BAT ACTIVITY SURVEY RESULTS REPORT

BUILDINGS AT RAMSGREAVE BUSINESS PARK, BLACKBURN, LANCASHIRE

AUGUST 2023

Bat Activity Survey Results Report

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August 2023

A report for

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1. INTRODUCTION

1.1 BACKGROUND AND REASON FOR SURVEY

PENNINE ecological have been commissioned by Iain Scales on behalf of their client RGB Property Management Ltd. to undertake bat presence/absence surveys of buildings at Ramsgreave Business Park, Pleckgate Road, Blackburn, BB1 8QU. This follows the recommendations for further survey which was outlined in the Preliminary Roost Assessment (PRA) report written by PENNINE Ecological in February 2023 (Pennine Ecological, 2023).

The PRA identified the property to be of **moderate suitability** to support a bat roost(s). Therefore, in accordance with current Bat Conservation Trust's *Bat Surveys for Professional Ecologists Good Practice Guidelines* 3rd Edition (Collins, 2016), two presence/absence surveys have been undertaken (see Figure 1.1 below).

Figure 1.1: Extract from Bat Conservation Trust - Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd ed. (2016)

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]

[a] 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.
[b] 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.

The surveys were undertaken to determine whether the proposals to demolish the existing buildings, to be replaced with new industrial units.

The results, conclusions and recommendations following the surveys, including any indicative mitigation to inform an application to Natural England for a European protected species mitigation licence (EPSML), where necessary, will be supplied within this report.

In accordance with Biodiversity Net Gain: Good practice principles for development (*CIEEM et al, 2019*), measures have been recommended proportionate to anticipated impacts to ensure that the proposed development results in a biodiversity net gain

Information pertaining to bat legislation and planning policy is included in Appendix A.

1.2 SITE LOCATION AND CONTEXT

The site is located at Ramsgreave Business Park, Pleckgate Road, Blackburn, BB1 8QU. The building subject to survey incorporates several business units that are adjoined. The sites grid reference is SD 6816 3085 and the location is shown in Figure 1.2 below.

Figure 1.2: Aerial image of buildings subject to survey at Ramsgreave Business Park

2. METHODOLOGY

2.1 SURVEY METHODS

The Bat Conservation Trust - Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd ed. (2016) edition states:-

"The guidelines do not aim to either override or replace knowledge and experience. It is accepted that departures from the guidelines (e.g. either decreasing or increasing the number of surveys carried out or using alternative methods) are often appropriate. The guidance should be interpreted and adapted on a case-by-case basis according to site-specific factors and the professional judgement of an experienced ecologist. Where examples are used in the guidelines, they are descriptive rather than prescriptive."

The survey methods have been determined using the experience of the surveyors and knowledge of the specific nature of the site.

Two dusk emergence survey were undertaken on 3rd August and 17th August 2023. This is considered to be within the main active season for bats (April to September inclusive) and within the optimal survey period in which Natural England accept bat surveys and grant European Protected Species Mitigation Licences (May to August inclusive).

The number of surveys and surveyors was adequate relative to the roost potential that was identified for the site i.e., moderate potential and requiring five surveyors to monitor potential roost features (PRF's) on the property at any one time.

Surveys were undertaken in good weather conditions and there were no visual constraints. Surveyors observed the roost features for at least 15 minutes prior to sunset and 1 hour 30 minutes after sunset (dusk).

The surveyors were aided with bat detection equipment (Anabat Chorus, EMTouch and Duet) that would enable surveyors to locate and record high frequency bat calls that are emitted by bats. The recordings were analysed following the survey using Anabat Insight software to verify field observations.

The surveys were led by the following people:

- Stuart Macpherson BSc (Hons) MSc, ACIEEM – Class 2 Natural England bat licenced ecologist (2021-10079-CL18-BAT). Experienced bat consultant and carer.

- Patrick Leatham BSc (Hons) MCIEEM – Ecological consultant with over 10 years' experience of undertaking bat surveys (preliminary roost assessments, bat activity surveys, and bat transect surveys). Accredited agent on Stuart Macpherson's bat licence (2021-10079-CL18-BAT).

2.2 SURVEY LIMITATIONS

The survey was undertaken in suitable weather conditions and within the recommended survey timeframes. There are considered to be no survey limitations.

3. RESULTS

The results of the bat activity surveys are outlined below.

3.1 BAT ACTIVITY SURVEY RESULTS

Survey details including dates, times and weather conditions are provided in Table 3.1 and the results of the dusk surveys provided in Table 3.2.

Table 3.1: Bat Activity Survey Details

Time of Survey	Sunset Time	Date	Weather Conditions
20:48 - 22:33	21:03	03/08/2023	Dry, light breeze, 50% cloud cover Start temp: 15°C End temp: 14°C
20:19 - 22:04	20:34	17/08/2023	Dry, light breeze, light cloud Start temp: 14°C End temp: 12°C

Table 3.2: Bat Activity Survey Results

Survey Results	Time	Species	Activity
Dusk survey 1 03/08/2023	**20:48 - 22:33**	**Summary: No emergence and low bat activity.**	
	21:21	Common pipistrelle	1no. bat commute south to north along brook to west of building
	21:23	Common pipistrelle	1no. bat commute south to north over buildings.
	21:41 - 21:47	Common pipistrelle	1no. bat foraging along Pleckgate Road and in gardens to south of site.
	22:03	Common pipistrelle	1no. bat brief foraging in gardens to south. Faint calls.
Dusk survey 2 17/08/2023	**20:19 - 22:04**	**Summary: No emergence and low bat activity.**	
	20:58	Common pipistrelle	1no. bat commute east to west along Pleckgate Road.
	21:04	Common pipistrelle	1no bat commute north to south over site.
	21:11 - 21:20	Common pipistrelle	1no. bat foraging along brook to immediate west of buildings.
	21:21	Common pipistrelle	1no bat commute south west to north east over buildings.

Survey Results	Time	Species	Activity
	21:29	Noctule	1no. brief pass. Heard not seen.

4. CONCLUSION & RECOMMENDATIONS/MITIGATION

4.1 CONCLUSION

From the surveys undertaken, it can be concluded that bats were absent from the buildings. Bat activity was low at the site with small numbers of common pipistrelle commuting over the site (generally in a south to north direction), and foraging in gardens to the south and along the brook to the west. The site is immediately surrounded by open countryside to the north. It is likely that a common pipistrelle roost is located south of the site and bats commute north over the buildings and into the wider countryside.

4.2 RECOMMENDATIONS/MITIGATION

Due to the absence of a bat roost, works can proceed as planned.

As bats are highly transient species' and can use buildings that offer potential roost features at any time of the year, it should be stated that if bats, or evidence of bats is found at any stage during the works, then as a legal requirement the work at the site must stop immediately and a bat ecologist contacted for further advice.

Although no roost has been identified, the proposal may consider enhancements for bats to demonstrate a biodiversity net gain for this site, in accordance with local and national planning policy. A number of potential enhancement measures are provided below.

4.2.1 Enhancing a development site for bats

External lighting

In all cases illumination of peripheral boundary areas should be avoided. Where lighting is required, this must be low level, low intensity and directed downwards away from boundaries. The following principles will apply;

- Where and if lighting is required, this will be directed internally within the site avoiding spillage towards boundary habitats.
- The use of low powered sodium lights or similar will be used and these will be fitted with cowls / covers that prevent lateral light spillage towards boundary habitats.
- Wherever possible and only if required low level (1-1.5m high) bollard lighting will be used.
- If required lights will be fitted with timer controls that minimise the duration of lighting.

Lighting requirements will follow guidance provided by the Bat Conservation Trust; links are provided below.

- Bat Conservation Trust's Artificial Lighting Guidance. Webpage link https://www.bats.org.uk/our-work/buildings-planning-and-development/lighting

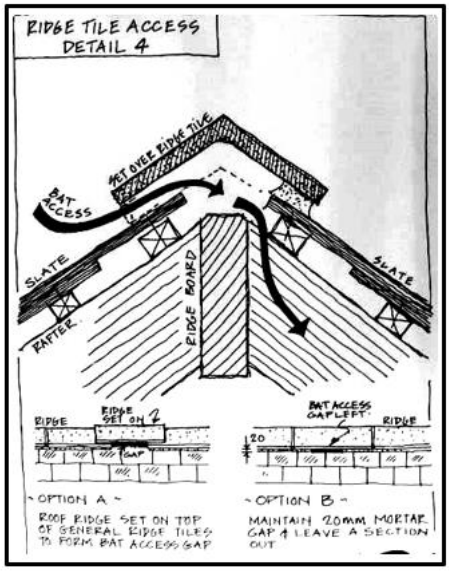
- Bat Conservation Trust and Institute of Lighting Professionals Guidance Note 08/23: Bats and Artificial Lighting in the UK. Webpage link https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/

Integrated bat box

The Habibat Bat Box is a solid box made of insulating concrete with internal roosting space. The box blends seamlessly into brick-built properties and may be incorporated into the fabric of buildings, being best placed on gable elevations.

Ridge access

Where appropriate, ridge tile access should be made with the incorporation of traditional Bitumen 1F underfelt immediately beneath ridge tiles. Breathable BRM membrane can cause significant problems where bats are in contact with it, whereby their fine claws become entangled within the fibres of the membrane, entrapping, and killing bats.

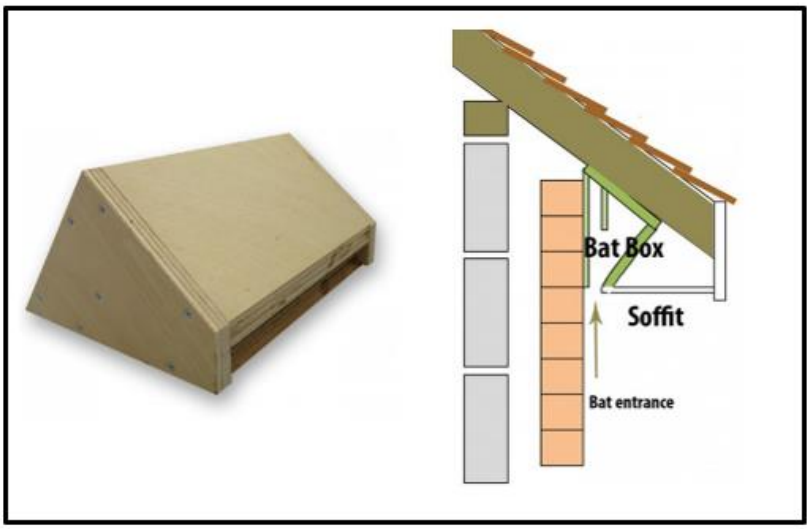


Soffit access

Where soffits are instated at gable elevations, roost provision may be instated in the form of a soffit bat box with internal roosting space.

Externally fitted boxes

A large number of externally fitted box models for bats exist for buildings. Suitable models for both buildings and trees may include the Eco Kent Bat Box or a soffit bat box.



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Appendix A: Bat Legislation and Policy

Legislation

All British bats and their roosts[1] are afforded protection under Schedule 5 of the Wildlife & Countryside Act (1981) (as amended) and are listed in Schedule 2 of The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579). When dealing with cases where a European Protected Species (EPS) (all UK bats) may be affected, a planning authority is a competent authority within the meaning of the Regulation 7 of the Regulations, that has a statutory duty as the local authority to have due regard to the provisions of the Regulations in the exercise of its functions.

The relevant sections of the Wildlife and Countryside Act 1981 (as amended) make it an offence to:

- Intentionally or recklessly damage or destroy any structure or place which any wild animal specified in Schedule 5 uses for shelter or protection;
- Intentionally or recklessly disturb any such animal while it is occupying a structure or place which it uses for shelter or protection; or
- Intentionally or recklessly obstruct access to any structure or place which any such animal uses for shelter or protection.

The relevant sections of the Conservation of Habitats and Species Regulations 2019 make it an offence to:

- Deliberately capture, injure or kill any wild animal of a European Protected Species;
- Deliberately disturb wild animals of any such species; and,
- Damage or destroy a breeding site or resting place of such an animal.

Where it is likely that the scheme would result in contravention of this legislation, a bat mitigation licence would be required to allow the works to proceed. As part of this process, the application must meet 'three tests' for licencing under the Conservation of Habitats and Species Regulations 2019. Planning guidance and case law also require the Local Planning Authority (LPA) to address these three tests when deciding whether to grant planning permission. The three tests are as follows:

- Regulation 55 (2) (e) states that a derogation license can only be issued for preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment;
- Regulation 55 (9) (a): that there is no satisfactory alternative; and
- Regulation 55 (9) (b): 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.

[1] 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

Policy

Paragraph 180 of the National Policy Planning Framework (as revised in July 2021) states:

180. When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons63 and a suitable compensation strategy exists; and,

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Bats in Lancashire

Up to eleven bat species have been recorded in Lancashire most of which use built structures (e.g., residential properties, bridges, and culverts) as well as features in trees (e.g., knot holes, woodpecker holes, peeling bark and torn limbs). The most frequently encountered species are the common and soprano pipistrelle bats; their abundant status in Lancashire is reflected throughout the UK