

- Protected species survey & licensing
- Habitat survey
- Habitat creation & management
- Arboricultural survey & impact assessment
- Invasive species survey & control
- Management plans

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For the attention of: RGB Property management Ltd

Date: 13th February 2023

Dear Salim,

Preliminary Bat Roost Assessment: Buildings at Ramsgreave Business Park, Pleckgate Road, Blackburn, BB1 8QW

PENNINE ecological have been commissioned to undertake a Preliminary Bat Roost Assessment (PRA) at the above site. The purpose of this study is to address any potential issues in relation to bats resulting from the proposal to demolish the existing factory buildings, to be replaced with new industrial units. Based on the proposals, potential impacts are considered to be confined to bats and birds. As such, a PRA was undertaken on the 10/02/2023 along with a search for any evidence of current or historic bird nesting. The sites grid reference is SD 6816 3085 and the location is shown below;

Figure 1: Aerial image of buildings at Ramsgreave Business Park, Blackburn



1. Desk Top Study:

A desk top consultation study with Lancashire Environment Record Network (LERN) was not undertaken for this study. However, searches for statutory sites and bat licence records were undertaken as follows;

Statutory and Non-Statutory Designated Sites:

Details of statutory sites were sought from the Natural England web site search:

<http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx>

There are no statutorily designated wildlife sites within 2km radii of the site. The Natural England (NE) Impact Risk Zone tool was also reviewed and consultation with NE would not be required for this development.

There are no known non-statutory designated sites within 500m radii of the site.

European Protected Species Mitigation Licences:

Details of European Protected Species Mitigation Licences (EPSML) for bats was sought from the Natural England web site search:

<http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx>

There are two EPSML in relation to bats within proximity of the site. The nearest EPSML record is approximately 340m south of the site, located along Pleckgate Road. The EPSML expired in 2012 and permitted the destruction of a resting place for common pipistrelle. Another EPSML is located approximately 790m south east of the site, near to Roe Lee Park Primary School. The EPSML expired in 2019 and permitted the damage of a resting place for common pipistrelle.

2. Bat Ecology and Legislation:

Bats are comprehensively protected by European legislation.

All British bats and their roosts¹ 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.

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*

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

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.

Use of Buildings by Bats:

- a) Summer breeding roost.
- b) Hibernation.
- c) Transitional or temporary roost.

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.

Up to eleven bat species have been regularly recorded in Lancashire, most of which use built structures, notably occupied residential properties for roosting. The most frequently encountered species is the Pipistrelle bat; its abundant status in Lancashire is reflected throughout the UK.

3. Survey Methodology

A daytime survey was conducted on the 10/02/2023. The building was inspected externally for evidence of bats and potential places / points of internal access that may be of value to bats. Close focusing binoculars were used to identify places that are frequently used by bats as roosts or as access into roost chambers.

During the survey the surrounding habitat was evaluated in relation to bats as very often roost selection is closely correlated with the surrounding habitat.

The daytime survey was conducted by Mr. Patrick Leatham, who is an experienced ecologist and full member of CIEEM. The results of the survey were discussed with Mr Stuart Macpherson, a highly experienced bat surveyor who holds a Natural England Class 2 bat licence (2021-10079-CL18-BAT). Mr Macpherson's evaluation of the site and conclusions concur with those of Mr Leatham's.

Constraints:

The building was inspected externally only due to no access into the factory being available at the time of survey. However, by observing through the windows, the buildings do not appear to have internal loft spaces to inspect. Full access to all the external elevations was possible and there were no visual restrictions to any of the elevations. Therefore an accurate roost assessment was provided and there are considered to be no constraints to the survey overall.

4. Bat Survey Results

Building Assessment

The buildings subject to survey comprise three factory buildings which are adjoined together. Building 1 is a two storey factory building with a slate roof with a number of skylights on both the north east roof pitch. There is a false face brick front on the south elevation of the building. A wooden soffit is present on the north east elevation. The south west elevation has an exposed wall plate where a wooden fascia board has been removed.

Building 2 is a single storey brick building with a corrugated asbestos roof. The roof is finished with an asbestos fascia around most of the roof edge.

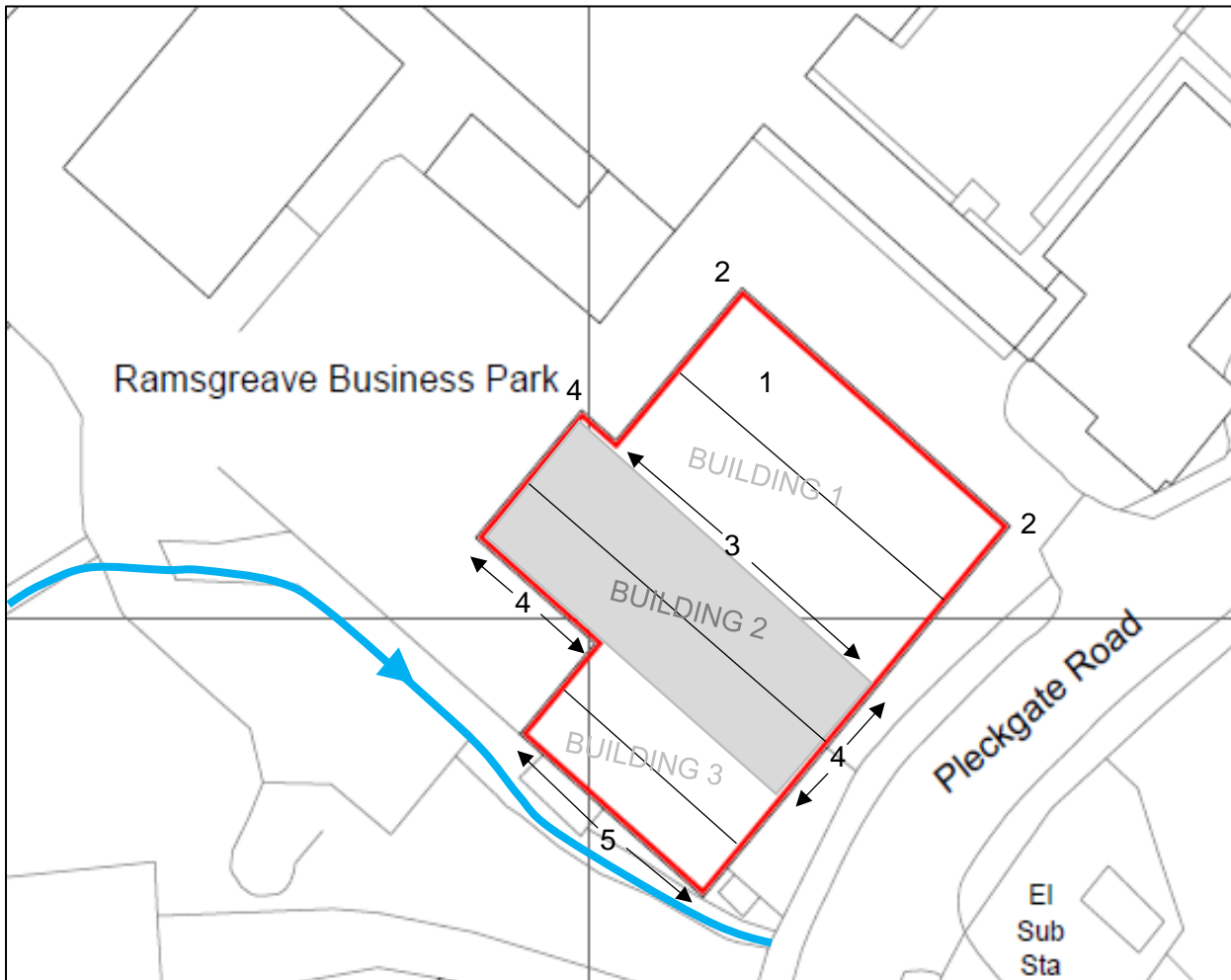
Building 3 is the same construction as Building 2. The corrugated asbestos roof overhangs the brick wall along the west elevation.

A number of features were identified during the external inspection which are considered suitable for use by bats. The potential roost features (PRF) are described in the Table and highlighted in the figure below.

Table 1: Ramsgreave Business Park Buildings - potential roost feature descriptions

PRF Reference	PRF Description
1	A number of dislodged roof slates and ridge tiles which along the north east roof pitch of Building 1. Gaps also present around the lead flashing surrounding the skylights in the roof.
2	Damaged wooden soffit on the north east elevation of Building 1 allows potential ingress to the wall cavity. Gaps particularly present on the north and south west corner of the building. There is historic evidence of bird nesting material within the soffit on the northern corner.
3	There is no soffit or fascia board along the south west elevation of Building 1. Subsequently the top of the brick wall is exposed and allows potential access to the wall cavity. Expanding foam has been used to fill some of the gaps along the top of the wall, however gaps are expected to still be present.
4	There is an asbestos fascia around most of the roof perimeter of Building 2. The fascia sits off the wall on the south facing elevation, south-west facing elevation and the northern corner of the building which allows potential access to the wall cavity. In parts, the fascia is large enough to house small numbers of bats between the wall and fascia board.
5	There is no fascia board or soffit present on the south west elevation of Building 3. There is potentially a gap where the roof meets the wall, however this was only observed from the road using binoculars as the brook restricts close access to the building. The elevation is cluttered with trees and scrub that are associated with the adjacent brook.

Figure 2: Potential Roost Features Location Plan



Habitat Assessment

The buildings form part of a business park which is on edge of an urban area. To the south of the site there is residential dwellings and a dual carriageway (A6119, Ramsgreave Drive) and north of the business park is rural landscape comprising arable land, hedgerows, and ponds. There is a small brook immediately west of the buildings with associated riparian habitats (trees and scrubs) and this provides direct links to the rural landscape north of the business park. There does not appear to be a lot of light pollution from the business park, with many of the security lights appearing defunct.

Overall the habitats associated with the site and locally are considered to be of moderate suitability for bats.

Preliminary Roost Assessment

Based on the PRF's identified and the surrounding habitat, the bat roost potential for the buildings is considered to be **Moderate**.

5. Recommendations

5.1 Bat Recommendations

Since the building is concluded to possess moderate potential for crevice dwelling bats, it is recommended that two dusk emergence surveys are undertaken. The surveys are required to establish whether or not bats are using the building and if present how they are using it.

The survey will need to be conducted during the main active season of bats i.e. between May – August. Two dusk surveys are accepted as being a reasonable level of survey effort where moderate potential has been identified. In addition, a data search of local bat records could be sourced to compliment the surveys.

Figure 3: Extract from Bat Conservation Trust: Bat Survey Guidelines 2016 3rd Edition

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 this 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 that surveys are spaced at least two weeks apart, preferably more. A dawn survey immediately after a dusk one is considered only one visit.

Following the completion of the surveys, further recommendations will be made in respect of any issues in relation to bats.

If you require clarification on any issue, please contact me at the above address.

Yours faithfully

Patrick Leatham

Patrick Leatham BSc (Hons), MCIEEM.

Site Photographs: February 10th 2023



Photograph 1: View of the east elevation of Building 1. Gaps in roof slates and around skylight.



Photograph 3: Damaged wooden soffit allowing potential access to wall cavity (PRF2).



Photograph 2: View of the east elevation with dislodged slates and gaps around skylight (PRF1).



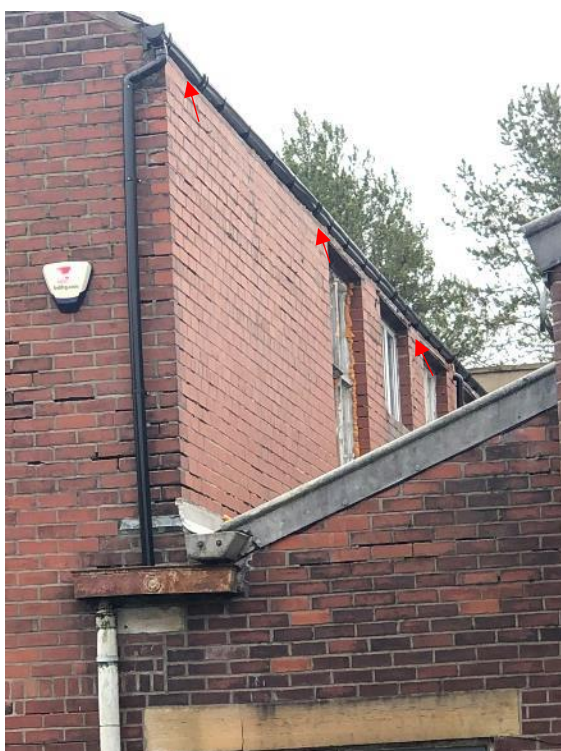
Photograph 4: Gap on south east corner where wooden soffit is damaged (PRF2).



Photograph 5: Gap along western elevation of Building 1 where fascia board is missing (PRF3).



Photograph 7: Asbestos fascia on Building 2 is off set from the wall allowing access between wall and fascia board (PRF4).



Photograph 6: PRF3 continues along the entire west elevation of Building 1.



Photograph 8: Gap on north corner of building 2 behind asbestos fascia (PRF4).



Photograph 9: Overview of the north elevations of the buildings. Minimal light pollution within the adjacent yard.



Photograph 11: Potential gap at top of wall due to absence of fascia board/soffit (PRF5). Unable to inspect closely due to watercourse.



Photograph 10: Large overhanging asbestos fascia on west elevation of building 4 is off set from brick wall (PRF4).



Photograph 12: Watercourse and riparian corridor immediately adjacent to west of Building 3.