Appendix 9.6: Initial Bat Assessment (2014)





Liverpool FC Stadium Expansion

Initial Bat Assessment

January 2014

Liverpool Football Club and Athletic Grounds



Liverpool FC Stadium Expansion

Initial Bat Assessment

January 2014

Liverpool Football Club and Athletic Grounds

Anfield Road Liverpool L4 0TH



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Executive Summary

This report presents the findings of an initial daytime bat survey at Liverpool FC Stadium (Anfield) and the immediately surrounding area. This review was commissioned by Liverpool Football Club (LFC), and has been carried out by Mott MacDonald to support a future planning application for the expansion of the football ground.

The purpose of this report is to provide an initial assessment of whether any of the buildings on the site currently, or ever have, supported roosting bats. The study has been undertaken following the methods laid out by the *Bat Conservation Trust - Good Practice Guidelines 2nd Edition* (Hundt, 2012) and the *Bat Mitigation Guidelines* (Mitchell-Jones, 2004).

The study comprised two phases: a desk study consultation exercise and a daytime inspection of the buildings. By combining the two phases it is possible to identify and evaluate the potential value of the Site for bats in order to determine the potential impacts of the proposed development and the need for any additional surveys.

The initial bat survey identified that the stadium and Conference and Events Department building generally have low potential to support roosting bats, with The Albert public house showing medium potential. Despite the lack of potential within the site, a single pipistrelle bat was found roosting in The Kop stand.

All trees within or immediately adjacent to the site have been classified as Category 3 trees (no potential to support roosting bats (Hundt, 2012)) and there is limited foraging potential.

Based on the current proposed development no bats will be directly impacted or disturbed and therefore only best practice recommendations have been made with regards to the development. Should plans change and The Kop stand or The Albert public house be affected by the development further surveys and a Natural England development licence will be required before the development can proceed.

Initial Bat Assessment



Introduction

1.1 **Project Background**

Mott MacDonald Limited (MML) was instructed by Liverpool Football Club (LFC) in October 2013 to undertake an initial bat assessment of Anfield Football Stadium and the immediately surrounding area, hereafter referred to as 'the Site'. The aims of this study are:

- To determine the bat roost potential of the stadium and any adjacent buildings and outline the consequent implications for development work with respect to the Wildlife & Countryside Act 1981, the Conservation of Habitats and Species Regulations 2010, and relevant Planning Policy Guidance;
- To assess the value of the Site for use by bats for foraging and feeding; and,
- To provide recommendations for any necessary additional survey work and mitigation measures required to offset any impacts caused by the development work including recommendations as to any licensing requirements.

To fulfil the above brief, an initial bat survey was undertaken on the 30 October 2013.

1.2 **Site Description**

Anfield Stadium is located between Walton Breck Road and Anfield Road in the Anfield area of Liverpool (central Ordnance Survey (OS) Grid Reference: SJ 3624 9308).

Anfield Stadium is located approximately 3 km north east of Liverpool city centre in a mainly residential area, with terraced housing positioned on three sides of the stadium. To the north east, along Anfield Road, is an area of hardstanding and bare ground beyond which lies Stanley Park. Stanley Park is a large area of public open space which includes amenity sports pitches as well as a large lake and mature trees and lies immediately adjacent to Anfield Cemetery. In total the park and cemetery create an area of approximately 80 ha of green space.

The north west boundary of the Site abuts houses located on Alroy Road and Gilman Road, with the south west boundary running along the northern side of Walton Breck Road. The south east boundary follows the rear boundary walls of properties situated on Skerries Road before cutting across Anfield road to the boundary with Stanley Park. Finally, the north east boundary of the Site directly abuts Stanley Park. A detailed Site Location Plan is provided in Appendix A.

1.3 **Proposed Development**

The proposed development comprises the expansion and redevelopment of the existing Anfield Stadium at Anfield and will include:

An application for full planning permission to erect a new Main Stand with associated player, media, conferencing and banqueting facilities and the provision of its surrounds to provide high quality public realm, improved circulation space and an improved public connection between

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- Walton Park Road and Stanley Park, along with additional car parking spaces on the former Anfield Comprehensive School.
- ii. An application for outline planning permission to redevelop the Anfield Road Stand, principally to create additional spectator facilities to increase the capacity of the stadium.

Overall the development will increase the capacity of the stadium from c.45,000 to c.60,000



2 Methodology

2.1 Overview

The study comprised two phases: a desk study consultation exercise and a daytime inspection of the stadium and immediately surrounding area. By combining the two phases it is possible to identify and evaluate the potential value of the Site for bats in order to recommend any additional survey work and determine the potential impacts of the proposed development.

2.2 Desk Study

A data search was undertaken in order to determine the presence of records of bats. The data search was conducted over a 5 km radius from the centre of the site as recommended in the *Bat Mitigation Guidelines* (Mitchell-Jones, 2004). The consultees for the desk study were:

- Merseyside BioBank (MBB), incorporating records from Merseyside and West Lancs Bat Group; and,
- Multi Agency Geographical Information for the Countryside (MAGIC) website for statutory conservation sites designated for bats.

2.3 Building Inspection

The football stadium was internally and externally assessed to determine its potential to support roosting bats. This was undertaken in the field by Tom Oliver, a licensed bat worker (Natural England Bat Class Licence Registration Number: CLS00071). The survey was commensurate with good practice, following the guidance set out in the *Bat Mitigation Guidelines* (Mitchell-Jones, 2004) and *Bat Surveys: Good Practice Guidelines 2nd Edition* (Hundt, 2012).

The building survey included looking for signs of use by bats, internally and externally, including:

- Bat droppings (size of droppings grouped into small, medium or large to signify type of bat that may be present);
- Feeding remains (bats often eat the bodies and leave the wings of invertebrate prey including moths, butterflies and larger flies such as lace wings);
- Oil (from fur) and urine stains;
- Scratch marks;
- Bat corpses; and
- Actual sightings.

The buildings were examined using direct observation, binoculars, endoscopes, ladders and a high power torch, where necessary, to enable closer inspection of suitable features.

Each building or stadium stand was classified as having negligible, low, moderate or high potential for roosting bats, or as a confirmed bat roost, based upon the evidence discovered during the survey or the features of the building. These features include gaps under roof and ridge tiles, and around lead flashing; holes in the roof or gable end of buildings; gaps under the eaves; gaps between sections of corrugated



walls; and in the under croft and welfare area behind the stadium seating. The criteria for assessing the potential of each building to support roosting bats are outlined in Table 2.1.

Table 2.1: Criteria for bat roost potential assessment of a structure.

Bat Roost Potential	Description
Negligible	The structure lacks any features suitable for roosting bats.
Low	The structure may have some interest to roosting bats, e.g. external roosting features such as fascia or soffit boards, but is considered to be sub-optimal to the extent that bats would not be anticipated to use it.
Moderate	The structure exhibits features suitable for use by roosting bats, such as internal and external cavities well insulated from external weather conditions, but is less than ideal in some way. It may be situated in less than ideal habitat, lacking suitable commuting corridors.
High	The structure exhibits a number of features suitable for use by roosting bats e.g. numerous roosting opportunities such as dark, enclosed roof voids; the structure has a high degree of connectivity with likely navigation routes; and the building is located within suitable foraging habitat, likely to be noticed by commuting bats.
Confirmed	Positive signs of bats are recorded within the structure (internally or externally), such as individual bats or bat droppings.

Source: Modified from Bat Surveys – Good Practice Guidelines – 2nd Edition (Hundt, 2012).

2.4 Tree Inspection

All trees within and immediately adjacent to the Site were surveyed for evidence of, or potential for, roosting bats. The trees were classified according to the criteria detailed below in Table 2.2, based upon the features of trees commonly used by roosting bats, Table 2.3.

Table 2.2: Protocol for visual inspection of trees due to be affected by arboricultural work, to assess the value of the trees to bats.

Tree Category	Description
Known Roost	Trees with a confirmed roost present
1*	Trees with multiple, highly suitable features capable of supporting larger roosts.
1	Trees with definite bat potential, supporting fewer suitable features than category 1* trees or with potential for use by single bats.
2	Trees with no obvious potential, although the tree is of a size and age that elevated surveys may result in cracks or crevices being found; or the tree supports some features which may have limited potential to support bats.
3	Trees with no bat potential to support bats.

Source: Bat Surveys – Good Practice Guidelines – 2nd Edition (Hundt, 2012).



Table 2.3: Features of trees commonly used by bats for roosting and shelter, and field signs that may indicate use of trees by bats

Features of Trees Used as Bat Roosts	Signs Indicating Possible Use by Bats
Natural holes	Tiny scratches around entry point
Woodpecker holes	Staining around entry point
Cracks / splits in major limbs	Bat droppings in, around or below entrance
Loose bark	Audible squeaking at dawn or in warm weather
Hollows / cavities	Flies around entry point
Dense epicormic growth (bats may roost within it)	Distinctive smell of bats
Bird and bat boxes	Smoothing of surfaces around cavity

Source: Bat Surveys - Good Practice Guidelines - 2nd Edition (Hundt, 2012).

Any habitat considered suitable for commuting or foraging bats was also recorded.

2.5 Limitations

The residential properties located on Anfield Road, Lothair Road, Alroy Road, Rockfield Road and Back Rockfield Road were not assessed in detail as part of the survey as they are not currently in the ownership of Liverpool Football Club and have therefore been excluded from this assessment.

The Albert public house was not internally assessed as access could not be gained at the time of survey.

Initial Bat Assessment



3 Legislation and Ecology

3.1 Legislation

Throughout Britain, bat numbers have suffered a decline in recent years and, as a result, all species of British bat are protected by United Kingdom (UK) and European legislation.

All species of British bats and their roosts are fully protected under Schedule 5 of the Wildlife & Countryside Act 1981 (as amended) with additional protection offered under Schedule 2 of the Conservation of Habitats and Species Regulations 2010 (as amended). This makes it an offence to kill, injure or disturb bats or obstruct access to, damage or destroy bat roosts. Under this legislation, a roost is determined as any structure or place used for shelter. As bats tend to reuse the same roosts, the roost is protected whether the bats are present at the time or not.

3.2 Status of Bats at the Local / Regional Level

There are eighteen species of bat in the UK, seventeen of which are known to be breeding here. Eight bat species are considered to be resident to the North Merseyside region, which are listed below.

- Brandt's bat (Myotis brandtii);
- Daubenton's bat (Myotis daubentonii);
- Natterer's bat (Myotis nattereri);
- Whiskered bat (Myotis mystacinus);
- Noctule (Nyctalus noctula);
- Common Pipistrelle (Pipistrellus pipistrellus);
- Soprano Pipistrelle (Pipistrellus pygmaeus);
- Brown Long-eared bat (*Plecotus auritus*);

Additionally Alcathoe's bat (*Myotis alcathoe*) has been recently discovered in Yorkshire and Sussex and due to its similarities to Whiskered and Brandt's bats it may also be present in the North Merseyside region.

Pipistrelle bats are widely distributed throughout North Merseyside, occurring in all four districts, and are the species most people come into contact with, most often found roosting in buildings and feeding in urban areas. Brown long-eared bats and noctule bats are less common but are also found throughout North Merseyside.

Daubenton's bats feed almost exclusively over water. Therefore their distribution is localised and has been recorded from Sefton, Liverpool and St Helens. Whiskered/Brandt's and Natterer's Bats are rare locally. Whiskered has been located in Sefton and St Helens and Natterer's only in St. Helens so far.



3.3 Current Factors Causing Loss or Decline in North Merseyside

British bats are insectivorous, occupying many habitat types. They require warm summer breeding roosts and cool, secure hibernation sites. The main factors currently causing loss or decline in North Merseyside include:

- Reduction in insect prey due to intensification of farming practice.
- Loss and fragmentation of suitable landscape diversity and habitat mosaics (pastures, woodlands, wetlands and hedgerows) resulting in reduced feeding resources and severed connections between feeding habitats and roosts.
- Loss of winter roost sites in old trees and buildings.
- Fear and misunderstanding of bats leading some people to exclude them from buildings.
- Loss of roost sites in buildings due to inappropriate timber treatments.

3.4 Status of Bat Species at the National Level

The unmitigated redevelopment of existing roost and foraging sites is an important factor in the decline in bat populations and national planning policy has been devised to halt or reverse this decline. Paragraph 98 of the Government circular 06/05 (ODPM, 2005) states that 'the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat'. Paragraph 99 also states that 'It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision..

Seven of the British bats are listed as Priority Species in the UK Biodiversity Action Plan (UKBAP) (2007), including the soprano pipistrelle and noctule. The Government Circular (ODPM, 2005) which supports National Planning Policy Framework states that 'local authorities should take steps to further the conservation of habitats and species of principal importance through their planning function.' The habitats and species subject to this duty are those listed as priorities under section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.



4 Results

4.1 Desk Study

There are no European Special Area of Conservation (SAC) designations for bat protection located within 30 km of the Site. However, Merseyside BioBank provided a range of bat records within 5 km of the Site; see Table 4.1 for full details. Species without records in the last ten years are considered to be less relevant.

Table 4.1: Summary of bat species within 5 km of the Site.

Species	No. of records	Most recent record	Proximity of most recent record to the Site	Proximity of nearest roost to Site	UK BAP	Local BAP
Savi's Pipistrelle (<i>Hypsugo savii</i>)	1	1996	4.5 km west	N/A	×	×
Daubenton's bat (Myotis daubentonii)	3	1990	4.6 km north east	N/A	*	✓
Noctule (Nyctalus noctula)	13	2007	4.6 km north east	N/A	✓	✓
Common Pipistrelle (Pipistrellus pipistrellus)	31	2013	3.6 km north east	4.8 km north east	×	✓
Soprano Pipistrelle (Pipistrellus pygmaeus)	1	2007	4.6 km north east	N/A	✓	✓
Pipistrelle (<i>Pipistrellus</i> sp.)	58	2012	200m south	4.6 km north east	×	✓
Brown Long-eared bat (Plecotus auritus)	21	1996	4.6 km north east	4.6 km north east	✓	✓

Source: Merseyside BioBank

4.2 Initial Daytime Inspection

4.2.1 Building Survey

An initial external and internal survey of the Site, where access allowed, was undertaken on the 30 October 2013, the results of which are detailed in Table 4.2.



Table 4.2: Summary of results from the stadium inspection

Building	Map Colour Code	Description	Potential Roost / Access Features	Evidence of Bat Presence	Bat Roost Potential	Photo No.
Main Stand	Red	Single tiered stand constructed from concrete and a metal support structure. The external walls and roof are clad in corrugated metal sheeting with a long window along the north west facing side. In the seating area the side walls and roof are also clad in corrugated metal sheeting. An expansive roof void is present above the seating area.	Access is possible into the roof void as well as the welfare areas behind the seating. There were no obvious places suitable for bat roosting.	None	Low	C.1-C.4
The Kop	Orange	Single tiered stand constructed from concrete and a metal support structure. The external walls and roof are clad in corrugated metal sheeting with a long window along the south west facing side, divided by red brick walls. In the seating area the side walls are also clad in corrugated metal sheeting with clear corrugated plastic sheets on the roof.	Direct access is possible to the welfare areas behind the seating through multiple entry and exit points.	Yes, droppings and bat found roosting behind a hand rail of the back wall of the 2 nd floor welfare area.	Overall low, but bat found to be roosting.	C.5-C.9
Centenary Stand	Yellow	Two tiered stand constructed from a mixture of concrete and brickwork with a metal support structure. The external walls are mainly brick work, with windows and a mixture of flat and corrugated metal sheeting. In the seating area the side walls are also clad in corrugated metal sheeting with clear corrugated plastic sheets on the roof.	Direct access is possible to the welfare areas behind the seating through multiple entry and exit points.	No	Low	C.10- C.12
Anfield Road Stand	Green	Two tiered stand constructed from a mixture of concrete with a metal support structure, some of which is visible above the roof. The external walls are clad in flat metal sheeting. In the seating area the side walls are also clad in corrugated metal sheeting with clear corrugated plastic sheets on the roof.	Direct access is possible to the welfare areas behind the seating through multiple entry and exit points.	No	Low	C.13- C.14



Building	Map Colour Code	Description	Potential Roost / Access Features	Evidence of Bat Presence	Bat Roost Potential	Photo No.
The Conference and Events Department Building	Purple	Three storey brick office building with a gently pitched tiled roof located next to the Shankly Gates. A single level garage is also attached to the main office building. The building is in a very good structural condition, with no holes in the brick work or missing roof tiles.	No obvious access points and the building appears in a good condition.	No	Negligible	C.15
The Albert public house	Blue	Two storey detached Victorian redbrick building with a tiled pitched roof fronting on to Walton Breck Road. The building is generally in a good state of repair with some minor damage visible around the pub name sign. The gable ends both have overhanging wooden soffits.	No obvious internal access points although the gable end wooden soffits overhang the brickwork	No	Medium	C.16

4.2.2 Tree Survey

All trees situated within the Site or immediately adjacent to it were assessed for their potential to support roosting bats with all the trees currently located within the Site showing no potential to support roosting bats and have therefore been classified as Category 3 trees – no potential to support bats (Hundt, 2012).

The trees located immediately adjacent to the north east boundary of the Site, within Stanley Park, were also assessed due to their close proximity to the Site. These trees are larger and more mature than any trees located within the Site (Photos C.17 – C.18) but still lack the required features capable of supporting roosting bats and have again been classified as Category 3 trees – no potential to support bats (Hundt, 2012).

4.2.3 Foraging Habitat

The introduced shrub habitat offers a small amount of suitable habitat for foraging bats, although the rest of the Site has no suitability. The adjacent Stanley Park has good foraging resources including mature trees, scrub and open water.



5 Interpretation and Recommendations

5.1 Interpretation

5.1.1 Building Survey

The stadium as a whole offers very little suitability for roosting bats; however, despite the lack of roosting opportunities, a single pipistrelle bat was found roosting in The Kop stand during the survey. The presence of the bat is likely to be because of a number of factors:

- 1. The stadium is only sporadically used, meaning it is quiet for extended periods of time;
- 2. Unrestricted access is available to the roosting position via open entrance/exit points into the seating area; and,
- 3. Stable atmospheric conditions; the welfare areas behind the seating are unheated and not in direct sunlight.

Pipistrelle bats are the most common bat in the urban environment and a small, opportunistic species able to exploit areas for roosting unsuitable for other bats. The presence of the bat within The Kop stand can potentially be explained by the combination of factors outlined above, combined with the opportunistic nature of the species and daring of a singular bat. It is highly unlikely that more bats will be roosting elsewhere with the stadium or that more bats will exploit the unique environment currently found within the second floor welfare area of The Kop.

As no works are currently planned to The Kop stand, it is considered that the planned development will have no effect on the individual currently roosting within the stand.

The Conference and Events Department building has negligible potential to support roosting bats as it is in a good condition, with no signs of cracks or crevices or lifted roof tiles. The Albert public house has some opportunities for roosting bats behind the overhanging wooden soffits on the gable ends as well as some missing roof tiles and a damaged pub sign and has therefore been classified as having moderate bat roost potential. However, given the location of these buildings and the presence of more suitable roosting areas elsewhere within the Site it is not anticipated that either of these buildings currently support bats. Additionally, as plans currently stand The Albert public house will not be directly affected by the proposed works.

5.1.2 Tree Survey

None of the trees within the Site are of sufficient maturity to support roosting bats. The trees immediately adjacent to the Site within Stanley Park are of sufficient maturity but currently lack the features required to support roosting bats. Therefore all trees within and immediately adjacent to the Site have been classified as Category 3 trees (no potential to support bats), and therefore roosting bats are not anticipated as being present within these habitats.



5.1.3 Foraging Habitat

Foraging bats are unlikely to use the Site in any great capacity. The small amount of suitable habitat, the introduced shrub, which is present within the Site, is not likely to support the numbers of invertebrates required to make it a regular foraging resource. It is more likely that bats occasionally forage or move across the Site when heading towards Stanley Park, which has good foraging resources for a range of different bat species.

5.1.4 Excluded Terraced Housing

This survey has specifically excluded the terraced housing on Anfield Road, Lothair Road, Alroy Road, Rockfield Road and Back Rockfield Road which currently lies outside the ownership of Liverpool Football Club. It is understood that this housing is currently owned by Liverpool City Council/Your Housing Group and will be demolished prior to the submission of the stadium expansion planning application.

5.2 Recommendations

As present the proposed works should not directly impact any roosting bats and will have a minimal effect on bats which occasionally forage or move across the Site and there are no specific recommendations beyond best practice guidance:

- The buildings should be demolished or development works started as soon as practically possible, reducing the risk of bats exploiting what little potential exists and potentially roosting in the intervening period.
- If any bats are located during demolition or development works, work should cease and a licensed bat worker or Natural England should be consulted for advice.
- If development work has not started within a year of this report, further surveys maybe required to assess whether the buildings have been colonised by bats in the intervening period.

Should the proposed works alter so that The Kop stand is directly affected by the development works, the following recommendations are made:

 Prior to any development work taking place, a European Protected Species (EPS) development licence will need to be obtained from Natural England to cover the alteration of the current roost and the disturbance to roosting bats.

Additionally, if the proposed works alter so that The Albert public house is directly affected by the development works the following recommendations are made:

- A detailed internal inspection of the roof voids within the building, by a licenced bat ecologist, should be undertaken to identify potential evidence of bats.
- If evidence of bats is found or their absence cannot be ruled out nocturnal bat surveys maybe required to determine whether the building is used by roosting bats and in what capacity. These surveys should

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be undertaken prior to any demolition or alterations and within the recognised bat survey season (between May and September), during appropriate weather conditions.



6 Conclusions

The initial bat survey of the Site identified that the stadium generally has low potential to support roosting bats. Despite this a single pipistrelle bat was found roosting behind a shelf attached to the back wall of the second floor welfare area (area behind the seating) in The Kop stand. The other buildings surveyed within the Site, the Conference and Events Department building and The Albert public house, were assessed as having low and moderate potential for roosting bats respectively. The excluded terraced housing has high potential to support roosting bats, but these buildings will be demolished prior to submission of the planning application.

No trees capable of supporting roosting bats are currently present within the Site. The trees immediately adjacent to the Site in Stanley Park are of sufficient maturity to potentially support bats, but currently lack the required features, such as cracks and crevices. Therefore all trees within or immediately adjacent to the Site have been classified as Category 3 trees – no potential to support roosting bats (Hundt, 2012).

The Site has limited foraging potential, but due to the presence of a major foraging resource adjacent to the Site it is likely that low numbers of bats forage or move across the Site.

The location of the roosting bat within The Kop stand is in a place which will remain unaffected by the proposed development. Given the levels of disturbance the bat is willing to endure when the stadium is in use the proposed development should also not disturb the bat either. Therefore as plans currently stand not recommendations have been made with regards to the bat, other than it is left in situ, left undisturbed and allowed to move freely.

Based on the current proposed development no bats will be directly impacted or disturbed and therefore only best practice recommendations have been made with regards to the development. Should plans change and The Kop stand or The Albert public house be affected by the development further surveys and a Natural England development licence will be required before the development can proceed.



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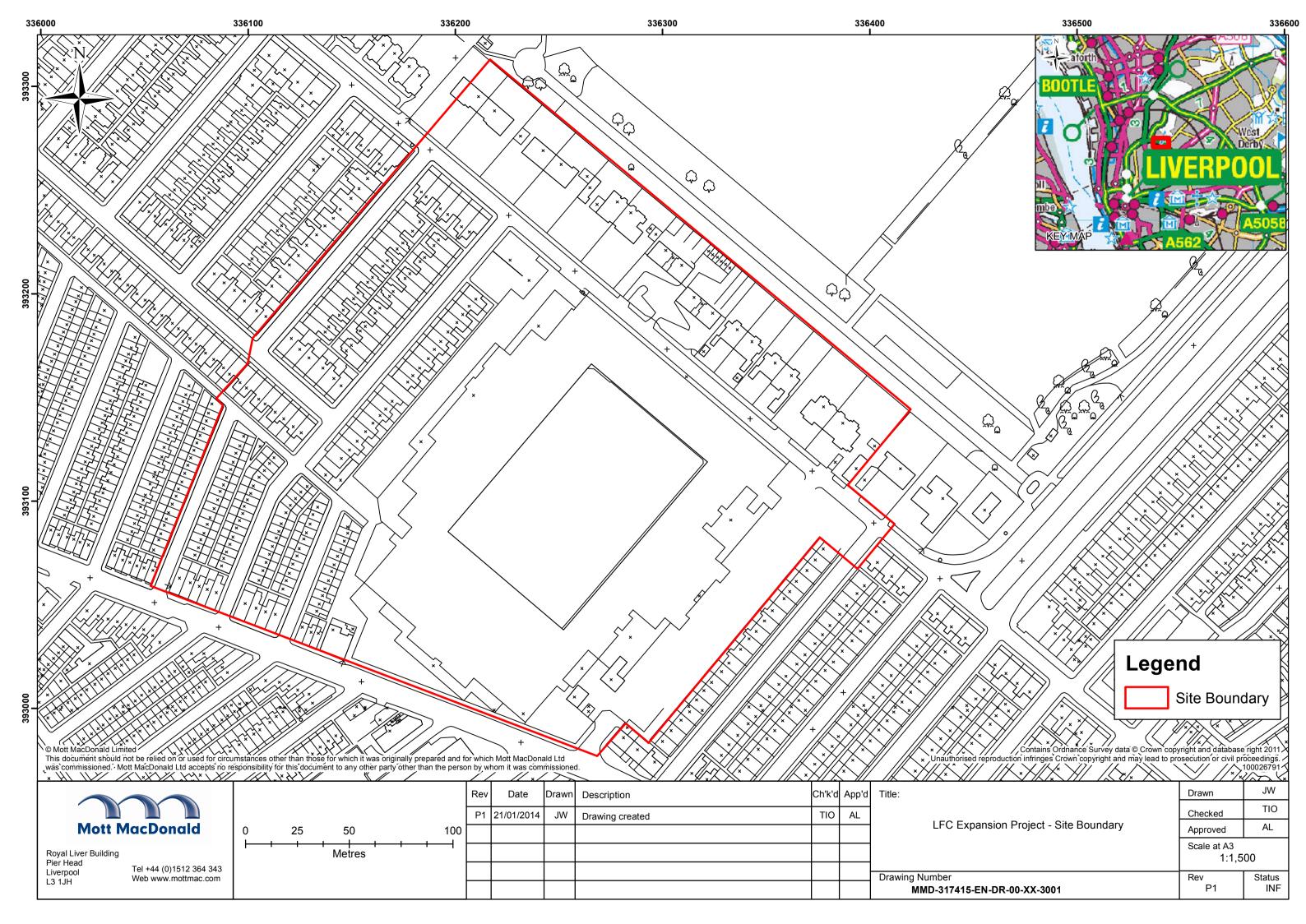


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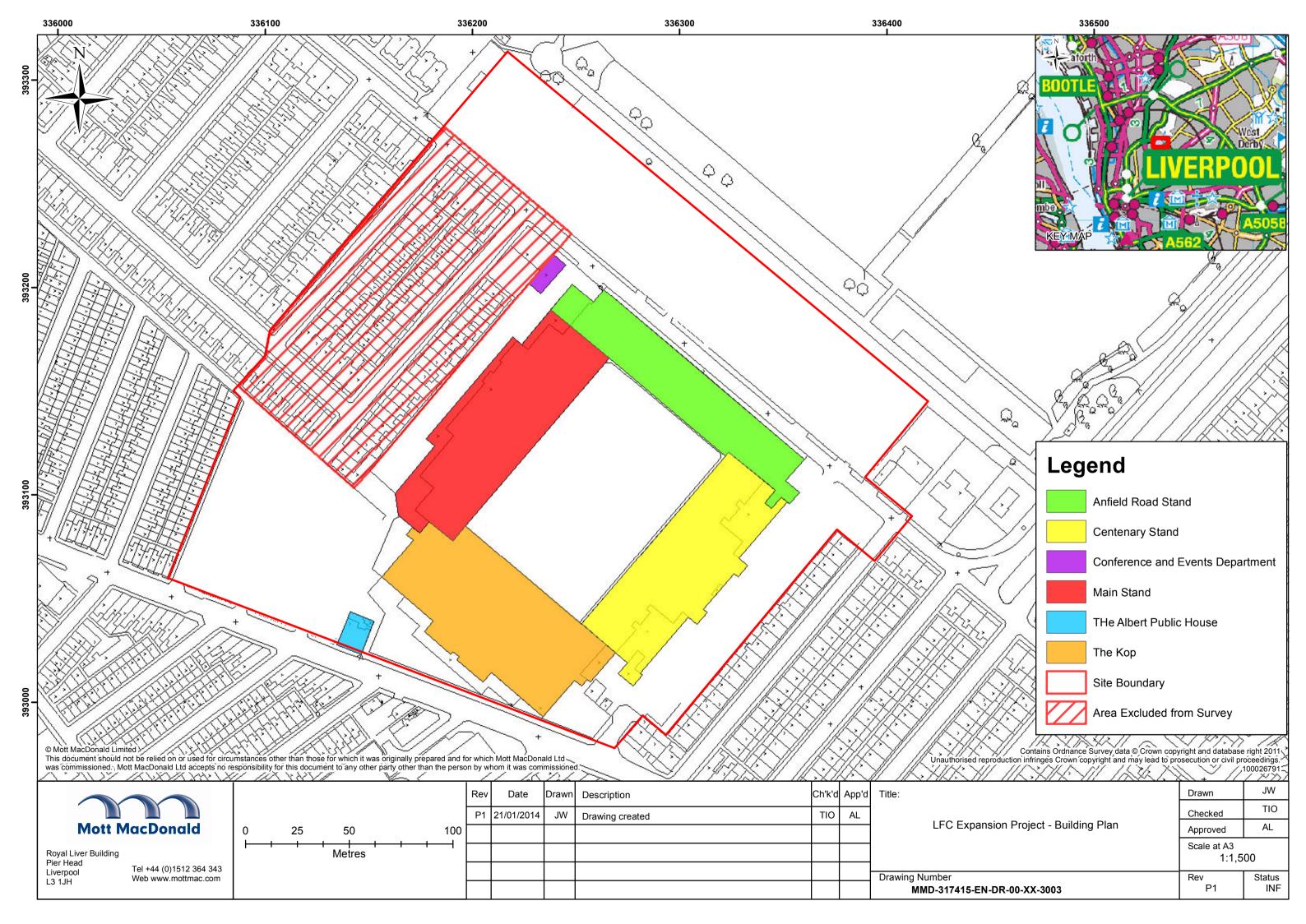


Appendix A. Site Location Plan





Appendix B. Building Plan





Appendix C. Site Photographs

Photo C.1: Outside view of the Main Stand which is clad Photo C.2: Inside the stand the walls and roof are also in corrugated metal.



clad in corrugated metal sheeting.



access to the welfare areas behind the seating.

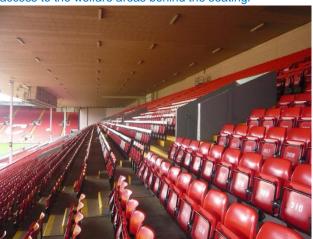


Photo C.3: The entry/exit points provide a constant open Photo C.4: The roof is open and expansive but lacks any suitable areas for bats.





Photo C.5: Outside view of The Kop which is constructed from metal, glass and brickwork.



Photo C.6: The Kop is a single tier of seating which has multiple entry/exit points to the welfare areas behind.

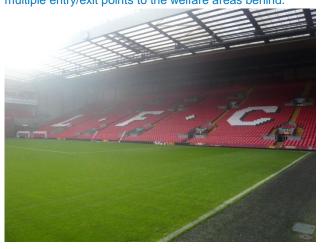


Photo C.7: The hand rail/shelf on the back wall of the 2nd floor, behind which a pipistrelle bat was roosting.



Photo C.8: Small group of pipistrelle bat droppings under the shelf.





Photo C.9: Small pipistrelle bat found between the wall and the shelf.



Photo C.10: The outside view of the Centenary Stand.



Photo C.11: The two tiered stand has little potential for bats with single skin metal sheeting on the walls and roof.



Photo C.12: Top of the Centenary Stand.





Park.



Photo C.13: View of the Anfield Road stand from Stanley Photo C.14: Again, the open nature of the seating area and use of corrugated metal makes it highly unsuitable for bats.



Photo C.15: The Conference and Events Department building located at the northern tip of the stadium.



Photo C.16: The Albert public house on Walton Breck Road.





Photo C.17: The trees located in Stanley Park which lie adjacent to the Site



Photo C.18: Example of the age of tree found in the park.

