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URBAN EDGE ENVIRONMENTAL CONSULTING

Peter Dines
Gerald Eve
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London W1G 0AY

13 April 2021
Our ref: UE0437

Dear Peter,

RE: Hove Bus Garage (West Garage), Conway St, Hove BN3 3LT: Preliminary Roost Assessment for Bats

Urban Edge Environmental Consulting Ltd undertook a preliminary bat roost assessment (PRA) at the above site on 9 March 2021. The purpose of the survey was to assess the building with regards to its suitability to support roosting bats, in reference to proposals for demolition and redevelopment. The site visit was undertaken by Jeff Turton BSc (Hons) ACIEEM, an ecologist with six years' professional consultancy experience.

Site Description

The site is located on Conway Street, Hove, East Sussex (Grid Reference: 528665, 105561); see Figure 1. The site currently comprises one building and there are no other habitats within the curtilage.

The site is within the central area of the town of Hove. The immediate surrounding area consists of urban and suburban development with associated residential gardens, mature trees and public greenspaces.

Proposed Works

Planning consent is being sought for demolition and subsequent redevelopment on c.0.5ha of previously developed land, currently comprising one building containing offices and workshops. The proposals would include the demolition of the existing building and erection of a new building to provide new workshops and associated office facilities and the HQ office above.

Figure 1: Location plan

Legislation

Bats and their roosts are fully protected by the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). The legislation affords all bat species European Protected Species (EPS) status and makes it an offence, among other things, to:

- Intentionally kill, injure or capture/take a bat.
- Intentionally or recklessly damage, destroy or obstruct access to any place that a bat uses for shelter or protection. This is taken to mean all bat roosts whether bats are present or not.
- Intentionally or recklessly disturb a bat while it is occupying a structure or place that it uses for shelter or protection. It is unlawful to enter a roost unless properly licenced.
- Sell, offer or expose for sale, or possess, or transport for the purpose of sale, any live or dead bat, any part of a bat, or anything derived from a bat.

Methodology

The PRA was carried out in accordance with the latest *Good Practice Guidelines* from the Bat Conservation Trust (3rd edition; Collins (ed.), 2016) as well as Natural England Standing Advice on bats. The building was subject to a physical internal inspection, particularly focused on the roof voids where applicable, and an external inspection which recorded potential access points and roosting opportunities. All features observable from ground level which are potentially suitable for bats were noted and the overall suitability of the structure for roosting bats was classified with reference to Box 1.

Box 1: Potential suitability of structures/trees for roosting bats (after Collins, 2016)	
Suitability	***Roosting habitats***
Negligible	Negligible habitat features on site likely to be used by roosting bats

Box 1: Potential suitability of structures/trees for roosting bats (after Collins, 2016)	
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically, but do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats A tree of sufficient size and age to contain potential roost features (PRF) but with none seen from the ground / using ladders or features seen with only very limited roosting potential
Moderate	A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (for roost type only)
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat

The inspection included a search for live animals and other signs that give an indication of past or present occupancy. In the case of bats, typical indicators include droppings (which are characteristic and are often indicative of species), signs of fur oil staining, urine splashing, characteristic odours, and accumulations of discarded prey remains. The inspections were undertaken with the aid of the following equipment: telescopic ladders, Wildlife Acoustics EM3 full spectrum bat detector to record and identify the calls of any bats which are present; CB-2 (1 million candlepower) searchlight fitted with a red filter to search dark areas for signs of bats; telescopic mirror to inspect hidden cavities; Hawke Sport Optics 10x42 close-focusing binoculars to view areas inaccessible on foot; and digital camera with flash to record any evidence of bats or features suitable for use by bats. Approximately one hour of search effort was expended.

Limitations

Access to inspect the rear/north elevation of the building was not available due to security fencing along the railway corridor.

Results

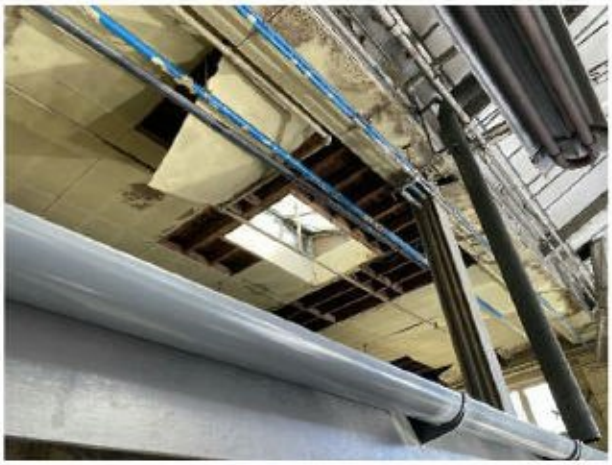
Exterior

The building was brick-built and of modern construction. It had a pitched roof made of corrugated asbestos and plastic. The external brickwork was in good condition with no features bats could have used. Ventilation fittings in the brickwork provided some limited features that could potentially be used by crevice roosting bats such as pipistrelles *Pipistrellus* spp., however, these were facing the urbanised environment of Conway Street which is artificially lit and supports very little vegetation. There were very limited, if not any, other ways in which bats could access the interior. The doors and windows were tightly sealed. The local area was subject to moderate levels of disturbance. There was a frequently used road at the front, and a railway to the rear. It was considered likely to be illuminated at night. No evidence of bats was found on the outside of the building, although this type of evidence is often removed by weather.

Hove Bus Garage (east elevation)

Inside the main workshop area

Inside the office facilities



Gloomy cavities above loose/missing ceiling tiles in workshop

Hole into cavity wall inside workshop

Ventilation holes built into external walls

Interior

The workshop areas were very large and were in constant use, creating a very loud and disturbed environment. In addition, the inside was flooded with daylight as the workshop doors were very large and were kept open to allow busses in and out. The office and welfare areas were also in constant use, were flooded with daylight and provided no roosting features or access for bats. There were minimal features on the inside that could be used by bats, with only gloomy cavities above ceilings tiles and a hole into a cavity wall noted. No bats or evidence of bats were found.

Evaluation

Overall the building provides very limited opportunities for roosting bats. There are very limited external features that could provide preferred roosting conditions for crevice roosting species such as pipistrelles, and there are very limited if any points of access into internal spaces which themselves provide sub-optimal roosting conditions. Furthermore, the habitat in the surrounding area of the site is not particularly suitable for bats, given that the property is situated in a disturbed and illuminated urban area and there are limited foraging opportunities or commuting links near to the site.

It is concluded that the building is of negligible suitability for roosting bats.

Recommendations

The building was assessed to be of negligible suitability for roosting bats; further surveys for bats are not required. Furthermore, no ecological enhancements in relation to bats are recommended because such measures are likely to be ineffective due to the unsuitable surrounding habitat.

The roofs of the building could provide suitable nesting conditions for gulls. All birds, their active nests and eggs are protected under The Wildlife and Countryside Act 1981 (as amended). Negative impacts on breeding birds will be avoided by undertaking demolition works which would result in removal of potential nesting habitats (including buildings) outside of the bird breeding season, which runs from 1 March to 31 August. Removal of nesting bird habitats should therefore be carried out between September and February. Any construction works undertaken within the bird breeding season where suitable bird breeding habitat exists will require a site check for nesting birds by a suitably qualified ecologist. This will take place no more than two days prior to works commencing. This is to ensure that no disturbance to active bird nests occurs. If a nest is found it must be cordoned off and works adjacent to the nest must be delayed until such time that the chicks have fledged from the nest. This will be supervised by a suitably qualified ecologist.

Ecological enhancements

Installation of green roofs should be considered during the final design stages for the new buildings. These will include a specification of proven ecological value for foraging birds and invertebrates which can help to significantly enhance biodiversity in urbanised areas. Such roofs are typified by substrates of varying type and depth, include dead wood habitat and open areas of vegetation, require low levels of maintenance, and are

attractive to people as well as wildlife. They also provide opportunities for natural colonisation by plants and invertebrates. Such roofs are preferable to standard stonecrop *Sedum spp.* dominated roofs that deliver little in the way of biodiversity value as they are typically less species-rich and have a shallower substrate depth. If green roofs are impractical, the use biodiverse green walls should be explored as an alternative.

The value of the site for birds will be enhanced by installing artificial nest boxes. These will be incorporated within building facades to the rear of the new building where there is less disturbance and less light pollution. For instance, nest boxes can be installed under the eaves for birds that utilise buildings for nesting, e.g. house sparrow *Passer domesticus*, a species of principal importance.

Conclusions

It is concluded that proposals to demolish the building is unlikely to result in the killing, injury or disturbance of individual bats, or damage, destruction or obstruction of a bat roost as the building is of negligible suitability. Consideration should be given to the possibility of nesting urban birds before demolition. Recommendations for ecological enhancements are given.

I trust this letter provides you with the detail you require at the present stage with respect to the ecological constraints associated with the proposals for this site. Should you have any queries or comments please do not hesitate to contact me.

Yours sincerely,

[redacted]

Nicholas Pincombe
BA(Hons) MSc CEnv MIEMA MCIEEM
Director

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