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NON-LICENSED METHOD STATEMENT

At

Glen Dimplex Factory

Stone Lane
Whiston
Knowsley
L35 2XW

NGR: SJ 47998 91567

Prepared for:	Ben Edmundson, Taylor Wimpey North West
Written by:	Toby Leverett, UES Graduate Ecologist
Approved by:	Mark Halliwell, UES Senior Ecologist

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1 INTRODUCTION

1.1 Author and qualifications

This report is written and compiled by Toby Leverett BSc MSc, Graduate Ecologist for United Environmental Services Ltd (UES).

The report has been verified by Mark Halliwell MBiol, UES Senior Ecologist. Mark is licensed by Natural England to disturb, take and handle all species of bats under licence number 2023-11661-CL18-BAT (level 2).

1.2 Proposed development

The proposed development involves the demolition of the existing buildings and the construction of a housing scheme. This will include the construction of numerous residential dwellings with associated access roads, footpaths and landscaping.

1.3 Surveys

Bat presence absence surveys were conducted at Glen Dimplex, Knowsley during the 2025 survey season. These surveys consisted of a single bat scoping survey followed by bat presence absence emergence surveys and two bat back tracking surveys. Static bat detectors were also installed from 2nd October – 28th November 2025 as a supplementary survey method to the bat back-tracking survey. The objective of these surveys was to establish whether or not bats are still using the buildings on site to roost, and if so, to assess the type and importance of the roosts. The surveys were carried out to recognised guidelines, timings and weather conditions, with particular reference to Natural England and Bat Conservation Trust (BCT) publications.

Surveyor details

- Tom Kenwright BSc MSc ACIEEM, UES Senior Ecologist. Tom is licensed by Natural England to disturb, take and handle all species of bats under licence number 2023-11076-CL18-BAT (level 2).
- Mark Halliwell MBiol, UES Senior Ecologist. Mark is licensed by Natural England to disturb, take and handle all species of bats under licence number 2023-11661-CL18-BAT (level 2).
- Daniel Smith BSc MScRes, UES Ecologist. Daniel is licensed by Natural England to disturb, take and handle all species of bats under licence number 2024-12117-CL18-BAT (level 2).
- Ysobella Cox BSc MBiol, UES Senior Ecologist. Ysobella is licensed by Natural England to survey all species of bats by observation using an artificial light under licence number 2024-12344-CL17-BAT (level 1). Ysobella is listed as an accredited agent on the bat survey licence of Toby Hart (2015-15898-CLS-CLS (level 3) and 2015-15899-CLS-CLS (level 4)). As such, she has been deemed competent to undertake licensable activities such as using an endoscope to survey for bats.
- Heather Tewnion BSc, UES Field Ecologist
- James Stubbs BSc MRes, UES Graduate Ecologist
- Josh Howard BSc, UES Graduate Field Ecologist
- Harry Fox BSc MRes, UES Graduate Ecologist
- Nathaniel Foley MSci, UES Graduate Ecologist
- Osian Shirley MSci, UES Graduate Ecologist
- Josie Wynn BSc, UES Graduate Ecologist
- Jonathan Heayns BSc MSc, UES Graduate Ecologist
- Bethany Dineley BSc, UES Graduate Ecologist



Buildings 4,5 and 6 were assessed as having negligible potential to support roosting bats as such no mitigation or compensation measures regarding bats are required for these buildings.

Buildings 2, 3 and 7 were assessed as having low or moderate potential to support roosting bats and as such were subject to a one or two bat presence/ absence surveys. During these surveys no bats were recorded emerging from the buildings, as such no additional mitigation or compensation measures regarding bats are required for these buildings.

Building 1 is a complex of several connected former factory buildings. The buildings are all of low suitability to support roosting bats based on the presence of PRFs such as crevices in brickwork and under eaves providing access to the tops of wall plates. No evidence of roosting bat activity was identified during internal or external inspections. The building was subject to a suite of bat surveys including; bat back-tracking surveys, supplementary bat emergence surveys, and static detector installation. Individual common pipistrelle were recorded flying through the north-eastern portion of Building 1 sporadically. In every instance the bat was observed leaving the building and was observed foraging under the cover of the building. Static detector analysis identified only common pipistrelle bats using Building 1. In each instance bats were recorded in mild weather conditions and more than 1 hour from sunrise or sunset. It is concluded that likely absence has been determined through the suite of survey methods employed, however, it was recommended that a non-licensed method statement was produced in order to reduce the risk of harm to bats to negligible levels.

1.4 Report objectives and structure

This document sets out all the necessary procedures, timings and mitigation measures to avoid impacts on bats during works on site and avoid any potential breaches of protected species legislation. This report should be read in conjunction with appendices 1 – 4.



2 IMPACT ASSESSMENT

No bats were recorded roosting within the buildings on site during the surveys conducted however bats were recorded foraging throughout the interior of Building 1. Bats accessed the building via the large open doorways at the northern and eastern aspects of the building.

As no recent evidence of bats roosting in the building was recorded, it is considered that bats are not currently using the bats for roosting purposes. However, there remains a residual risk that bats may use the building to roost in the future. As such, the works should proceed under this non-licenced method statement to protect bats in the event that they are present at the time of the works.



3 MITIGATION MEASURES

The following measures are designed with the primary objective of safeguarding bats in the event that they are present during the works. They will ensure that the construction personnel have a high level of understanding about bats and the legislation which protects them and provide them with the necessary guidance and mechanisms should any bats be discovered during the development process.

3.1 Timings

No timing restrictions are required as the works are being conducted under a non-licensed method statement as a precautionary measure only. The building is not considered to be suitable to support roosts of high conservation value such as maternity roosts. Moreover, the building is not considered to be suitable to support hibernating bats. PRFs are restricted to crevices in walls and at the top of wall plates. These features are all shallow and relatively exposed which will result in a high variation in environmental conditions not conducive to hibernating bats.

3.2 Toolbox talk

The onsite ecologist will deliver a toolbox talk to the contractors responsible for the destructive works, prior to commencement. The talk will cover bat ecology, bats and the law, and what to do if bats or field signs of bats are found during the works. The talk will also highlight PRFs which have been identified associated with Building 1 to target soft-demolition works.

3.3 Prior inspection of potential roosting areas

The building will be searched by a licensed bat ecologist immediately prior to the start of works. The search will cover the internal area of Building 1 where individual common pipistrelle were observed commuting through the structure. This area is shown highlighted in green on the attached site plan (see Appendix 1 – Site Plan) The ecologist will use an endoscope where necessary to examine inside the potential roosting features, in order to further confirm the presence or absence of bats and direct works accordingly.

In the unlikely event that a bat or evidence of bats is discovered during the works, the works will stop immediately, and the current non-licensed method statement will be reviewed by the ecologist, including the requirement for a Bat Mitigation Class Licence (BMCL) or European Protected Species Licence (EPSL). If needed, works will not continue until a BMCL or EPSL has been granted by Natural England.

3.4 Bat box

Prior to the destructive works, an interim Schwegler 2F (general purpose) bat box will be affixed to a nearby tree to ensure that it is available during the entire development process. Provided it is agreed with the licenced ecologist, alternative bat box models can be used if the specified model is not available at the time of purchase. The bat box will be sited under the advice of the licensed ecologist and away from any potential disturbance (including external lighting).



3.5 Soft demolition techniques

The potential roosting features identified during the pre-commencement inspection (as described in 3.3) are to be removed by hand, under the direct supervision of a licensed bat ecologist.

3.6 Ongoing advice

UES will remain on call throughout the development in case any further advice is needed or bats are encountered. In the unlikely event that a bat or evidence of bats is discovered during the works, works will stop immediately. The bat will be left in-situ and the roost will be reinstated. If the roost can't be reinstated, or if the bat is injured or at risk of harm if left in-situ, only then will the bat be collected by hand by the onsite ecologist and transported to the pre-installed bat box on site. If the bat is harmed or emaciated, it will be taken to the nearest animal hospital or bat carer if deemed necessary by the onsite ecologist. The current non-licensed method statement will be reviewed, including the requirement for a BMCL or EPSL. If needed, works will not continue until a BMCL or EPSL has been granted by Natural England.

UES can be contacted directly on



4 ENHANCEMENT MEASURES

The proposed development will not result in the loss of any roosts however the development presents an opportunity to enhance the roosting opportunities on site for bats.

4.1 Bat boxes

A Schwegler 2F bat box will be fitted to a suitably mature nearby tree in order to provide interim roosting habitat whilst the works are being undertaken. Permission may need to be granted by third party land owners, but if this is not possible the bat box can be mounted on a pole within the garden of the property. If any bats are discovered during the works, they will be taken by hand and transported to the interim bat box by the licensed ecologist.

The bat box should be located on a southerly aspect, where it will receive the maximum amount of sunlight. It should be sited at a height of between three and six metres and away from any potential disturbance, as specified by the onsite ecologist. The bat box will remain *in situ* after the works have been completed on site.

The development proposals also offer to opportunity to significantly enhance roosting opportunities on site by the inclusion of a suite of bat and bird boxes in the proposed development scheme. Integrated bat boxes are preferable as they are discrete, maintenance free, and ensure that the buildings constructed will remain suitable for protected species in perpetuity.

Once bats have inhabited a bat box they may only be disturbed by a licensed bat ecologist.

4.2 External lighting

When planning external lighting, consideration is to be given to the commuting and dispersal routes used by bats. External lighting is to be directed away from the tree lines and proposed bat box locations.

Lighting on the new property will be located and directed away from the roost access points, and the use of cowling will also be used if required, in order to prevent light spillage upwards.

See Appendix 3 – External lighting guidance for further information.



5 POST-DEVELOPMENT

There will be no fragmentation, isolation or long-term impacts on bats locally as a result of the proposed development. Under the current scheme, no linear features will be lost or altered, and habitat linkages will remain unchanged.

No long-term monitoring or management is considered necessary.



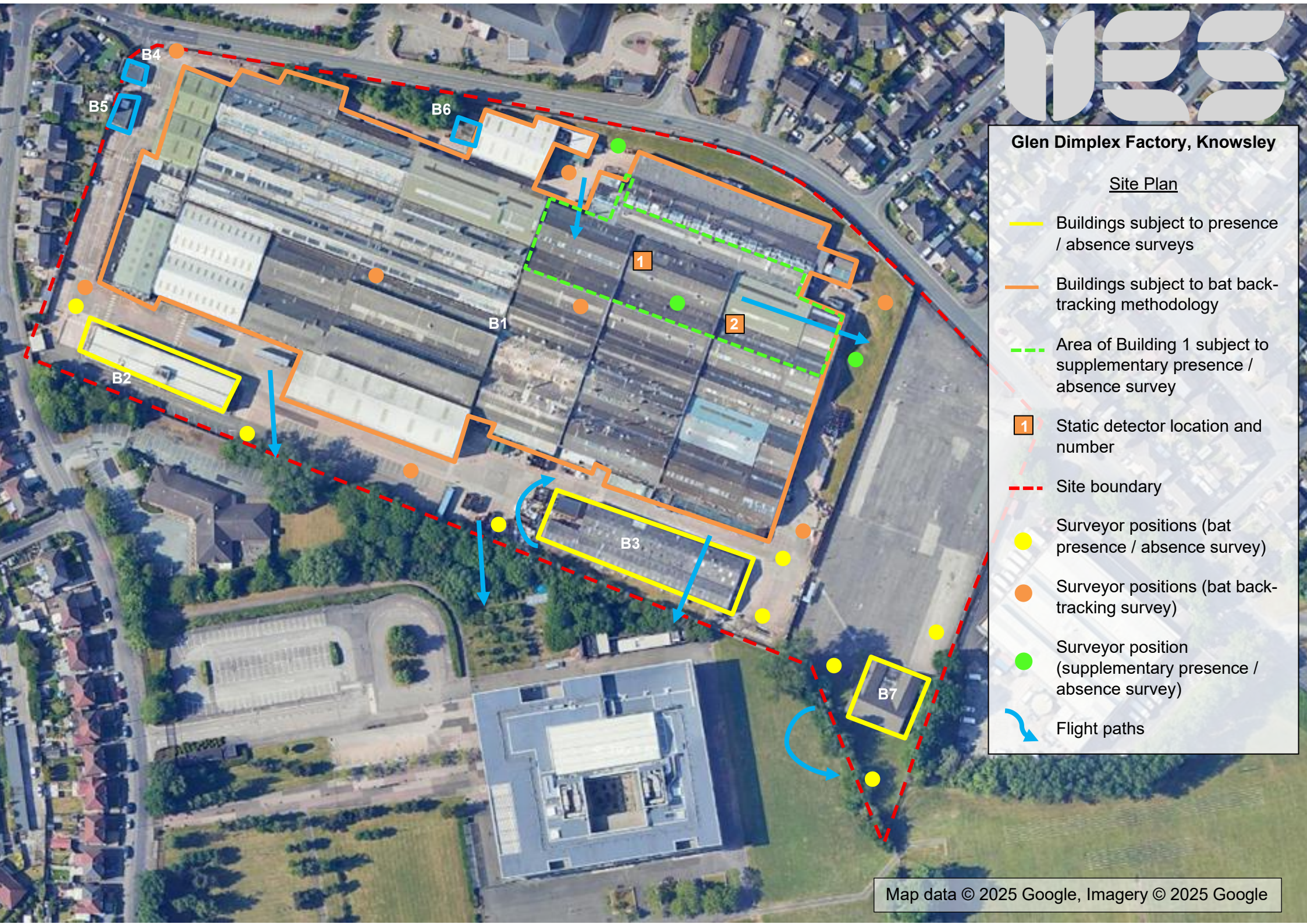
APPENDICES

Appendix 1 – Bat survey plan

Glen Dimplex Factory, Knowsley

Site Plan

-  Buildings subject to presence / absence surveys
-  Buildings subject to bat back-tracking methodology
-  Area of Building 1 subject to supplementary presence / absence survey
-  Static detector location and number
-  Site boundary
-  Surveyor positions (bat presence / absence survey)
-  Surveyor positions (bat back-tracking survey)
-  Surveyor position (supplementary presence / absence survey)
-  Flight paths





Appendix 2 – Proposed site plan



House Name	No of Units
Beaford	2
	26
Brambleford	48
	5
Tetford	6
	12
Ayleford	14
Aynesdale	6
	4
Harrton	24
	11
Chalham	7
Corkham	18
Henford	19
Wansdale	4
TOTAL	206

RIBA Workstage 1 / 2 Preparation and Brief, Concept Design.
An appraisal layout is to offer a conceptual general arrangement based on constraints and opportunities provided and is not intended to offer a detailed design solution compliant with statutory approvals and is not intended for any other purposes. Many constraints are not known at concept stages and we would recommend that all appraisal layouts are accompanied by other consultant reports relevant to the site, including, but not limited to: Civil engineering, Flood risk assessment, BNG, Utilities reports, Full tree assessments, Energy Report, Planning consultant compliance assessments.

RIBA Workstage 1-2 Preparation and Brief, Concept Design

This appraisal layout is to offer a conceptual general arrangement for a site, it is not intended to provide a detailed design solution and should not be used for any purposes. Site constraints, statutory regulations, costings and the detailed design of the house types are not therefore considered. These factors are site specific and could typically be, although not limited to: Land ownership, planning policy, building regulations, highway regulations, site access, boundary conditions/structures, topography, soil and surface features (trees, ponds etc), surface water/hail water connections, SuDS requirements, Overhead services, utility and services in the ground, water courses, views and bad neighbours.

We would recommend that all appraisal layouts are accompanied by other consultant reports relevant to the site, including, but not limited to: Civil engineering, Flood risk assessment, BNG, Utilities reports, Energy Report, planning compliance reports.

- Key
- Site Boundary
 - Red line / Legal Ownership - To be confirmed
 - Net Developable Area
 - Fencing - rear/side boundaries
 - Fencing - plot boundaries
 - Brick Screenwall
 - Play Area type and size - LEAP (400m²)
 - POS and buffers
 - Proposed Tree Planting

Rev D 08-08-2025
Parking bays plots 172-175 corrected to 5.0m length.
Plots 177-181 repositioned by 0.1m. Plots 171-175 repositioned by 0.4m.
Plots 169-170 house type substitution from Tetford to Brambleford.

Rev C 28-05-2025
Plot 14-33, 62-70 & 181 repositioned by 1m.

Rev B 12-05-2025
Amended in accordance with TW comments.

Rev A 11-04-2025
Amended in accordance with TW comments.

Rev	Description	Date	Initial
Revisions			

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Appraisal Site Layout

PRELIMINARY			
PROJ NO	REV	DATE	BY
1:500 @ A0	26/03/25	BGA	BGA
DRAWING NUMBER			
25053	00	1000	D



Appendix 3 – External lighting guidance

Lighting scheme in relation to bats

The two most important features of street and security lighting with respect to bats are:

1. The UV component. Low or zero UV installations are preferred to reduce attraction of insects to lighting and therefore to reduce the attraction of foraging bats to these areas.
2. Restriction of the area illuminated. Lighting must be shielded to maintain dark areas, particularly above lighting installations, and in many cases, land adjacent to the areas illuminated. The aim is to maintain dark commuting corridors for foraging and commuting bats. Bats avoid well lit areas, and these create barriers for flying bats between roosting and feeding areas.

UV characteristics:

Low

- Low pressure Sodium Lamps (SOX) emit a minimal UV component.
- High pressure Sodium Lamps (SON) emit a small UV component.
- White SON, though low in UV, emit more than regular SON.

High

- Metal Halide lamps emit more UV than SON lamps, but less than Mercury lamps
- Mercury lamps (MBF) emit a high UV component.
- Tungsten Halogen, if unfiltered, emit a high UV component
- Compact Fluorescent (CFL), if unfiltered, emit a high UV component.
- Variable
- Light Emitting Diodes (LEDs) have a range of UV outputs. Variants are available with low or minimal UV output.
- Glass glazing and UV filtering lenses are recommended to reduce UV output.

Street lighting

- Low-pressure sodium or high-pressure sodium must be used instead of mercury or metal halide lamps. LEDs must be specified as low UV. Tungsten halogen and CFL sources must have appropriate UV filtering to reduce UV to low levels.
- Lighting must be directed to where it is needed and light spillage avoided. Hoods must be used on each lamp to direct light and contain spillage. Light leakage into hedgerows and trees must be avoided.
- If possible, the times during which the lighting is on overnight must be limited to provide some dark periods. If the light is fitted with a timer this must be adjusted to reduce the amount of 'lit time' and provide dark periods.

Security and domestic external lighting

The above recommendations concerning UV output and direction apply. In addition:

- Lighting should illuminate only ground floor areas. Light should not leak upwards to illuminate first floor and higher levels.
- Lamps of greater than 2000 lumens (150 W) must not be used.
- Movement or similar sensors must be used. They must be carefully installed and aimed, to reduce the amount of time a light is on each night.
- Light must illuminate only the immediate area required, by using as sharp a downward angle as possible. Light must not be directed at or close to bat roost access points or flight paths from the roost. A shield or hood can be used to control or restrict the area to be lit.
- Wide angle illumination must be avoided as this will be more disturbing to foraging and commuting bats as well as people and other wildlife.
- Lighting must not illuminate any bat bricks and boxes placed on buildings, trees or other nearby locations.



Appendix 4 – Statutory and planning context

Ecological assessments

Ecological assessments play an important part within the planning context; they include an initial assessment which highlights any specific interests of a site. From the initial site assessment, the surveyor assesses the suitability of habitats within the site to support protected species and makes recommendations for further survey works if required. The following paragraphs provide a brief interpretation of the legislative protection that is relevant to the findings of this report.

Bats

In the United Kingdom, all species of bat and their roosts are afforded full protection under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (known as the “Habitats Regulations”). The Wildlife and Countryside Act is the domestic implementation of the Convention on the Conservation of European Wildlife and Natural Habitats (the Bern Convention) and was amended by the Countryside and Rights of Way Act 2000. This makes it an offence to:

- Deliberately, intentionally or recklessly kill, injure or capture a bat
- Deliberately, intentionally or recklessly disturb a bat while it is occupying a structure or place that it uses for shelter or protection
- Deliberately, intentionally or recklessly damage, destroy or obstruct access to any place that a bat uses for shelter or protection (even if the bat is not present at the time)
- Keep, transport, sell or exchange, or offer for sale or exchange any live or dead bat, any part of a bat or anything derived from a bat

Under UK law, a bat roost is *any structure or place which any wild [bat] ... uses for shelter or protection*. As bats often reuse the same roosts, legal opinion is that a roost is protected whether or not the bats are present at the time of the activity taking place.

Penalties for offences include fines of up to £5000, plus up to six months imprisonment, for each offence committed.

If an activity is likely to result in any of the above offences, a licence can be applied for to derogate from the protection afforded. These licences must provide appropriate mitigation and are issued by Natural England.

A Natural England mitigation licence application requires a Mitigation Method Statement and, in many cases, a Reasoned Statement of Application. The Mitigation Method Statement contains details of the proposed mitigation works. The Reasoned Statement needs to provide a rational and reasoned justification as to why the proposed development meets the requirements of the Conservation (National Habitats & c.) regulations 1994, namely Regulations 44(2)(e), (f) or (g), and 44(3)(a).

The National Planning Policy Framework 2021 (NPPF) provides guidance on the interpretation of the law in relation to the natural environment and development.

The Natural Environment and Rural Communities (NERC) Act 2006 lists the following bat species as species of principle importance under Section 41:

- Barbastelle *Barbastella barbastellus*
- Bechstein’s bat *Myotis bechsteinii*
- Noctule *Nyctalus noctula*
- Soprano pipistrelle *Pipistrellus pygmaeus*
- Brown long-eared bat *Plecotus auritus*
- Greater horseshoe *Rhinolophus ferrumequinum*
- Lesser horseshoe *Rhinolophus hipposideros*

Section 40 requires every public body in the exercising of its functions ‘have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity’ (all biodiversity and not just section 41 species and habitats); therefore making these bats a material consideration in the planning process and requiring a detailed ecological bat survey before planning permission can be granted.

Planning policy

National Planning Guidance is issued in the form of the National Planning Policy Framework 2021 (NPPF). The most relevant section is 15: Conserving and enhancing the natural environment.

Key relevant principles stated in 15: Conserving and enhancing the natural environment are;

- 174.** Planning policies and decisions should contribute to and enhance the natural and local environment by:
- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
 - c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
 - e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
 - f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- 179.** To protect and enhance biodiversity and geodiversity, plans should:
- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity⁶¹; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation⁶²; and
 - b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity
- 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.