



Interim Bat Survey Report Preliminary Roost Assessment (PRA)

10 Tower Street
Alton, GU34 1NS

Date: April 2021

1 Summary

Site:	10 Tower Street, Alton, Hampshire, GU34 1NS
Central OS Grid Reference:	SU 71534 38875
Report Commissioned by:	Davtee Chartered Building Consultancy
Date of Roost Assessment:	8 th April 2021
Report author:	Holly Maynard BSc (Hons) MRes, Ecologist
Reviewed and approved by:	Claire Munn BSc (Hons) MSc MCIEEM, Principal Ecologist

Bat Survey Results	Preliminary Roost Assessment (PRA)	Building B1 and Building B2 are of moderate suitability for roosting bats due to multiple Potential Roosting Features (PRFs) and potential access into the buildings for bats.
Further Surveys	Emergence / re-entry surveys	Two follow-up emergence / re-entry surveys are recommended in suitable weather between May and August in line with standard guidance (Collins, 2016) in order to determine if roosting bats are present or likely to be absent from the buildings.
Avoidance and/or Mitigation	-	To be informed by the further bat surveys.
Enhancements	-	To be informed by the further bat surveys.

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Appendix 1 Legislation and Policy

2 Introduction

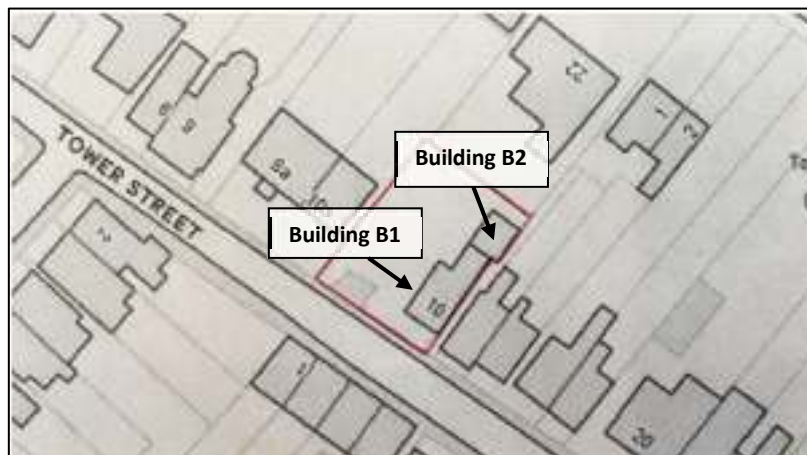
2.1 Background

David Archer Associates was commissioned by Davtee Chartered Building Consultancy to undertake a Preliminary Roost Assessment (PRA) for bats at 10 Tower Street, Alton, Hampshire, GU34 1NS, hereafter referred to as the 'site'. The survey assessed the existing dwelling (Building B1) and the timber lean-to extension (Building B2) for their suitability and potential to support roosting bats. Recommendations for further surveys, avoidance, mitigation and enhancement measures for bats are included in this report where applicable. This report will support a planning application to demolish the existing buildings to enable subsequent development.

2.2 Site Location and Description

The site is situated within an urban location and centred around Ordnance Survey Grid Reference SU 71534 38875 (**Figure 2.1**). The site comprises of the existing buildings, hard standing, amenity grassland, scattered ornamental planting, a mature conifer tree to the north-east, and boundary features such as wooden fencing and brick wall. Tower Street bounds the site to the south-west, with further residential housing and associated private gardens located immediately adjacent to the other boundaries. The wider landscape is mostly built-up, associated with the town of Alton, with arable fields, pasture, parkland and pockets of broadleaved woodland beyond the town's boundaries; the nearest large area of woodland is located c.1km west of the site.

Figure 2.1: Site location, indicated by the red outline. The buildings subject to survey are shown by the black arrows.



2.3 Development Proposals

The existing dwelling and lean-to extension are proposed for demolition in order to facilitate development, the details of which are yet to be determined.

2.4 Legislation and Policy

All UK species of bats and their roosts are strictly protected under UK legislation (*Conservation of Habitats and Species Regulations 2017 (as amended)* (CHSR), and the *Wildlife and Countryside Act, (1981)* (WCA). Post-Brexit, four bat species, included in Annex II of the *Habitats Directive 1992* are still a feature for which Special Areas of Conservation (SACs) can be designated. Bat foraging / commuting habitat is not legally protected, although it is a material consideration within the planning process

under the *National Planning Policy Framework*. Refer to **Appendix 1** for further information about the legislation and planning policies that protect bats.

2.5 Objectives

The objectives of this assessment are to:

- Assess presence / likely absence of roosting bats within the buildings on site;
- Identify the species, numbers, usage and access points (if roosting bats are present);
- Assess any impacts that the development may have on any roosting and foraging / commuting bats;
- Determine the need for a Natural England European Protected Species Mitigation (EPSM) licence; and
- Inform any avoidance, mitigation and enhancement measures, if required.

3 Methodology

3.1 Surveyor Information

The PRA survey was undertaken by Ecologist Holly Maynard who has over four years' post-graduate experience of bat surveys, including PRAs. Holly holds a bat survey licence for Jersey and is in the process of transferring this to a Natural England class licence. In the interim period, Holly is acting as an Accredited Agent under Claire Munn's bat class licence (ref: 2015-12515-CLS-CLS).

3.2 Data Search

3.2.1 Designated Sites

The Multi-Agency Geographical Information for the Countryside (MAGIC) website was accessed on the 26th April 2021 for information on the location of any statutory sites designated for bats within 5km of the application site.

3.2.2 Bat Records

MAGIC was accessed on the 26th April 2021 to identify any bat mitigation licences granted by Natural England within a 2km radius of the site.

3.3 Preliminary Roost Assessment

A daytime roost assessment was undertaken on the 8th April 2021. The weather conditions during the survey were noted to be 11°C with a moderate breeze (Beaufort scale 4), 90% cloud cover and dry. A full external and internal assessment of the buildings within the site was carried out using, where relevant, binoculars, a ladder and a high-powered torch. The building was described and surveyed for bats and their evidence, which includes droppings, staining, scratch marks and feeding remains. The building was then assigned a level of suitability for roosting bats as outlined in **Table 3.1** below.

Table 3.1: Classifying the bat roosting suitability of buildings and trees (Collins, 2016).

High roosting suitability	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger number of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
Moderate roosting suitability	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 (with respect to roost type only).
Low roosting suitability	<p>A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites 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 (i.e. unlikely to be suitable for maternity or hibernation).</p> <p>A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential.</p>
Negligible roosting suitability	A structure or tree with few, if any features suitable for roosting.

3.4 Limitations and Assumptions

It was not possible to access the internal roof space of the eastern section of Building B1 due to the absence of a loft hatch and due to health and safety reasons it was not possible to undertake a full inspection of the internal roof space associated with Building B2. Additionally, the southern roof slope of Building B1 was partially obstructed from view due to the adjacent property to the east.

This PRA provides an overview of the likelihood of bats occurring on the site (negligible, low, moderate, or high). Absence of a species cannot be presumed where no evidence was found. Further surveys have been recommended where there is reasonable likelihood of a protected species being present and impacted by the development proposal. This is based on the suitability of the buildings and any evidence observed. Therefore, the survey results are not significantly limited and are considered to represent a valid assessment of the potential of the buildings within the site to support roosting bats.

On the assumption that site conditions and habitats remain unchanged, the PRA will remain valid for one year i.e. until April 2022 and should be updated if the further surveys recommended have not yet commenced within this timeframe.

4 Results and Evaluation

The results of the background data search and field surveys are set out below. An evaluation of any bat roosts (if present) within the site will be made on completion of the further nocturnal surveys.

4.1 Data Search

4.1.1 Designated Sites

No statutory sites designated for bats are located within 5km of the site.

4.1.2 Bat Records

The table below provides a list of bat Mitigation Licences granted by Natural England within 2km of the site (MAGIC, 2021).

Table 4.1: Granted bat mitigation licence applications within 2km of the site.

Case Reference	Bat Species	Type of Roost	Distance & Direction	Licence Start & End Dates
2015-12441- EPS-MIT	Common pipistrelle <i>Pipistrellus pipistrellus</i>	Resting place	c. 350m SW	04.07.2015 – 30.06.2020

4.2 Preliminary Roost Assessment

Building B1: The existing dwelling is a two-storey detached brick building, with a pitched interlocking tiled roof (**Photo 4.1**). The building extends out to the east. A small open porch extension and chimney are present on the north-western aspect of the property. The main roof tiles are in a good state of repair and appear to be well sealed, with the exception of one piece of missing mortar on the north-eastern corner of the roof.

Wooden soffits are present on the northern and southern aspects of the building. A gap is present in the corner of the soffit on the lower section of the roof where the lead flashing is raised, and this may provide a suitable crevice for roosting bats. In addition, there is a gap present on the northern corner of the roof (**Photo 4.2**), where the wooden soffit has rotted away, which offers suitable roosting habitat for bats and potential access into the internal roof space.

Photo 4.1: Building B1, facing south-west.



Photo 4.2: Building B1, rotten soffit on the northern corner of the building.



The south-western gable end of the property offers limited roosting habitat for bats, however there are some gaps present beneath the wooden fascia board and rendered wall (**Photo 4.3**). These are generally shallow in depth but may offer some opportunities for crevice seeking bats.

Photo 4.3: Building B1, gaps beneath the fascia on the south-western gable end (red arrow).



Internally, Building B1 has a small roof void (c. 0.5m in height) and is lined behind the rafters with bitumastic felt (**Photo 4.4**). Rockwool insulation is present at ceiling level and has been packed around the eaves. There is a water tank above the loft hatch and a central wooden ridge beam is present. There is no visible access at the eaves however gaps were noted around the northern end of the roof void, allowing visible daylight to spill in. The brickwork on the internal gable walls is well sealed and does not offer any suitable features for roosting bats.

During the survey, no bats / evidence of bats was found.

Photo 4.4: Internal loft space in Building B1.



Building B2: A small lean-to extension adjoins the main dwelling to the east. The extension is of timber construction with a sloping corrugated metal roof (**Photo 4.5**). The lower level of this building is currently being used as a garage / storage space. There are multiple gaps beneath the timber slats on both the northern and southern aspects of the lean-to which offer suitable roosting habitat for bats and direct access into the internals of the building (**Photo 4.6**).

Gaps are also present in the corrugated roof to the east and south, particularly where the lean-to extension meets the brickwork of the existing dwelling. A door is present on the upper level of the extension to the north and there are also gaps around the door frame which offer direct access into the internals.

Photo 4.5: Building B2, facing east.



Photo 4.6: Building B2, gaps beneath the timber slats on the northern elevation.



Internally, the lower level of the extension is cluttered, and a high number of cobwebs were noted. The roof space of the upper level is c. 1.5m in height at its highest point and this gradually slopes down towards the east (**Photo 4.7**). The upper level is boarded and there is no insulation or liner present. Historic nesting bird material was found in the corner of the roof; however no bats / evidence of bats was found. There are multiple access points into the internals via the corrugated roof and gaps around the door frame to the north.

Photo 4.7: Upper roof space of Building B2.



Overall Suitability for Roosting Bats:

Based on the PRA, the on-site buildings hold **moderate suitability** for roosting bats.

5 Impact Assessment

Potential impacts of the proposed development in the absence of mitigation during construction and operation are discussed below.

5.1 Designated Sites

No statutory sites designated for bats are located within 5km of the application site and therefore **no impacts** are expected. No further mitigation is required.

5.2 Bat Roosts

This will be determined on completion of the further bat surveys.

6 Recommendations for Further Surveys, Avoidance, Mitigation and Enhancement

6.1 Further Surveys

The buildings within the site were assessed as being of **moderate suitability** for roosting bats. Two bat emergence / re-entry surveys that are spaced at least two weeks apart between May and August are therefore recommended in line with current guidance (Collins, 2016).

If roosting bats are identified using the buildings and impacts are considered likely to cause a legal offence, one further bat emergence/ re-entry survey between May – September and a European Protected Species Mitigation (EPSM) licence from Natural England would be required prior to works affecting a roost.

6.2 Avoidance and Mitigation

To be determined on completion of the further bat surveys.

6.3 Enhancements

To be determined on completion of the further bat surveys.

7 Conclusion

Further surveys are needed prior to being able to reach a conclusion as to the likely impacts of the proposed development on bats. This report should be updated on completion of the further surveys to include the methods, results, evaluation, impact assessment and recommendations for avoidance, mitigation and enhancement as necessary.

8 References

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Appendix 1 Legislation and Policy

All 18 British bat species are listed in Schedule 5 of the *Wildlife and Countryside Act 1981 (as amended)* and Schedule 2 of the *Conservation of Habitats and Species Regulations (CHSR) 2017 (as amended)*. Furthermore, the *Countryside and Rights of Way Act 2000* (Schedule 12, Paragraph 5) has amended Section 9 of the 1981 Act. Bats are therefore, fully protected under Section 9 of the 1981 Act and under Regulation 41 of the *CHSR 2017 (as amended)*, which previously transposed the Habitats Directive into UK law. Since the UK's departure from the European Union, the *Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019* essentially transfers the procedural aspects of the EU legislation into a national framework, with no material changes to the protection afforded to the habitats and species within.

In addition to the protection afforded to all bats, four UK bat species are listed in Annex II of the EC Directive, with the same additional level of protection being transposed into the *CHSR* for post-Brexit application. These four species are the greater horseshoe bat *Rhinolophus ferrumequinum*, the lesser horseshoe bat *Rhinolophus hipposideros*, Bechstein's bat *Myotis bechsteinii* and the barbastelle *Barbastella barbastellus*, for which Special Areas of Conservation can be designated under certain criteria.

All British bat species are also listed as protected under national laws via Schedule 5 of the *Wildlife and Countryside Act (WCA) 1981 (as amended)*. Furthermore, the *Countryside and Rights of Way (CRoW) Act 2000* (Schedule 12, Section 5a) has amended Section 9 (subsection 4) of the WCA Act, 1981 thereby strengthening the level of protection further to include 'reckless' offences as well as 'intentional'.

Ultimately, the above legislation makes it an offence to, or to attempt to do, any of the following:

- Deliberately capture, injure or kill a bat;
- Deliberately disturb a bat, including in particular any disturbance which is likely to impair a bat's ability to survive; breed or reproduce; or rear or nurture their young;
- In the case of hibernating or migratory species, to impair their ability to hibernate or migrate;
- Affect significantly the local distribution or abundance of the species to which they belong;
- Damage, destroy or obstruct a breeding site or resting place of a bat whether intentionally or recklessly; and / or,
- Possess, control, transport, exchange or sell a bat or parts of a bat, alive or dead.

Furthermore, where development will result in damage to, or obstruct access to, any bat roost (whether occupied or not) or risks harming or significantly disturbing bats, a mitigation licence is required from Natural England, the regulatory body responsible for protected species in England, to allow the development to proceed.

The legal interpretation of "development" in the context of bats is not restricted to works requiring planning permission from LPAs but includes permitted development and can encompass works that do not require any formal permission.

Bats are also afforded more general protection in England (and Wales) within the *Natural Environment and Rural Communities Act, 2006*. This imposes a duty on all public bodies, including local authorities and statutory bodies, in exercising their functions, “to have due regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity” [Section 40 (1)]. It notes that “conserving biodiversity includes restoring or enhancing a population or habitat” [Section 40 (3)]. Consequently, attention should be given to dealing with the modification or development of an area if aspects of it are deemed important to bats, such as roosts, flight corridors and foraging areas.

Species of Principal Importance in England (SPIE) – formerly UK Biodiversity Action Plan Priority (BAP) include the barbastelle, brown long-eared bat *Plecotus auritus*, soprano pipistrelle *Pipistrellus pygmaeus*, noctule *Nyctalus noctula*, greater horseshoe, lesser horseshoe and Bechstein's bat.