



Preliminary Roost & Nest Assessment



1 Sea Front
Hayling Island
Hampshire
PO11 0AG

September 2025

Contract Details		
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1. Executive Summary of Findings

1.1 Summary of Results

Constraints

There were no perceived constraints to the survey of the dwelling which would trigger further investigation or Phase 2 Bat Emergence Surveys or Phase 2 Bird Surveys. A mobile elevated working platform (MEWP) was required to investigate hard to reach potential ingress points which were then investigated with an endoscope.

Internal and external surfaces were fully inspected, and a compliant assessment made of the roof structure. The survey effort was considered sufficient to draw appropriate conclusions. It took into account the time of year (optimal period is April – September) and likely availability of evidence, with appropriate emphasis on suitable roosting or nesting conditions, opportunities for potential access through ingress points, free-flight, crawl spaces externally and internally, and features that may have been hidden from full view.

BATS

- ▶ *The structures are not occupied or potentially suitable for bats during the active season, generally accepted as April – September inclusive.*
- ▶ *The structure are not occupied or potentially suitable for bats during the less active period (October - November and March) or during the Hibernation period. (December – February inclusive).*

Confirmed Bat Roost?			Suitability for Roosting Bats?		
Non-Hibernation	Non-Classic Hibernation	Classic Hibernation	Non-Hibernation	Non-Classic Hibernation	Classic Hibernation
No	No	No	No	No	No

1.2 Building Assessment Criteria

Negligible: No obvious habitat features on site likely to be used by roosting bats; *however, a small element of uncertainty always remains as bats can use small and apparently unsuitable features on occasion.*

[Source – Bat Conservation Trust UK Bat Mitigation Guidelines – Reason, P.F. and Wray, S. (2023).]

The above summary applies to all structures on site. Each structure is discussed individually within the body of the report.

1.3 Summary of Perceived Impacts - Bats

- ▶ *The proposal brief includes demolition of all structures on site and replacement with residential housing*
- ▶ *At the time of the assessment, it was not considered there would be any disturbance, harm or death to bat species caused by these proposals as the structures are considered as being of negligible value to roosting bats.*

BIRDS

1.4 Building Assessment – Birds

- ▶ *The structure does not offer any features which would indicate nesting birds are present and hidden from view internally.*

1.5 Summary of Perceived Impacts - Birds

Evidence the structure is presently utilised by nesting birds:

- ▶ *None*
- ▶ *As nesting was not recorded, there is no requirement to replace nesting sites. Mitigation is therefore not a requirement for birds.*
- ▶ *If nests, whether completed or in the process of being built, are found on site, any works with the potential to damage or destroy the nest, eggs or young birds, must stop until the birds have completed breeding. This includes any activity that could potentially cause an adult bird to desert the nest resulting in death or egg failure. Nesting sites should be inspected only by experienced ecologists.*
- ▶ *Any disturbance of a breeding bird on Schedule 1 is an offence, regardless of whether this impacts upon the breeding attempt. These nests can only be visited by an ecologist with a licence for the specific species concerned.*
- ▶ *Birds might nest on machinery or scaffolding and other temporary site structures. If this happens the equipment cannot be used until the birds have finished nesting and such areas might need to be sealed off to prevent disturbance.*

1.6 Additional Protected Species/Habitats - Protected Species

- ▶ *None – The site is unsuited to other EPS: dormouse, GCN, Sand lizards and smooth snakes, none of which are recorded within 1km of this site. Additionally, no records of badgers in close proximity and no potential for this species onsite. Priority species such as harvest mice and hedgehogs are highly unlikely to found in this area and the onsite habitat is unsuited to them. The site is basically devoid of natural habitats apart from some ornamental planting beds.*
- ▶ *Where Species/ habitats are at risk from impact under the proposed project, have been recorded. Reference must be made to the Mitigation Section.*

It is understood that a BNG assessment has been undertaken by another Ecological Consultancy, and a separate report will be provided as part of the planning application. Therefore, BNG has not been considered within this report

1.7 Priority and Protected Habitats

There are no priority habitats onsite, there are however coastal sand dunes immediately south, coastal vegetated shingle and lowland acid grassland to the east.

Other habitats are included within the tables below –

Priority habitats within 2km

Habitat	Proximity to site
Coastal Sand Dune	Nine areas to the S and SW. Closest borders the site
Lowland Dry Acid Grassland	Closest borders the site to the east, with a few more to the E & W.
Coastal vegetated shingle	Parcels to E & W. Closest borders the east boundary
Saline lagoons	Almost 2km to the E
Good quality semi-improved grassland	Closest 1.45km to the west
Mudflats	Closest 1.47km to NW
Coastal and floodplain grazing marsh	Closest almost 2km to the NW
Deciduous woodland	Closest 1.3km SW

Statutory designated site within 2km

Designated Site Name	Designation	Distance (approx.)	Reason for Notification
Sinah Common	SSSI	S&E Adjacent	Diverse Coastal habitats including sand dunes and saltmarsh
Chichester and Langstone Harbours	SAC / SPA RAMSAR	1.45km N	Chichester and Langstone Harbours SPA due to internationally important coastal and estuary habitat – significant in supporting wintering and breeding bird populations
Solent Maritime	SAC	0.37km S	11,243ha SAC due to its four coastal plain estuaries, Atlantic salt meadows and Spartina swards
Langstone Harbours	SSSI	1.68km N	2,069ha it includes one of the largest areas of mixed saltmarsh on the south coast – it resembles a land locked lake at high tide.

The site lies within the SSSI impact zones of Sinah Common SSSI and Chichester and Langstone Harbours SSSI. The LPA will be expected to consult Natural England for this proposal.

The proximity to the SAC / SPA and RAMSAR sites may lead to the LPA requesting a shadow Habitats Regulation Assessment (HRA) to consider indirect effects of development, such as pollution and increased recreational pressure in this area, although as the site is already commercial, with frequent noise and visitor disturbance, it is considered highly likely that developing this site as residential, rather than its current use as a fun fair will reduce the level of disturbance for wildlife in this area.

A Construction Ecological Management Plan (CEMP) it is considered necessary to ensure that there will not be any significant land or marine designations impacted by the proposed works.

1.8 Advisory

Regardless of any lack of evidence of species recorded onsite, legislation exists for the protection of wildlife in general. In this case, an advisory regarding good practice for the protection of any species which might venture onsite, is contained in this report.

1.9 Summary Enhancement

As a minimum, LPAs now expect any new structure to include bat roost or bird nesting provision under the National Planning Policy Framework July 2021.

- ▶ *The project will provide nesting opportunities for birds including swifts*

1.10 Developer's Next Step

This report is ready to be submitted to the local planning authority.

2. Project Details

2.1 Illustrated Proposal & Description of the Proposed Project

- ▶ *The proposal brief includes demolition and replacement with up to 55 two and three bed flats*
- ▶ *The proposed works do not pose a threat of disturbance, harm or death for roosting bats.*
- ▶ *The proposed works do not pose a threat of disturbance, harm or death for nesting/fledging birds.*



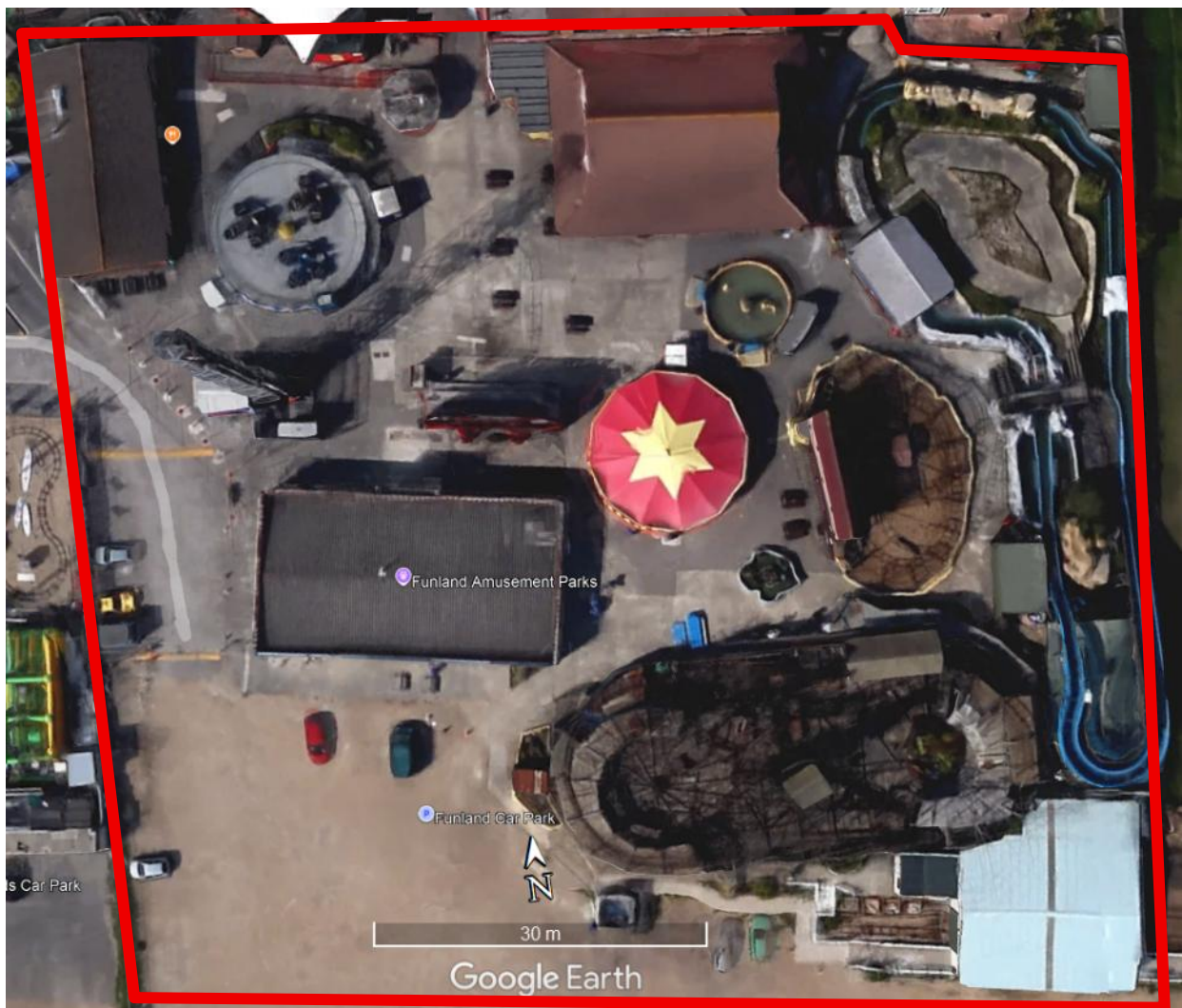
3. Zone of Influence (Zol)

The Zol is the area /resources that might be affected by the biophysical changes caused by activities associated with this project.

All associated construction materials/machinery/facilities must be sited and stored in the area of least onsite impact and within the Zol, as indicated below. This precaution protects other habitats of value and wildlife from unintended impacts during all construction phases.

Habitats of value are recorded, where applicable, within Section 5.2 – Predicted Impacts.

Image - Google Earth – Habitat Map offers a fair representation of onsite habitats during September 2025.



Associated habitat: All structures are immediately surrounded by predominantly sealed surface.

To the north is urban residential and to the south and southwest Coastal Sand Dunes, a little further south, the Solent, to the east and west are Coastal vegetated shingle. To the east and west Lowland Dry Acid Grassland. Details of sites further away are provided above.

3.1 Assessment of Adjacent and Surrounding Habitat:

Map of Site Area to 1km



Habitats surrounding this site, comprise urban residential and coastal (with constant onshore breezes) which offer low potential for either foraging and commuting bats or birds. There are pockets of rural agricultural a little further away to the north. However irrespective of potential commuting routes, the survey revealed that the property had no evidence of bat usage and negligible potential to be used as a roost.

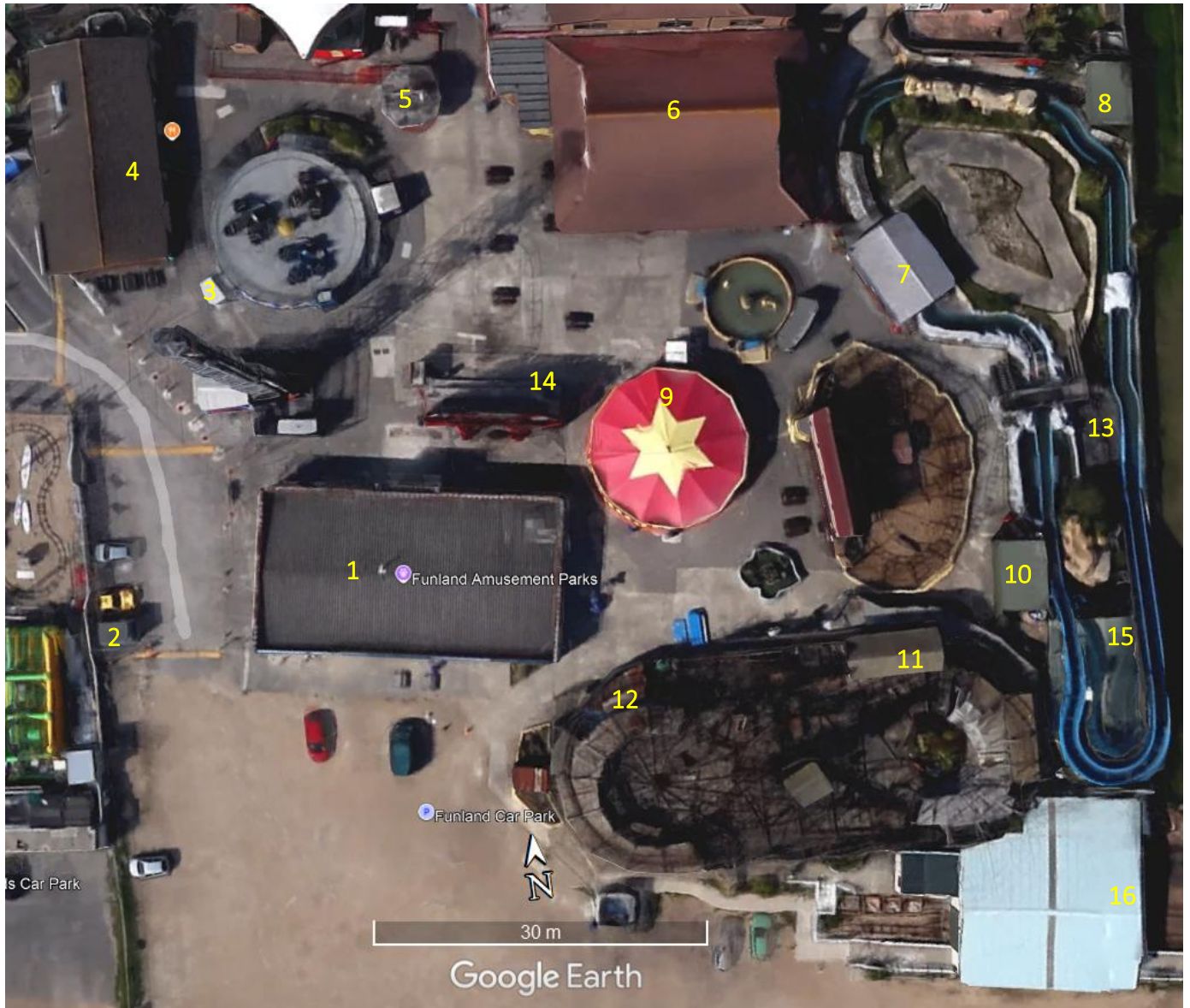
The site lies within the SSSI impact zones of Sinah Common and Chichester and Langstone Harbours SSSI

The LPA will be expected to consult Natural England for this proposal.

The proximity to the SAC / SPA and RAMSAR sites may lead to the LPA requesting a shadow Habitats Regulation Assessment (HRA) to consider indirect effects of development, such as pollution and increased recreational pressure in this area, although as the site is already commercial, with frequent noise and visitor disturbance and artificial lighting, it is considered highly likely that developing this site as residential, rather than its current use as a fun fair will reduce the level of disturbance for wildlife in this area.

A Construction Ecological Management Plan (CEMP) it is considered necessary to ensure that there will not be any significant land or marine designations impacted by the proposed works.

3.2 Site map



4. Building / Structure Descriptions

Building 1 (B1)



External features: Concrete block interior skin with fabricated metal sheeting exterior. The constant fluctuation in temperature makes this structure unsuited to bats. An endoscope was used to explore damage to the outer cladding – no evidence of bat usage. Images below



Internal features: Asbestos roof with (partial) suspended ceiling



Negligible potential for roosting bats or nesting birds

B2



External features: UPVC windows and doors and metal walls and roof

Internal features: Plywood lined no potential for bats or birds

Negligible potential for roosting bats or nesting birds

B3



External features: metal sheeting – this is actually the electrical fuse box for the fair ground

Internal features: included for completeness, but totally unsuited to bat or birds

Negligible potential for roosting bats or nesting birds

B4



External features:

Brick walls under an interlocking concrete tile roof. Some apparent gaps where tiles interlock. Bricks are well pointed and offer no PRFs These were explored with an endoscope.

The design of the tiles means that even if a corner of a tile (where they overlap) is broken, or slightly misaligned, the tile still fits tightly together further up. Consequently, these apparent gaps, are not really gaps. Shallow crevices would make any bat in such a location easy prey for herring gulls. Absolutely no evidence of bats usage.

Slight damage to the SW corner soffit was explored with an endoscope. No evidence of bat or bird usage.

Internal features:

Roof is lined with bitumen felt. The ceiling is comprised of ceiling tiles, making it impossible to walk on. Multiple tiles were removed to ensure this was not a constraint. Some internal light glimpses, but no evidence of bats or bird usage

Negligible potential for roosting bats or nesting birds

B5



External features:

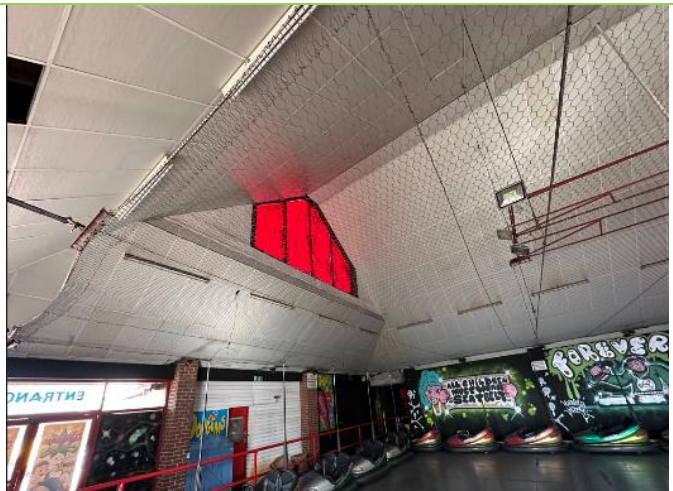
Brick hexagonal ticketing kiosk under a preformed stick-on roofing tile roof.

Internal features:

No void and no potential crevices.

Negligible potential for roosting bats or nesting birds

B6





External features:

Largely brick built with a pitched concrete tile roof. A small section is single storey, has a flat roof and appears to be block rendered walls. Some potential ingress points were investigated with the use of a MEWP and an endoscope. SW corner of soffit, multiple raised tiles near the gable end, a gap under the soffit, raised lead work and gap where the soffit joins the gable

Internal features:

Vaulted ceilings and covered with chicken wire to permit electrical connection with the dodgem cars. No real voids.

Negligible potential for roosting bats or nesting birds

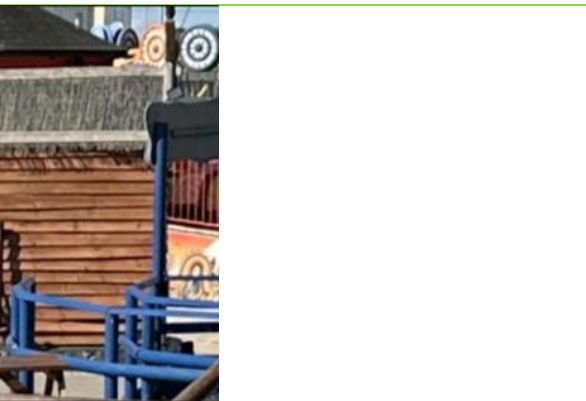
B7

	
<p><i>External features:</i> Open on the east, west and south sides. The walls are wooden, and the roof bitumen mineral felt. This structure is used as a waiting area for a ride. It does not have any PRFs</p>	<p><i>Internal features:</i> No void</p>
<p>Negligible potential for roosting bats or nesting birds</p>	

B8

	
<p><i>External features:</i> Corrugated metal shed, open to the west. It does not have any concealed voids or other PRFs</p>	<p><i>Internal features:</i> No concealed void. Currently used for storage</p>
<p>Negligible potential for roosting bats or nesting birds</p>	

B9

	
<p><i>External features:</i> Wooden shed with a pitched roof. Roof is composed of bitumen felt and what appears to be bamboo or another form of grass.</p>	<p><i>Internal features:</i> No void. No linings. The window is covered in chicken wire which permits light into the interior.</p>
<p>Negligible potential for roosting bats or nesting birds</p>	

B10



External features:

Metal frame with UPVC panels. It is a control room for a ride. No PRFs

Internal features:

No void and no PRFs

Negligible potential for roosting bats or nesting birds

B11



External features:

Flat roof timber shed – this is a kiosk selling tickets.

Internal features:

No void, no lining

Negligible potential for roosting bats or nesting birds

B12



External features:

Roller coaster structure – open on all sides.
Combination of metal, UPVA and wood. No PRFs

Internal features:

No voids, no PRFs

Negligible potential for roosting bats or nesting birds

B13



External features:

Wooden 'log' built shed which houses equipment and water for the log ride. No PRFs



Internal features:

No void, no PRFs

Negligible potential for roosting bats or nesting birds

B14



External features:

Wooden ticketing office. Hipped roof. Windows are located on the north, east and west walls. No PRFs

Internal features:

No voids, No PRFs

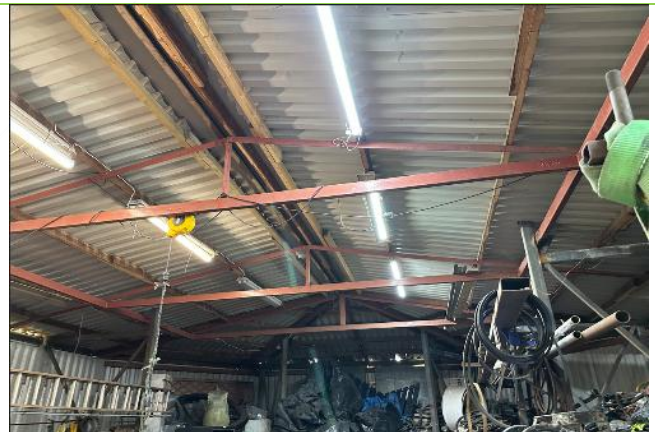
Negligible potential for roosting bats or nesting birds

B15



External features:

Pressed steel walls and roof, used for fabrication and repairs workshop. No PRFs



Internal features:

No voids. No PRFs

Negligible potential for roosting bats or nesting birds

B16



External features:

Shipping containers used for safe storage. Steel construction and solidly put together. No PRFs

Internal features:

No voids, no PRFs

Negligible potential for roosting bats or nesting birds

Other overview images from the MEWP





5. Results and Assessment

5.1 Rationale: Bats

The building exteriors were searched visually using binoculars or a close range monocular for evidence of bats, with particular attention being paid to sheltered areas such as window ledges and pipes where bat droppings might lie undisturbed from the weather and areas hidden from sight.

The interior spaces were checked for light ingress and access points for bats. Bat droppings, insect prey remains, urine stains, oil stains from bats repeatedly moving over a small area and polishing the surface and the potential presence of bats either dead or alive was considered including areas hidden from sight.

- ▶ *Externally there were generally negligible ingress points, no evidence, or other potential roosting sites recorded. Features associated with the structure and commonly associated with bat roosting are generally tight and secure with no gapping, crawl spaces or free-flight.*
- ▶ *However, in three structures (B1, B4 and B6) very limited potential was identified, this comprised of*
 - *Slightly raised roof tiles*
 - *Damage to soffits*
 - *Raised leadwork*
 - *Holes in the metal walls*
- ▶ *As a result, a MEWP was utilised to get up close to these features and an endoscope used to thoroughly investigate these 'PRFs' for evidence of bats or bird usage.*
 - *No evidence of bat roosting, droppings, feeding remains, staining or other signs were recorded within the structures surveyed.*
 - *No evidence of bird nesting or other signs were recorded within the structures surveyed.*

It is considered that none of the structures on site offer roosting potential to bats and none offer nesting potential to birds. Both birds and bats are peripatetic and if circumstances change are capable of taking advantage quickly. Consequently, the structures must be maintained exactly as they are and any damage from a storm or vandalism, might trigger the need for a resurvey.

5.2 Predicted Impact to Protected Habitat/Species.

The LPA will consult the associated planning documents submitted with this application to ensure the understanding of the works within this report reflects those submitted as the final Illustrated Proposal.

- ▶ *If bats were present, it would be expected that at least some evidence would be present. Features generally and specifically associated with bats are not evident or are of negligible significance and can be discounted. Therefore, no loss to roosting features are expected under this development. Active or hibernation roosting is highly unlikely within this structure.*
- ▶ *Phase 2 Survey for Bats - further Phase 2 Bat Emergence Surveys are not considered necessary.*
- ▶ *The site lies within the SSSI impact zones of Sinah Common and Chichester and Langstone Harbours SSSI - The LPA will be expected to consult Natural England for this proposal.*
- ▶ *The proximity to the SAC/SPA and RAMSAR sites may lead to the LPA requesting a shadow Habitats Regulation Assessment (HRA) to consider indirect effects of development, such as pollution and increased recreational pressure in this area, although as the site is already commercial, with frequent noise and visitor disturbance and artificial lighting, it is considered highly likely that*

developing this site as residential, rather than its current use as a fun fair will reduce the level of disturbance for wildlife in this area.

- ▶ *A Construction Ecological Management Plan (CEMP) it is considered necessary to ensure that there will not be any significant land or marine designations impacted by the proposed works. The CEMP will need to detail how the development will prevent pollution such as dust and cement leaving the site. It must detail working times, the use of artificial lighting during the construction phase and keeping noise to the minimum whilst undertaking site works during the winter months.*

5.3 Advisory

Whilst no evidence of bats exists at present, it might be possible for bats to become associated with this structure in the future, where forces such as nature or impacts to this structure occur.

Lack of evidence at point of survey does not discharge the client/agent of their responsibilities to protected species.

Irrespective of survey findings, contractors should be made aware that there is always the potential presence of bats in association with roofing layers, ridgelines and wall tops. In the event that a bat is found during works, all activities near the discovered bat(s) will cease and advice sought from Ecological Surveys Ltd or the Bat Conservation Trust Helpline (Tel: 0345 1300 228). Bats should not be handled (unless with gloves) and only to protect them from harm. Wherever possible, any species should be left in situ until advice is obtained.

5.4 Rationale: Birds

Nests and nesting material were **not** recorded.

- ▶ *Active future nesting could occur upon external walls (e.g. House martins) or on roof areas (gulls), or within any voids.*

Predicted Impact to Protected Habitat/Species.

Illustrated Proposal

The LPA will consult the associated planning documents submitted with this application to ensure the understanding of the works within this report reflects those submitted as the final Illustrated Proposal.

- ▶ *Features generally and specifically associated with birds are not evident or are of negligible significance and can be discounted. Therefore, no loss to nesting features are expected under this development.*
- ▶ *A Phase 2 Bird Survey is not considered proportionate in this instance where mitigation can be effectively applied.*
- ▶ *Mitigation to recreate nesting habitat is not required.*

Bird Nesting Advisory

It is possible that bird nests could be newly established in association with this site during future bird nesting seasons. The bird nesting season generally extends from March to August inclusive, although, depending upon the species, geographical area and the weather conditions, nesting can extend outside this period and it is the nesting behaviour that must be observed, not the supposed time frame. For example, collared doves (*Streptopelia decaocto*) and barn owls (*Tyto alba*) have been observed to nest in

every month of the year.

All British birds and their nests are protected whilst in use; therefore, if a nest is found during construction work, all activity must cease within proximity and ecological advice sought immediately.

5.5 Additional Protected Habitats/Species

Ecological Surveys Ltd has a professional obligation to record and report protected species which might or will be affected by the proposed works onsite and will highlight where mitigation or further surveys will be necessary to protect species in order that the client/developer does not accidentally contravene the law.

[Source -www.gov.uk/guidance/protected-species-how-to-review-planning-applications].

If the presence of further protected species is suspected prior to works proceeding where disturbance, harm or death might occur owing to the proposed works, consultation with the acting ecologist is imperative to prevent a potential Wildlife Offence.

- ▶ *Habitat/Species - No further habitats or protected species potential exists on this site.*
- ▶ *Good practice for the protection of any potential species is a requirement. Refer to Advisory - Impact Avoidance During the Construction Phases.*

6. Mitigation – Bats and Birds

Under the National Planning Policy Framework (NPPF), Local Planning Authorities (LPAs) have an obligation to promote the preservation, restoration and recreation of priority habitats, ecological networks and the protection and recovery of priority species as identified under the Natural Environment and Rural Communities Act (2006). Local Planning Authorities will seek to produce a net gain in biodiversity by requiring developers to design wildlife into their plans and to ensure that any unavoidable impacts are appropriately mitigated for. Mitigation is the process of replacing any ecological / biodiversity losses because of development.

- ▶ *Mitigation specifically for roosting bats and nesting birds is not required.*
- ▶ *Good Practice for the protection of any species is a requirement.*

6.1 Impact Avoidance During the Construction Phase

All activities on site will bear in mind the potential for wildlife or the environment being harmed through the process of development from inception to end. A proactive approach for the lawful protection of wildlife and the environment regarding use of materials, machines, chemicals, and human activity on site will be implemented.

- Contractors must ensure that no harm can come to wildlife by maintaining the site efficiently, clearing away any material such as wire in which animals can become entangled and preventing access to toxic substances.
- Trenches or large excavations will be covered overnight to prevent wildlife such as badgers or hedgehogs falling in and failing to escape. If this is not possible, then a strategically placed plank might provide a means of escape.
- Any large bore pipes will be capped at the end of the day to reduce the potential for badgers and other wildlife entering and becoming trapped.
- Areas that are being retained will be protected from damage during construction by erecting Heras (or similar) fencing around these features. The fencing will be erected outside the line of the canopy as this helps protect the roots from compaction of the soil.

- Any areas proposed for planting post-development will be fenced off where possible to prevent compaction of the soil through vehicle movements.
- If there is a substantial delay before development commences, the site will be maintained in a way that would prevent wildlife colonising it and causing constraints in the future. Such management will include mowing grassland at least twice a year and preventing scrub encroachment.
- Piles of brush wood and or log piles will be carefully inspected for signs of wildlife prior to their removal. This is especially crucial during the period March – September (inclusive) as some species of bird choose such sites to construct their nests. Ideally removal of such features will be done outside of the nesting season. If this is not possible, it is recommended that these features are covered in such a way as to exclude / prevent birds/hedgehogs and / or reptiles taking up residence.
- If nesting birds or reptiles be discovered, work must cease immediately, and ecological advice sought.
- All hedgerows / trees / shrubs removal will be done outside of the bird nesting season March – September (inclusive). If removal is not possible during this period, careful checks of such, must be conducted by a suitably experienced ecologist prior to works commencing.

6.2 Additional Protected Species/Habitat Constraints & Mitigation

SSSI impact zones - The site lies within the SSSI impact zones of Sinah Common and Chichester and Langstone Harbours SSSI - The LPA will be expected to consult Natural England for this proposal.

shadow Habitats Regulation Assessment (HRA) - The proximity to the SAC / SPA and RAMSAR sites may lead to the LPA requesting a shadow Habitats Regulation Assessment (HRA) to consider indirect effects of development, such as pollution and increased recreational pressure in this area, although as the site is already commercial, with frequent noise and visitor disturbance and artificial lighting, it is considered highly likely that developing this site as residential, rather than its current use as a fun fair will reduce the level of disturbance for wildlife in this area.

A Construction Ecological Management Plan (CEMP) - it is considered necessary to ensure that there will not be any significant land or marine designations impacted by the proposed works. The CEMP will need to detail how the development will prevent pollution such as dust and cement leaving the site. It must detail working times, the use of artificial lighting during the construction phase and keeping noise to the minimum whilst undertaking site works during the winter months.

7. Enhancement

The National Planning Policy Framework (NPPF) sets out the UK Government's national policies on enhancement of biodiversity and promotion of ecosystem services through the planning system.

Under NPPF, Local Planning Authorities (LPAs) have an obligation to promote the preservation, restoration and recreation of priority habitats, ecological and the protection and recovery of priority species as identified under the Natural Environment and Rural Communities Act (2006).

LPAs will therefore seek to produce a net gain in biodiversity by requiring developers to design wildlife into their plans and to ensure that any unavoidable impacts are appropriately mitigated for.

As a minimum LPAs now expect any new structure to include bat roost or bird nesting provision.

Enhancement for Birds: -

Birds must be accommodated by either adapting the structure of a building to allow access to parts otherwise sealed by modern construction, or through the provision of purpose-built nesting boxes.

The client must:

- ▶ Incorporate features which support the nesting of birds in the construction of new development on the north or east orientation to avoid eggs and chicks overheating
- ▶ A minimum of 10 bird nest facilities must be built into the new structures.
 - 5 of which must be designed for swifts and built in at a minimum height of 4m and preferably higher.
 - 5 other boxes designed for hole nesting birds must be built in at a height of 3m+ to prevent predation or vandalism.
- ▶ Only boxes of robust or permanent construction – preferably those constructed to be incorporated within the building fabric itself – are likely to be suitable.

[Equipment Shop \(nhbs.com\)](http://Equipment Shop (nhbs.com)) Other providers of provision are available.

A wide variety of box types are available to suit almost all build designs. The precise types can be agreed once the plans are firmed up and materials are confirmed. – ideas are provided below.



8. Conclusions

The application site has been surveyed and the results assessed.

8.1.1 The survey assessment concludes that the structure does not offer suitability for hibernating roosting bats or bats roosting during the active season and therefore, no further action is required with respect to bat roosts.

8.1.2 All features commonly associated with bats and that would be impacted by proposed works were assessed as:

- No evidence recorded.*
- None or discounted potential roosting features.*

8.1.3 Advisories have been provided regarding future occupation by bats.

*8.1.4 Active or inactive bird nests were **not** recorded as present, therefore, unmitigated works/development at this site, at this present time, are **not** considered likely to cause disturbance, harm or death to birds.*

8.1.5 Advisories have been provided regarding future occupation by birds.

8.1.6 The Zone of Influence has been identified in order that habitats and/or species of value (as applicable) are appropriately protected onsite during each phase of the construction.

8.1.7 Enhancement of the site post development is required. The habitat value has been taken into account when making enhancement recommendations. It is considered that enhancement for birds will be of value owing to the habitat onsite/offsite offering biodiversity value for this species.

8.1.8 Enhancement might be subject to Conditioning within any granting of Planning Permission. The Local Planning Authority (LPA) 'Building Control' will ensure that Mitigation / Enhancement measures have been implemented as per recommendations.

8.1.9 A Construction Ecological Management Plan (CEMP) - it is considered necessary to ensure that there will not be any significant land or marine designations impacted by the proposed works. The CEMP will need to detail how the development will prevent pollution such as dust and cement leaving the site. It must also as a minimum detail working times, the use of artificial lighting during the construction phase and keeping noise to the minimum whilst undertaking site works during the winter months.

9. References

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10. Appendices

10.1 Notice

Ecological Surveys Limited was commissioned to undertake an Internal / External Bat and Protected Species Scoping Survey of the above site proposed for development. This report details the results and conclusions of this survey with due diligence to associated legislation and policy.

The developer must comply with legislation to protect onsite & offsite habitats & species.

Bats – International Law: The UK is a contracting party to the 1979 Convention on the Conservation of European Wildlife and Natural Habitats (commonly referred to as the Bern Convention). The Bern Convention has been described as the “*European treaty for the conservation of nature*”.

Its provisions with regards to bats are transposed into law as follows: *in England and Wales via the Conservation of Habitats and Species Regulations 2017 (as amended) (the England and Wales Habitats Regulations) and the Wildlife and Countryside Act 1981 (as amended) (the W&CA);*

Regulation (Reg.) 43 of the England and Wales Habitats Regulations makes it an offence to:

- *deliberately capture, injure or kill a bat;*
- *deliberately disturb bats (which includes any disturbance which is likely to impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or in the case of animals of a hibernating or migratory species, to hibernate or migrate or to affect significantly the local distribution or abundance of the species to which they belong);*
- *damage or destroy a breeding site or resting place of a bat;*
- *or possess, control, transport, sell or exchange, or offer for sale or exchange, any live or dead bat or part of a bat or anything derived from a bat or any part of a bat.*

Under Section 9 of the W&CA (s.9(4)(b), 9(4)(c) and 9(5) only), it is an offence (in relation to bats) to:

- *intentionally or recklessly disturb a bat while it is occupying a structure or place of shelter or protection;*
- *intentionally or recklessly obstruct access to any structure or place used by a bat for shelter or protection;*
- *or*
- *sell, offer or expose for sale, or have in their possession or transports for the purpose of sale, any live*
- *or dead bat or any part of, or anything derived from a bat (or be responsible for adverts suggesting the intention to do this).*

Birds - All wild birds, their nests and young are protected throughout England and Wales by the Wildlife & Countryside Act 1981 (as amended).

- *It is illegal to kill, injure or take any wild bird, or damage or destroy the nest or eggs of breeding birds. The legislation applies to all bird species, common and rare. In addition to the protection afforded to all wild birds, rarer or particularly vulnerable species listed on Schedule 1 of the 1981 Act, such as the barn owl, receive enhanced protection when breeding.*
- *Schedule 1 species, including their dependent young, are protected from intentional or reckless disturbance whilst at or near the nest, in addition to the protection afforded the more common species.*

The results of this survey are deemed to be valid for 12 months from date of survey, where the works undertaken, and the boundary of the site remain as indicated. If development works are to be carried out after this time has elapsed, or amendments are made to the boundary line which affect alternative structures or additional features commonly associated with bats, an updated survey will be required.

This survey was undertaken with all proper and reasonable skill and care in a professional manner and in

accordance with accepted standards, methodologies and guidelines.

This report is based on the evidence recorded at the site at the time of the survey. The information gathered is considered sufficient to provide an assessment of the ecological interest on the site and justify the recommendations provided in this report.

Birds - All wild birds, their nests and young are protected throughout England and Wales by the Wildlife & Countryside Act 1981 (as amended).

It is illegal to kill, injure or take any wild bird, or damage or destroy the nest or eggs of breeding birds. The legislation applies to all bird species, common and rare. In addition to the protection afforded to all wild birds, rarer or particularly vulnerable species listed on Schedule 1 of the 1981 Act, such as the barn owl, receive enhanced protection when breeding.

Schedule 1 species, including their dependent young, are protected from intentional or reckless disturbance whilst at or near the nest, in addition to the protection afforded the more common species. All wild bird species, their eggs and nests are protected by law. You must always try to avoid harming birds or to use measures which do not kill or injure them before considering taking harmful action.

In most cases you should be able to avoid harming wild birds by:

- timing your work to avoid the breeding season
- using a range of methods that deter but don't harm them

In exceptional cases the law allows [certain exemptions to permit legal activities](#) (such as a development with planning permission) and where avoiding harm isn't possible. You may also be able to get a licence from Natural England for certain activities if you need to remove wild birds because they're causing problems.

What you must not do.

You're breaking the law if you:

- ▶ *intentionally kill, injure or take wild birds*
- ▶ *intentionally take, damage or destroy a wild bird's nest while it's being used or built*
- ▶ *intentionally take or destroy a wild bird's egg*
- ▶ *possess, control or transport live or dead wild birds, or parts of them, or their eggs*
- ▶ *sell wild birds or put them on display for sale*
- ▶ *use prohibited methods to kill or take wild birds*

Some birds, [known as 'schedule 1 birds'](#), eg barn owls, have extra legal protection. For these bird species it's also an offence to do the following, either intentionally or by not taking enough care:

- ▶ *disturb them while they're nesting, building a nest, in or near a nest that contains their young*
- ▶ *disturb their dependent young.*

You could get an unlimited fine and up to 6 months in prison for each offence if you're found guilty.

Activities that can harm birds.

These activities can affect wild birds, particularly during breeding season:

- ▶ *trimming or cutting trees, bushes, hedges and rough vegetation*
- ▶ *renovating, converting or demolishing a building*
- ▶ *creating disturbance, eg noise, lighting and vibration*
- ▶ *taking actions to prevent problems, eg shooting birds or removing nests*

When you can get a licence

- ▶ *There are no licensing purposes to permit development or construction but there are ways you can continue development or construction when birds are present. These activities should rely upon the legal exemptions. You must make sure that you can comply fully with the terms of the exemption so that you don't break the law.*
- ▶ *You can [apply for a licence](#) from Natural England in certain circumstances and for certain problems.*
- ▶ *Licences are available for disturbing or harming birds for a limited number of reasons that include:*
 - ▶ *preserve public health and safety*
 - ▶ *preserve air safety*
 - ▶ *do work for science, education or research*
 - ▶ *prevent damage to crops or animal feed*
 - ▶ *conserve plants and animals (including other wild birds)*
 - ▶ *prevent damage to fisheries*
 - ▶ *take part in photography, falconry, keeping or breeding birds*

Get more information:

Find out what's involved for [construction that affects protected species](#).

Find out what ecologists and local planning authorities can do for surveys and planning mitigation measures for wild birds.

Published 13 October 2014. Last updated 29 March 2015

References

Collins, J. (ed) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition) The Bat Conservation Trust, London.

&

UK Bat Mitigation Guidelines – Reason, P.F. and Wray, S. (2023).

UK Bat Mitigation Guidelines: a guide to impact

assessment, mitigation and compensation for developments affecting bats. Version 1.1.

Chartered Institute of Ecology and Environmental Management, Ampfield.

Legislative Context

Habitats Regulations (transposing the EC habitats Directive: Conservation of Habitats and Species regulations 2010 (as amended) & Wildlife & Countryside Act 1981 (as amended)).

Relevant Planning Policy

National Planning Policy Framework (NPPF) (GOV.UK, 2021a) especially Ch. 15 Conserving & Enhancing the Natural Environment.

Circular 06/05: Biodiversity & geological Conservation – Statutory Obligations & their Impact within the Planning System (GOV.UK, 2005)

National Planning Practice Guidance Natural Environment (GOV.UK, 2019) (para 10 – 35)

10.2 Survey Trigger – Bats.

A Bat Survey is ordinarily triggered when there is to be:

Conversion, modification, demolition or removal of buildings (including hotels, schools, hospitals, churches, commercial and derelict buildings) which are:

- ▶ *Agricultural buildings (e.g. farmhouses, barns and outbuildings) of traditional brick or stone construction and/or with exposed wooden beams.*

- ▶ *Buildings with weather boarding and/or hanging tiles that are within 200m of woodland and/or water.*
- ▶ *Pre-1960 detached buildings and structures within 200m of woodland and/or water.*
- ▶ *Pre-1914 buildings within 400m of woodland and/or water.*
- ▶ *Pre-1914 buildings with gable ends or slate roofs, regardless of location.*
- ▶ *Located within, or immediately adjacent to woodland and/or immediately adjacent to water.*
- ▶ *Dutch barns or livestock buildings with a single skin roof and board-and-gap or Yorkshire boarding if, following a preliminary roost assessment, the site appears to be particularly suited to bats.*
- ▶ *At the behest of the LPA / County Ecologist.*
- ▶ *Further details of other triggers can be found below.*

Development and Planning Trigger for Bat Surveys

Development and planning trigger list for bat surveys, which can be adapted to local circumstances (taken from the Association for Local Government Ecologists (ALGE) template for biodiversity and geological conservation validation checklists 2007, available from <http://alge.org.uk/publication/index.php>).

(1) Conversion, modification, demolition or removal of buildings (including hotels, schools, hospitals, churches, commercial premises and derelict buildings) which are:

- ▶ Agricultural buildings (e.g. farmhouses, barns and outbuildings) of traditional brick or stone construction and/or with exposed wooden beams;
- ▶ Buildings with weather boarding and/or hanging tiles that are within 200m of woodland and/or water;
- ▶ Pre-1960 detached buildings and structures within 200m of woodland and/or water;
- ▶ Pre-1914 buildings within 400m of woodland and/or water;
- ▶ Pre-1914 buildings with gable ends or slate roofs, regardless of location;
- ▶ Located within, or immediately adjacent to woodland and/or immediately adjacent to water;
- ▶ Dutch barns or livestock buildings with a single skin roof and board-and-gap or Yorkshire boarding if, following a preliminary roost assessment, the site appears to be particularly suited to bats.

(2) Development affecting built structures:

- ▶ Tunnels, mines, kilns, ice-houses, adits, military fortifications, air-raid shelters, cellars and similar underground ducts and structures; unused industrial chimneys that are unlined and brick/stone construction;
- ▶ Bridge structures, aqueducts and viaduct (especially over water and wet ground).

(3) Floodlighting of

- ▶ Churches and listed buildings, green space (e.g. sports pitches) within 50m of woodland, water, field hedgerows or lines of trees with connectivity to woodland or water;
- ▶ Any building meeting the criteria listed in (1) above.

(4) Felling, removal or lopping of:

- ▶ Woodland;

<ul style="list-style-type: none"> ➤ Field hedgerows and/or lines of trees with connectivity to woodland or water bodies; ➤ Old and veteran trees that are more than 100 years old; ➤ Mature trees with obvious holes, cracks or cavities, or that are covered with mature ivy (including large dead trees).
<p>(5) Proposals affecting water bodies:</p> <ul style="list-style-type: none"> ➤ In or within 200m of rivers, streams, canals, lakes, reed beds or other aquatic habitats.
<p>(6) Proposal located in or immediately adjacent to:</p> <ul style="list-style-type: none"> ➤ Quarries or gravel pit; ➤ Natural cliff faces and rock outcrops with crevices or caves and swallets.
<p>(7) Proposals for wind farm developments</p> <ul style="list-style-type: none"> ➤ of multiple wind turbines and single wind turbines (depending on the size and location) (NE TIN 051 – undergoing updates at the time of writing)
<p>(8) All proposals in sites where bats are known to be present¹</p> <ul style="list-style-type: none"> ➤ This may include proposed development affecting any type of buildings, structures, features or location.
<p>Notes:</p> <p>¹ : Where sites are of international importance to bats, they may be designated as SACs. Developers of large sites 5-10km away from such SACs may be required to undertake a HRA.</p>

10.3 Survey Objectives & Methods

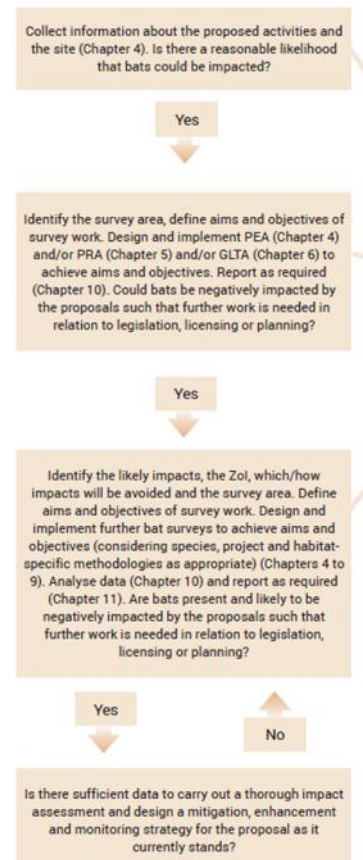
Proportionality

When planning/undertaking surveys, it is important to take a proportionate approach. The type of survey or suite of surveys undertaken, and the amount of effort expended should be proportionate to the predicted impacts of the proposed planned activities on onsite species (bats/birds) but it needs to be recognised that robust surveys are fundamental to understanding what those impacts are.

A PRNA is a detailed inspection of the exterior and interior of a structure to look for features that bats and birds could use as entry/exit roosting and nesting and to search for signs and indications of bats and birds.

The PRNA aims and objectives are generally to determine:

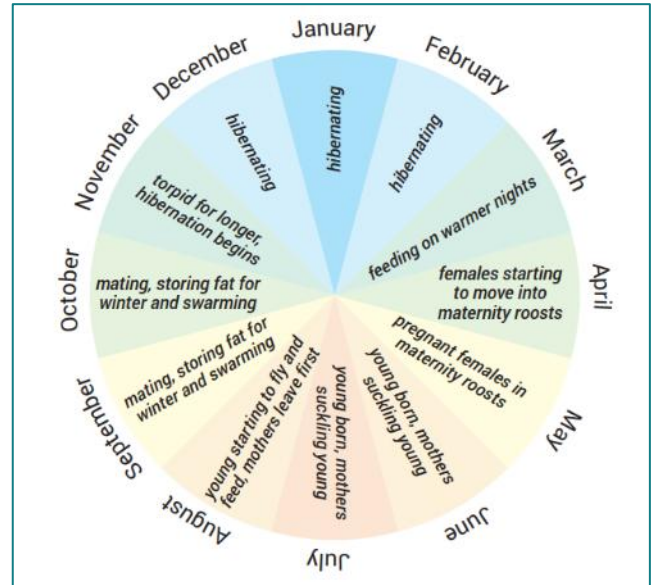
- *The presence of, or past use of the site by, any species of bat.*
- *The presence of, or past use of the site by, barn owl, or other nesting birds.*
- *The site's potential for use by any of the above.*
- *Collect robust data following good practice guidelines to allow an assessment of the potential impacts of the proposed development on bat populations both on and offsite:*
 - *Potential and actual bat roosting locations,*



- Evidence of bats found,
- Roosting locations,
- And the number of ecologists required for subsequent surveys.
- ▶ Any other ecological issues/concerns relating to the proposal.
- ▶ The need for additional surveys to determine how protected species could be impacted and the actions of avoidance, mitigation, compensation and enhancement.
- ▶ Assist clients in their statutory obligations.

When assessing a structure for the presence / potential presence of **bats**, two distinct considerations are necessary.

- ▶ Is the structure occupied or potentially suitable for bats during the active season, generally accepted as April – September inclusive?
- ▶ Is the structure occupied or potentially suitable for bats during the less active period (October - November and March) or during the Hibernation period (December – February inclusive)?



Bat Annual Life Cycle [Source – Collins, J. (ed) (2023) Bat Surveys for

When assessing a structure for the presence / potential presence of **birds**, the following considerations are necessary.

- ▶ Is the structure actively occupied by nesting birds or has it been in the past?
- ▶ Will the proposed project works destroy a nesting site? In which case, appropriate mitigation for replacing the nesting site must be undertaken, dependent upon the occupying species.

Internal & External Inspection

The aim of the survey was to assess levels of usage of specific structures or potential for usage by bats and birds through the presence of actual animals or their field signs. The survey was conducted with the aid of

- ▶ Head and hand-held torches,
- ▶ An endoscope,
- ▶ Close-range binocular/monocular,
- ▶ Bat-box Duet and
- ▶ A digital camera.

Images and samples (where available) were taken for supporting evidence.

Interior: - The interior spaces are checked for light ingress and access points for bats and birds. Bat droppings, insect prey remains, urine stains, oil stains from bats repeatedly moving over a small area and polishing the surface and the potential presence of bats either dead or alive was considered.

Bird droppings, whitewash, pellets, nesting materials, birds, dead or alive, and potential for nesting are considered, including areas hidden from sight.

Exterior: - The building exteriors are searched visually using binoculars or a close range monocular and photographed with a digital zoom camera for field evidence of bats or birds, with particular attention being paid to sheltered areas such as window ledges and pipes where bat/bird droppings might lie undisturbed from the weather and areas hidden from sight.

10.4 Impacts

The following are considerations when assessing impacts.

Bats	Roosting Habitats	Flight Paths & Foraging Habitats
<ul style="list-style-type: none"> ► Physical disturbance. ► Noise or vibration disturbance through, for example, increased human presence or use of noise- or – vibration generating equipment. ► Lighting disturbance. ► Injury/mortality (eg in roost during destruction or through collision with road/rail traffic) 	<ul style="list-style-type: none"> ► Modification of access point to roost either physically or indirectly, for example, lighting or removal of vegetation. ► Modification of access point to roost either physically for example by roof removal, or indirectly, for example, changed temperature, humidity, ventilation or lighting regime. ► Loss of roost. 	<ul style="list-style-type: none"> ► Modification of flight paths or foraging habitats either physically or through disturbance, e.g. light spill/noise. ► Severance of flight-paths (fragmentation) ► Loss of foraging habitats

In identifying potential impacts on bats, the entire project life cycle will be considered, including:

- pre-development impacts or advance works (e.g. ground investigations involving drilling or digging, asbestos survey, early vegetation clearance, or measures to secure derelict buildings);
- construction impacts (not just land take, but scaffolding, piling, building works and construction-related traffic, noise and light);
- operational impacts (e.g. the ongoing disturbance from public access, exposure to new predators²⁶, new lighting, collision mortality from trains or road traffic, or deadwood removal because of increased public access); and
- decommissioning impacts (such as removal of structures, disturbance or waste issues).

Different parameters exist to assess the different impacts of the project.

- Is it a positive or negative impact.
- What is the extent of the impact? What area does it cover?
- What is the magnitude or size of the impact?
- What is the duration of the impact? How long will it last?
- What is the timing and frequency of the impact?
- How do the impacts differ throughout the process from pre-construction, through construction to operation (and dismantling and restoration of some projects).

10.5 Rationale: Bats

Exterior Features

The building exteriors were searched visually using binoculars or a close range monocular for evidence of bats, with particular attention being paid to:

- sheltered areas such as window ledges and pipes where bat droppings might lie undisturbed from the weather and areas hidden from sight,

- ▶ *windowsills, windowpanes, walls, guttering, lead flashing,*
- ▶ *behind peeling paintwork or lifted rendering,*
- ▶ *hanging tiles, weatherboarding, eaves, soffit boxes, fascias, lifted lead flashing (particularly around chimneys,) gables,*
- ▶ *gaps under felt (including those with a flat roof,)*
- ▶ *under tiles/slates,*
- ▶ *in existing bat boxes,*
- ▶ *gaps in mortar, brickwork/stonework – to rubble-filled walls/cavity walls.*

Interior Features

The interior spaces were checked for light ingress and access points for bats. Bat droppings, insect prey remains, urine stains, oil stains from bats repeatedly moving over a small area and polishing the surface and the potential presence of bats either dead or alive was considered, including areas hidden from sight.

Interior void

- ▶ *Ridge and hip beams and other roof beams,*
- ▶ *Mortice and tenon joints,*
- ▶ *All beams (free hanging bats)*
- ▶ *Joists,*
- ▶ *The junction of roof timbers, especially where ridge and hip beams meet,*
- ▶ *Roofing felt,*
- ▶ *Wood or interior cladding,*
- ▶ *Insulation, floor*
- ▶ *Walls*

Interior Rooms (as applicable)

- ▶ *Window features, as appropriate and where accessible.*
- ▶ *Floor & surfaces,*
- ▶ *Behind panelling,*
- ▶ *In lintels above doors,*
- ▶ *Behind peeling paper*
- ▶ *Behind pictures*
- ▶ *In cupboards*
- ▶ *Fireplace*

Potential Suitability	Roosting Habitats in Structures	Potential Flight-Paths & Foraging Habitats
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines or generate/shelter insect populations available to foraging bats).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	No obvious habitat features on site likely to be used as flightpaths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.

Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions ^(b) and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site but could be used by individual hibernating bats ^(c))	Habitat that could be used by small numbers of bats as flightpaths such as gappy hedgerow or unvegetated stream but isolated i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions ^(b) , and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation- the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for flightpaths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland, or water.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions ^(b) , and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flightpaths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses, and grazed parkland. Site is close to and connected to known roosts.

Classification Criteria

BCT do not define how many bats are estimated to be potentially present in the low/moderate/high categories.

It should be noted that the grading system above only reports on the situation at the time of survey; should bat activity levels change after the initial survey, or should the buildings be modified (for example if roof tiles are removed or fascia boards develop cracks), the category may need revision.

If these surveys reveal interesting results (e.g. rare or edge-of-range species, species assemblages, larger numbers of bats) then guidance states that it may be necessary to carry out further surveys over and above these, to identify bats moving around between sites.

Additionally, automated / static surveys for winter activity within structures with a moderate to high likelihood of bats being present should be undertaken over a minimum of two weeks per survey each month from November to March.

Optimum season for works in different types of roosts.

[Source - UK Bat Mitigation Guidelines – 2023 – V1.1 www.cieem.net]

The period of works may be extended if the way in which the bats use the site is well understood.

Roost type	Months to avoid	Optimum period for carrying out works (some variation between species and weather-dependent)
Maternity	May-August (potentially September)	September to end April

Hibernation (not used for swarming)	November to March	April to end October [see also 6.2.14 <i>et seq</i>]
Hibernation and swarming site	August to March (key); potentially July until April	April to July (potentially later, depending on site and nature of works)
Mating/swarming: not used for hibernation	August to October (key); potentially July until mid-November Also April-early May in at least some species	Mid-November – end March (potentially later, maybe species - specific) Broader restrictions if site also used for hibernation: see above
Non-breeding summer roost	None	No restrictions – assuming bats can be excluded if present in small numbers or otherwise safely managed

The paragraph references below relate to the document: UK Bat Mitigation Guidelines – 2023 – V1.1 www.cieem.net

a. See Section 6.9 for the timing of bat exclusions.

b. Furmankiewicz et al., 2013

6.2.10. Similarly, whilst Table 6.1 sets out the ‘optimum season’ for works affecting winter roosts, this applies most usefully to what might be called ‘classic’ hibernation sites, i.e. sites providing cool stable conditions which tend to support larger numbers of hibernating bats (or possibly smaller numbers, but over several years). However, many bats do not use such sites during the winter months, instead roosting individually or in small numbers in buildings (particularly pipistrelles) or in trees. In addition, when prevailing conditions are favourable, many bats are frequently found in thermally unstable roost sites and not necessarily in hibernation torpor.

6.2.11. It would therefore not be appropriate to avoid all work to any building or trees which could support a bat during the winter months as, whilst bats may be found almost anywhere (e.g. under roof tiles, soffits, wall-plates, or cladding that provide PRFs), they are not everywhere. Preventing all works to structures and trees for the entirety of the period November to March in case a winter-roosting bat could be present, however low the risk, is therefore impractical and disproportionate. For instance, for large-scale Local Authority roofing projects (thousands of properties in any year), it is simply not possible for all roof-strips to be carried out only in spring and autumn. For trees, the winter period is the most common for forestry operations (Davidson-Watts, pers.comm.).

6.2.12. Repeated disturbance to hibernating bats can seriously deplete their food reserves but, as noted by Mitchell-Jones (2004), unless significant numbers of hibernating bats are known to be present, there is no advantage in requesting a deferment of scheduled building works. It is therefore important to assess hibernation potential when determining whether works can safely continue during colder weather. This assessment (and the supporting rationale) should be fully documented, and updated whenever new information comes to light (i.e. survey data).

6.2.13. For working on trees in winter, particularly in woodland, an understanding of the likely value of the roost resource in all seasons would be part of the approach to survey and assessment, and is covered in revisions to published UK bat survey guidance (Collins, 2023). However, the SNCBs’ current position is that an identified tree roost cannot be removed in winter, even when it can be demonstrated that bats are absent from a roost (see para 6.5.19) (6.5.19. The process of blocking/excluding PRFs in autumn so that trees can be felled in the subsequent winter maybe necessary to work around seasonal licensing restrictions)

6.2.14. An assessment of ‘non-classic’ winter potential is not always undertaken for the purposes of planning. In addition, the vast majority of re-roofing works (by far the largest category of works affecting such ‘non-classic’ hibernation sites) do not require planning consent. This section is therefore included to guide such an assessment, prior to winter working on any type of site where ‘non-classic’ features may be present (i.e. most types of building)

6.2.15. For 'non-classic' hibernation sites, particularly those within/behind external features of buildings or cavity walls, the extent to which they can be surveyed is limited. Often only a destructive search would be definitive, and therefore counterproductive. A static detector placed outside a structure might pick up bats flying past on warmer nights rather than confirm winter use. This may give a useful understanding of winter bat activity if a number of buildings are being affected but is unlikely to be helpful in relation to a specific building.

6.2.16. For void-dwelling species which can linger into winter (notably brown long-eared bat, serotine) but not always visibly so (e.g. where there is deep insulation obscuring joists or the peak of the void is well above head height, preventing close inspection), visual inspections supported by static detectors within the void, during conditions which include periods suitable for bats to be active (Park, Jones & Ransome, 2000)⁴⁷, (Hope & Jones, 2013), can indicate continued presence or almost-certain absence. It is important that the detectors are there for a sufficiently long period, to be judged by the prevailing conditions, but not fewer than five suitable days. Daily temperatures within the void and ambient external temperatures should be monitored.

6.2.17. A rationale for undertaking a winter assessment is shown below in **Figure 6.1** (with thanks to Neil Middleton, BatAbility Courses & Tuition). The results of this assessment should guide the approach to mitigation, notably timing restrictions. The assessment should consider: the suitability of features to support roosting bats or to allow access for roosting bats;

the temperature and humidity conditions likely to be present within the structure during the winter period and the suitability in this respect for it to be used by hibernating bats; the surrounding habitat, in terms of its potential for use by bats outside of the hibernation period for commuting and/or foraging purposes (i.e. is it reasonable that bats are familiar with the area and therefore may be aware of suitable roosting locations within the site); and the presence of known roosts within the structure, or adjacent structures, or surrounding area during the active season.

6.2.18. The last point should be informed by surveys undertaken at other times of the year, where possible.

6.2.19. If works are required that could in principle affect bats, a risk-based approach is required, dependent on the likelihood of encountering bats, the status of the work, and weather/temperatures experienced. The likelihood of species other than pipistrelles should be considered (brown long-eared bats and whiskered bats are the next most commonly found under external features). The rationale for continuing in adverse conditions should be recorded.

6.2.20. Consideration should also be given as to whether any proposed works would constitute a single disturbance event (likely to be tolerable) or carries a risk of repeated disturbance/arousal (ideally to be avoided).

6.2.21. Where the assessment determines that the likelihood of finding bats in winter is negligible or low, then works should be able to proceed without any temperature restrictions. Any bats found would be treated as 'unexpected finds'⁴⁸. Records of bats (or evidence that bats have been present) should be collated to inform future approaches to working in the hibernation season (see APPENDIX 7).

⁴⁷. Park et al. (2003) note that bats arouse periodically from hibernation even when they are unlikely to feed, drink or mate (and thus may not leave the roost); that arousals are normally synchronised to dusk so that foraging opportunities can be exploited if they arise; and that the minimum temperature thresholds for the flight of many insects can be as low as 8°C. Hope and Jones (2013) found similar patterns of arousals linked to dusk in Natterer's bats. Avery (1985) showed that pipistrelles will leave hibernation to feed in any winter month during the period of hibernation, and on a third of all winter nights.

⁴⁸. This would also be the case if surveys had not previously established the presence of an opportunistic/transitional roost for which a licence had been sought, as it is not possible to apply for a licence on a precautionary basis.

6.2.22. Where the assessment determines that the likelihood of finding bats in winter is moderate, but that only very small numbers of bats are likely to be found (if any, based on an understanding of how bats appear to be using the site in question), then risk of harm for any torpid bats found can be reduced by only

stripping roofs when: it is dry/calm; and temperatures are no lower than 8°C for at least an hour or two from dusk on 3-4 consecutive nights (which would be sufficient for bats to be active and to feed).

6.2.23. In addition (and as for works at other times of the year): the works should be covered by a method statement appropriate to the level of risk (see Section 6.10); care facilities for any bats found should be in place (see 6.9.17)

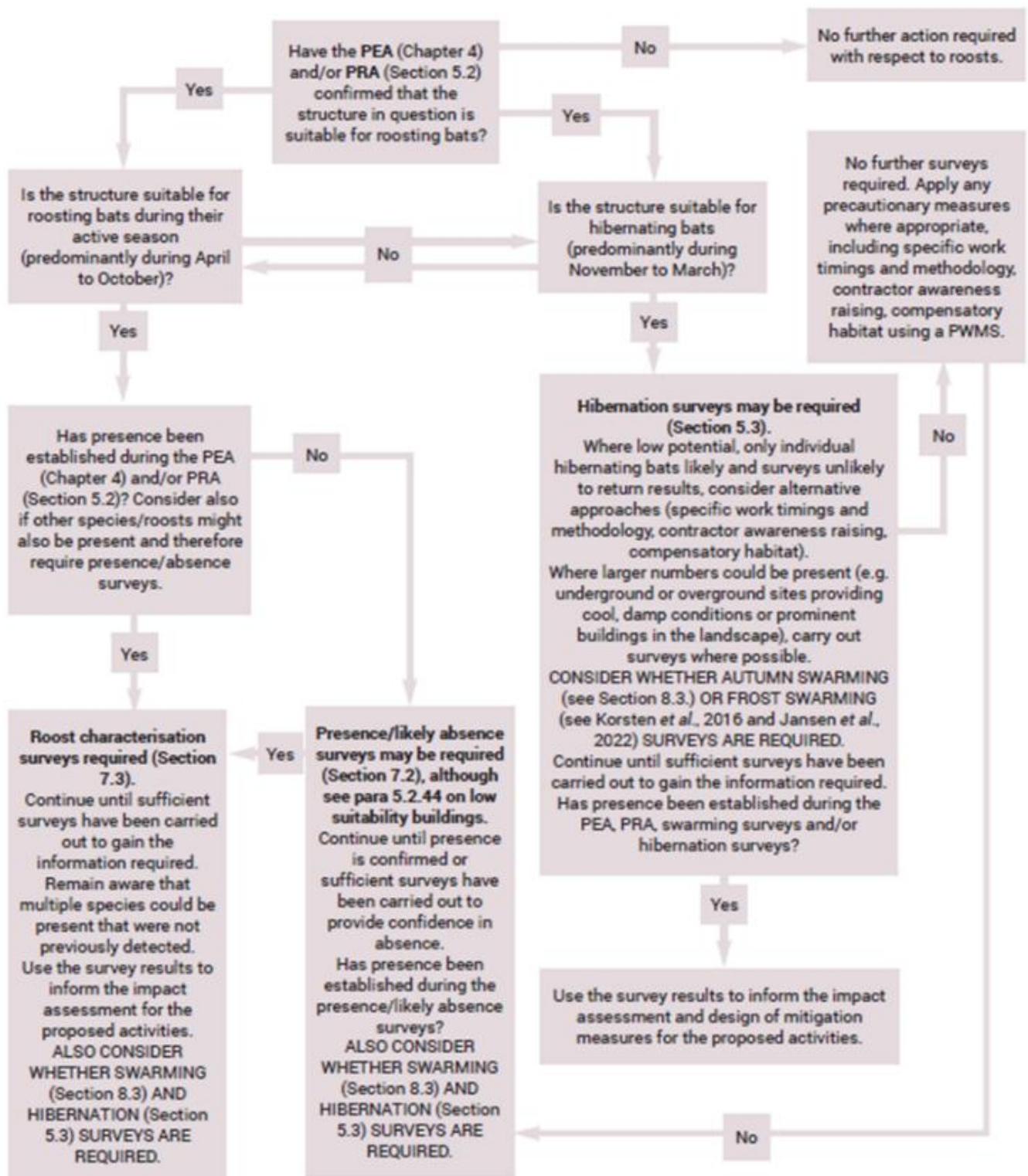
6.10. Precautionary working method statements (PWMSs)

6.10.1. A licence is not always necessary. Good practice and avoidance measures are promoted by all the UK SNCBs to minimise the impact of a proposed activity on wildlife, and in particular EPS, to avoid committing offences. Licensing should be seen as the last resort where all other alternative ways of avoiding impacts on the species have been discounted.

6.10.2. The need for a licence may be avoided through appropriate timing (see Section 6.2), or where working methods are in place to ensure the roost is not impacted. For example: the roost is not directly affected, connectivity to adjoining habitat can be maintained, and there is a buffer within which plant and materials are not stored or active nearby; or low-impact refurbishment works are undertaken in the same building as the roost, but the roost and its access are left intact, and working methods avoid disturbance (see 2.5.6) even when the roost is occupied.

6.10.3. Another example where a non-licensable approach to works can be adopted includes buildings of 'low potential' with no evidence of use, but where the presence of a bat (or very low numbers of bats) cannot be ruled out even where the requisite number of surveys have been completed. In these circumstances, a precautionary approach to design and construction methods is sensible.

The following information has been extracted from Collins, J. (ed) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition) The Bat Conservation Trust, London, to inform upon the assessment.

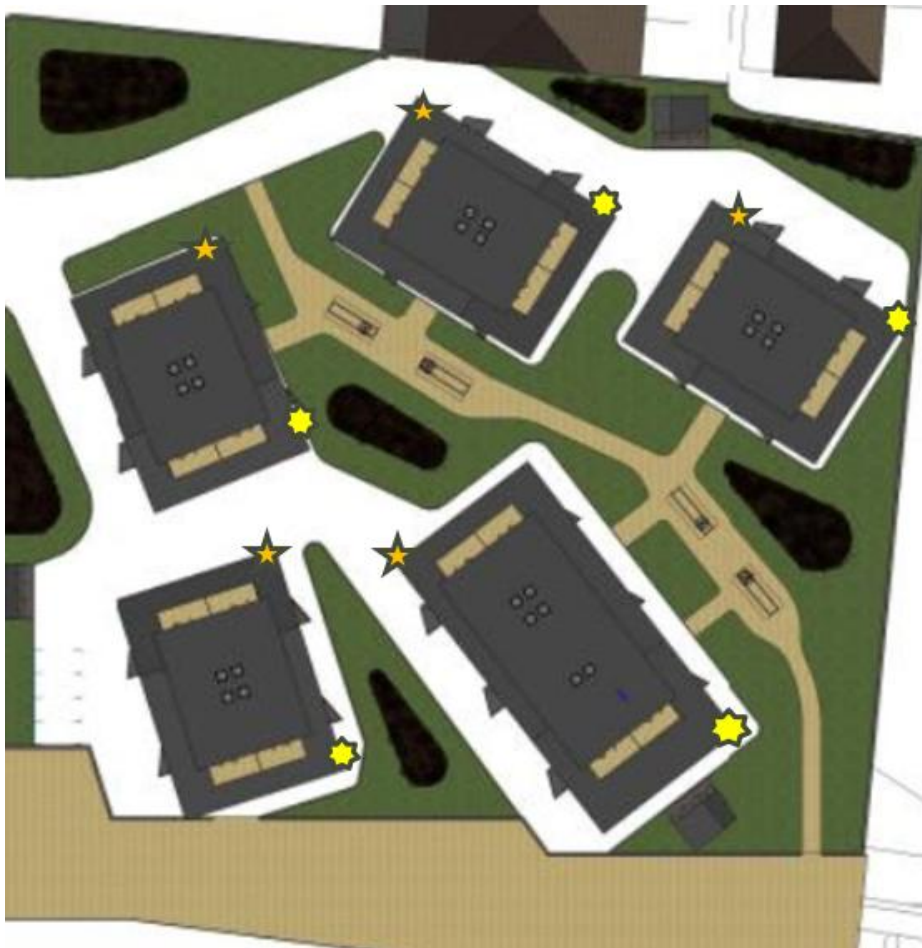


Note on Figure 5.1: In some situations, bats may use the same structure throughout the year and in these situations, both arms of the flow chart need to be fully considered.

11. Appendix 4: Bat Species

1	Alcathoe	<i>Myotis alcathoe</i>
2	Barbastelle	<i>Barbastella barbastellus</i>
3	Bechstein's bat	<i>Myotis bechsteinii</i>
4	Brandt's bat	<i>Myotis brandtii</i>
5	Brown long-eared bat	<i>Plecotus auritus</i>
6	Common pipistrelle	<i>Pipistrellus pipistrellus</i>
7	Daubenton's bat	<i>Myotis daubentonii</i>
8	Greater horseshoe bat	<i>Rhinolophus ferrumequinum</i>
9	Greater mouse-eared bat	<i>Myotis myotis</i>
10	Grey long-eared bat	<i>Plecotus austriacus</i>
11	Leisler's bat	<i>Nyctalus leisleri</i>
12	Lesser horseshoe bat	<i>Rhinolophus hipposideros</i>
13	Nathusius' pipistrelle	<i>Pipistrellus nathusii</i>
14	Natterer's bat	<i>Myotis nattereri</i>
15	Noctule	<i>Nyctalus noctula</i>
16	Serotine	<i>Eptesicus serotinus</i>
17	Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>
18	Whiskered bat	<i>Myotis mystacinus</i>

Nest box location map



Swift nest boxes ★
Other hole nesting species ★