwelling bats to utilise the gaps under the exposed tiles, but this property is exposed to large levels of potential disturbance daily with noise, vibrations, and light. The immediate surroundings also lack suitable foraging habitat which would entice bats into this industrial estate.	

Building B1 Exterior B1 – north-western elevation (pictured opposite). Underneath the north-western extension of the property, there is an overhanging, open and exposed section where materials and debris have accumulated. The open nature exposes this section to inclement weather, noise, and high light levels. The nature of the ceiling and space lacks any suitable roosting features for crevice dwelling bats.	
Building B1 Interior B1 – loft space (pictured opposite). There is only one loft space within the building due to the three flat roofs, extensions, and dormer window present. The loft space in the main building has been converted into a liveable space and has a vaulted ceiling present. There is no 'loft space' present within the building as such and the space is illuminated by the windows present in the loft space. The internal loft space is plaster-boarded and plastered, with no evident gaps between the boards. The brickwork on the gable ends is in excellent condition with no missing mortar or gaps present which would allow ingress. There were low numbers of cobwebs present within the space which could indicate a lack of internal activity from void-dwelling bats such as brown long-eared. Rat droppings were observed within the loft space.	

Building B1 Interior

B1 – second storey (pictured opposite).

This image shows the high levels of light that enter the building due to the uncovered windows present on every elevation of the property.

Being present within an industrial estate and adjacent to a scrap metal yard, the property will be subject to high levels of light and potential noise.

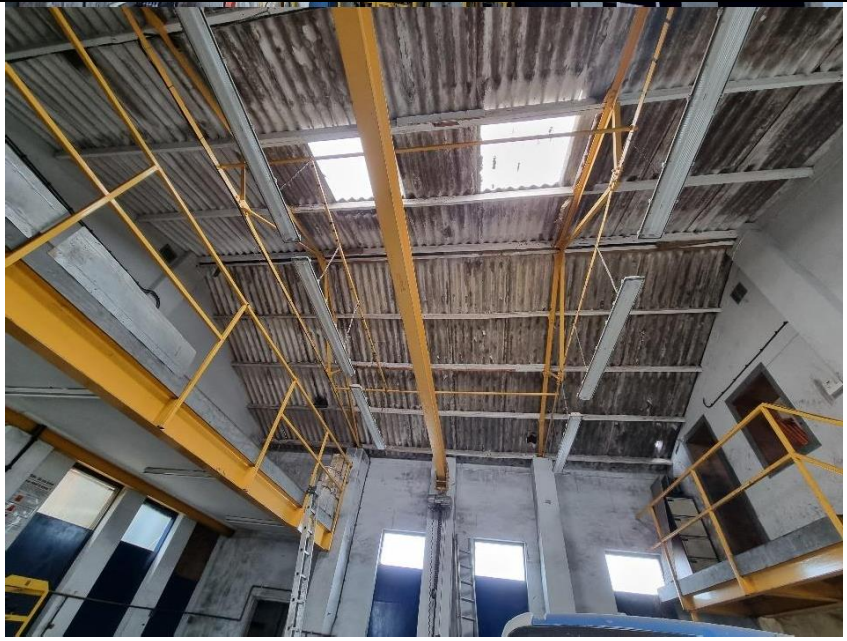
B1 Evidence of bats

No evidence of bats was observed internally or externally, though external evidence can be subject to weathering. There were no droppings or feeding remains observed within the property on any of the elevations.

B1 Breeding birds and other incidental observations

There was no evidence of nesting birds located internally or externally on the survey building, despite the open windows present on the northern elevation.

Building B2 Exterior B2 – south-eastern elevation (pictured opposite). Building 2 is a one and a half storey working building on the industrial unit which houses machinery for the depollution (dismantling) of vehicles. The front of the building has pebbledash rendering, which is in relatively good condition, butthere is a section missing around the window to the east. This missing rendering has not createda gap or lifted space underneath and the remaining rendering is still flush to the building, the pointing in mortar joints below remains in-tact also, preventcrevice dwelling bats from roosting behind. The windows are in good condition with no cracks or gaps around the frames allowing ingress or any crevices suitable for roosting bats. The shutter door is also secure.	
Building B2 Exterior B2 – north-eastern elevation (pictured opposite). The rendering of the brickwork continues around the property and appears to be in good condition on the gable end of the property. The windows on this elevation are also in good condition with no means of ingress. The roof is asbestos cement sheeting with clear plastic inserts within. The sheeting is in good condition and there are no gaps or lifted sections that would be suitable for roosting bats.	

Building B2 Interior B2 – Roof of the building (pictured opposite). The open doorway in the shutter had allowed for the ingress of two pigeons, seen in the image opposite on the metal beams. The metal beams are secure and lack any voids in the way timber beams often have and therefore there is a lack of suitable internal crevices for bats. The roof has no lining or membrane present on the rear and the ceiling is vaulted. The openness of the building would be unsuitable for void-dwelling bats due to the exposure to varied temperatures and the lack of a more suitable microclimate often observed in loft spaces. The clear inserts within the roof also allow large levels of light to enter the building.	
Building B2 Interior B2 – Interior (pictured opposite). The interior of B2 houses machinery for the business. There are larger levels of light from the numerous windows present on the elevations and the clear inserts within the roof. The brickwork of the elevations that were not visible from outside appear to be in very good condition within, with no gaps or cracks present at all. This building connects internally to building three via the steps and door present on the left-hand side of the image.	

B2 Evidence of bats

No evidence of bats was observed internally or externally, though external evidence can be subject to weathering. There were no droppings or feeding remains observed within the property on any of the elevations. The building lacks suitable roosting features to support roosting bats.

B2 Breeding birds and other incidental observations

There was no evidence of nesting birds located internally or externally on the survey building, however, two pigeons were observed present within the building during the survey.

Building B3 Exterior

B3 – south-eastern elevation (pictured opposite).

B3 is immediately adjacent to B2 on the north-eastern side of B2. It has a sloped roof, not a pitched roof like B2 and is connected internally on the second storey as shown above. The roof is asbestos cement sheeting like B2.

The brickwork is rendered on the ground floor and exposed brickwork on the second storey. The brickwork on both storeys is in good condition with no cracks or gaps.

On the ground floor, there is an open doorway, which is permanently open to a small section of the building (shown in the picture below), which is exposed to noise and light.

Building B3 Interior B3 – north-eastern interior (pictured opposite). On the ground floor, there is an open section which is used for storage. The walls within are in very good condition with no missing mortar between the brickwork. The ceiling of the space is smooth and with one metal beam, the space lacks any suitable crevices for roosting bats and any enclosed areas that would be suitable for void-dwelling bats. The space is exposed to high levels of light. The stored items within were searched for evidence of bats such as droppings and feeding remains as these can accumulate on surfaces. However, no evidence of bats was observed.	
Building B3 Interior B3 – interior – second storey (pictured opposite). The second storey is connected to B2 through steps and a doorway access. The interior of B3 has a sloped roof, with a boarded suspended ceiling within. The space has some stored items which were searched for evidence of bats, but no droppings or feeding remains were observed within the building. Large amounts of light enter through the windows of the building.	

Building B3 Interior

B3 – Interior (pictured opposite).

A small section of the roof had been torn down to do asbestos testing of the roof.

Though this allows entry into a small space of the roof, there are clear panels in the roof which illuminate the space within the roof.

Due to the internal access between B2 and B3, there was historical evidence of nesting birds within B3 withan old nest at top of a set of ladders in the building.

B3 Evidence of bats

No evidence of bats was observed internally or externally, though external evidence can be subject to weathering. There were no droppings or feeding remains observed within the property on any of the elevations. The building lacks suitable roosting features to support roosting bats.

B3 Breeding birds and other incidental observations

There was an old nest observed within the building, but no current nesting activity or birds observed within the building.

Building B4 Exterior and Interior

B4 – south-eastern elevation (pictured opposite).

B4 is a large metal corrugated structure with a fully open frontage and partially open side. The metal roof has clear plastic inserts and metal beams for the structure.

This is exposed to high levels of light and inclement weather, with temperature fluctuations which make this structure unsuitable for roosting bats.

B4 Evidence of bats

No evidence of bats was observed internally or externally, though external evidence can be subject to weathering. There were no droppings or feeding remains observed within the property on any of the elevations. The building lacks suitable roosting features to support roosting bats.

B4 Breeding birds and other incidental observations

There was no evidence of nesting birds located internally or externally on the survey building.

Foraging and Commuting Habitat

The immediate landscape lacks suitable foraging and commuting habitat. There are large industrial units, commercial buildings which are well illuminated by both natural and artificial lighting sources and lack suitable vegetation, connectivity and any waterbodies that could provide insects for foraging. The wider landscape contains much more suitable habitat to support bat populations.

4.0 Conclusions, Impacts and Recommendations

4.1 Informative Guidelines

A summary of the relevant legislation and planning policies is provided in Appendix 4.

Bats

Bats are protected under the Wildlife and Countryside Act and the Conservation of Habitats and Species Regulations 2017 (amended by the Conservation of Habitats and Species Regulations (amendment) (EU Exit) Regulations 2019).

There are three possible outcomes of this survey, each with specific recommendations. These are outlined below:

Confirmed bat roost

Best practice survey guidelines (Collins, 2016) recommend additional surveys for confirmed roosts. Three further surveys are required to characterise the bat roost present including species, roost type and access points to inform an EPSL application to Natural England. Surveys must be completed during the active bat season (May – September). At least two of the surveys should be completed during the optimal survey period mid-May to August, and at least on the surveys should be a dawn re-entry survey.

Low, moderate, or high likelihood of a bat roost present

Best practice survey guidelines (Collins, 2016) recommend additional surveys for features assessed as having low to high suitability for roosting bats. One, two or three further surveys are required to confirm presence or likely absence of a bat roost, based on a low, medium, or high roost likelihood evaluation. Surveys must be completed during the active bat season (May – September). If more than one survey is recommended, at least one of them should be completed during the optimal survey period mid-May to August, and at least one the surveys should be a dawn re-entry survey. If two or one further survey is recommended these surveys must be completed during the optimal survey period (mid-May to August). For low and moderate roost likelihood evaluation the survey effort recommended at this stage is iterative and if bats roosts are confirmed in the building, a further survey will be required to provide sufficient information to inform an EPSL application to Natural England.

Negligible likelihood of a bat roost present

Buildings assessed as comprising negligible suitability for roosting bats do not normally require further surveys. However, if bats are found during any stage of the development, work should stop immediately, and a suitably qualified ecologist should be contacted for further advice.

Birds

Legislation protects all wild birds whilst they are breeding, and prohibits the killing, injuring, or taking of any wild bird or their nests and eggs. Certain species of bird, including the barn owl, are subject to special provisions; it is an offence to disturb any bird or their young during the breeding season.

4.2 Evaluation

Taking the desk study and field survey results into account, Table 4 presents an evaluation of the value of the site for bats and also details any other ecological constraints identified such as nesting birds in relation to the proposed development which will comprise the demolition of buildings 1 & 3, renovation, and replacement of the roof on building 2 and alterations to the façade of building 4.

Table 4: Evaluation of the site for bats and any other ecological constraints

Feature	***Survey conclusions (with justification)***	***Foreseen impacts***	***Recommendations*** *Measures required to adhere to guidance, legislation, and planning policies.*	***Biodiversity Enhancements*** *The Local Planning Authority has a duty to ask forenhancements under the NPPF (2021)*
Roosting bats (B2, B3 and B4)	B2, B3 and B4 have negligible value for roosting bats due to a lack ofpotential roost features.	Bats are very unlikely to be roosting within these buildings and as such, there are not anticipated to be any impacts on bats in this location as a result of the proposed development.	In the unlikely event that a bat or evidence of bats is discovered during the development, all work must stop, and a bat licensed ecologist contacted for furtheradvice.	The installation of two bat boxes on retained buildings will provide additional roosting habitat for bats e.g. Beaumaris Bat Box (buildings) Vivara Pro Woodstone Bat Box (buildings) Or a similar alternative brand. Bat boxes should be positioned 3-5m above ground level facing in a south or south-westerly direction with a clear flight path to and from the entrance, away from artificial light.

Roosting bats (B1)	B1 has negligible to very low valuefor roosting bats due to a lack of potential roost features. The small section of absent hanging tiles on the dormer window offers a very small amount of suitable roosting habitat, though subject to levels of noise and light that make the building undesirable for roosting bats and there is a lack of suitable habitat in the immediate landscape to support foraging and commuting bats.	Bats are very unlikely to be roosting within this building, however, the proposed development will result in the demolition of this building. This could, if present, result in destruction of any bat roosts present and could cause disturbance, death, or injury to bats.	Owing to the nature of the proposed development and the low potential for impacts to bat roosts, further bat surveys are considered to be disproportionate. It is anticipated that any risk to bats can be reduced to an acceptably low level through the implementation of a precautionary working method during and post-development. This will include the following measures: • Ecological supervision of the potential roosting features (hanging tiles on building 1 only) will be required unless demolition works are scheduled during the winter months (November toMarch) when bats are least likely to be present. • An inspection of the potential roost features identified (hanging tiles) in this report will be undertaken prior to works commencing, if the proposed works are undertaken during the current roosting season. • A toolbox talk will be given to contractors to make them aware ofthe possible presence of bats on the site. • The potential roost features (hanging tiles) of the buildings to be demolished or altered will be removed by hand (where a risk still remains following the pre-commencement inspection) prior to any mechanical demolition. In the unlikely event that a bat or evidence of bats is discovered during thedevelopment all work must stop and a bat licensed ecologist contacted for further advice.	The installation of two bat boxes on retained buildings, as noted above, will provide additional roosting habitat for bats.

Foraging and commuting bats	There are no habitats on the site which could be used by bats for foraging or commuting.	The proposed development will not result in the removal of any habitats which could be used by foraging or commuting bats.	None.	None.
Nesting birds (B1, B2 and B4)	The building or tree offers no opportunities for nesting birds.	None.	None.	None.
Nesting birds (B3)	The building contains historical evidence of nesting birds with an old bird's nest observed in the secondstorey.	The proposed development could result in the destruction or the disturbance and subsequent abandonment of active bird nests.	An inspection of building 3 should be undertaken by a suitably qualified person prior to works commencing. Alternatively, works can be undertaken outside the nesting bird period 1st March to 31st August. All active nests will need to be retained until theyoung have fledged.	The installation of two bird boxes on retained buildings will provide additional nesting habitat for birds e.g. Schwegler No 17 Swift Nest Box (buildings) Schwegler 1SP Sparrow Terrace (buildings) Or a similar alternative brand. Swift and sparrow boxes should be positioned at the eaves of a building ideally at the highest point of the building.
Other ecological constraints	None identified.	N/A	N/A	N/A

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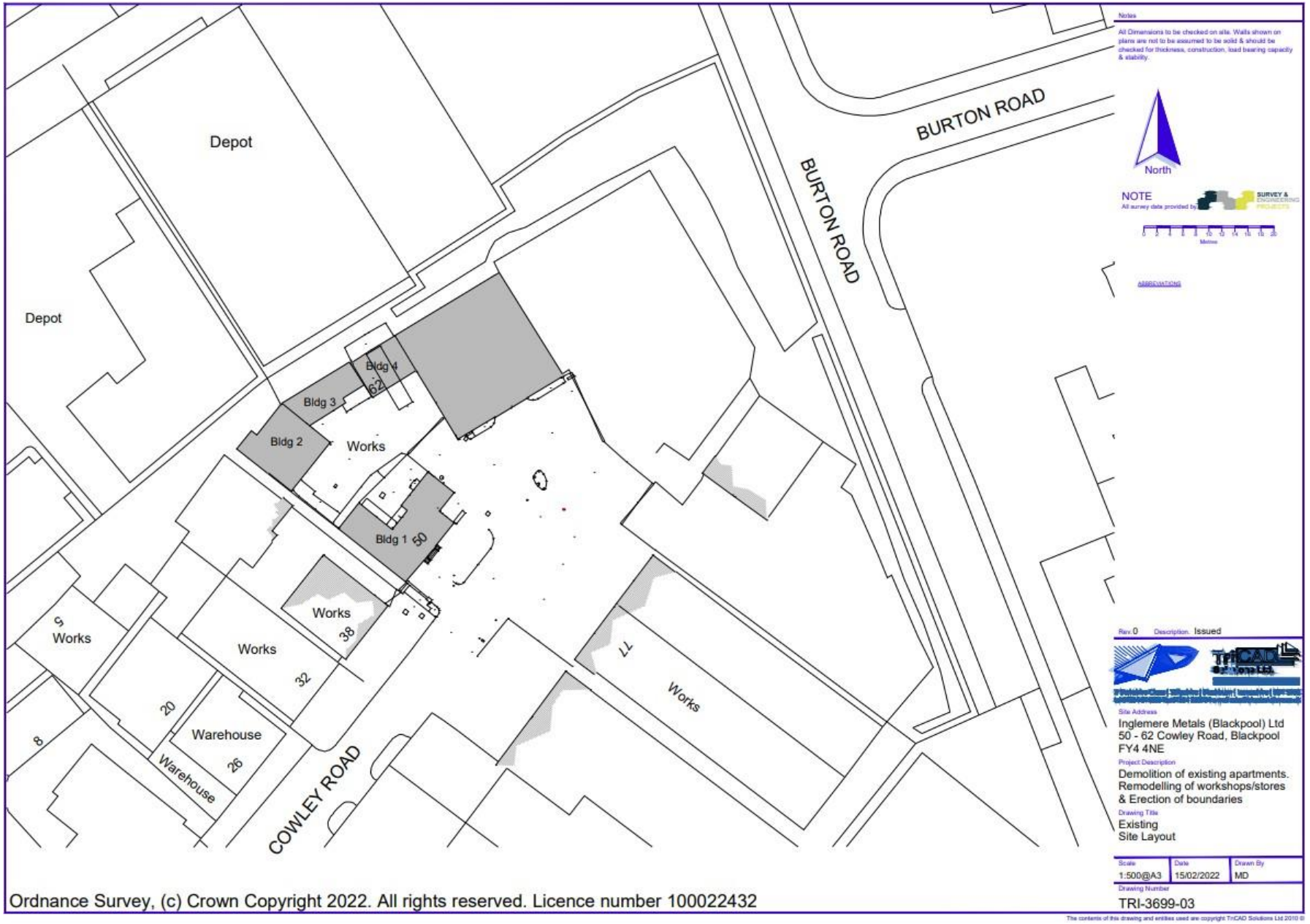
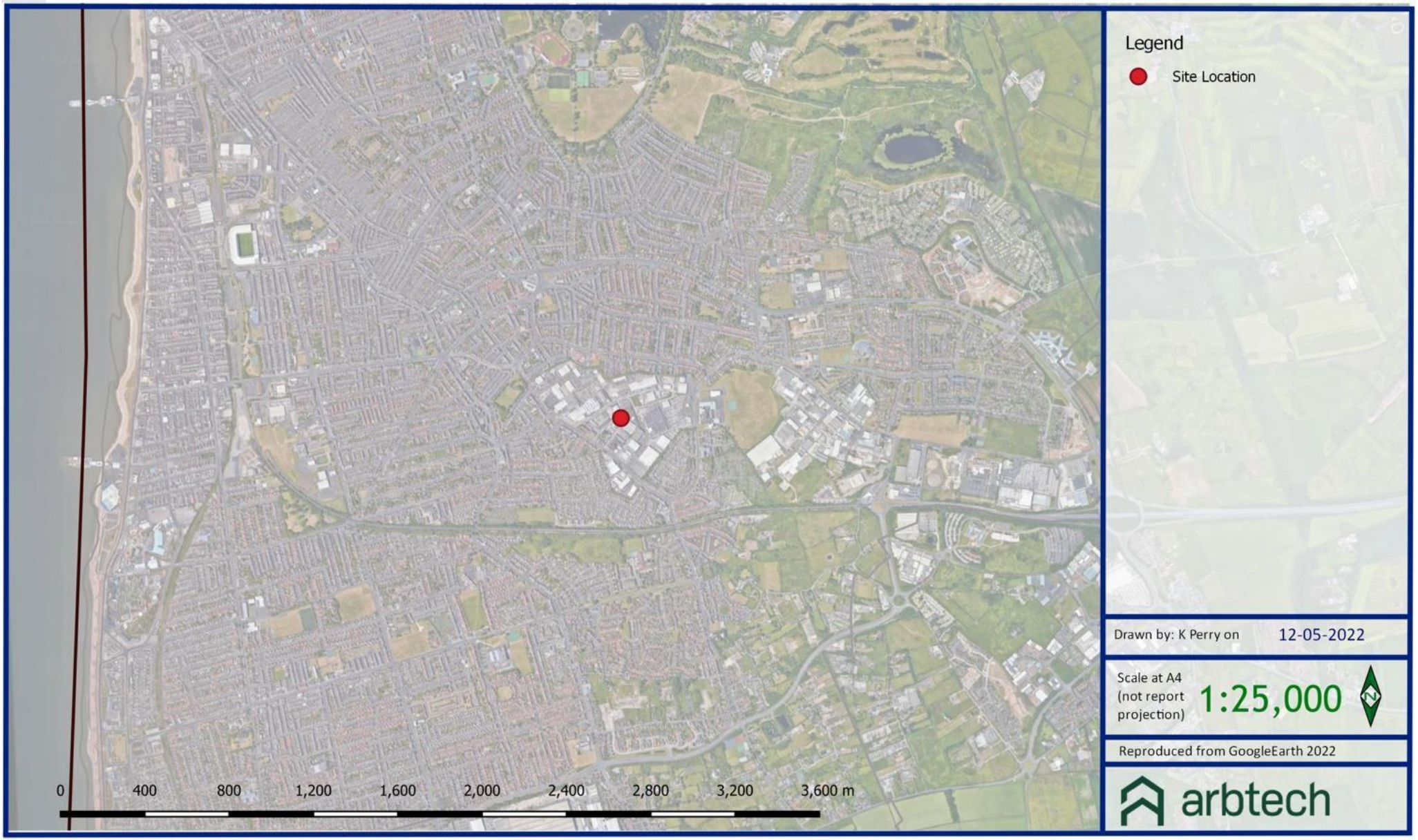
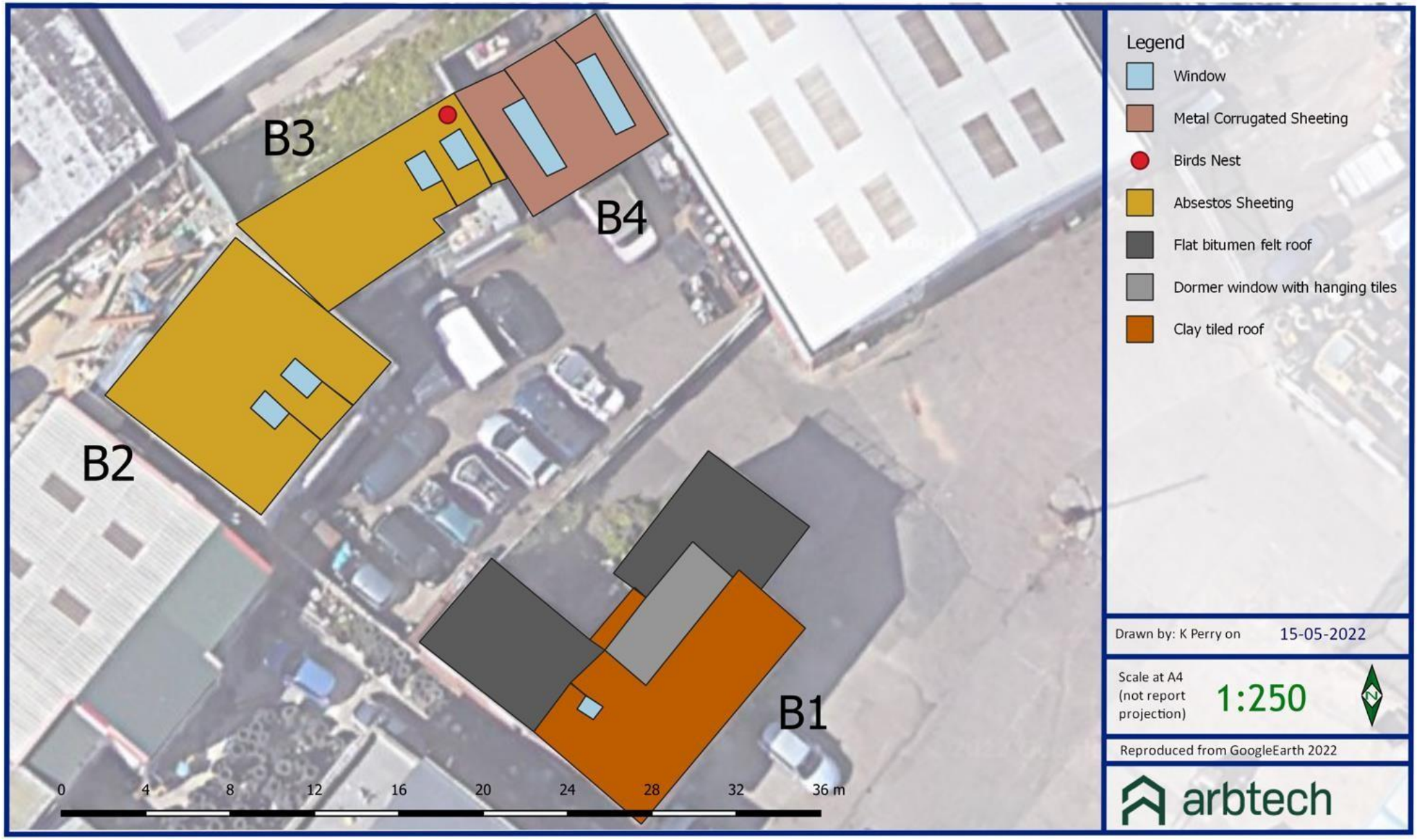
Appendix 1: Proposed Development Plan



Appendix 2: Site Location Plan



Appendix 3: Bat Survey Plan



Appendix 4: Legislation and Planning Policy Related to Bats

LEGAL PROTECTION

All species of bat are fully protected under ***The Conservation of Habitats and Species Regulations 2017*** (as amended) through their inclusion on Schedule 2.

Regulation 43: Protection of certain wild animals - offences

(1) A person is guilty of an offence if they:

(a) Deliberately captures, injures, or kills any wild animal of a European protected species,

(b) Deliberately disturbs wild animals of any such species,

(c) Deliberately takes or destroys the eggs of such an animal, or

(d) Damages or destroys a breeding site or resting place of such an animal,

(2) For the purposes of paragraph (1) (b), disturbance of animals includes in particular any disturbance which is likely—

(a) To impair their ability:

(i) To survive, to breed or reproduce, or to rear or nurture their young; or

(ii) In the case of animals of a hibernating or migratory species, to hibernate or migrate; or

(b) To affect significantly the local distribution or abundance of the species to which they belong.

Bats are also protected under the ***Wildlife and Countryside Act 1981*** (as amended) through their inclusion on Schedule 5. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection
- Selling, offering, or exposing for sale, possession or transporting for purpose of sale

NATIONAL PLANNING POLICY (ENGLAND)

National Planning Policy Framework 2021

The National Planning Policy Framework promotes sustainable development. The Framework specifies the need for protection of designated sites and priority habitats and species. An emphasis is also made on the need for ecological infrastructure through protection, restoration, and re-creation. The protection and recovery of priority species (considered likely to be those listed as species of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006) is also listed as a requirement of planning policy.

In determining a planning application, planning authorities should aim to conserve and enhance biodiversity by ensuring that: designated sites are protected from harm; there is appropriate mitigation or compensation where significant harm cannot be avoided; measurable gains in biodiversity in and around developments are incorporated; and planning permission is refused for development resulting in the loss or deterioration of irreplaceable habitats including aged or veteran trees and also ancient woodland.

The Natural Environment and Rural Communities Act 2006 and the Biodiversity Duty

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'.

Section 41 of the Act requires the Secretary of State to publish a list of habitats and species which are of 'principal importance for the conservation of biodiversity'. This list is intended to assist decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications. A developer must show that their protection has been adequately addressed within a development proposal.

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A European Protected Species Licence (EPSL) issued by Natural England will be required for works likely to affect a bat roost or for operations likely to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g., survive, breed, rear young and hibernate). The licence is to allow derogation from the relevant legislation but also to enable appropriate mitigation measures to be put in place and their efficiency/success to be monitored. The legislation may also be interpreted such that, in certain circumstances, important foraging areas and/or commuting routes can be regarded as being afforded *de facto* protection, for example, where it can be proven that the continued usage of such areas is crucial to maintaining the integrity and long-term viability of a bat roost (Garland & Markham, 2008).

There are 17 species of bat breeding in England and Natural England issues licences under Regulation 55 of the Habitats Regulations to allow you to work within the law.

Licences are issued for specific purposes stated in the Regulations, if the following three tests are met:

- The purpose of the work meets one of those listed in the Habitats Regulations (see below);
- That there is no satisfactory alternative;
- That the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range

The Habitats Regulations permits licences to be issued for a specific set of purposes including:

1. include preserving public health or public safety or other imperative reasons of over-riding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment;
2. scientific and educational purposes;
3. ringing or marking; and,
4. conserving wild animals.

Development works fall under the first purpose and Natural England issues bat mitigation licences for developments.

EUROPEAN PROTECTED SPECIES POLICIES

In December 2016 Natural England officially introduced the four licensing policies throughout England. The four policies seek to achieve better outcomes for European Protected Species (EPS) and reduce unnecessary costs, delays and uncertainty that can be inherent in the current standard EPS licensing system. The policies are summarised as follows:

- Policy 1; provides greater flexibility in exclusion and relocation activities, where there is investment in habitat provision;
- Policy 2; provides greater flexibility in the location of compensatory habitat;
- Policy 3; provides greater flexibility on exclusion measures where this will allow EPS to use temporary habitat; and,
- Policy 4; provides a reduced survey effort in circumstances where the impacts of development can be confidently predicted.

The four policies have been designed to have a net benefit for EPS by improving populations overall and not just protecting individuals within development sites. Most notably Natural England now recognises that the Habitats Regulations legal framework now applies to 'local populations' of EPS and not individuals/site populations.