Tyrer Ecological Consultants Ltd

Bringing Together Over 30 Years of
Ecological Excellence

Tyrer Ecological Consultants Ltd, Roselands, Suite 1, 3, Cross Green, Formby, L37 4BH

Inspection & Assessment in relation to Bats & Breeding Birds

April 2024

Project Reference: PR-0104-24

2 St. Paul's Road
Blackpool
Lancashire
FY1 2NY

National Grid Reference: SD30893761

Document Title	Inspection & Assessment in relation to Bats & Breeding Birds
Project Reference	PR-0104-24
Issue Number	1.0
Prepared for	ORYArchitecturalStudios
Prepared by	Tyrer Ecological Consultants Ltd

Surveyor	Mr. B. Richards Qualifying CIEEM
Author	Mr. B. Richards Qualifying CIEEM
Survey Date	22/03/2024
Reviewed by	Mrs. K. Wilding CEnv MIEMA ACIEEM
Review Date	09/04/2024
Approved by	Mrs. K. Wilding CEnv MIEMA ACIEEM
Date of Issue	09/04/2024

Terms of use:

This report has been prepared by Tyrer Ecological Consultants Ltd with all reasonable skill, care and diligence within the terms of the instruction and permissions granted by the client. The results, conclusions and recommendations of this report are presented in line with the British Standard 42020:2013.

Tyrer Ecological Consultants Ltd have produced this report with all due integrity and adhere to the CIEEM Professional Code of Conduct, with the aim of upholding these objectives and the reputation of the profession.

We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above.

This report is confidential to the client.

This report and contents therein are to be used only in conjunction with the Planning Application for which the report has been produced. It must not be used for any other purpose, copied, re-produced or sent to any other party other than the Local Planning Authority Department without the express permission of Tyrer Ecological Consultants Ltd. Furthermore, the data contained herein must not be copied, re-produced or sent to any other party/organisation whatsoever without the express permission of Tyrer Ecological Consultants Ltd.

Tyrer Ecological Consultants Ltd will however consider forwarding data that is collected as part of its reports to the relevant wildlife records centre.

Executive Summary

As part of a proposed planning application concerning 2 St. Paul's Road, Blackpool, Ecological Consultants Ltd carried out a daytime preliminary roost assessment in relation to bats with an inclusive inspection for breeding birds in March 2024.

The survey was commissioned by ORYArchitecturalStudios; the scope of proposals is unknown.

Detailed methods, findings, conclusions and recommendations are presented throughout the report; however, the reader should be aware of the following **Key** points:

Bats:

Based upon the findings of the survey, covered through sections 5.0 – 6.0 of the report and supported by **Appendix I**, **B1** is duly categorised as pertaining to '**Low**' bat roost suitability, in accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023).

Table 7.2. Recommended minimum number of survey visits for presence/absence surveys to give confidence in a negative result for structures (also recommended for trees but unlikely to give confidence in a negative result).

Low roost suitability or PRF-I	Moderate roost suitability	High roost suitability or PRF-M
One survey visit. One dusk emergence survey[a] (structures). No further surveys required (trees).	Two separate dusk emergence survey visits[b].	Three separate dusk emergence survey visits[b].

*It is recommended that **one dusk emergence survey** is conducted at the site within the active season of bats (May – August, extending into September in some cases), in order to establish if / how the building is being used by bats, and if so, identify the species present, abundance, roost locations and flight lines around the site following emergence. A total of **two surveyors** would be required to cover the potential roosting features as described.*

The applicant should be aware that further surveys may be necessary in order to provide a more complete understanding of the usage of the structure and to support further recommendations.

Breeding birds:

Feral pigeon were observed utilising the building for breeding purposes. Given the field signs, feral pigeon breeding presence may need to be addressed from a pest control point of view as breeding habits in relation to this species are atypical of other bird species and can last throughout the year. A General Licence is therefore likely to be necessary to legally control the species.

*General Licence GL41 is considered applicable for the site. From 1st January 2024, you must follow the conditions of GL41 to control certain target birds for the purposes of preserving public health or public safety. **See here for further information**.*

In relation to more common bird species, the structure provides a suitable nesting platform for birds adapted to urbanisation.

Any works impacting the southern elevation of the structure or to the loft space should, therefore, be undertaken outside of the breeding bird season, typically March – September

inclusive. For works within the breeding bird season, any areas that can support nesting birds should be checked by a professional Ecologist for nesting birds within 48 hours or less prior to works commencing.

Table of Contents

1.0 Introduction & Reasons for Survey

1.1 As part of a proposed planning application concerning 2 St. Paul's Road, Blackpool, Ecological Consultants Ltd carried out a daytime preliminary roost assessment in relation to bats with an inclusive inspection for breeding birds in March 2024.

1.2 The survey was commissioned by ORYArchitecturalStudios; the scope of proposals is unknown. See **Figure 1.1** for the location of the site.

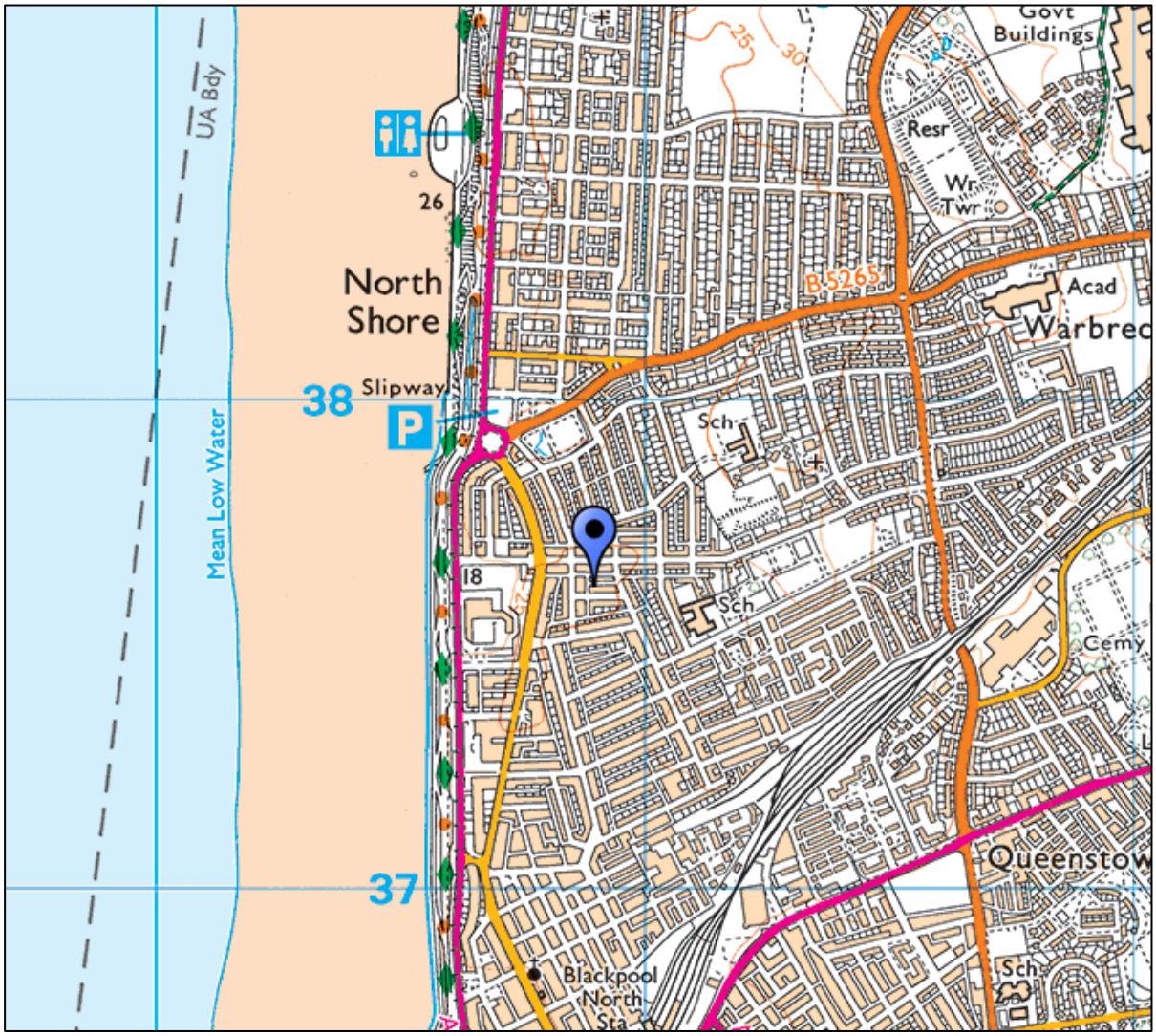

Figure 1.1 – *Location of the site (blue pin) © OS Maps 2024*

1.3 The aim of the survey was to ascertain if the structure is of value to bats, whilst an assessment of nesting and general suitability for birds was also carried out. If any potential roost features (PRFs) were found to be suitable for bats, or signs of use were observed, where suitable habitats and / or bat records exist in the locality, then more detailed surveys would be recommended i.e. dusk emergence surveys during the main active season of bats which is May – August (extending into September).

1.4 If additional surveys are required following the initial site visit, this report will outline the details of those further requirements, in accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023).

1.5 If it was determined that bat(s) or their roost / place of rest / shelter will be subsequently impacted by the works then a European Protected Species (EPS) licence would be legally required to proceed with the development.

1.6 If evidence indicated breeding birds may be impacted by proposals, tailored recommendations would be made accordingly, species pending.

1.7 As part of the local authority's planning policies and obligations to the Planning Framework, ecological surveys are generally required prior to planning permission being granted where protected / priority habitats and species are, or may be present, that could be affected by the proposals for which the application seeks consent. Where more detailed surveys are recommended by the ecologist, following an initial daytime investigation, then Local Planning Authorities (LPA), on the advice of their ecological advisors, will not grant permission until such time that all relevant information is gathered.

2.0 Protected Species & Their Requirements

Bats

2.1 All British bats and their **roosts are afforded full protection under the Wildlife & Countryside Act (1981) (as amended) and are listed in Schedule 2 of the Conservation of Habitats and Species Regulations (2019) (EU Exit). When dealing with cases where an EPS (all UK bats) may be affected, a planning authority is a competent authority within the meaning of Regulation 7 of the Regulations, and therefore has a statutory duty, as the local authority, to have due regard to the provisions of the Regulations in the exercise of its functions.

2.2 Uses of Buildings by Bats

a) Summer breeding roost (May – August)
b) Hibernation roost (October – March)
c) Transitional or temporary roost (other months)

2.3 Roost selection is often closely correlated to suitable foraging habitat within a reasonable commuting distance from the roost and different sites are used depending upon insect densities and abundance; climatic conditions can also affect their ability to successfully forage. All British bats are insectivorous.

*** The term roost is generically referred to as a place that bat/s use for the any of the above reasons, however it should be noted that under the Conservation of Habitats and Species Regulations (2019) (EU Exit) (Regulation 43 (d) the term roost is not used but refers to "a breeding site or resting place of such an animal" and is afforded legal protection. The roost, breeding site or resting place of bats, which ever terminology is used is legally protected whether or not bats are in occupation.*

2.4 Up to eleven bat species have been recorded in Lancashire to date, most of which use built structures, notably occupied residential buildings, for roosting. The most frequently encountered bat species is the common pipistrelle (*Pipistrellus pipistrellus*) and its abundant status in Lancashire is reflected throughout the UK.

Breeding birds

2.5 All wild birds, no matter how common, their eggs, young and nests, whilst being built or occupied, are protected under both the Wildlife and Countryside Act (WCA 1981) and Natural Environment and Rural Communities Act (NERC Act 2006).

2.6 Any work that would damage an occupied nest, eggs or young of breeding birds, regardless of priority status, must be avoided; any damage to nests that may occur as a result of the development should be outside of the main breeding bird season (March – August). On occasions nests can become unoccupied during the breeding season but the status of the nest(s) should be determined by a suitably experienced ecologist / ornithologist.

2.7 Birds listed on Schedule 1 (Sch.1) of the WCA 1981, for example peregrine falcon (*Falco peregrinus*) afforded a greater level of protection and are safeguarded also from disturbance. This raptor is known to inhabit urban environments, where suitable nesting sites, such as churches, cathedrals and other taller structures, coincide with an abundance of prey items in the form of urban bird species, including feral pigeon.

Policy

2.8 Paragraph 186 of the National Policy Planning Framework (as revised in December 2023) states:

"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 reasons 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."

2.9 This national focus on biodiversity is echoed in Policy CS6: Green Infrastructure covering the Natural Environment within the Blackpool Local Plan Core Policies states that:

"All development should incorporate new or enhance existing green infrastructure of an appropriate size, type and standard. Where on-site provision is not possible, financial contributions will be sought to make appropriate provision for open space and green infrastructure."

Priority Habitats & Species

2.10 In the United Kingdom, legal protection and otherwise legislative recognition is afforded to particular habitats and species based on a variety of ecological factors. These are typically referred to as priority habitats and species, and can be identified under a variety of legislation and local policy, notably the UK Biodiversity Action Plan (UKBAP), Section 41 (s.41) of the NERC Act as well as under Local Biodiversity Action Plans (LBAPS).

3.0 Survey Methodology

3.1 As part of the Inspection & Assessment in relation to Bats & Breeding Birds report, a desk-top and field-based study is conducted. Methods for both components of the appraisal are given below.

Desktop study

3.2 Prior to a site visit, a desktop study was conducted using online resources to obtain information pertaining to any sites afforded statutory (e.g. SSSI) and non-statutory (e.g. LWS) designations for nature conservation within 2.0 kilometres of the site boundary. To do so, the Multi Agency Geographic Information for the Countryside (MAGiC – provided by DEFRA) was accessed to gather such information; this particular interactive mapping service was also used to locate any locally granted European Protected Species Mitigation Licenses (EPSML) and species records to further inform conclusions concerning such species in the context of the study site and its proposed development.

3.3 Historic satellite imagery was reviewed using sources such as Google Earth (© 2023/24) to help establish past use of the land and determine the nature of adjoining and extending habitats; such information aids in the understanding of how the site might interact with its surroundings ecologically and its value in that context, and how the development may impact at a wider scale.

3.4 In addition, the Blackpool Borough Council 'Planning – Public Access' online function was utilised to help inform the desktop study by analysis of existing publicly accessible ecological survey results that have been carried out locally within the previous five years.

3.5 A commercial data request to the Local Environment Records Centre serving the area – in this case Lancashire Environmental Records Network (LeRN) – has not been sourced and is justified through application of the following recent guidance:

1) The Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK (CIEEM, 2020) states:

"*It is generally expected that a desk study, including a data search, will be a key part of the ecological surveys or reports produced to inform a planning application. Freely available web-based sources of data and contextual information should always be used; in some cases, it may be acceptable to not undertake a data search with the LERC or other relevant NSS or local interest groups, for example:*

ii) Situations where the ***data search would be extremely unlikely to provide information needed to inform the assessment, due to the scale and location of the proposed development****. The appropriateness of excluding a data search will need to be judged on a case-by-case basis as, in most situations, it will be essential to carry out such a search even if the development is very small or is likely to have a low impact. It can be very difficult to demonstrate that a data search would not have provided relevant information without obtaining and reviewing those data.*

iii) In some cases for Preliminary Roost Assessments of buildings in ***low impact / small-scale scenarios,*** *such as an extension to a residential property, loft conversions (full or partial), installation of Velux/dormer windows, single modern agricultural or similar building conversion or demolition; however, it should not be assumed that data searches are never required for such scenarios and this must be judged on a case by case basis and justified accordingly.*

3.6 As exemptions as made **bold** above can be applied at the site, whilst following best practice, it is considered unnecessary to conduct a commercial data request following the desk study effort and daytime assessment at this time, which offers a proportionate level of survey effort. If, however, a data search is considered necessary by the Local Authority advisory body to inform the ecological impact assessment following any further surveys recommended in this report, a proportionate data search should be commissioned with results interpreted into the conclusions and recommendations of a re-issued / updated report.

Field survey

3.7 In context with the above, a diurnal inspection and assessment of the buildings and the immediate environment in relation to bats and breeding birds was conducted on 22nd March 2024 in dry conditions (9ºC), wind 1/12 (Beaufort scale), 40% cloud, by the following surveyor (see **Table 3.1**):

Table 3.1 – Site surveyor credentials

Name	Description of most relevant credentials
Mr. B. Richards Qualifying CIEEM	• Consultant Ecologist with 2 years training and experience, • MBiolSci in Biological Sciences (Zoology), • Accredited agent on the Natural England Class 2 bat license of Mrs K Wilding CEnv MIEMA ACIEEM (CLS-14227), • Holder of a FISC Level 3 (2023) (Botanical competency).

3.8 Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023), states:

"*The guidelines should be interpreted and adapted on a case-by-case basis according to site-specific factors and the professional judgement of an experienced ecologist. The questions should not be whether the guidelines were followed, but were the defined objectives of the surveys met? Where examples are used in the guidelines, they are descriptive rather than prescriptive."*

3.9 The site was assessed for bats; a daytime bat walkover (DBW) was undertaken to observe, assess and record any habitats or features suitable for usage by bats, either as commuting, foraging or roosting provision. Wider connectivity to other habitats was also considered during the DBW.

3.10 Buildings and other permanent / semi-permanent structures were subject to a preliminary roost assessment (PRA), to identify potential areas which may be of value to bats and to determine evidence of use. This typically involves a systematic search of the external aspects of any structure(s), comprising an investigation of features known to be used by bats (for example roofing material, soffits, fascia, lead flashing hanging tiles) using a high-powered torch and close-focus binoculars, where necessary. An internal assessment of the structure(s) was also carried out, with the aid of a high-powered torch and endoscope, where necessary, to identify any evidence of bat use of a structure. Field signs of bats typically comprise bat droppings, urine splashing, fur-oil staining, incidental animal presence, dead specimens and / or the presence of prey items, such as moth wings.

3.11 Trees (where present) would be subject to a ground level tree assessment (GLTA) using equipment such as close-focus binoculars and a high powered-torch. Potential roost features (PRFs) can include woodpecker holes, rot holes, hazard beams, other vertical or horizontal cracks or splits in stems and branches, partially decayed lifted bark, knot holes, man-made

holes, tear-outs, cankers in which cavities have developed, other hollows or cavities, including butt-rots, double-leaders forming compression forks with included bark, gaps between overlapping stems or branches, partially detached climbing species with stem diameters in excess of 50mm or pre-existing bat / bird boxes. These PRFs can then be determined as PRF-I or PRF-M, dependent on their suitability for individual / low numbers of bats or their capability to host multiple bats.

3.12 Criteria for roost assessment are based upon the determinants given in the Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023): (see **Figures 3.1 – 3.3** overleaf).

3.13 The site and any built structure(s) on site were inspected for evidence of nesting and suitability for relevant species. Bird species observed and heard were recorded on site, and a search was made for nest material, or areas suitable for nesting – this can take the form of searching structures, woody vegetation, semi-aquatic vegetation such as reeds and / or ground flora. Elevations of any buildings or structures on site were inspected for evidence of birds that show a high dependency upon built structures, many of which are in a state of decline. These might include the following species for example (list non-extensive):

- **Starling** (*Sturnus vulgaris*): Birds of Conservation Concern (BoCC) red status
- **House sparrow** (*Passer domesticus*): BoCC red status
- **House martin** (*Delichon urbica*): BoCC red status
- **Swift** (*Apus apus*): BoCC red status

3.14 Additional to the site's capacity to support generally common species for breeding, the area was also subject to an assessment for wider capacity to support species with extra protection under Sch.1 of the Wildlife & Countryside Act (1981) (as amended), as well as those listed in s.41 of the NERC Act and on the Lancashire BAP.

3.15 The results, conclusions and recommendations are based on a number of factors i.e.

- Practical experience of the surveyor,
- Knowledge of bat / bird species relevant to the site location and geographical range,
- Nature of the immediate / surrounding habitat in relation to foraging / commuting opportunities,
- Presence / absence of roost potential and the general condition of the structure / tree,
- Presence of loft spaces and / or cellars and reasonable practicality of use,
- Value and types of roost potential, if present (i.e. – maternity, hibernation, transitional).

3.16 The results, conclusions and recommendations of this report have been assessed by Mrs. K. Wilding, the Director of Tyrer Ecological Consultants Ltd, and her assessment is consistent with that of the surveyor Mr. B. Richards.

Table 4.1. Guidelines for assessing the potential suitability of proposed development sites for bats, based on the presence of habitat features within the landscape, to be applied using professional judgement.

Potential suitability	Description	
	Roosting habitats in structures	**Potential flight-paths and foraging habitats**
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging bats).
Negligible[a]	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	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[b] 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[c]).	Habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions[b] and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions[b] and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.

a Negligible is defined as 'so small or unimportant as to be not worth considering, insignificant'. This category may be used where there are places that a bat could roost or forage (due to one attribute) but it is unlikely that they actually would (due to another attribute).

b For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance.

c Evidence from the Netherlands shows mass swarming events of common pipistrelle bats in the autumn followed by mass hibernation in a diverse range of building types in urban environments (Korsten *et al.*, 2016 and Jansen *et al.*, 2022). Common pipistrelle swarming has been observed in the UK (Bell, 2022 and Tomlinson, 2020) and winter hibernation of numbers of this species has been detected at Seaton Delaval Hall in Northumberland (National Trust, 2018). This phenomenon requires some research in the UK, but ecologists should be aware of the potential for larger numbers of this species to be present during the autumn and winter in prominent buildings in the landscape, urban or otherwise.

Figure 3.1 – *BCT guidelines extract*

Table 4.2. Guidelines for assessing the suitability of trees on proposed development sites for bats, to be applied using professional judgement.

Suitability	Description
NONE	Either no PRFs in the tree or highly unlikely to be any
FAR	Further assessment required to establish if PRFs are present in the tree
PRF	A tree with at least one PRF present

Figure 3.2 – *BCT extract on tree roost suitability criteria*

Table 6.2. Guidelines for categorising the potential suitability of PRFs on a proposed development site for bats, to be applied using professional judgement.

Suitability	Description
PRF-I	PRF is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats.
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony.

Figure 3.3 – *BCT extract on tree roost categorisation criteria*

4.0 Limitations

4.1 The survey took place outside of the bat active season of April – October inclusive, therefore there was a lower chance of encountering direct evidence of bats, such as fresh droppings or feeding remains. The presence of PRFs and the suitability of these can be assessed all year round, however, and often evidence of bats can remain present for several years and still be readily identifiable by a suitably experienced surveyor, thus allowing for conclusive assessments to be undertaken year-round. Timing is not considered a constraint in this instance.

4.2 The survey took place within the early stages of the breeding bird season; whilst not all bird species have begun building nests and displaying breeding behaviour in this period, suitability of use can be identified throughout the year, and evidence of nesting oft persists across breeding seasons. Timing is again not considered a constraint in this regard.

4.3 Whilst both lofts were accessed by the surveyor, these were only partially accessible owing to the unsafe nature of the structure. Whilst a detailed search of the lofts in their entirety to check for evidence of priority species was not possible, it is considered that enough ecological information was gathered by the surveyor in order to form sound ecological conclusions in respect of the target species groups.

4.4 In considering all potential survey constraints, whilst access issues were encountered, no significant limitations were experienced that might adversely influence the results, conclusions, and recommendations of this report.

5.0 Desk Study Results

5.1 The site of the proposed works (referred to in-part as "the application site" and "the site") is situated to the north of St. Paul's Road in Blackpool, approximately 2km north of the town centre (see **Figure 5.1** below). The site broadly comprises an end-of-terrace structure with associated yard space to the front and rear.

Figure 5.1 – *Location of the red line boundary within the landscape © Google Earth Pro 2023/24*

5.2 The immediate environment is entirely urban in nature, with banks of residential properties to all compass directions, typically with associated hardstanding to the front and rear, though some have small areas of amenity greenspace in the form of introduced shrubbery and scattered trees. A region of grassland surrounds the Grand Hotel Blackpool at a distance of 116m to the west of the site, with Claremont Park providing the nearest area of woodland approximately 250m to the east.

Relevant planning history

5.3 Several previous planning applications have been undertaken at the site, notably an application and appeal pertaining to 'use of premises as three self-contained, permanent flats' (Reference Number: **04/0007**) as well as a planning enforcement order in relation to the 'poor condition of the property' (Reference Number: **21/8266**). No ecological documentation has been produced in support of these applications.

Designated sites

5.4 No statutory designated sites for nature conservation are present within a 2.0km search radius of the site (see **Figure 5.2** overleaf for a visual representation).

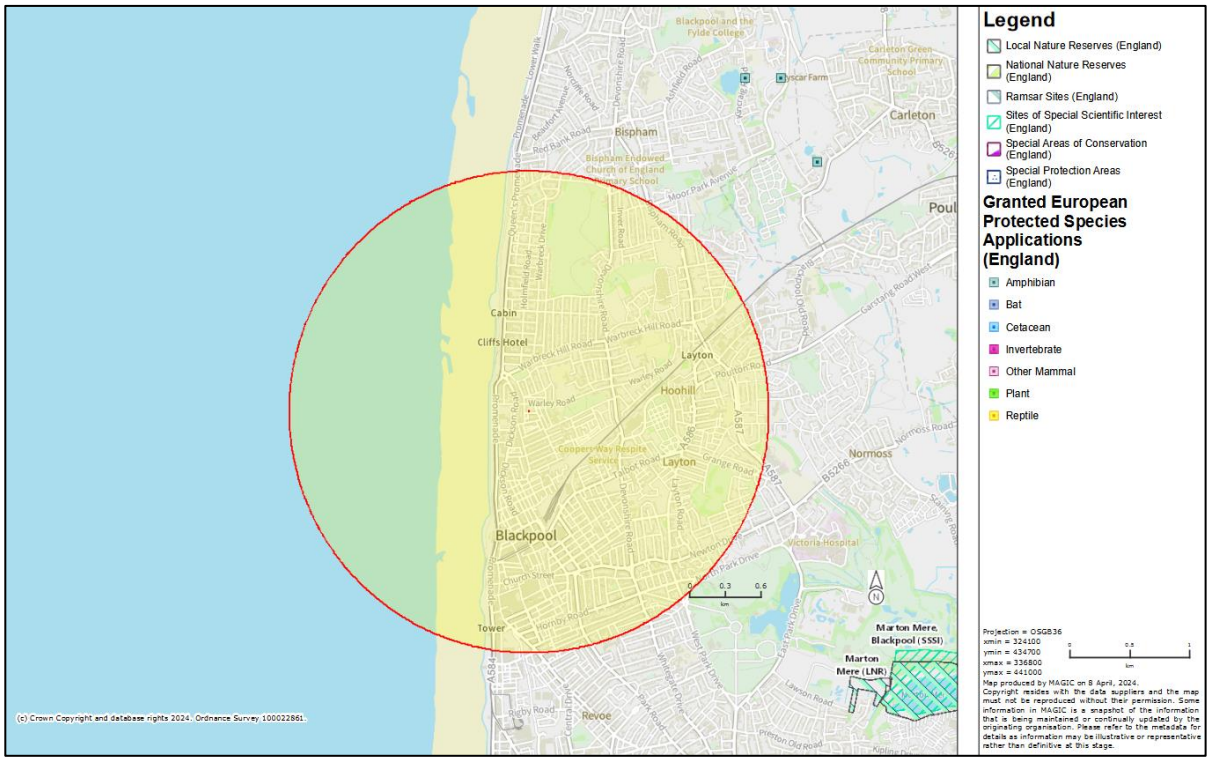

Figure 5.2 – *Designated site data for the area within 2.0km of application site © MAGiC Maps 2024*

5.5 The site is positioned within the Impact Risk Zone (IRZ) for several Sites of Special Scientific Interest (SSSI) in the wider landscape, most notably Marton Mere, Blackpool SSSI positioned approximately 3.6km to the south-east. Based on the IRZ information available on MAGiC Maps, the site does not fall under any of the categories which would trigger further consultation with Natural England. It is also considered unlikely that works to the property would increase residential disturbance on the surrounding designated sites, and NE are unlikely to need be consulted in this regard.

5.6 Where no impact to SSSI's is predicted, NE issue the following advice within their standing guidance on SSSI impact zones (NE, 2019):

"*It is important to note that the SSSI IRZs only indicate Natural England's assessment of likely risk to the notified features of SSSIs. Where they indicate such a risk is unlikely, this does not mean that there are no potential impacts on biodiversity or the wider natural environment.*"

Habitats

5.7 An online search of MAGiC Maps identified the following priority habitats within a 2.0km search radius (see **Table 5.1** overleaf).

Table 5.1 – Priority habitats located within 2.0km buffer

Habitat Type	Designation	Distance to site
Deciduous woodland	Priority Habitat Inventory	1.2km north-east
Lowland fens	Priority Habitat Inventory	1.8km north-east
Maritime cliff and slope	Priority Habitat Inventory	0.4km north-west
Wood-pasture and parkland	BAP Priority Habitat	2.0km south-east

Bats

5.8 An online search of MAGiC Maps revealed that no previous EPSMLs have been granted within the search radius (see **Figure 5.2** previous for a visual representation).

5.9 Tyrer Ecological Consultants Ltd have previous and ongoing projects involving bats in the 2.0km area surrounding the site; as such, the as such, the following biological data (see **Table 5.2**) is readily available to the Ecologist from the company database – all data has been previously submitted to the LERC serving the area, which, in this case is LeRN.

Table 5.1 – LERC submitted biological data records collected by Tyrer Ecological Consultants Ltd

Year	Distance from site	Context (where relevant)
2019	1.4km north-east	Common pipistrelle x1; **disturbed bat**
2021	1.0km north	Common pipistrelle x3; d**ay roost**

5.10 Habitats in the immediate vicinity of the site provide low value foraging opportunities for bats, though some level of connectivity does exist with dimly lit alleyways and sparsely vegetated streets providing loose stepping stone habitats which link to areas of broadleaved woodland to the east. The habitats present are considered likely to support only those bat species which are adapted to urbanisation, for example the common pipistrelle.

NB: *Where quality habitat is present close to buildings then the percentage use of those buildings, by bats, increases given that roost opportunities are available and vice versa.*

Birds

5.11 Given the urban location of the site, it does not fall within any areas of grassland, farmland, woodland or wetland which are typically associated with notable bird assemblages. Species considered likely to be present include those linked with dense urban development, for example starling, house sparrow and herring gull (*Larus argentatus*).

5.12 The coastline is known to support wading bird species such as oystercatcher (*Haematopus ostralegus*), turnstone (*Arenaria interpres*) and sanderling (*Calidris alba*), though the site surrounding habitat appears to provide negligible value habitat for these, and other wetland, species.

6.0 Field Study Results

Bats

6.1 The single structure present within the red line boundary of the site is a two-storey unoccupied residential dwelling, understood to have formerly been a House of Multiple Occupancy. The end-of-terrace building is of brick construction and is covered by a multi-pitched slate roof, with approximate maximum dimensions of 16m x 6m x 6m (length x width x height). The structure features components such as timber doors, UPVC windows, timber lintels, concrete sills, part UPVC and part timber fascia and areas of lead flashing. In respect of its condition, the surveyor is not qualified to assess structural state; however, the aesthetic condition of the building was adjudged to be very poor, with large areas of degradation noted to the brickwork and roof verges, and general dilapidation, including smashed windows and other clear evidence of vandalism.

6.2 Internally, two distinct loft spaces are present within the structure, one to the northern pitch and the other to the southern pitch. See **Figure 6.1** for loft locations in reference to the structure.

Figure 6.1 – *Location of the loft spaces in reference to the structure © Google Earth Pro 2023/24*

6.3 L1 is present over the entire footprint of the northern roof pitch (7m x 3.5m) and is accessed via a large loft hatch. The space is of trussed construction cool, draughty, heavily cobwebbed and part illuminated via gaps in the roofing material, having an apex height of approximately 1m.

6.4 L2 is present above the southern portion of the house (9m x 6m), being accessed via a smaller loft hatch. This loft space is larger, with an apex height of 2.5m, and is again cool and draughty, though this space is somewhat darker with minimal light ingress.

6.5 Based on the above, both L1 and L2 are considered unsuitable for the breeding purposes of loft-dwelling species such as the brown long-eared bat. Whilst L2 meets the spatial requirements for these roosts, both of the loft spaces lack the stable, warm thermal characteristics required by these species to raise their young. This does not necessarily rule out usage of the structure for alternative roosting purposes, though there is a distinct lack of suitable broadleaved woodland habitat within the surrounding landscape which is the favoured foraging ground of these habitats. In addition, no evidence of loft-dwelling species was encountered by the surveyor.

6.6 A bitumastic underfelt is present beneath the southern half of L2, although no underfelt is present elsewhere; where present, underfelt or other such roof lining typically improves a buildings value to bats, notably for crevice-dwelling bats of the Pipistrellus genus, whereby the bats roost between the lining and the roof cover material provided external opportunities exist. No evidence of this species group was encountered by the surveyor, though this is often the case owing to their crevice dwelling nature, and an absence of direct evidence does not necessarily indicate absence. These species are able to live even in dense urban areas and can find suitable foraging grounds where dim light and insect prey abundances co-exist.

NB: *The breeding roosts of Pipistrelle bats are proportionally higher in occupied residential dwellings where the warm, dry conditions favour the requirements of a maternity colony but other structures are also used, especially for hibernation or by male bats which do not need the same conditions as a maternity colony.*

6.7 Externally, a variety of PRFs are present across all aspects of the building. The outer brickwork skin has fallen away to the southern elevation, providing ingress opportunities into the cavity wall, the wall plate and into gaps in the brickwork itself. The southern roof pitch has several lifted slates and some damage to the roof which could provide ingress to areas underlaid by bitumastic felt. The western facing gable end has some areas of missing mortar at the roof verge, as well as two areas of lifted lead flashing which likely lead to ventilation pipes, though it is not known if these are active. The northern aspect has areas of cracked brickwork which could provide access to the cavity wall, and portions of mortar have fallen away from the roof verge which could allow access to the wall plate and loft space. A gap is present beneath the timber fascia on the eastern elevation of the northern part of the structure, which could again allow for access to the wall plate and other suitable roost locations. See **Appendix I** for indicative examples of PRFs.

6.8 Whilst the habitats surrounding the structure are of low value to bats, feasible commuting corridors do exist in the form of alleyways and sparsely vegetated gardens. This, coupled with the abundance of PRFs on the structure, means that the structure is duly categorised as pertaining to '**Low**' bat roost suitability, in accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023).

6.9 No trees are present within the red line boundary of the site, and as such none were assessed in reference to the BCT guidelines.

6.10 From a habitat suitability assessment, the site provides low value foraging habitat for bats, though the alleyway to the north could allow for commuting between the site and more

favourable foraging habitat in the surrounding landscape. Pipistrelle bats in particular are known to roost in urban areas and can roost in suitable buildings which appear to have minimal habitat value.

Breeding birds

6.11 In relation to WCA Schedule 1 specially protected bird species such as peregrine falcon, the site provides no suitable nesting platforms or locally distinct habitat. The site is considered entirely unsuitable for this, alongside other Sch.1 raptor species.

6.12 Similarly, the site provides no suitable habitat for wetland bird species mentioned previously.

6.13 In relation to more common bird species, the structure on site is confirmed to support several breeding feral pigeon (*Columba livia 'domestica'*), with mats of faeces and eggshells encountered within the building by the surveyor.

6.14 In addition, the structure offers a suitable nesting platform during the breeding bird season (typically March – August inclusive, extending into September species / weather dependent) for other bird species adapted to urbanisation, and known to exist within the surrounding area, for example starling and house sparrow, with the smashed windows allowing for access into the structure and some of the PRFs described previously suitable for nesting bird usage also.

6.15 The following bird species were identified by the surveyor during the diurnal appraisal (see **Table 6.1**):

Table 6.1 – Bird species encountered during the survey

Common Name	Scientific Name	Status	Context
Feral pigeon	*Columba livia 'domestica'*	Green	Nesting within structure
Starling	*Sturnus vulgaris*	Red	On roof of structure

s.41	A bird listed on Section 41 of the Natural Environment Rural Communities Act 2006 (NERC Act)
LBAP	A local biodiversity action plan listed species
Q	A qualifying species of nearby SSSI / SAC / SPA / Ramsar
SPEC	A species of conservation concern, Amber or Red

7.0 Conclusions & Recommendations

Bats

7.1 Based upon the findings of the survey, covered through sections 5.0 – 6.0 of the report and supported by **Appendix I**, **B1** is duly categorised as pertaining to '**Low**' bat roost suitability, in accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023).

Table 7.2. Recommended minimum number of survey visits for presence/absence surveys to give confidence in a negative result for structures (also recommended for trees but unlikely to give confidence in a negative result).

Low roost suitability or PRF-I	Moderate roost suitability	High roost suitability or PRF-M
One survey visit. One dusk emergence survey[a] (structures). No further surveys required (trees).	Two separate dusk emergence survey visits[b].	Three separate dusk emergence survey visits[b].

Figure 7.1 – *BCT extract on 'Low' suitability criteria*

7.2 Given that works are likely to involve the renovation of the currently vacant structure and thus result in the loss of the PRFs on the structure, further survey effort must be undertaken to allow for a full impact assessment to be concluded.

7.3 It is recommended that **one dusk emergence survey** is conducted at the site within the active season of bats (May – August, extending into September in some cases), in order to establish if / how the building is being used by bats, and if so, identify the species present, abundance, roost locations and flight lines around the site following emergence. A total of **two surveyors** would be required to cover the potential roosting features as described.

7.4 Whilst only a single survey is recommended, should further evidence be gathered during this survey which would alter the categorisation of the structure, then the applicant should be aware that further surveys may be necessary in order to provide a more complete understanding of the usage of the structure and to support further recommendations.

7.5 The applicant should be aware that, if, during further surveys, evidence is gathered that confirms bat(s) or their roost(s) are found on site and will be impacted upon, then a protected species licence from Natural England will be required to legally commence with the proposals. It should be noted that if a breeding roost is discovered then work that will result in any of the above actions cannot take place until after the breeding season, which is widely accepted as running from May – August inclusive.

7.6 Natural England provides information and guidance about licensing and the following extract is included in that guidance:

"If you intend to apply for a licence for development, you are advised to seek the guidance of a consultant ecologist. Natural England's view is that a licence is needed if the consultant ecologist, based on survey information and specialist knowledge of the species concerned, considers that on balance the proposed activity is reasonably likely to result in an offence under the Conservation of Habitats & Species Regulations 2017 (as amended).

If the consultant Ecologist, on the basis of survey information and specialist knowledge of the species concerned, considers that on balance the proposed activity is reasonably unlikely to result in an offence being committed then no licence is required. However, in these circumstances Natural England would urge that reasonable precautions be taken to minimise

the effect on European protected species should they be found during the course of the activity. If European protected species are found, cease the work until you have assessed whether you can proceed without committing an offence. A licence should be applied for if an offence/s is unavoidable, and the work should not commence until a licence is obtained.

The application should be completed by the developer and a consultant ecologist. The ecologist will need to be able to demonstrate to the satisfaction of Natural England that they have the relevant skills and knowledge of the species concerned.

7.7 Where more detailed bat surveys are recommended by the Ecologist, following an initial daytime investigation, then Local Planning Authorities, on the advice of their ecological advisors, may not determine the application until such time that all relevant information is gathered, i.e., by conducting dusk / dawn surveys. The advice that is provided by the ecological advisors is also in accordance with the obligations placed upon Local Authorities by way of its duties under the Conservation of Habitats & Species Regulations 2017 (as amended). Therefore, it would be prudent to make enquiries to the relevant departmental Planning Officer before submitting a Planning Application that includes an ecological survey report that recommends more detailed surveys.

7.8 Installation of overly harsh artificial lighting as part of any development that exceeds current levels may have a negative impact upon foraging / commuting bats in the landscape, subject to their presence, particularly if increased light spillage occurs in areas of that are currently free from illumination, particularly including tree lines and hedgerows. A bat-sensitive lighting plan is therefore recommended in order to avoid potential impacts to bats that may use the surrounding treelines. Several options to consider have been listed below, though the reader is referred to the Bat Conservation Trust's 'Bats and Artificial Lighting at Night' guidelines (August 2023) for further information.

Appropriate luminaire specifications: Light sources, lamps, LEDs and their fittings come in a myriad of different specifications which a lighting professional can help to select. However, the following should be considered when choosing luminaires and their potential impact on Key Habitats and features:

- All luminaires should lack UV elements when manufactured. Metal halide, compact fluorescent sources should not be used.
- LED luminaires should be used where possible due to their sharp cut-off, lower intensity, good colour rendition and dimming capability.
- A warm white light source (2700Kelvin or lower) should be adopted to reduce blue light component.
- Light sources should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats (Stone, 2012).
- Internal luminaires can be recessed (as opposed to using a pendant fitting) where installed in proximity to windows to reduce glare and light spill.
- Waymarking inground markers (low output with cowls or similar to minimise upward light spill) to delineate path edges.
- Column heights should be carefully considered to minimise light spill and glare visibility. This should be balanced with the potential for increased numbers of columns and upward light reflectance as with bollards.
- Only luminaires with a negligible or zero Upward Light Ratio, and with good optical control, should be considered - See ILP GN01.
- Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt.
- Where appropriate, external security lighting should be set on motion-sensors and set to as short a possible a timer as the risk assessment will allow. For most general residential purposes, a 1 or 2 minute timer is likely to be appropriate.
- Use of a Central Management System (CMS) with additional web-enabled devices to light on demand.

- Use of motion sensors for local authority street lighting may not be feasible unless the authority has the potential for smart metering through a CMS.
- The use of bollard or low-level downward-directional luminaires is strongly discouraged. This is due to a considerable range of issues, such as unacceptable glare, poor illumination efficiency, unacceptable upward light output, increased upward light scatter from surfaces and poor facial recognition which makes them unsuitable for most sites. Therefore, they should only be considered in specific cases where the lighting professional and project manager are able to resolve these issues.
- Only if all other options have been explored, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed. However, due to the lensing and fine cut-off control of the beam inherent in modern LED luminaires, the effect of cowls and baffles is often far less than anticipated and so should not be relied upon solely.

Breeding birds

7.9 No impacts are applicable in relation to any Sch.1 (WCA) specially protected bird species such as peregrine falcon, and no further surveys or recommendations are necessary in relation to specially protected birds.

7.10 Feral pigeon were observed utilising the building for breeding purposes. Given the field signs, feral pigeon breeding presence may need to be addressed from a pest control point of view as breeding habits in relation to this species are atypical of other bird species and can last throughout the year. A General Licence is therefore likely to be necessary to legally control the species.

7.11 General Licence GL41 is considered applicable for the site. From 1st January 2024, you must follow the conditions of GL41 to control certain target birds for the purposes of preserving public health or public safety. **See here for further information**.

7.12 In relation to more common bird species, the structure provides a suitable nesting platform for birds adapted to urbanisation. Any works impacting the southern elevation of the structure or to the loft space should, therefore, be undertaken outside of the breeding bird season, typically March – September inclusive. For works within the breeding bird season, any areas that can support nesting birds should be checked by a professional Ecologist for nesting birds within 48 hours or less prior to works commencing.

Point 3.24 of the British Standards Publication 42020:2013 defines a professional ecologist as: "*a person who has, through relevant education, training or experience, gained recognised qualifications and expertise in the field of ecology and environmental management.*"

7.13 Where / if active nests are / have been located by the Ecologist, then any works which may affect them would have to be delayed until the young have fledged and the nest has been abandoned naturally, this can be aided, for example, via implementation of appropriate buffer zone(s) around the nest site (typically 5 – 10 metres) in which no disturbance is permitted until the nest is no longer in use. This would have to be coordinated through the expert judgement of the professional ecologist and species pending.

NB: *All wild birds (with only minor exceptions) and their nests whilst being built or containing eggs or dependant young are protected from destruction, damage and disturbance under the Wildlife & Countryside Act 1981 (as amended). It is a punishable offence to interfere in any way with an active nest.*

8.0 Bibliography

- **Bat Conservation Trust (BCT),** 2023. *Bats and Artificial Lighting at Night, Guidance Note GN08/23.* Available from: https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/
- **CIEEM *et al***, 2019. *Biodiversity Net Gain: Good practice principles for development*. Available from: www.cieem.net/data/files/Publications/Biodiversity_Net_Gain_Principles.pdf
- **CIEEM**, 2016. *Guidelines for Ecological Impact Assessment in the UK and Ireland*, 2nd edition. Available from: www.cieem.net/data/files/Publications/EcIA_Guidelines_Terrestrial_Freshwater_and_Coastal_Jan_2016.pdf
- **CIEEM**. 2020. *Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK*. 2nd Edition. Chartered Institute of Ecology and Environmental Management. Winchester, UK
- **CIEEM**, 2017. *Guidelines for Preliminary Ecological Appraisal*, 2nd edition. Available from: www.cieem.net/data/files/Publications/Guidelines_for_Preliminary_Ecological_Appraisal_Jan2018_1.pdf
- **Collins, J** (ed.) 2023. *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (4th edition). The Bat Conservation Trust, London.
- **Communities & Local Government (C&LG)**, 2018. *National Planning Policy Framework*. Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf
- **Gunnell, K. Grant, G. and Williams, C.** 2012. '*Landscape and urban design for bats and biodiversity*'. Bat Conservation Trust.
- **Magic Maps Application**, 2024. Available from: www.natureonthemap.naturalengland.org.uk/MagicMap.aspx
- **Mitchell-Jones, A.J. and McLeish, A.P**. (Eds) (2004). *Bat Workers' Manual*, Joint Nature Conservation Committee, Peterborough.
- **Reason, P.F. and Wray, S.** (2023). *UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats*. Chartered Institute of Ecology and Environmental Management, Ampfield.

Appendix I: Site Photographs

Plate 1 – *The southern elevation of the structure on site*

Plate 2 – *PRFs on southern elevation, circled*

Plate 3 – *Western elevation, with lead flashing PRFs*

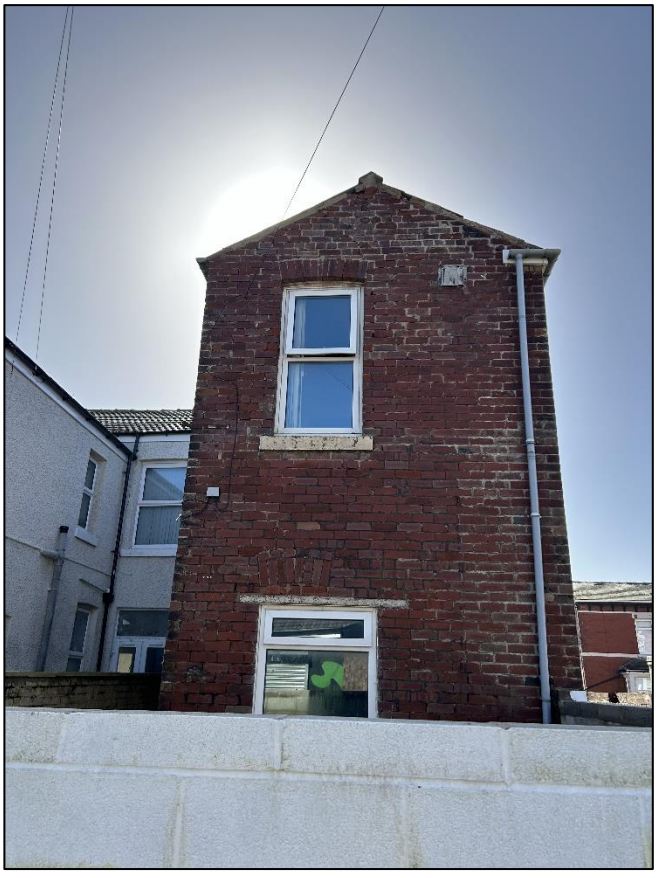

Plate 4 – *Northern aspect*

Plate 5 – *PRFs on northern aspect, circled*

Plate 6 – *Eastern facing aspect, with gaps beneath timber fascia*

Plate 7 – *Close up of lifted fascia*

Plate 8 – *Evidence of breeding feral pigeon*

Plate 9 – *Further evidence of breeding feral pigeon*

Plate 10 – *Access hatch for L1*

Plate 11 – *Nature of L1*

Plate 12 – *Access hatch for L2*

Plate 13 – *Nature of L2*

Appendix II: Biodiversity Enhancement: General Recommendations

Breeding Birds – House Sparrow

The sparrow terrace has been designed to help redress the balance of falling house sparrow numbers. The current UK population is now half of what it previously was in 1980 and this is widely attributed to habitat destruction and lack of suitable nesting spaces. House sparrows are social birds and like to nest in company, therefore, this terrace provides ideal nesting opportunities for three families. The terrace can be fixed on to the surface of a suitable wall or incorporated into the wall. It is suitable for all types of buildings.

Breeding Birds – Starling

Starling populations have declined dramatically in recent years and are now on the Red List of birds of high conservation concern. Loss of habitat is one of the major pressures on this species and household renovations and new buildings offer much fewer nesting sites than have previously been available. Providing these birds with a safe and secure habitat and nesting environment is a great way to help ensure their future survival.

This Vivara Pro WoodStone® Starling Nest Box has a 45mm diameter entrance hole which makes it ideal for starlings. It should be sited on an external wall or tree at a height of at least 1.5m using an aluminium nail or screw and wall plug (not included). Site near to vegetation if possible as this will provide additional protection and cover.

Breeding Birds – Other

This traditional design has proved to be highly effective in attracting Robins, as well as other small species such as Black Redstart, Spotted Flycatcher and Wren. It is designed to be installed on the walls of houses, barns, garden sheds or other buildings and should be hung so that the entrance is to one side (at an angle of 90° to the wall). The front panel can be easily removed for cleaning.

This type of box should not be made conspicuous on a tree or bush because small predators can enter through the unprotected opening. By hanging on a wall, predators won't be able to reach the box. Alternatively hide the box in Ivy, Honeysuckle or other climbing plants.

Invertebrates - Bee bricks

The Bee Brick can be used in place of a standard brick or block in construction to create habitat for solitary bees. Alternatively, it can be used as a standalone bee house in your garden or wild patch. It will provide much needed nesting space for solitary bee species such as red mason bees and leafcutter bees, both of which are non-aggressive.

Each Bee Brick contains cavities in which solitary bees can lay their eggs before sealing the entrance with mud and chewed-up vegetation. The offspring will emerge the following spring and the cycle will begin again. Each cavity goes part way into the brick, which is solid at the back. Bee Bricks should be placed in a warm sunny spot on a south-facing wall at a minimum height of 1m, with no vegetation obstructing the holes. It is highly recommended that bee-friendly plants should be located nearby so that the bees using the bricks have food, otherwise it is unlikely that the brick will be used.
Available in a choice of four colours: white grey, dark grey, yellow and red.

Specification:

* Material: Concrete
* Origin: Cornwall, UK
* Dimensions: W 215mm x D 105mm x H 65mm
* Weight: 2.9kg
* Colours: White grey, yellow, dark grey and red

Native Planting and/or Landscaping

New feature landscaping should incorporate native woody plants as opposed to non-native species that are of significantly less benefit to biodiversity. Species such as Blackthorn (*Prunus spinosa*), Honeysuckle (*Lonicera periclymenum*), Rowan (*Sorbus aucuparia*), Guelder-rose (*Vibernum opulus*) and Hawthorn (*Crataegus monogyna*) are native and will provide a valuable resource for a myriad of wildlife as opposed to non-native, exotic species which are generally much less effective, particularly to pollinator groups including bees, butterflies and moths.

Suitable Trees	Suitable Woody Shrubs
English Oak (*Quercus robur*)	Hawthorn (*Crataegus monogyna*)
Rowan (*Sorbus aucuparia*)	Honeysuckle (*Lonicera periclymenum*)
Wild Service Tree (*Sorbus torminialis)*	Guelder Rose (*Vibernum opulus*)
Silver Birch (*Betula pendula*)	Elder (*Sambucus nigra*)
Ash (*Fraxinus excelsior*)	Wild Privet (*Ligustrum vulgare*)
Goat Willow (*Salix capraea*)	Blackthorn (*Prunus spinosa*)
Beech (*Fagus sylvatica*)	
Wild Cherry (*Prunus avium*)	