



**PRELIMINARY ECOLOGICAL APPRAISAL
BAT RISK ASSESSMENT**

**LANDS OFF ASH BANK ROAD
WERRINGTON
STAFFORDSHIRE
BOM-PP-25-06
SEPTEMBER 2025**

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PRELIMINARY ECOLOGICAL APPRAISAL

BAT RISK ASSESSMENT

LANDS OFF ASH BANK ROAD

WERRINGTON

STAFFORDSHIRE MOORLANDS

STAFFORDSHIRE

ST9 OFF

GRID REF

SJ 93847 47295

REPORT FOR

PLANNING POTENTIAL/CARTA REAL ESTATE

Quality Assurance

Version	Prepared by	Date	Checked by	Date	Approved by	Date
R1	David Pollard	01/09/2025	Holly Pollard	01/09/2025	Sarah Woods	01/09/2025
R2						

This report is intended to provide an accurate description of findings from survey work undertaken on the date shown in the report; however, it cannot fully account for any changes to site conditions following the completion of the survey work due to activities carried out on site or the dynamic nature of the natural environment. All work carried out by Bombus Ecology is subject to our Terms and Conditions.

The report has been produced in accordance with current best practice guidelines.

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1. Introduction

- 1.1: Due to a series of legal protections, it is illegal to cause disturbance or harm to many species across the whole of the UK, including nesting birds, bats of all UK species, great crested newts, badgers and many others. In order to determine the possible impact that development works or other land management proposals may cause, an ecological assessment is necessary to identify the species using the site, ways in which these species may be at risk, and potential avoidance, mitigation or compensation measures required during the planned works on site. The aim of this report is to provide the above listed information and to inform future works taking place on the proposed site, in terms of habitat protection and ecological enhancement (biodiversity net gain).

LEGISLATION

- 1.2: Within the UK, there is a suite of environmental legislative acts concerned with the protection, conservation and enhancement of the ecological and environmental factors present within our rural and built environments. The Wildlife and Countryside Act (1981) is the primary legislation for protection of wildlife within the UK and refers to the treatment and management of protected species listed as Schedule 1 (birds), 5 (mammals, reptiles, fish and invertebrates) and 8 (plants). Section 9 is arguably the most important part of the legislative act, as it states 'It is an offence to intentionally kill, injure, or take a scheduled species that is living wild at the time; to possess a scheduled species; to damage, destroy or obstruct access to the place of refuge used by the protected species.'
- 1.3: The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 is the English enactment of European legislation and provides similar but subtly different protection for species listed on Schedules 2 and 4 of those regulations. A recent change in this legislation means that the provisions of this act now complement those of the Wildlife and Countryside Act more. Species to which these provisions apply are the European Protected Species, examples of this include any of the Bat species within the UK and Great Crested Newts. Activities that might cause offences to be committed can be legitimised by obtaining a licence from the relevant statutory body.
- 1.4: All British bat species are listed on Schedule 5 of the Wildlife and Countryside Act 1981 and are afforded protection under Section 9 of this Act. In addition, all British bat species are listed on Schedule 2 of The Conservation of Habitats and Species Regulations 2019 and are protected under Regulation 39 of these Regulations. They make provision for the purpose of implementing European Union Directive on the Conservation of Natural Habitats and of Wild Fauna and

Flora 1992, under which bats are included on Annex IV. The Act and Regulations makes it an offence, inter alia, to:

- Intentionally kill, injure, take (handle) or capture a bat;
- Intentionally or recklessly damage, destroy or obstruct access to any place that a bat uses for shelter or protection (this is taken to mean all bat roosts whether bats are present or not) – under the Habitats Regulations it is an offence to damage or destroy a breeding site or resting place of any bat; or
- Intentionally or recklessly disturb a bat while it is occupying a structure or place that it uses for shelter or protection – under the Habitats Regulations it is an offence to deliberately disturb a bat (this applies anywhere, not just at its roost) in such a way as to be likely to affect its ability to survive, breed, reproduce, rear or nurture its young, or hibernate.

1.5: Badgers also have their own specific piece of legislation, the Protection of Badgers Act (1992), and there are other species that also have their own specific legislation.

1.6: Other important pieces of legislation that are important to protecting and conserving the environment as a whole within the UK and in some cases Europe include the Ramsar Convention on Wetlands (1971), Convention on the Conservation of Migratory Species of Wild Animals (1979), Convention on Biological Diversity (1992), The Countryside and Rights of Way Act (2000) and the Plant Health Act (1967, amended 2008). This is by no means an exhaustive list, but these are the most important legislations with regards to the ecological protections of the UK countryside.

BIOSECURITY

1.7: Biosecurity is important when entering any land, or other premises where there is a risk of spreading pests. Primarily, the goal of biosecurity is to prevent, control and/or manage risks to life and health. Food safety, zoonoses, the introduction of animal and plant diseases and pests, and the introduction and management of invasive alien species are all possible aspects relating to biosecurity, and it is of vital importance that measures are taken to prevent the spread of disease, loss of biodiversity and introduction of pests and pathogens.

1.8: Biosecurity measures are a series of precautionary steps designed to reduce the risk of transmission of harmful organisms. Good biosecurity practice refers to ways of working that minimise the risk of contamination and the spread of pests and invasive plants. The term pest in this case should be taken to include all invertebrate, bacterial or fungal organisms that are harmful.

- 1.9: When conducting all on site survey work, appropriate biosecurity measures are employed to prevent breaches of biosecurity and the potential spread of harmful pests and disease. A detailed brief on our biosecurity measures and qualifications is available on request.

2. Site Context

- 2.1: The site, known as Lands of Ash Bank Road is located at Werrington, Staffordshire ST9 0FF at Grid Reference SJ 93847 47295 (Figure 1). This can be accessed directly off Ash Bank Road. The plan for the site is to construct a retail unit (CO-OP) on this site.
- 2.2: Bombus Ecology was commissioned to carry out a Bat Risk Assessment of the site, in order to identify the current ecological value of the site and any potential issues that will need to be mitigated or compensated for as a result of the planned works, as well as providing the basis for a suite of ecological habitat enhancement which is a key aim of the project.



FIGURE 1 Surveyed Area indicated by the yellow line above.

3. Methodology

- 3.1: During the course of our Preliminary Ecological Assessment, we use two main methods of survey: field based, and computer based. When conducting these surveys, we ensure that we adhere to all guidelines set out by the appropriate expert bodies, including Natural England, the Bat Conservation Trust, The British Trust for Ornithology and the Amphibian and Reptile Conservation Trust to name a few. In accordance with best practice, levels of wildlife disturbance caused when conducting these surveys are kept to an absolute minimum and appropriate biosecurity measures are assessed and put in place.

FIELD SURVEY

- 3.2: The field-based survey consists of an initial walkover survey conducted over the proposed site to identify the presence of any protected species or habitats, as well as to identify any invasive species that may be present and any possible detrimental impacts on site that the proposed works may cause. Any ponds and watercourses within the immediate vicinity of the site would also be assessed for their value to protected species, and if deemed necessary a habitat suitability index would be carried out. Through this initial field-based survey, the need for further species-specific surveys would be confirmed and it would also be determined if any alternate biosecurity methods would be necessary for future site visits.

COMPUTER BASED SURVEY

- 3.3: The computer-based survey is carried out using data sets from open-source resources such as OpenStreetMap, the Ordnance Survey OpenData, the governmental open data download portal and the Multi-Agency Geographical Information for the Countryside web portal (MAGIC) which collates datasets from a wide variety of governmental and non-governmental organisations including DEFRA, Historic England, the RSPB, the Forestry Commission and the Environment Agency to name a few. Designated areas within the near vicinity of the site are important to know in case of any impact that may be caused through the planned future use of the site and any proposed works to take place. From this information, a landscape scale map is produced using geographical information services (GIS) software to illustrate and investigate the distances and geographical barriers between the site and the designated areas, in order to determine any potential impacts.

PROTECTED SPECIES SURVEY

- 3.4: Based on the habitats present, the site was assessed with particular regard to determining the presence or otherwise of badgers (*Meles meles*), bats, great crested newts (GCN) (*Triturus cristatus*), nesting birds, and reptiles. An overview of the survey methods used is outlined below.

3.5: Badgers:

An assessment of the site and surrounding habitats (where access was available), with a focus on any areas of dense vegetation, was carried out in order to identify any evidence of badgers, including:

- the presence of any setts
- well-used runs/tracks
- supplementary evidence, such as hairs or prints
- badgers themselves

Any badger holes found during the survey were classified in accordance with standardised survey guidelines (Harris *et al.*, 1989), being grouped into setts, where applicable, and categorised in terms of the type of sett (in descending order of significance: main, annexe, subsidiary, outlier) and the level of use of each hole (well-used, partially-used, disused).

3.6: Bats:

An assessment of the target building was carried out to identify the presence of any Potential Roosting Features (PRFs) for bats, and/or evidence of roosting bats, following the guidelines provided by the Bat Conservation Trust (BCT) (Collins, 2023). An external inspection of the building was carried out, focussing on features that may provide roosting opportunities or access points to roosting features internally, such as the roofing materials, soffits, fascias, barge boards and any lead flashing if present. The target building is categorised in accordance with BCT guidelines, detailed in Table 1 below.

A preliminary ground level roost assessment of any trees if present within an impact zone or directly adjacent to the barn was also carried out to identify the presence of any PRFs for bats, such as split bark, woodpecker holes and other cavities for bats and/or evidence of roosting bats. All trees assessed were categorised in terms of their value in accordance with the current Bat Conservation Trust (BCT) survey guidelines 4th Edition (Collins, 2023), shown in Table 1.

Features that are symptomatic of bat use include bat droppings in around or below an entrance hole, staining around an entrance hole, small scratches around an entrance hole, audible squeaking at dusk or in warm weather, smoothening of surfaces around the cavity of an entrance hole and the distinctive smell of bats. The bat risk assessment was completed using ladders, binoculars and a powerful torch. An endoscope was also available to check any small gaps/cracks for evidence of bats.

Table 1. Guidelines for assessing bat roosting potential of structures and trees

Suitability	Habitat description	Further action required?
Negligible	Negligible habitat features on site likely to be used by roosting bats.	No further bat risk assessment effort or bat activity surveys are required.
Low	A tree of sufficient size and age to contain PRFs, but with none seen from the ground or features seen with only very limited roosting potential.	Trees: No further bat risk assessment effort or bat activity surveys are required.
Moderate	A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection conditions and surrounding habitat, but unlikely to support a roost of high conservation status.	Two bat activity surveys are required to determine whether the structure or tree is being utilised by roosting bats; this should be comprised of one dusk and one dawn survey. One survey must occur between May and August.
High	A structure or tree 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.	Three bat activity surveys are required to determine whether the structure or tree is being utilised by roosting bats; this should be comprised of one dusk and one dawn survey, with an additional survey (either dusk or dawn). Two surveys must occur between May and August.

The bat activity survey followed the walkover inspection and was completed by Director of Ecology David Pollard MRSB who is a Level 2 (2017-29217-CLS-CLS) Licensed Bat Surveyor and has over 27 years' experience in bat survey work. He was assisted in this commission by Ecologist Holly Pollard who is an experienced bat surveyor (6 years) both currently working towards their first bat licence.

The equipment used for survey and call analysis included: 'Echometer' Touch Detectors recording in RTE, Anabat Express recording in Frequency Division and Bat Box duets. Transect surveys were carried out after sunset. Visual observations of bat activity were noted using night and thermal vision units and bat species were identified using bat detectors. The information recorded included weather, timings, whether bats emerged from or entered the building, direction of travel, species and activity: foraging or commuting. The surveys were carried out under suitable conditions (mild, no rain or strong wind) in which bats would be active. Observations were made with thermal imaging equipment and Night Vision equipment (Nightfox Whisper/ Fox plus Encanfire IR) after dark

3.7: **Great Crested Newts:**

An assessment of the habitats present on the site was carried out in order to determine their suitability to support GCN and any natural or artificial refugia (such as logs, stones, discarded building materials etc.) present were also lifted to check for the presence of GCN.

3.8: Nesting Birds:

The habitats on site were assessed to determine their suitability for nesting, with a check carried out for the presence of any active nests or any evidence of nesting behaviour.

3.9: Reptiles:

The assessment for reptiles followed a similar methodology to that for GCN, with an assessment of the habitats present carried out to determine their suitability to support reptiles, and with any refugia lifted to check for the presence of reptiles or evidence of reptiles, such as sloughs (shed skins).

3.10: Other Wildlife:

In accordance with good practice, the site was checked for the presence of any other protected/notable species, with a regard to any other species highlighted in the desktop study.

3.11: Invasive Species: The site was also surveyed for the presence of any invasive, non-native flora or fauna.

4. Results

- 4.1: The survey was carried out on the 27th of August 2025, by Director of Ecology David Pollard BSc (Hons) MRSB and was assisted in this commission by Principal Ecologist Sarah Woods BSc (Hons) MSc AMRSB MRES and Ecologist Holly Pollard.
- 4.2: The weather conditions at the time of the field survey initially were showers, humid with a slight breeze and a temperature of 19° C, and as such were suitable for this initial walkover survey. There were no constraints with regards to access on the site. All survey and biosecurity guidelines were adhered to. The results of the field and computer-based study are as listed below.

ECOLOGICAL FEATURES ON SITE

- 4.3: The site consists of a small field (0.17 ha) and farm buildings in the village of Werrington.
- 4.4: The field is improved grassland with species such as false oat-grass *Arrhenatherum elatius*, cock's-foot *Dactylis glomerata*, Yorkshire fog *Holcus lanatus* and common couch *Elytrigia repens*. Ruderal perennial species were also present including common nettle *Urtica dioica*, broad-leaved dock *Rumex obtusifolius*, hogweed *Heracleum sphondylium*, cow parsley *Anthriscus sylvestris*, horsemint *Mentha latifolia* and ragwort *Senecio jacobaea*.



- 4.5: Target Building 1 is a large wooden framed building with corrugated metal sides and roof. There were no signs of bats anywhere externally in the form of staining and droppings. Any small gaps were searched utilising an endoscope – most had extensive cobwebbing. There is a large gap along the eastern corner of the building – under further investigation there was considerable water ingress. The construction materials result in fluctuations in temperature and this linked with water ingress would be sub optimal for bats.
- 4.6: Target Building 2 is a single storey brick built building with windows and a tile roof. The building itself is reasonably well appointed thus a lack of PRF's – externally there were no signs of bats and there is considerable ambient light.
- 4.7: Target Building 3 is a small wooden framed building with metal roof and sides. This building was in a poor condition with roof collapse from surrounding vegetation. There were no signs of bats.
- 4.8: Target Building 4 is a derelict brick built building with no roof.
- 4.9: The buildings are surrounded by dense bramble scrub *Rubus fruticosus* agg with hedge bindweed *Calystegia sepium*
- 4.10: The field is bounded by a mixture of a brick wall/wooden fencing on the southern edge and an intact hedge on the northern edge. Along the brick wall there is a mature many stemmed silver birch *Betula pendula* and a wild cherry *Prunus avium*. The hedgerow contained species including hawthorn *Crataegus monogyna* dominates the canopy but holly *Ilex aquifolium* is locally frequent and hazel *Corylus avellana* is occasional along with elder *Sambucus nigra*. Close to the northern hedge there is a considerable amount of sycamore *Acer pseudoplatanus* re generation.

ECOLOGICAL FEATURES OFF SITE

- 4.11: The site is located within a wider urban landscape within the village of Werrington close to the Young Offenders Institute. There are no ponds/small lakes within 500m and urban infrastructure features are barriers to amphibian movement.

PROTECTED SPECIES ON SITE

4.12: Badgers

Badgers will utilise the farmland and woodlands in the wider area for foraging. There were no signs in the vicinity of site, thus, badgers are not considered to be of material consideration in this development of this portion of land.

4.13: Bats

The Target Buildings is currently deemed to be of negligible/low potential for foraging bats due to lack of signs but loose slates and lack of access prompted the emergence survey. The odd cracks, crevices or PRF were examined using an endoscope most also had cobwebs.

Dusk Bat Survey Date and Conditions	Weather	Survey Start/Sunset	Survey End	Temp Start	Temp Finish
27th August 2025	Warm, showery with slight southerly breeze	19:30/20:02	22:00	18.2°C	13°C

There was a small amount of bat foraging activity around site, common pipistrelles *Pipistrellus pipistrellus* appeared some 40 minutes after sunset indicating their roost was some distance. Other bats noted were noctule/Leisler's *Nyctalus sp.* flying high over house and mature trees. The small amount of activity was understandable given the streetlights and anthropomorphic disturbance.

The trees on the periphery of site are mature enough to offer PRFs for bats but are not going to be impacted upon by this localised development. The associated landscapes have the greater potential to be a bat flight lines/foraging routes given the optimal foraging habitat close by although altitude may be a limiting factor and thus should be maintained and protected from light spill and noise disturbance. Studies have shown that bat activity drops off as altitude increases.

4.14: Birds

The buildings and surrounding vegetation, hedgerows and trees will offer numerous nesting opportunities for common passerine species particularly small passerine species.

4.15: Great Crested Newts and Other Amphibians

There are no ponds/small lakes within 500m but numerous streams and ditch systems which as moving water are barriers to amphibian movement. and as such, GCN will not be of material consideration to this development.

4.16: Reptiles

The majority of the site is low potential for common reptiles tracks and hard standing around the house and barns, and dense vegetation with a lack of

basking spots. There is also a degree of isolation from optimal habitats. Reptiles would forage and commute within woodlands close to site.

4.17: Invasive Species on Site

Two small stands of Montbretia *Crocasmia spp.*, as listed on Schedule 9 of the Wildlife and Countryside Act, were recorded in the hedgerow on-site at the time of the survey.

Computer-Based Study of Site

4.18: The computer-based study was carried out on a landscape wide scale, using open-source GIS software to research and analyse any potential impacts to designated areas that may occur as a result of the planned works. The closest internationally designated site is the South Pennines (Phase 2) Special Area of Conservation (SAC), Special Protected Area (SPA) is 16.4 km to the north of the site. The nearest nationally designated site is Wetley Moor Site of Special Scientific Interest (SSSI) which 0.6 km northwest of site.

4.19: There are nineteen areas of ancient woodland/Ancient Replanted Woodland within 5km of site. The nearest area is Brookhouse Wood at 1.73 km northeast of site

4.20: Due to the contained nature of the site's redevelopment proposals, it is not felt there will be any impact on locally protected sites.

Table 2. Statutory Designated Sites within 5km of site

Designated area type	Site Name	Reference code	Reason for designation	Size (ha)	Distance from site (km)
Sites of Special Scientific Interest (SSSI)	Wetley Moor	1002040	Biological	69.47	0.6
	Hulme Quarry	1002470	Biological	40.75	2.35
	Churnet Valley	1002020	Biological	348.67	4.21
National Nature Reserve (NNR)	Hulme Quarry	1008720	Biological	40.75	2,35
Local Nature Reserve (LNR)	Berryhill Fields	1009901	Biological	63.31	3.10
	Bagnall Road Wood	1082928	Biological	6.11	3.71
	Coyney Woods	1421551	Biological	30.15	3.96
	Consall	1475798	Biological	93.37	4.21
	Holden Lane Pools	1009728	Biological	8.37	4.86

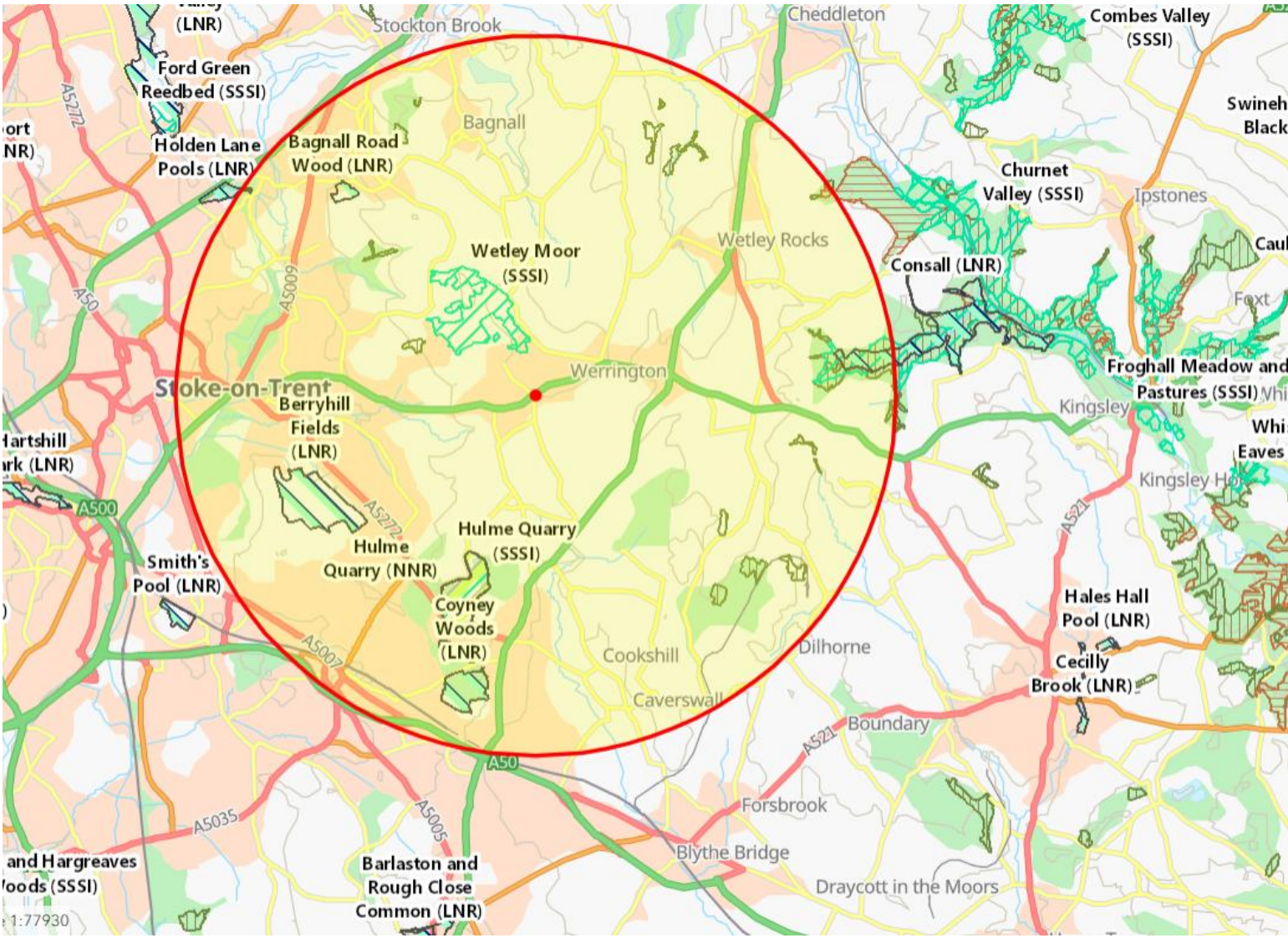


FIGURE 3 Protected Sites within 5km

5. Conclusion and Recommendations

5.1: The target buildings are deemed to be of negligible/low potential for bats at this current time due to lack of signs, and no emergence noted. The site itself is of limited wildlife value due to its location and anthropomorphic influence and as such no further surveys will be required for this site.

5.2: Based on the findings from the survey carried out as part of this Preliminary Ecological Appraisal, Bombus Ecology Ltd would recommend the following:

MITIGATION

5.3: Any vegetation should not be removed to allow access during nominal bird breeding season (March to August). If this is not achievable, then the ecologist will provide advice and potentially a watching brief.

5.4: In the very unlikely event, a bat is found during the redevelopment of the house, work should cease on that section and the Ecologist at Bombus Ecology informed will provide a watching brief and method statement.

5.5: The use of bitumen felt or second-generation membranes within any roof voids if one is to be created.

5.6: If lighting is required it is recommended that a wildlife-friendly, low-level lighting scheme should be adopted during and post-development to minimise disturbance to any nocturnal wildlife using the peripheries of site, such as bats foraging along the site boundaries. Further details can be obtained from the ecologist.

ENHANCEMENT

5.7: Emerging Government policy supports the pursuit of measurable net gains for biodiversity. The Environment Bill includes a requirement of 10% for biodiversity net gain on all development sites.

5.8: The following measures are recommended to get biodiversity enhancements:

- Installation of Bat tiles/Bat bricks
- Landscape planting of trees that provide nectar, fruit or nuts i.e. rowan *Sorbus aucuparia*, hornbeams *Sorbus sp.* blackthorn *Prunus spinosa*, hazel and crab apple *Malus sylvestris*.

FURTHER SURVEYS

5.9: No further survey work is required for this site.

6. Site Images



Image 1 Looking northwest across site



Image 2 South across site to Target Building 1



Image 3 Target Building 1 with large gap allowing water ingress



Image 4 Mature Birch and semi-mature Wild Cherry



Image 5 Target Building 2



Image 6 Target Building 2 and 3 and dense bramble scrub



Image 7 Target Building 3



Image 8 Target Building 4 derelict building



Image 9 Looking west across site



Image 10 Sycamore regeneration in base of hedgerow

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