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BAT METHOD STATEMENT

At

Huyton Cricket Club

Huyton Lane
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Liverpool
L36 7XD

NGR: SJ 44443 91320

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A handwritten signature in black ink, appearing to read 'Ycobella Cox', with a horizontal line underneath.

Date:	28 th August 2025
UES reference:	UES04790/10





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1 INTRODUCTION

1.1 Author and qualifications

This report is written and compiled by Nathaniel Foley MSc, UES Graduate Ecologist.

The report has been verified by Ysobella Cox BSc MBiol, UES 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.

1.2 Proposed development and previous survey information

The proposed development is a housing scheme for the construction of up to 81 residential dwellings with associated access roads and landscaping. The disused cricket clubhouse (Building 1) will be restored and converted into a community centre whilst the two outbuildings (Buildings 2 & 3) will be demolished.

Huyton Cricket Club was previously subject to bat presence / absence surveys by Bowland Ecology in 2020 (report reference BOW17/941) during which a single bat roost was identified:

- **Roost 1:** An individual common pipistrelle *Pipistrellus pipistrellus* emerging from the southeastern eaves of Building 1.

Breck Homes Ltd commissioned United Environmental Services (UES) Ltd in December 2024 to undertake updated bat scoping and bat presence / absence surveys to support a new planning application for the site. There are three buildings present that were subject to internal and external building inspections as part of a bat scoping survey undertaken in January 2025. For the purposes of the bat scoping report the buildings were numbered 1 - 3 (See report reference: UES04790/04).

Building 1 was assessed as having moderate potential to support roosting bats, whilst Building 2 was assessed as having low potential to support roosting bats. As such, two further presence / absence surveys were undertaken of Building 1 in May 2025, with a single further survey of Building 2, in accordance with the Bat Conservation Trust (BCT) guidelines. Building 3 was assessed as having negligible potential to support roosting bats.

During the bat presence / absence surveys undertaken by UES in May 2025, no bats were found to be roosting within Building 1 or Building 2. Whilst Building 1 formerly contained a day roost used by a maximum of one common pipistrelle (Roost 1), the roost is now 5 years old, and as such, is considered to be a historic roost, as evidenced by the lack of roosting bats observed during the surveys undertaken in 2025.

1.3 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

A common pipistrelle day roost (Roost 1) was previously identified in Building 1 by Bowland Ecology in 2020 (report reference BOW17/941). The updated presence / absence surveys undertaken by UES on 2nd May and 23rd May 2025 found no bats to be roosting within either Building 1 or Building 2 onsite (report reference UES04790/03).

Based on the findings of the surveys, it is considered that Roost 1 is a historic roost which is no longer in use. The scheme does not need to be registered under an EPS licence granted by Natural England; however, due to the residual risk that bats could use the building in the future to roost, this non-licensed method statement will be implemented onsite during the works to reduce the risk to a negligible level.

The proposed development is for a housing scheme and will involve reroofing and renovation works to Building 1, which will be repurposed to serve as a community centre.

Without mitigation, the development could have the following impacts on bats and their roosts in the building:

- Killing or direct harm
- Disturbance by noise, lighting and vibration
- Entombment
- Loss or modification of roosts
- Blocking or modification of roost access points.



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. In the event that bats are present they are likely to be single / low numbers of common bat species which negate the need for timing restrictions in relation to this development.

3.2 Toolbox talk

Prior to the start of any construction works, the project ecologist will deliver a toolbox talk to the contractors responsible for the works. 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.

3.3 Prior commencement building inspection

Building 1 will be subject to internal and external building inspections by a licensed bat ecologist immediately prior to the start of the works, including any external gaps which could be used by roosting bats. 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 event that a bat is discovered during the works, all works will stop and UES will be contacted to review the requirement for an EPS mitigation licence. If the discovered bat is harmed or emaciated, it will be taken to the nearest animal hospital or bat carer if deemed necessary by the onsite ecologist. However, if possible the roost will be reinstated to minimise the disturbance to the bat.

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 licensed 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) and will remain in situ in perpetuity.



3.5 Soft demolition techniques

The potential roosting features and other sensitive areas of the building are to be removed by hand, under the direct supervision of a licensed bat ecologist.

In the unlikely event that a bat 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.

3.6 Ongoing advice

UES will remain on call throughout the development in case any further advice is needed, or bats are encountered. As above, the requirement for an EPS mitigation licence will be reviewed if bats are unexpectedly discovered during the works.

UES can be contacted directly on 01565 757788.

4 COMPENSATION MEASURES

4.1 Bat boxes

A Schwegler 2F bat box (or similar as approved by the licenced ecologist if the specified model is not available) will be fitted to a suitably mature tree nearby in order to provide interim roosting habitat for bats, should they be encountered during the works (as detailed in section 3.4), as well as to provide compensation for the loss of the common pipistrelle day roost that was previously identified onsite.

A further 14x Vivara Pro Build-in WoodStone bat boxes will be integrated into the external walls of the newly constructed buildings as per the Ecological Enhancement Plan (EEP) produced for the proposed development by UES, to enhance the availability of roosting opportunities for bats onsite (report reference UES04790/09).

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. Any lighting installed as part of the works should be wildlife friendly and avoid overspill on to the adjacent tree lines along the boundaries of the site, as well as the River Alt to the north and east of the site which will provide commuting and foraging opportunities for bats in the local area.

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, the majority of linear features onsite will be retained as part of the proposals and new linear features including tree lines and hedgerows will be established, as detailed within the EEP report prepared by UES Ltd (report reference UES04790/09). In addition, no external lighting will be directed onto the River Alt and its associated treeline to ensure that there is no impact upon nocturnal wildlife using the watercourse for commuting and foraging purposes, and to retain connectivity to higher quality habitats further afield.

No long-term monitoring or management is considered necessary.



APPENDICES

Appendix 1 – Bat roost plan



Huyton Cricket Club, Huyton

Site Plan:

-  Building boundary
-  Roost 1: Historic common pipistrelle day roost identified by Bowland Ecology in 2020.





Appendix 2 – Photographs



Photograph 1 – The southeastern aspect of Building 1.



Photograph 2 – The western aspect of Building 1.



Photograph 3 – The southwestern aspect of Building 1.



Photograph 4 – The northwestern aspect of Building 1.



Photograph 5 – Building 2.



Photograph 6 – Building 3.



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 2024 (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 2024 (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;

- 187.** 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 and incorporating features which support priority or threatened species such as swifts, bats, and hedgehogs;
 - 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.
- 192.** 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 biodiversity⁶⁸; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation⁶⁹; 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
- 193.** 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 reasons⁷⁰ 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.