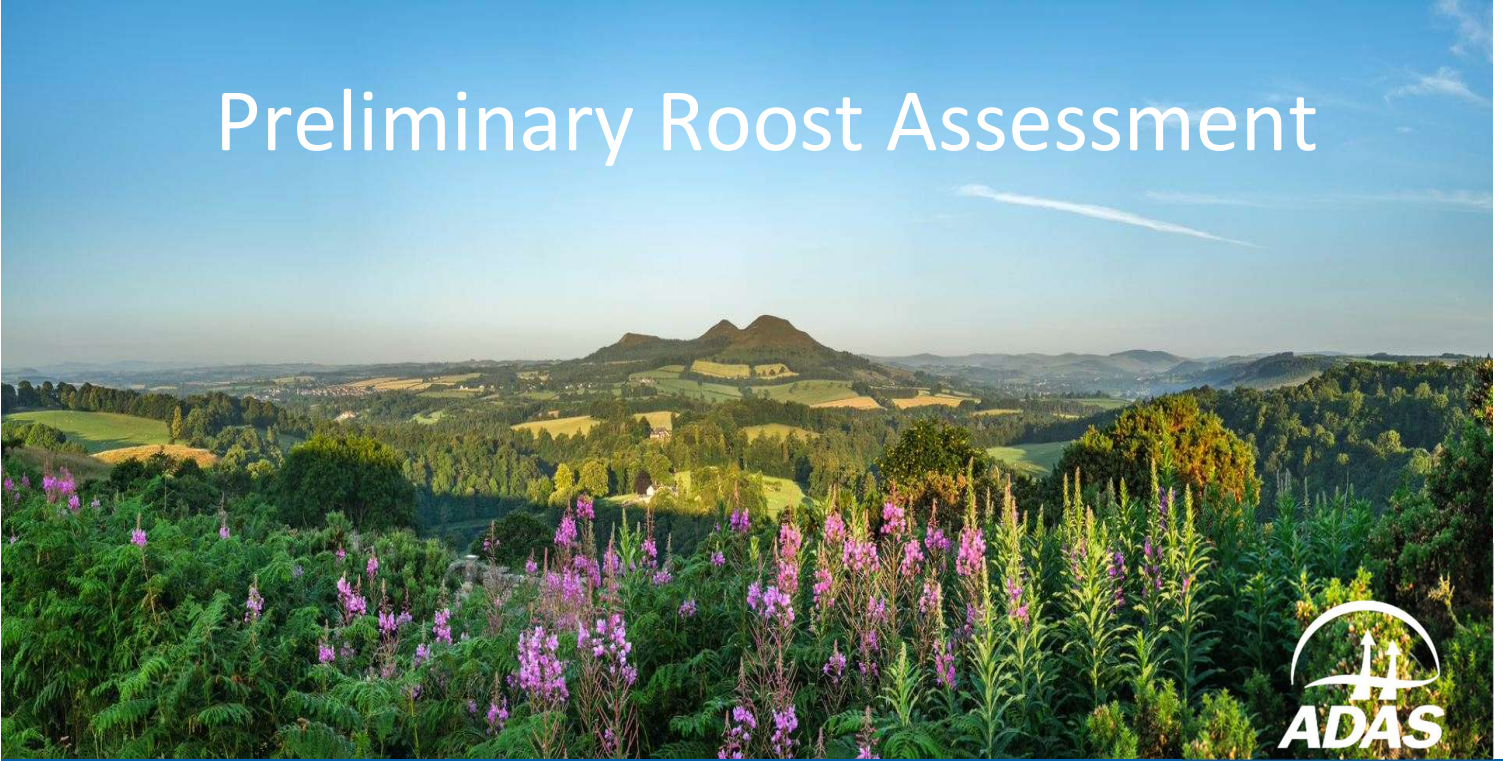


Preliminary Roost Assessment



Marley Hay, Liverpool

Principal Author:

Helen Starmer-Allen ACIEEM

Project Code/ADAS Ref:

1052665

WNT69105-1389 (01)

Address:

RSK ADAS Ltd

14 Beecham Ct, Goose Green

Wigan, WN3 6PR

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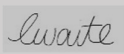
Tom Kelly

Jennings Design Associates

The Warehouse, Saxon St,

Denton, M34 3DS

Quality Assurance

Version	Date	Author	Checked	Approved
01	19 September 2024	Helen Starmer-Allen ACIEEM 	Sebastian Phelan BSc (Hons) MCIEEM 	Simon Fawcett BSc (Hons) MCIEEM 
02	19 February 2025	Lucy Cater BSc (Hons) 	Lydia Waite BSc (Hons) MCIEEM 	Rob Nicholson BSc (Hons) MCIEEM 

The information which ADAS has prepared and provided is true and has been prepared and provided in accordance with the CIEEM's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

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Where any data supplied by the client or from other sources have been used, it has been assumed that the information is correct. No responsibility can be accepted by ADAS for inaccuracies in the data supplied by any other party. The conclusions and recommendations in this report are based on the assumption that all relevant information has been supplied by those bodies from whom it was requested.

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Where field investigations have been carried out, these have been restricted to a level of detail required to achieve the stated objectives of the work.

This work has been undertaken in accordance with the quality management system of RSK ADAS Limited.

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Summary

ADAS was invited by Tom Kelly of Jennings Design Associates Ltd on behalf of Stacey D'Adonna of ForHousing to conduct a Preliminary Roost Assessment on seven small garages at Marled Hey, Stockbridge Village, L28 0QL (Grid Reference SJ 42219 93519), to support the planning application for two bungalows.

The Preliminary Roost Assessment was undertaken on 06 September 2024 by ADAS Assistant Ecologist Helen Starmer-Allen ACIEEM. No evidence of a roost, roosting potential or bats was found during the survey. As the proposed works will only impact buildings assessed to be of negligible suitability to support roosting bats, the proposed development can proceed without any further bat survey work or a protected species licence from Natural England.

The report was updated to reflect a new site boundary provided to ADAS by the client on 05 February 2025. The document was updated by Lucy Cater BSc (Hons). The results of this report were not considered to have changed due to the updated redline boundary, as no additional structures were included nor existing structures excluded by the updated redline boundary.

1 Introduction

1.1 Background and Survey Objectives

RSK ADAS Limited was commissioned to undertake a Preliminary Roost Assessment (PRA) of seven small garages at Marled Hey, Stockbridge Village, L28 0QL (Grid Reference SJ 42219 93519), to identify if any suitable bat access and roosting features were present within these buildings. The current development proposals include the demolition of all buildings on site.

The PRA is designed to assess the building's suitability to support roosting bats.

The objectives of this study are to:

- *Assess the buildings suitability to support roosting bats;*
- *Identify any bat roosts within the building (if possible);*
- *Identify evidence of roosting bats within the building (if possible);*
- *Determine species of bats present (if possible);*
- *Provide an overview of measures required to ensure proposed works do not negatively affect bat populations;*
- *Determine whether further survey work is required.*

1.2 Site Description

The site comprised seven brick-built garages, arranged in a straight line (southeast to northwest) and all had traditional style pull-out doors. However, these doors had been boarded over with large sheets of plywood. The roof was constructed out of a sealed layer of concrete with no overhang or detailing. The roofs were flat and had no guttering or fascias (see Appendix 1 for photographs). The garages sat within a residential area with a small patch of modified grassland and concrete hardstanding (road / car parking spaces) adjacent. Figure 1 below shows the site in context of the wider landscape.



Figure 1. Site location and wider landscape (site indicated by red line boundary)

Imagery taken from Bing Aerial. September 2024.

1.3 Description of the Proposed Development

The proposed development involves the total demolition of the seven-garage building and the construction of two bungalows, in line with the plans provided by the client on 05 February 2025 "0934-JDA-XX-XX-DR-A-0001-P06-Location Plan.pdf".

2 Legislation and Planning Policy

2.1 Legislation

Bats are protected under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). Under the Wildlife and Countryside Act 1981 it is illegal to:

- *Kill or injure bats;*
- *Cause disturbance at their resting places; or*
- *Block access to, damage or destroy their roost sites.*

Under the Conservation of Habitats and Species Regulations 2017 (as amended) it is an offence to:

- *Deliberately capture or kill a bat;*
- *Damage or destroy a breeding site or resting place of any bat (this is an absolute offence and intent or recklessness does not have to be proved); and*
- *Deliberately disturb a bat (this applies anywhere, not just at its roost).*

2.2 National Planning Policy Framework

The National Planning Policy Framework (NPPF) (Department for Levelling Up, Housing and Communities, 2024), is a policy framework document which provides a range of important principles. Paragraph 187 of the NPPF states that decisions should contribute to and enhance the natural local environment by:

‘Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.’

Paragraph 188 goes on to state:

‘... take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.’

When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles (paragraph 193):

‘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.’

2.3 Local Planning policy

Table 1 details the policies within the Liverpool Local Plan 2013-2033 (adopted January 2022) which are relevant to the ecological features on site.

Table 1: Summary of relevant local planning policy – Liverpool Local Plan

Policy	Description
Policy GI 6 Protection of Biodiversity and Geodiversity	1. Development which may result in a likely significant effect on an internationally important site must be accompanied by sufficient evidence to enable the Council to make a Habitats Regulations Assessment. Adverse effects should be avoided and/or mitigated to ensure that the integrity of internationally important sites is protected. Development which may adversely affect the integrity of internationally important sites will only be permitted where there are no alternative solutions and there are imperative reasons of overriding public interest and suitable compensatory provision is secured. This also applies to sites and habitats outside the designated boundaries that support species listed as being important in the designations of the internationally important sites. 2. Development which may cause direct or indirect significant harm to other designated sites of nature or geological conservation importance, Priority Habitats, legally protected species and / or Priority Species will only be permitted on: a. National sites (Mersey Estuary Site of Special Scientific Interest (SSSI)): where there are no alternatives and where the benefits of development clearly outweigh the impact on the features of the site that make it of special scientific interest, and its broader contribution to the national network; b. Local Sites (Local Nature Reserves (LNRs), Local Wildlife Site (LWS) and Regionally Important Geological/Geomorphological Sites (RIGS): where the reasons for and the benefits of development clearly outweigh the impact on the nature conservation value of the site and its broader contribution to the Liverpool City Region (LCR) Ecological Network; c. Sites including Priority Habitats/ Irreplaceable habitats (including ancient woodlands and aged or veteran trees) where there are wholly exceptional reasons and a suitable compensation strategy exists. 3. Where it has been demonstrated that significant harm cannot be avoided, appropriate mitigation, replacement or other compensatory provision may be required. 4. Where significant harm resulting from development cannot be avoided, adequately mitigated or, as a last resort, compensated, then planning permission will be refused. 5. Development proposals which affect sites of nature conservation importance, Priority Habitats, legally protected species or Priority Species must be supported by an Ecological Appraisal and include details of avoidance, mitigation and /or compensation where appropriate. 6. The policy applies where development proposals in Liverpool may directly or indirectly affect sites with known conservation value in a neighbouring authority area. 7. This policy will apply to other sites recognised during the Plan period as being of nature conservation importance, including land provided as compensation.
GI 8 New Planting and Design	Where appropriate, depending on the character of the site and locality, new development should make provision on site for the planting and successful growth of new trees and landscaping, including any replacement planting provided as compensation for loss due to development. It should be demonstrated that: a. New planting is sustainable for the long-term, fit for purpose, and species selection has had regard to international, national, sub-regional and local biodiversity initiatives. Plant selection must provide a high quality landscape and make a positive contribution to the landscape character of the site and surrounding area; b. Consideration has been given to locational challenges, including within the City Centre or more heavily urbanised parts of the City. On sites with limited space for planting, alternative planting surfaces and innovative green infrastructure solutions such as green roofs and walls should be considered. Planting should where possible consist of more than just Sedum species; c. Opportunities for the creation of new habitats has been taken; d. The use of stock size in planting schemes is appropriate to the site; and . e. Plant selection and design of the planted area has wherever possible contributed to rainwater management of the site by minimising surface run off and maximising surface infiltration. 2. If it can be demonstrated that on-site provision cannot be appropriately achieved or off-site tree provision is more appropriate the Council will require a commuted sum based on the cost of providing and establishing new trees in the locality. 3. Developers will be required to ensure the establishment of the planting proposals by replacing all dead, dying or diseased stock for a period of five years from the date of completion of development.

GI 9 Management of Existing Site Vegetation	1. Where there are trees present on site, or where the development is sited within 3m of the outer extent of the canopy spread of any tree, a tree survey, Arboricultural Impact Assessment (AIA) and Arboricultural Method Statement (AMS) must be submitted alongside the planning application. The AIA must include a draft tree protection plan. 2. Any tree works to implement the development which have been agreed within an approved AMS should be carried out by a competent/qualified arborist. 3. In order to protect and integrate existing trees and landscape features within new development, developers must demonstrate that: a. The tree constraints highlighted by the survey have informed the site layout design to ensure that development is suitably integrated with trees and that potential conflicts are avoided. Applications which cause an unacceptable loss of trees will be refused and the removal of any protected tree will only be allowed in exceptional circumstances such as where the tree is dangerous and on condition that replacement planting takes place; 244 244 b. Site layouts of the proposed development show adequate spacing between the development and the existing retained trees, taking into account the current and future spatial requirement of the tree both above and underground; c. With the exception of trees to be removed for reasons of good arboricultural management, any tree that is removed as part of an agreed development scheme will be replaced taking account of the size of the tree, space requirements for tree growth and nature and design of the site. If replacement tree planting cannot reasonably be located on site, then the City Council may seek funding from the developer for off-site planting in the locality; d. With regard to residential proposals, site layouts show the location of existing trees within the garden area, specifically indicating the proportion of the garden area under the canopy of an existing tree. It will not normally be acceptable for the canopy of an existing tree to cover more than 50% of the garden area; e. For residential proposals, trees identified as being veterans will not be situated within single garden areas but are to be situated in communal areas. In the event where this is not possible, full justification must be provided as to why this cannot be achieved and mitigating measures to ensure the successful retention of the veteran must be proposed for consideration; f. Consideration has been given to protecting areas of post development planting on development sites from compaction or contamination which will inhibit the success and rapid establishment of future planting. Where space constraints do not allow this to occur then a restoration method must be proposed.
GI 10 Green Infrastructure Enhancement	1. To mitigate the impact of climate change in the City, all major development proposals should be designed to incorporate green infrastructure measures including the following, where appropriate: a. Integrating or enhancing existing biodiversity features; b. Providing or enhancing green infrastructure at key gateways to, and along, key corridors in the City, where appropriate opportunities arise within the development site; c. Enhancing existing open spaces within the site and maintaining access to public open space; d. The inclusion of small scale green infrastructure projects. This could include food growing, small community gardens; e. Inclusion of effective water management through the use of permeable surfaces and/or Sustainable Urban Drainage Systems, and where possible and appropriate to do, the opening of culverted watercourses; f. Improving or creating access to the Public Rights of Way network, green corridors such as the Liverpool Loop Line or the Leeds Liverpool Canal, or Liverpool City Region (LCR) Active Travel Routes to encourage active and sustainable travel and recreation. 2. Development proposals which are located in close proximity to green corridor routes or the LCR Active Travel Routes should contribute to their delivery. 3. All development proposals, should contribute to ensuring a net gain in biodiversity in the City including, where relevant, contributing to the recovery of priority species and habitats. 4. Where fairly and reasonably related to the development proposal, financial contributions through an appropriate legal agreement will be sought towards the creation of new off-site green infrastructure provision, or to enhance and improve existing provision off-site, where it is clearly demonstrated that on-site provision is not possible, beneficial or appropriate.

3 Methods

3.1 Desk Study

A desk study was carried out to identify known records of bat species, within a 2 km radius of the proposed development and granted European Protected Species licence applications within 2 km.

Multi-Agency Geographic Information for the Countryside (MAGIC) was used to derive information relating to the location of granted European Protected Species licence applications within a 2 km radius of the site and to check any statutory designated sites which are designated for bats within 15 km of the site. BioBank Merseyside Environmental Records Centre provided records of bat species recorded within 2 km of the site.

3.2 Preliminary Roost Assessment

A Preliminary Roost Assessment was carried out to determine suitability of the building for roosting bats. ADAS Assistant Ecologist Helen Starmer-Allen ACIEEM conducted an external inspection of the building on 06 September 2024. This involved systematically checking the exterior areas of the building, identifying and classifying any features or structures suitable for bat roosts, entry/exit points, including evidence of bats such as droppings or feeding remains. Any holes or crevasses were examined with the aid of the Rigid micro CA-25 Inspection endoscope camera. The assessment was based on the most recent guidance included in the Bat Conservation Trust’s Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, J. (Ed) 2024) (see table below).

Table 2: BCT guidelines for assessing the potential suitability of structures for roosting bats, based on features present and using professional judgement.

Suitability	Description of Roosting Habitats
Negligible	Negligible habitat features on site likely to be used by roosting bats.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, they do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis by a large number of bats (i.e. unlikely to be suitable for maternity or hibernation).

Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protections, conditions, and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost status only-the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed).
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, and surrounding habitat.

3.3 Limitations

Although there was no internal access to the garages this is not considered a significant constraint to the survey. All external features were examined, which were all well-sealed and there were no access points that could lead into internal voids.

It is important to note that most species are greatly under-recorded and therefore a lack of records for a location should not be taken as an absence of the species concerned. Furthermore, a record for a particular habitat or species does not necessarily confirm its current presence.

4 Results

4.1 Desk Study

A search using MAGIC confirmed there are no statutory designated sites which are designated for bats within 15 km of the site.

4.1.1 Bat roost records

A search using MAGIC confirmed two bat mitigation licences have been granted by Natural England within 2 km of the site. These include:

- *EPSM2013-5749 – Destruction of breeding site and resting place for Common Pipistrelle (Pipistrellus pipistrellus), Soprano Pipistrelle (Pipistrellus pygmaeus), Brown long-eared Bat (Plecotus auratus) and Whiskered Bat (Myotis mystacinus) from 19.04.2012 – 30.08.2016 approximately 1.7 km northwest of the site.*
- *EPSM2010 – 2694 – destruction of a resting place for Common Pipistrelle from 01.04.2011 – 31.12.2012 approximately 1.9 km southwest of the site.*

Table 3: Records of bats within 2 km of the site.

Species	Summary of biological records
Bats	BioBank Merseyside Ecology Services Ten activity records were returned from BioBank Merseyside within 2 km of the site associated with Pipistrelle (<i>Pipistrellus</i> sp) and Nathusius (<i>Pipistrellus nathusii</i>). These records were not associated with any known roosts.

4.2 Preliminary Roost Assessment

The garages were oriented with their openings facing south. At the time of survey, the garage doors were securely closed and covered with wooden boards (see Appendix 3: Photographs 1-4). The east and north walls were fully sealed, preventing any potential entry (see Appendix 3: Photographs 5-7). On the west-facing wall, several small holes were observed at the top where the wall meets the roof. One hole was too shallow to accommodate roosting bats, while another was blocked by wood, leaving no space for entry. A third hole, initially considered potentially suitable for bats, was inspected using a rigid micro CA-25 Inspection camera. The inspection revealed that the hole was too shallow and exposed to support bat roosting. At the front of the garages, on the east wall facing south, several cracks were found between the inner and outer walls, as well as around a metal gate. The lower portion of the crack was too shallow for bats, and a larger crack was inspected, revealing it was filled with concrete debris and also too exposed to serve as a bat roosting site (see Appendix 3: Photographs 7-10).

The buildings had no options of entry for bats, so the garages had negligible bat roost potential for all species. This also ruled out any hibernation potential.

5 Conclusions and Recommendations

No evidence of bat presence was noted within the exterior of the building, and it was considered that the building was of negligible suitability for roosting bats. As the proposed works will not impact a roost or potential roosting site, it is considered that the proposed works can be carried out without any further survey work or a protected species licence from Natural England being required.

In terms of enhancement of the site, there are a number of options for enhancing the value of any proposed buildings for bats, in line with guidance published by the Bat Conservation Trust (Gunnell et al, 2012). For example, the installation of bat boxes on the walls of the proposed buildings or nearby trees could provide suitable roosting opportunities for bats, and the provision of insect hotels around the surrounding grounds could increase the number and diversity of insects on site, thus providing an increased food resource for bats. The placement and specification of these items should be determined by a suitably qualified ecologist.

6 References

Collins, J. (ed.), (2024). *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn)*. The Bat Conservation Trust, London. ISBN-13 978-1-872745-96-1

Gunnell, K., Grant, G. and Williams, C., (2012). *Landscape and Urban Design for Bats and Biodiversity*. The Bat Conservation Trust, London.

Appendix 1: Photographs



Photograph 1: Fully sealed garage doors with plywood cover.



Photograph 2: Fully sealed garage doors with plywood cover.



Photograph 3: Sealed garage entrance with small crack visible along the exterior wall next to metal fencing.



Photograph 4: Remaining garage entrances, sealed roof and no overhang or fascias.



Photograph 5: Sealed side wall with no gaps or crevices.



Photograph 6: Sealed back external wall, facing into community car park.



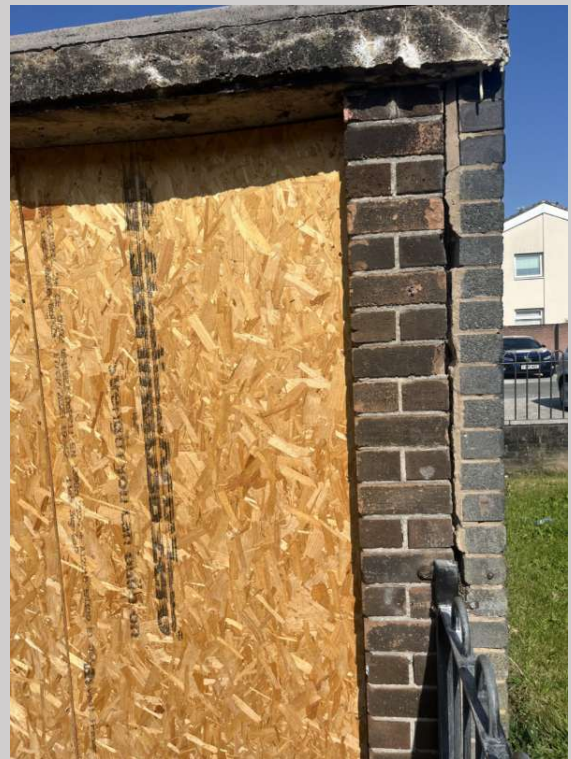
Photograph 7: Corner of the external building.



Photograph 8: Fully sealed corner and garage opening.



Photograph 9: Back external wall facing car park.



Photograph 10: Small crack and crevice which was examined by endoscope.