

Date: 12 May 2022
 Reference: SUF_IP300QE_010422
 Your ref: Roof repair works



Mr & Mrs Milner
 Gedding Grange
 Drinkstone Road
 Gedding
 Suffolk
 IP30 0QE

Technical Services Wildlife
 Licensing (EPS)
 Natural England
 Horizon House
 Deanery Road
 Bristol
 BS1 5AH

Dear Mr and Mrs Milner,

Bat Roost at Gedding Grange, Drinkstone Road, Gedding, Suffolk, IP30 0QE

Thank you for seeking advice from Natural England regarding the bat roost in your property and the proposed roofing works. Bats are highly threatened mammals and their successful conservation depends on the availability of a range of roost sites that provide suitable conditions throughout the year; they therefore depend very much on the goodwill of individuals such as yourself.

Please read the letter in full and ensure that anyone employed by you or assisting you in carrying out this work also reads the letter and understands what is required. Please contact us immediately if you foresee any difficulty in carrying out the work under our advice or you have any further questions.

Background and survey information

Natural England offers free advice for householders where bats are present. We can advise on how and when proposed work should be carried out in order to prevent harm to bats and comply with the relevant legislation (please see the Bat legislation section in the Annex for a summary).

Following a visit to you on 23 April 2022 by Odette Robson, Natural England's Volunteer Bat Roost Visitor, I have received a report and am writing to confirm our advice with you.

The table below summarises the bat roost information based on this report.

Bats visible at visit	Yes, bats seen during survey.
Bat species and numbers	Six brown long-eared bats seen roosting near the apex at the southern end of the main roof void, with eight dead fully grown bats, estimated to be between 1 and 2 years old found within roof void.
Bat droppings information	No bat droppings in the north-east roof void.
Roost location	Roof tiles largely intact but occasional gaps where tiles are lifted could provide crevice roosting opportunities for species such as pipistrelle bats.
Roost type	Summer maternity roost site definitely present, with potential for hibernation.

¹Contact Natural England via our contractor the Bat Conservation Trust (a registered charity in England, Wales and Scotland) on their helpline 0345 1300 228 (or office line 020 7735 6663).

Bat access point(s) location	Thousands of long-eared bat droppings scattered throughout the loft void, with accumulations beneath favoured roosting sites.
Additional information	17 th century timber property with 19 th century alterations, rendered with peg tile roof lined with bitumen on main roof and foam insulation fitted to underside of tiles on the north-east section of the property which has a separate loft void to the main building. Loft space boarded throughout with insulation replaced around seven years ago.



Photograph 1, annotated by Volunteer: position of roosting bats. Red area denotes separate roof void, where no evidence of bats was found.



Photograph 2, taken by Volunteer: Cluster of bats seen at south-end of main roof void.

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I understand that the foam insulation in the north-east roof void will be removed and replaced with bitumen felt, which will involve the removal of the tiles. We would like to thank you for correctly seeking advice on how these works should be undertaken. Such responsible actions will not only ensure that the law is not broken when undertaking any action to resolve such issues but will also help to conserve the bat colony in the long term by protecting it from harm.

In order to avoid harming bats or their roosts the works must be undertaken according to the Timings and Procedures below. If for any reason you cannot follow this course of work, please contact Natural England via the Bat Conservation Trust¹ for further advice as it may mean you require a licence. Please contact us for further advice if other works are required.

Timing

As with all species, long-eared bats are very vulnerable to disturbance during hibernation, late pregnancy, and while dependent young that are unable to fly are in the roosts. Many species of bat use roost sites on a seasonal basis and will disperse to a different winter hibernation site. However, long-eared bats may use the same roost throughout the year and remain in the loft space during the winter. Long-eared bat maternity colonies usually disperse in September when the juveniles have been weaned.

It is likely that bats are using your property as a maternity site during the summer months and it is uncertain if they remain in their roost during winter months given the species. Crevice dwelling species of bat may also hibernate within gaps between tiles, hence works during these periods of the year should be avoided. On this basis we advise that the work be scheduled to take place **between 1 September and 30 November 2022, between 15 March and 30 April 2023 or between 1 September and 30 November 2023.**

Procedure for works

Prior to works

Brief all contractors on the location of the bat roost. Inform them that bats may also be present in other areas of the building, such as under tiles and slates, in gaps between timbers and in wall crevices, at any time of year.

Make a copy of this letter available on site at all times for contractors to follow. Contractors must read the procedure in full before commencing works.

Before work commences, thoroughly check roof spaces, and all accessible areas where works are to take place, for bats. Searching should particularly include high up at the ridge beam, behind any gaps in the felt, at the ends of the roof at the gable apex and under the eaves on the wall plates.

Scaffolding

Please note that the above timings include installation and dismantling of scaffolding.

Take care not to cover or damage any bat access points or crevices where bats may be roosting when installing and dismantling scaffolding. Gaps which are larger than

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15mm by 20mm, where the back of the gap cannot be seen, may give access or be used by crevice roosting bats.

Bat access points on the main roof must remain clear throughout works.

Any coverings on scaffolding;

- must have an opening of a minimum 1x 2 metres which must be opened at dusk and left open until dawn. This is to maintain flight routes to and from the building in the event that a bat or bats are roosting in the fabric of the building.

During works

Work with caution, remain vigilant and check for the presence of bats throughout works. Wear gloves at all times.

Please note that bats are very small and may be hidden:

- within narrow crevices in roof beams
- in crevices in brick and stonework
- tucked behind roof felt
- under tiles
- under lead flashing.

Undertake work systematically and remove roof structures carefully. Complete one section before moving to the next to allow any hidden bats access to an undisturbed part of the roof or loft space at all times.

Loosen and lift tiles vertically by hand to avoid crushing any bats that may be underneath. Before discarding, closely examine the underside of each tile for bats clinging to it.

Bat-friendly roofing materials

The only roofing felts or linings currently approved by Natural England for use in buildings with bat roosts are traditional bitumen felt (i.e., type 1F) or sarking boards.

Non-bitumen-coated roofing membranes (formerly known as breathable roofing membranes, modern roofing membranes, BRMs or MRMs) must not be used. The long fibres that make up non-bitumen-coated roofing membranes have a tendency to be pulled out by roosting bats, who often become entangled and die. Non-bitumen-coated roofing membranes are not obligatory under any Building Regulations. Ventilation, regardless of the roofing felt used, is still required (see British Standard BS 5250:2011).

We are aware that some non-bitumen-coated roofing membranes are currently being marketed as “bat safe.” Any manufacturer making this claim should be able to show that the independent testing methodology recommended by experts has been followed, and that the results have been discussed with Natural England. Unless and until these criteria are met, bitumen felt and/or sarking boards remain the only materials approved for use in bat roosts.

The recommended independent testing method has been described in a paper by E.A. Essah *et al.*, “Method for evaluating the snagging propensity of roofing membranes in buildings by roosting bats,” which was published in the journal *Building Research & Information* in May 2021. Manufacturers and other interested parties can buy a copy of the methodology for £34 by visiting

<https://www.tandfonline.com/doi/abs/10.1080/09613218.2021.1763773>

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Retaining bat access

The bats access points to the main roof void are not located on the north-east extension roof and therefore it is not necessary to reinstate any roosting features during the works.

If any bats are discovered prior to work or whilst work is in progress, please pause work in this area, gently cover the bat over and contact Natural England¹ for further advice immediately. This will help to avoid any harm to bats and committing offences (see Bat legislation section in the Annex).

It is important to follow this advice to ensure that the law is not broken and to help conserve the bats that depend on this building in the long term.

Please note that the above advice refers only to the aforementioned works. If you plan to carry out any other works, or if the schedule of works is altered in any way, further advice should be sought before works may proceed.

Please ensure that anyone employed by you or assisting you in carrying out this work reads this letter and understands what is required. It is the responsibility of those commissioning or managing the work to ensure that the advice provided is passed to all those carrying out work affecting the bats or their roost. This advice only applies to the above property. We recommend that you retain this letter in case the need arises to demonstrate that you have sought advice. Please do not hesitate to contact Natural England¹ if you foresee any difficulties or have any questions about this advice. We may contact you to see if the advice was helpful and monitor the outcome.

Monitoring of the roost

Occasionally bats do die within roof voids, although as predation is a major cause of death, not very many adult bats are usually found dead in a roof void. Please monitor this situation and if more dead bats are found, please contact Natural England and the Volunteer, quoting the reference number on this letter and stating that you were asked to monitor the number of dead bats found.

Use of roof void

Droppings tend to accumulate over the summer months, when the bats are most active. The droppings of British bats are not known to pose a health risk and they can be safely disposed of on flowerbeds etc. as they make good fertiliser. Polythene sheeting or newspaper put down under the main roosting areas will make it easy to clean the droppings out in the future.

Should you wish to remove the droppings which have accumulated over the summer, this can be carried out annually in late September or October, preventing an accumulation of droppings. Bat droppings are very dry and therefore do not rot and smell in a well ventilated roof space.

It is recommended that you cover any items stored in your loft space with dust sheets to prevent droppings falling on your possessions. Please do not stack items up too high as this will impede the bats flight path- ideally items should be distributed around the loft, leaving adequate space above stored items. Please do not store items right up to the eaves or against the gable apex walls, as this may block the bats access points, trapping the bats,

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although you may wish to store items slightly to the side of the roof apex, avoiding the area directly below the apex where the bats roost. Items such as buckets, washing up tubs and baby baths should be stored upside down as bats can explore such items and become trapped by the slippery sides as they can not take off from ground level.

Please avoid entering the roof void during the summer maternity season, between June and August, if possible when the bats will have dependent young, and try to avoid entering the loft between late November until spring, as bats may be hibernating in the roof void.

When you do enter the roof void, please close the access hatch behind you to prevent any disturbed bats entering the living area of your property and try to avoid approaching the area where the bats are roosting if possible. Please avoid shining lights directly at the bats and minimise the amount of noise made whilst you are in the roof void. Care should be taken that any loft lights are switched off when not in use.

Water tank and containers

Please note that bats may become trapped inside plastic/metal containers or water tanks in loft voids.

We recommend that you;

- Cover containers or store them upside down

- Cover the water tank fully, ensuring the lid is secure and fitted properly

In case bats are present, please take care to minimise disturbance by restricting the time spent and noise made whilst in the loft void.

National Bat Monitoring Programme (NBMP)

Many of our bat species have declined dramatically over the last 60 years and because of this, a number of national, annual surveys are organised through the Bat Conservation Trust to monitor the status of many of our bat species across a range of habitats. The surveys are carried out by a network of volunteers and form NBMP and they are very important as they help to track changes in bat populations.

As a roost owner you can sign up to the roost count, which involves counting your bats as they emerge on two evenings during the summer survey period. Not only is this an enjoyable way to spend an evening and to learn more about bats, but the results from this and other NBMP surveys are very important, as they enable us to track changes in the UK's bat populations. For more information and to sign up to take part, please visit: <http://nbmp.bats.org.uk/Surveys.aspx> or contact us at nbmp@bats.org.uk / 020 7820 7166.

Planning Future Work

Because bats rely on buildings as roost sites, they are vulnerable to disturbance and therefore the laws protecting bats are strict. Advice must be sought prior to planning works to a building used by bats to avoid disturbing bats or destroying a roost site and committing offences. This is important not only to help conserve bats and to comply with the legislation but also to prevent any undue delay in works should a bat be found during works.

If in the future any other works are proposed at this property (such as those included on, but not limited to, the list below), please contact Natural England for advice (via the Bat Conservation Trust on 0345 1300 228) at your earliest opportunity.

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1. Rodent/insect pest control
2. Work within the roof space such as plumbing or electrical wiring
3. Re-roofing and roof repairs
4. Timber treatment
5. Renewal or repairs of fascias, soffits, bargeboards and hanging slates
6. Repairs to chimneys and flashing
7. Loft or cavity wall insulation
8. Conversions or extensions
9. Renewal or repairs to ceilings
10. Pointing works
11. Solar panel installation
12. Replacement windows and lintels
13. Installation of chimneys and flues for new wood burners or boilers

Please note that some works may not fall within the scope of the free advice service, for example some lighting projects, full roof replacements, conversions and extensions, and you may be advised to employ an ecological consultant.

Further information about bats and their legal protection can be found in the Annex to this letter.

Thank you again for taking the trouble to seek advice.

Yours sincerely,



Jennifer Pope
Senior Bat Advisor, The Bat Conservation Trust acting on behalf of Natural England

Email: jpope@bats.org.uk

Contact Natural England via the Bat Conservation Trust on 0345 1300 228

Enclosed; Living With Bats, Bats during works

A small number of bats in the UK have been found to carry rabies viruses, although the risk is extremely small. Natural England's current advice is that members of the public should not handle bats; if you find a bat in your house, please call the Bat Conservation Trust on 0345 1300 228. Further information is available from www.defra.gov.uk and www.bats.org.uk.

Annex

Additional information

All bats found in England are small, eat insects and fly at night. Bats are most likely to be seasonal visitors to this property and are unlikely to pose a health risk. Except in very rare circumstances, they are generally unlikely to cause damage to the building in which they choose to live. They do not chew woodwork, fabric or cables, or build nests.

Bats usually roost in different sites throughout the year, and may sometimes vacate a roost for a period of years before resuming occupation. Bat behaviour varies seasonally with two key phases

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of activity. Broadly speaking, breeding related activities mostly take place from spring to autumn. Bats hibernate during colder months, when there is little food available. As the weather gets milder during spring, bats become more active, and generally begin to occupy roosts in buildings from late April onwards. These are often maternity sites and are frequently composed of the same group of females returning to the roost each year. Females give birth to a single baby during the summer, and by autumn most bats have left the nursery roost. Although most bats disperse to other sites to hibernate, some bats may be present in roofs and other parts of buildings, such as cellars and cavity walls, throughout the year.

For more information about bats and their roosts, Natural England's free PDF booklet 'NE23 -Focus on Bats' can be downloaded via this web address: bit.ly/1NhiGRa.

Bat Legislation

As population numbers have fallen, all bats and their roosts are protected under The Wildlife and Countryside Act 1981 (as amended) and Conservation of Habitats and Species Regulations 2017. Bats use roosts on a seasonal basis and therefore bat roosts are protected whether the bats are in occupation or not. Under this legislation it is an offence to:

- deliberately capture (or take), injure or kill a bat;
- intentionally, recklessly or deliberately disturb a bat (in relation to the Wildlife and Countryside Act 1981 (as amended) the offence applies whilst the species is occupying a structure or place which it uses for shelter or protection; in relation to the Conservation of Habitats and Species Regulations 2017 as it applies anywhere;
- damage or destroy the breeding or resting place (roost) of a bat;
- possess a bat (alive or dead), or any part of a bat;
- intentionally or recklessly obstruct access to a bat roost;
- sell (or offer for sale) or exchange bats (alive or dead), or parts of bats.

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