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**Preliminary Bat Survey Report for
Walkden House,
Priory Road, Ashton-in-Makerfield, WN4 9UG
SD 5688 0025**

Commissioned-by:
David Booton
for

Wigan and Leigh Housing Company Limited

Survey Date: 6/4/17

Report Date: 7/4/17

Summary.

(This summary should be read in conjunction with the conclusions and recommendations.)

This property has reasonable links with good bat feeding habitat. It is in an area where the pipistrelle bat is common.

There was no evidence to suggest a maternity colony of bats had used the lofts, but 3 bat droppings were found near a south-east-facing gable-end. It is uncertain how old these were and it appears the boxed eaves may have been replaced and a dry-verge fitted since they were deposited. They have been sent for dna analysis to confirm the species that deposited them; which seems likely to have been common pipistrelle.

Other potential bat entry places still exist at soffits and under roof tiles.

I assess the risk of some roosting as being low to moderate. I have recommended two bat activity surveys (emergence-at-dusk or return-to-roost-at-dawn) be undertaken between the months of May and September inclusive, with at least one of them between the months of May and August inclusive.

Introduction.

I was asked to assess the importance of this property to bats as part of the planning process, prior to its demolition.

This is a 1980s-style, largely two-storey, residential accommodation complex:



Front (south-west) and rear elevations



Fig. 1. Walkden House site bounded in red

It is in a residential area where there are likely to be other bat roosts. It is 40m from a wooded railway embankment to the north which links with the wooded motorway embankment of the M6. This is less than 400m away and links with other woodlands within 600m. The location is shown in Fig. 2 below:

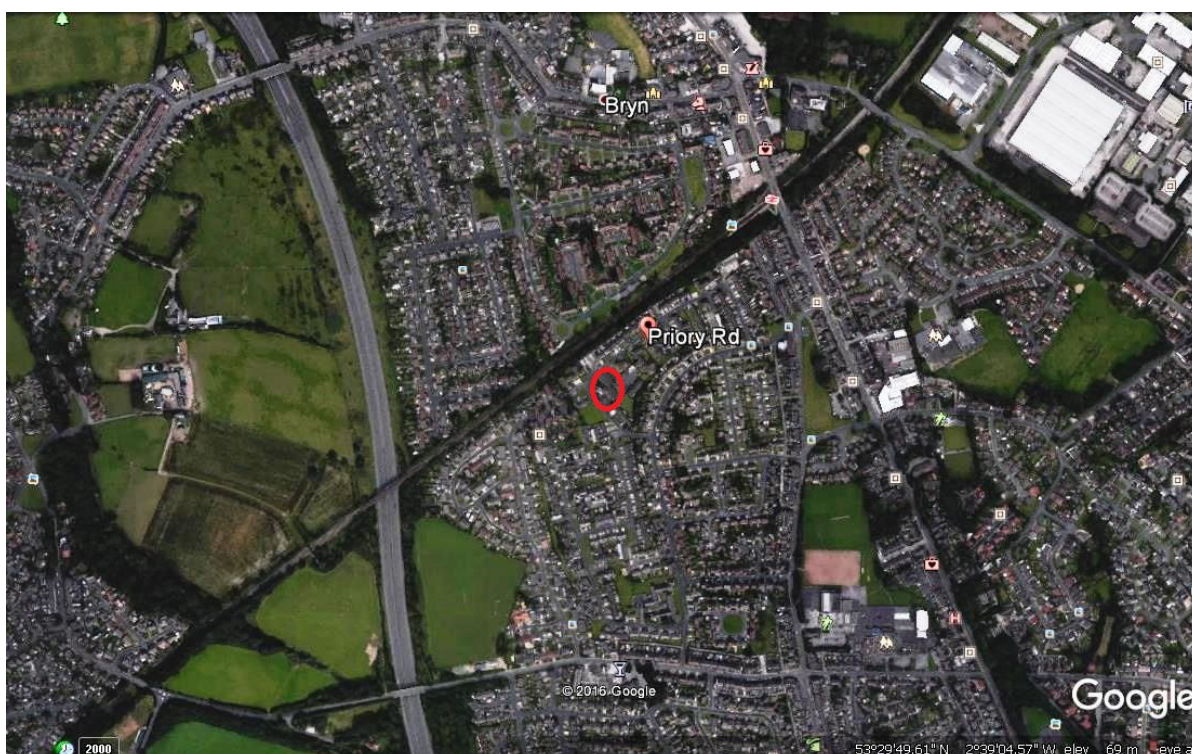


Fig. 2. Location of Walkden House indicated by red circle

The pipistrelle bat (2 species but especially *Pipistrellus pipistrellus*) is common and widespread in the area and is recorded in even the most urban locations.

Roosts of this species can occur in any building that provides suitable roosting crevices, with the risk of bat presence increased by close proximity to good bat feeding habitat and commuting routes; for example tree-lines, hedges, woodland, scrub and water courses and bodies. The bats use different roosts at different times of year, sometimes singly and sometimes in large groups of females with dependent young. They can move frequently and unpredictably between the roost sites known to them. The majority of house-holders with a roost of this species are unaware of it.

In summer females gather together each with their single off-spring in, sometimes large, maternity colony groups. Disturbance can cause the abandonment of babies (pups). In autumn when the young are independent, females visit males to mate. In winter the bats hibernate and rousing from hibernation - a slow process - can result in a depletion of fat reserves that may compromise the bats' ability to survive the winter. Females become pregnant in spring when their food (insects) becomes available again.

The likelihood of any other species frequenting the vicinity of this building is relatively low.

Bats and the Law.

All British bats and their roosts are legally protected under the Wildlife and Countryside Act of 1981 (as amended) and the EC Habitats Directive of 1992 as implemented by the 2010 Conservation of Habitats and Species Regulations. (Further information is available via <http://www.legislation.gov.uk/>)

As a result of these two pieces of legislation, amongst other things it is an offence to intentionally or recklessly kill, injure or capture bats, disturb bats or damage, destroy or obstruct access to bat roosts. Doing so can result in a custodial sentence. Fines of up to £5000 per bat can be issued in cases of non-compliance with the law. Bat roosts are protected whether or not bats are present at the time.

Under the European legislation, it is necessary for a development to maintain the favourable conservation status of bats in their natural range. This has generally been interpreted as meaning no net loss of roosts, and it is expected that roosting provision for bats will be made better than or equal to whatever is being lost to development. Wider environmental issues such as changes to feeding and commuting habitat, and lighting, also require consideration. However, the term “roost” in this context, tends to be interpreted to exclude places used opportunistically on a single occasion by just one bat.

Under English legislation (the Wildlife and Countryside Act, as above), a “bat roost” is described as “any structure or place which any wild [bat]... uses for shelter or protection”.

Implications.

Where a development will destroy a bat roost, a European Protected Species Licence is required before the roost can be interfered with in any way. It takes approximately 7 weeks for these to be issued once the application has been submitted. The application includes a Method Statement, and this along with the licence itself forms a legally binding document.

European Protected Species licences are issued providing planning permission has been granted, where appropriate.

Three conditions have to be met in order to obtain a licence:

- That the development is necessary for the purpose of “preserving public health or public safety or other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequence of primary importance for the environment”;
- 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 in their natural range”.

does not occur.

Planners must now satisfy themselves before validating applications whether or not bats will be implicated in the work and whether or not the impacts can be mitigated against and/or compensated-for.

The mitigation and compensation measures would include appropriate timing and methodology for the work including details of how the bats will be provided-for in the long term.

Natural England, the Government body responsible for administering the law relating to bats, have issued guidelines to planners on how to proceed with respect to bats: http://www.persona.uk.com/LTVS/I-OP_INQDOX/OBJ1604/FWY128.pdf.

Outside the planning system, the onus is on developers/members of the public, to have sufficient investigations undertaken to satisfy themselves (and the authorities in the event of a subsequent investigation), that their actions are unlikely to be in contravention of

bat legislation. Where this is in doubt it is necessary to seek appropriate advice and licencing before commencing any work on site.

N.b. It should always be remembered that bats often roost in places not anticipated by a lay person, such as modern buildings, trees with cavities and bridges. Some leave no signs in lofts, as they roost underneath external features such as roof slates, ridges, weather-boarding and cladding.

In the case of a building, tree or other feature not already known to be a bat roost, if bats are found during the course of work, contractors are legally obliged to stop work and seek advice. This should be from an appropriately experienced and licenced bat ecologist. Assuming good-quality bat survey work had been carried-out before the commencement of the project, and its recommendations followed, it would be unlikely that the discovery of bats during the course of the work would be considered to be "reckless" interference.

Additional Relevant Legislation and Policy.

Between 1995 and 2010 certain more vulnerable habitats and species were the subject of National or Local Biodiversity Action Plans. This strategy for the protection of biodiversity has been superseded by UK post-2010 Biodiversity Framework, which is largely now implemented at county level. Internationally The Convention on Biodiversity produced a Strategic Plan for Biodiversity 2011-2020. Further to this the EU Biodiversity Strategy was launched in 2011.

Section 41 of NERC lists species "of principal importance for the purpose of conserving biodiversity".

The National Planning Policy Framework of 2012 states that "the planning system should contribute to and enhance the natural and local environment" by a number of means, including "minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks... ."

Survey.

I made a daytime visit on **6/4/17** to undertake a preliminary survey of the building, assess its likely importance to bats and advise whether or not a precautionary approach or further survey work is needed.

Having being involved with bat survey work for 29 years and consultancy work for 20 years, it is always my objective to carry-out my work in a manner consistent with accepted Good Practice Guidelines (1) and consistent with the code of practice of the CIEEM. I hold Natural England Class Licences CL16 and CL18 (Registration CLS03475). These cover me for consultancy/scientific and Volunteer Bat Warden work, surveying hibernation sites and training others. I have a supplementary licence to photograph bats in roosts and a CL29 Barn Owl Class Licence. My credentials are expanded-upon in Appendix 1.

As far as possible, I surveyed the building inside and out with the aid of surveyor's ladders, 2 million candle-power torch, camera with 18x optical zoom and binoculars (8x42). Head-torch, 10x 50 binoculars, fibrescope (6 and 13mm heads, extendable to 2m) and mirrors were also available if needed.

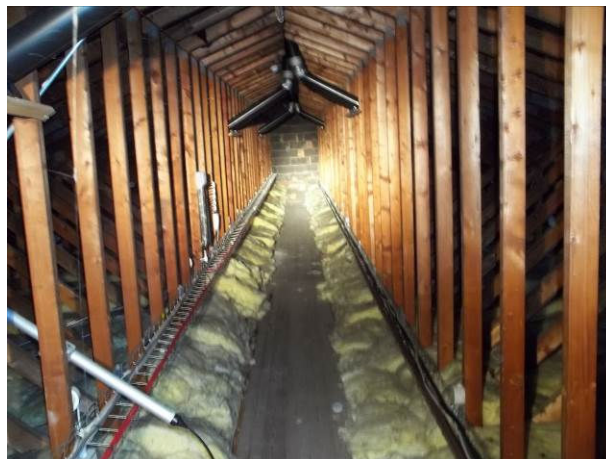
With respect to bats I was looking for access to potential roosting places and evidence of their use such as droppings, urine spots, staining and scratch marks around entrances, feeding remains and bats - alive or dead. It should be noted that droppings are the sign most frequently found, but they can turn to powder quite quickly and are soon washed and blown away from exposed external surfaces.

There are limitations to undertaking a bat survey just after winter, when bats are hibernating and largely inactive. Droppings from the summer may no longer be evident.

Findings.

The building has two large lofts, both orientated from north-west to south-east.

The roofs are lined with bitumastic felt and have a thick layer of insulating material at floor level. Each has a central walkway:



Pipework passes through the ceilings and in these places bats could gain entry from below ridge tiles into the loft:



At the south-eastern end of the more northerly limb of the building, 3 bat droppings were found. The location where they were found is shown below:



Inner gable wall where bat droppings were found

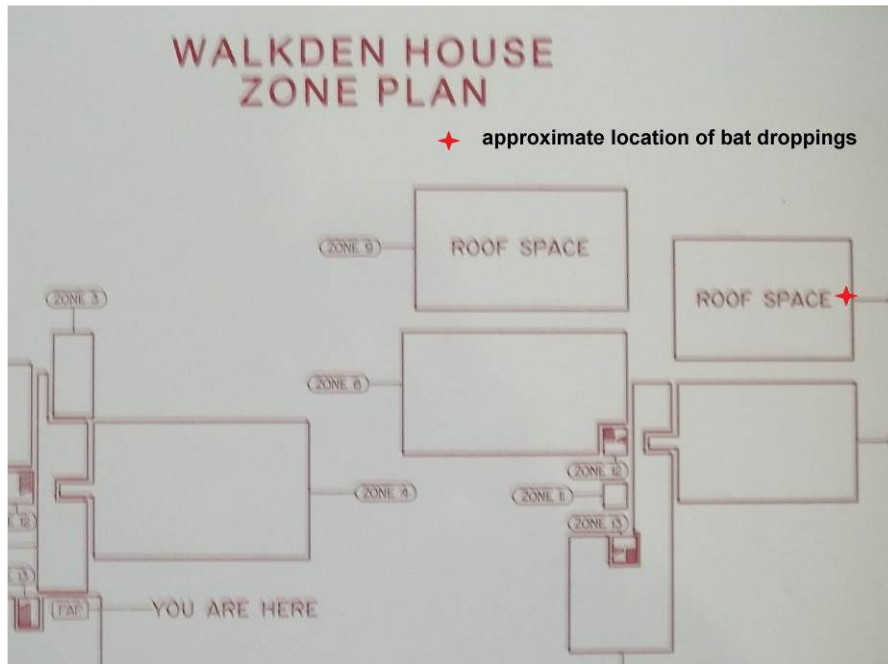


Fig. 3. Approximate location of bat droppings.



Fig. 4. Approximate location of bat droppings.

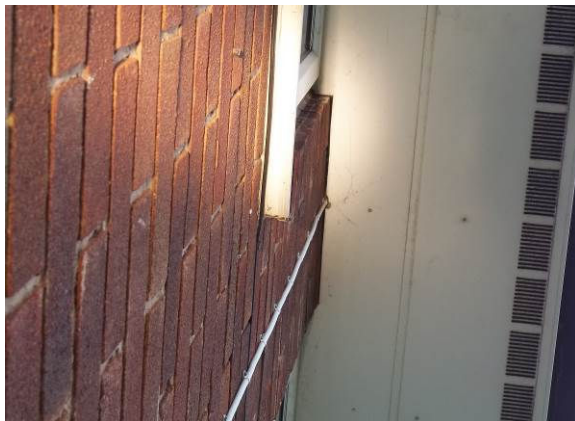
The bat droppings were removed to allow them to be sent for dna analysis.

Externally, there was no obvious gap at the soffit at the gable end where the bat droppings were found, though some of it is hard to visualise because of the lay-out of the buildings:



Gable end and boxed eaves at end where bat droppings found

Many of the soffits are well sealed but there are a few notable exceptions, including a gap in the brickwork in the second photograph below:



There is also a crack in the brickwork of the chimney:



The roofs are in generally good condition, but there are a few places where bats could get under the tiles, especially near wall-heads:



Conclusions/Discussion.

Appendix 2 gives an outline of the criteria used in assessing the level of risk of use by bats.

There was no evidence to suggest a maternity colony of bats has roosted here with dependent young in summer.

It is uncertain how long the few bat droppings found had been there. The fact there is no obvious bat access at the gable end where they were found raises the question of whether the boxed eaves have been replaced since, especially as sealant has been used at the soffit and a dry-verge has been fitted. It seems possible that bat access was inadvertently prevented by these measures.

However there are still gaps at some soffits and under some roof tiles, so bats could still gain entry to roost.

I've assessed the risk of roosting as low to moderate, with some degree of risk of use by a maternity colony with dependent young in summer.

Good Practice Guidelines suggest even low risk buildings should have a bat activity survey (emergence at dusk or to return-to-roost at dawn) when the findings of the initial survey were negative. See Appendix 3.

Recommendations.

These recommendations should be read in conjunction with the conclusions above.

Have two bat activity surveys (emergence-at-dusk or return-to-roost-at-dawn) carried-out in favourable weather conditions over the months of May to September inclusive, with at least one of them between the months of May and August inclusive. Dependent on the findings further recommendations will be made.

It is my usual practice to separate the surveys by at least a month, as the way bats use buildings changes as the season progresses.

References.

1. Ed. by Collins, J. (2016). Bat Surveys for Professional Ecologists: Good Practice Guidelines - Third Edition. Bat Conservation Trust.

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Appendix 1 - Angela Graham's Experience.

- I hold Natural England Class Licences CL16 and CL18. These cover me for consultancy/scientific work, work as a Volunteer Bat Warden and allow me to train volunteers. I have a supplementary licence to use flash photography in bat roosts (2014/SC1/0160), possess up to 10 live/dead bat specimens (20123429). I have a CL29 licence to disturb barn owls.
- I'm a member of The Chartered Institute of Ecology and Environmental Management and I report concerns about standards to them on an increasing basis.
- I undertake my work in accordance with the principles outlined in the Bat Conservation Trust's "Good Practice Guidelines".
- I have been involved in bat conservation for 28 years, initially as a volunteer with the Nature Conservancy Council (NCC) - first licenced in 1989 - and as a founder member of the South Lancashire Bat Group (1987). Later, and for many years, I was Co-ordinator/Chair and Trainer for the South Lancashire Bat Group. I trained the people who currently run the group, one of whom is a Trustee for the Bat Conservation Trust, along with an earlier trainee of mine.
- Over the last 20 years I have done increasing numbers of bat surveys on a consultancy basis, firstly part-time, then-full time from December 2003.
- I am experienced at applying-for European Protected Species Licences with respect to bats, especially common pipistrelles.
- From 2003 to 2008 I represented the bat groups of the north-west region at national meetings of the Bat Conservation Trust.
- I regularly communicate with the Ecologists who advise local authority planners, especially the Greater Manchester Ecology Unit and West Yorkshire Ecology raising concerns about practice and protocols.

Other experience includes:

- Attending bat-worker conferences every year since 1988 (mainly England, some in Wales) plus additional symposia on specific topics such as mitigation and woodland bats.
- Helping with winter surveys of underground hibernation sites in Clwyd.
- Participating in "Bat Detector Workshops" during the 1990s in different areas of the country, concerned with locating bat roosts and feeding sites/commuting routes.
- Sitting on local council "Wildlife Advisory Groups" (WAGs) in the Greater Manchester area from the early 1990s until around 2005.
- Helping local authorities and the Greater Manchester Ecology Unit formulate their Biodiversity Action Plans for bats, including the plan for Bolton.
- Administering the bat casework for English Nature (now Natural England) in the South Lancashire and Greater Manchester areas over 1998-2000.
- Assisting with research involving mist netting, harp trapping and radio-tracking.
- Continuing to attend courses run by recognised experts to ensure I stay up-to date both with respect to bat survey-work, sound analysis and conservation, and issues such as health and safety.
- Re-passing the Construction Site (CITB) Operatives test in May 2012 and updating my confined spaces training in 2006.
- Contributing to the Bat Conservation Trust's survey standards guidelines.

Appendix 2 - Criteria used in assessing risk of roosting (in the absence of obvious evidence of roosting).

| Risk of roosting | Definition | Suggested Action |
|--------------------|--|--|
| Nil | Whole of structure/tree can be seen well enough to be sure there are no roosting opportunities. | No need to consider bats further unless development is delayed and potential roosting places might develop in time. |
| Minimal/negligible | All or most of structure/tree can be seen well enough to suggest (but not confirm with 100% certainty) there are few, if any, places where bats could roost and/or the location does not provide easy access for bats to their insect prey, either in the immediate vicinity and/or via links with the wider natural environment. | Although roosting is thought to be unlikely and therefore the development is unlikely to impact on the favourable conservation status of bats, a precautionary approach should be taken at the time of the work. Further survey work needed only if development delayed. |
| Low | Whole of structure/tree can be seen well enough to know there are no more than a few openings that could be used by an individual bat or two and/or these provide access to the sorts of features that are likely to be suboptimal due to materials and/or conditions within (eg unstable temperature); and/or the location provides limited access to prey items, either in the immediate vicinity and/or via links with the wider natural environment. | Although regular roosting is thought to be relatively unlikely and the development is unlikely to impact on the favourable conservation status of bats, a single survey at dusk or dawn in favourable weather conditions would be appropriate to reduce the extent to which the judgement is based on speculation. If the findings were ambiguous e.g. possible bat emergence and/or considerable bat activity around the building, the survey would need repeating. My personal view is that it may be possible to by-pass such a survey if the timing and methodology (including alternative provision of potential roosting places for bats if any will be lost) can be planned to ensure no harm comes to bats and there is no reduction of appropriate roosting places available to them in the future. As pipistrelle bats in particular can change roosts frequently, often leaving no signs of their presence, this could be better all-round than carrying out a single survey that may provide little additional useful information. Basic precautions will be required at the time of the work irrespective of the findings of any additional survey work. |

| | | |
|-------------------------------|---|---|
| Moderate/ medium | A small number of openings are present and at least some seem likely to provide good conditions for roosting bats, and/or a loft/hay-loft/cellar is present that appears to have good qualities for roosting but no evidence of bats has been found at the time; and/or the location (as above) may limit the attractiveness to bats, but it is uncertain to what extent. | Further work is needed to better assess the abundance of bat activity in the vicinity and whether or not bats seem to make use of the roosting potential available. It is likely that more than one survey at dusk or dawn will be necessary, and possibly a repeat day-time inspection, including lofts/hay-lofts. In the case of cellars and equivalent winter inspection is necessary. |
| High | There is at least one feature that is typical of those favoured by bats for regular roosting and it/they provide access to abundant insect food on-site and/or via links with the wider natural environment. The feature/s could be suitable for use by a maternity colony, either as a main or satellite roost, or by a territorial male in autumn in the case of pipistrelles, or by individuals or small numbers of bats at any time of year, including winter when hibernating. | The extent to which bats of different species make use of the potential available needs to be investigated by carrying-out at least 3 surveys at dusk and/or dawn spaced over the months of May to September inclusive, possibly extending into April or October if weather conditions are favourable. (Air temperature above 8°C and not more than light rain and/or gentle breeze.) Maternity colonies have largely disbanded by September, but territorial male pipistrelles may be missed without a survey in September and a lot of smaller roosts are discovered at this time of year. As bats could hibernate unseen in winter and/or roost at other times not covered by the survey work, appropriate precautions will be needed at the time of the work along with maintenance of appropriate potential roosting places. |
| High - hibernation only | Cave-like places with stable conditions and high humidity, such as cellars can be used for hibernation in winter. | High-risk potential hibernation sites need at least 3 inspections spaced over the winter months as bats will move between sites depending on the weather conditions. |

Appendix 3 - Recommendations for further survey work when the findings of the preliminary survey were negative.

Bat Conservation Trust

Table 7.3 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 | Moderate roost suitability | High roost suitability |
|---|--|---|
| One survey visit. One dusk emergence or dawn re-entry survey ^a (structures). No further surveys required (trees). | Two separate survey visits. One dusk emergence and a separate dawn re-entry survey. ^b | Three separate survey visits. At least one dusk emergence and a separate dawn re-entry survey. The third visit could be either dusk or dawn. ^b |

^a Structures that have been categorised as low potential can be problematic and the number of surveys required should be judged on a case-by-case basis (see Section 5.2.9). If there is a possibility that quiet calling, late-emerging species are present then a dawn survey may be more appropriate providing weather conditions are suitable. In some cases, more than one survey may be needed, particularly where there are several buildings in the category.

^b Multiple survey visits should be spread out to sample as much of the recommended survey period (see Table 7.1) as possible; it is recommended surveys are spaced at least two weeks apart, preferably more. A dawn survey immediately after a dusk one is considered only one visit.

Taken from "Bat Surveys for Professional Ecologists: Good Practice Guidelines", 3rd Edition (2)

Table 7.1 Recommended timings 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 | Moderate roost suitability | High roost suitability |
|---|--|--|
| May to August (structures) No further surveys required (trees) | May to September ^a with at least one of surveys between May and August ^b | May to September ^a with at least two of surveys between May and August ^b |

September surveys are both weather- and location-dependent. Conditions may become more unsuitable in these months, particularly in more northerly latitudes, which may reduce the length of the survey season.

Multiple survey visits should be spread out to sample as much of the recommended survey period as possible; it is recommended that surveys are spaced at least two weeks apart, preferably more, unless there are specific ecological reasons for the surveys to be closer together (for example, a more accurate count of a maternity colony is required but it is likely that the colony will soon disperse). If there is potential for a maternity colony then consideration should be given to detectability. A survey on 31 August followed by a mid-September survey is unlikely to pick up a maternity colony. An ecologist should use their professional judgement to design the most appropriate survey regime.

Taken from "Bat Surveys for Professional Ecologists: Good Practice Guidelines", 3rd Edition (2)