



Preliminary Bat Roost Assessment

Drayton Manor Lodge, Tring Hill, Aylesbury Road, Tring, HP23 4LD

April 2023

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This ecological report will remain valid for a period of 18 months (until February 2024) from the date of the last survey. If planning is not obtained, or works do not commence within this time period, further surveys may be required to update the site information.

1 Introduction

1.1 Overview

Consent is being sought for a proposed development at Drayton Manor Lodge, Tring Hill, Aylesbury Road, Tring HP23 4LD (hereafter referred to as the 'potential development site'), which is within the Buckinghamshire Council (BC).

The proposal involves the demolition of the existing buildings on-site.

AVAL Consulting Group Limited (ACGL) was instructed by the client to conduct a Preliminary Bat Roost Assessment to accompany the planning application to the BC, seeking consent to undertake the proposed work. The purpose of the Preliminary Roost Assessment is to determine the presence of roosting bats and identify the need for any further surveys where necessary. If necessary, appropriate mitigation measures are to be identified and recommended.

This report was prepared by David Stanley (BSc Ecology and Wildlife Conservation and MSc Biodiversity Conservation – both CIEEM accredited, previous bat survey experience at Hai-Bar Nature Reserve and currently working towards a bat licence with Ecology Training UK).

A Preliminary Roost Assessment report has been prepared to determine the presence/likely absence of roosting bats for this proposed development and identify need for any further consideration.

Local Authorities are tasked with determining new development and local planning applications against a wide range of social, economic, and environmental criteria. The purpose of this report is to assess whether the development proposal is compliant with the relevant local policies in terms of ecological impact as a result of the proposed commercial development.

This assessment has been carried out in accordance with good practice guidelines, including the National Planning Policy Framework (2021) and applicable local supplementary guidance.

The remainder of this report is presented in the following order:

- Section 2: Relevant national, regional, and local applicable policies;
- Section 3: Methodology;
- Section 4: Results and Evaluation;
- Section 5: Mitigation;
- Section 6: Conclusions.

1.2 Objectives

- To gain an understanding of the importance of the defined survey area for bats;
- To identify potential bat roosts provided by buildings within the site;

- To determine the presence/likely absence of roosting bats within suitable features;
- Identify bat species and numbers present; and
- To determine levels of bat foraging and commuting activity within habitat potentially affected by the proposed development.

2 Legislation and Policy

This section summarises the relevant National and Local legislative and policy background, statutory and non-statutory guidelines relevant to the potential commercial development.

2.1 National Policy

2.1.1 National Planning Policy (July 2021)

The principal national planning policy guidance with respect to the potential development is the National Planning Policy Framework (NPPF). The most recent update of the NPPF was published on July 2021 by the Department for Communities and Local Government (DCLG). This guidance sets out the Government's planning policies for England and how they are expected to be applied. Three dimensions to sustainable development have been identified in the NPPF: economic, social, and environmental.

The NPPF Section 174 states that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”*

Section 175 states that:

“Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.”

Section 172 states that:

“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the

highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads⁵⁹. The scale and extent of development within these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.”

Section 177 states that:

“When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development⁶⁰ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

Section 179 states that:

“To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and steppingstones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”*

Section 180 states that:

“When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁵⁸ and a suitable compensation strategy exists; and*

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”

Section 182 states that:

“The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.”

2.1.2 Relevant National Planning Practice Guidance (NPPG, 2016)

NPPG is a web-based resource which brings together planning guidance on various topics into one place. It was launched in March 2014 and coincided with the cancelling of the majority of Government Circulars which had previously given guidance on many aspects of planning.

The guidance note on ‘Natural Environment’ explains key issues in implementing policy to protect and enhance the natural environment, including local requirements. This has been referred to when preparing this report. It states that:

“Planning authorities need to consider the potential impacts of development on protected and priority species, and the scope to avoid or mitigate any impacts when considering site allocations or planning applications. Guidance on the law affecting Habitats Sites, protected species and SSSIs.

Natural England has issued standing advice on protected species. A protected species mitigation licence from Natural England may be required before any work can start.”

The PPG also states that:

“Information on biodiversity and geodiversity impacts and opportunities needs to inform all stages of development (including site selection and design, pre-application consultation and the application itself). An ecological survey will be necessary in advance of a planning application if the type and location of development could have a significant impact on biodiversity and existing information is lacking or inadequate. Pre-application discussions can help to scope whether this is the case and, if so, the survey work required.

Even where an Environmental Impact Assessment is not needed, it might still be appropriate to undertake an ecological survey, for example, where protected species may be present or where biodiverse habitats may be lost.

As with other supporting information, local planning authorities should require ecological surveys only where clearly justified. Assessments should be proportionate to the nature and scale of development proposed and the likely impact on biodiversity. Further guidance on information requirements is set out in making an application.”

Biodiversity net gain is mentioned in the PPG and states that:

“The National Planning Policy Framework encourages net gains for biodiversity to be sought through planning policies and decisions. Biodiversity net gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. Biodiversity net gain can be achieved on-site, off-site or through a combination of on-site and off-site measures. It may help local authorities to meet their duty under Section 40 of the Natural Environment and Rural Communities Act 2006.”

2.2 Species and Habitats Legislation

2.2.1 The Conservation of Habitats and Species Regulations 2017 (as amended)

The Conservation of Habitats and Species Regulations 2017 (as amended) consolidates all various amendments made to The Conservation (Natural Habitats & c.) Regulations 1994, in respect of England and Wales. The 1994 Regulations transposed the EC Habitats Directive 1992 (Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora) into national law.

Annexes I and II of the Habitats Directive list (respectively) habitats and species for which member states are required to establish and monitor SACs. The EC Birds Directive provides a similar network of sites (SPAs) for all rare or vulnerable species listed in Annex I and all regularly occurring migratory species, with particular focus on wetlands of international importance.

Together with SACs, SPAs form a network of pan-European protected areas known as 'NATURA 2000' sites.

The Habitats Regulations also make it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade on the animals listed in Schedule 2, or pick, cut, uproot, destroy or trade in the plants listed in Schedule 4.

2.2.2 The Convention on Conservation of European Wildlife and Natural Habitats (Bern Convention 1979)

The Convention on Conservation of European Wildlife and Natural Habitats (Bern Convention 1979) aims to ensure conservation and protection of all wild plant and animal species and their natural habitats (listed in Appendices I and II of the Convention), to increase cooperation between contracting parties, and to afford special protection to the most vulnerable or threatened species (including migratory species).

2.2.3 The Wildlife and Countryside Act 1981 (as amended) (WCA 1981)

The WCA is the primary UK mechanism for statutory site designation (Sites of Special Scientific Interest [SSSIs]) and the protection of individual species listed under Schedule 1, 2, 5 and 8 of the Act, each subject to varying levels of protection.

2.2.4 The Countryside and Rights of Way Act 2000

This legislation strengthens the provision of the 1981 WCA (as amended), both in respect of statutory sites such as SSSIs and protected species. It also places a statutory obligation on Local Authorities and other public bodies to further conservation of biodiversity in the exercise of their functions, thus providing a statutory basis to the Biodiversity Action Plan (BAP) process, which began in 1994. Section 74 of the Act lists the habitat types and species of principal importance in England. The UK Biodiversity action Plan has now been superseded by the 'UK Post-2010 Biodiversity Framework' (July 2012), however, many of the species and habitats in the UK and local BAPs have not been updated and are still considered relevant to date.

2.3 Relevant Protected Species Legislation Potentially Relating to the Site

2.3.1 Bats

All UK bat species are 'European Protected Species' (EPS) protected under the 2017 Conservation of Habitats and Species Regulations, which implements the EC

Habitats Directive 92/43/EEC in the United Kingdom. In relation to an EPS, the 2017 Regulations make it an offence to:

- Deliberately capture, injure or kill any wild animal of an EPS;
- Deliberately disturb wild animals of any such species, in particular any disturbance which is likely to: (i) impair their ability to survive, to breed or reproduce, or to rear or nurture their young; or to hibernate or migrate; (ii) affect significantly the local distribution or abundance of the species to which they belong;
- Damage or destroy a breeding site or resting place of such an animal; and
- To: (a) be in possession of, or to control; (b) to transport any live or dead animal or any part of an animal; (c) to sell or exchange or (d) offer for sale or exchange any live or dead animal or part of an animal of an EPS.

In addition, all UK bats are protected under the 1981 Wildlife and Countryside Act (as amended). All species are listed on Schedule 5 of the Act and are subject to the provisions of Sections 9.4b and 9.4c, which make it an offence to:

- Intentionally or recklessly disturb a bat while it is occupying a structure or place which it uses for shelter or protection; and
- Intentionally or recklessly obstruct access to any structure or place used for shelter or protection by a bat.

Summary

It is considered that the environmental and ecological priorities for development are to reduce the negative impacts on the environment, maximise sustainable development, encourage biodiversity and to ensure the protection of wildlife and protected species.

3 Methodology

To achieve the objectives outlined in Section 1.2, a desktop study was completed followed by a site visit.

3.1 Desktop Study

The desk study was undertaken by referring to the following data sources:

- Defra (2022). Multi-Agency Geographic Information for the Countryside (MAGIC)

Satellite mapping, Ordnance survey, road map, habitat and designated site data from Defra (2022) was used to assess the value of the surrounding habitat for bats in the area at a landscape scale (5km), including any potentially important habitat corridors (linear habitat features), feeding grounds or potential roost opportunities, such as large expanses of woodland. The features and habitats immediately surrounding the site (local area) were also assessed at a finer scale as these influence the likely presence of bats within the survey site.

3.2 Preliminary Roost Assessment

On the 8th of August 2022, an inspection of the site was undertaken during daylight to determine the potential for bats. This was to establish, if possible, whether bats are using the building or have been using the building in the past. An assessment of the buildings was undertaken in accordance with the latest published best practice guidance (Collins, 2016).

All accessible parts of the buildings were inspected, to look for bats and signs of the presence of bats, including:

- Droppings
- Feeding remains including moth and butterfly wings
- Staining from urine or oils near crevices or holes or on timber (such as roof beams), walls, chimney breasts etc
- Scratch marks on walls and timber
- Squeaking or chattering calls

The assessment outside the building included inspection of all walls, windows, windowsills and tiles, including a search for any crevices under tiles, missing mortar, gaps in the ridge or gable end of the roofs, crevices in render and brickwork, gaps tiles and any other potential bat roost opportunities. An internal inspection was also carried out.

Table 1: Guidelines for assessing the proposed development sites for bats (from Collins, 2016).

Suitability	Description	Number of activity survey visits required
Negligible	Negligible habitat features on site likely to be used by roosting bats	None
Low	A structure or tree with one or more potential roost sites that could be used by individual bats opportunistically.	One

	However, potential roost sites not suitable for larger numbers or regular use (i.e. maternity or hibernation).	
Moderate	A structure or tree with one or more potential roost sites that could be used by bats, but unlikely to support a roost of high conservation status	Two
High	A structure or tree with one or more potential roost sites obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time.	Three
Confirmed roost	Evidence of bats or use by bats found.	Minimum of two – to characterise roost

3.3 Limitations

The results of the survey and assessment work undertaken by Aval Consulting Group are representative at the time of surveying.

Any third party and external data sources used may vary due to the quality and scale, the supporting information used to define locations/boundaries and sensitivity of the data itself. Aval Consulting Group cannot take responsibility for the accuracy of external data sources and as such discrepancies and inaccuracies may occur.

It should be noted that whilst every effort has been made to describe the features on site in the context of their suitability for roosting bats, this does not provide a complete characterisation of the site. This survey provides a preliminary view of the likelihood of bats being present. This is based on suitability of the habitats on site and in the local area, the ecology and biology of bats as currently understood, and the known distribution of bats as recovered during the desk study.

A thorough inspection of the building, including cavities, cannot be conducted without specialist access equipment, meaning only accessible areas have been surveyed. Therefore, a negative result does not definitively prove the absence of protected species (although this is not a major limitation if required nocturnal emergence/ re-entry bat survey(s) are conducted).

Any third party and external data sources used is not exhaustive and may vary due to the quality and scale, the supporting information used to define locations/boundaries and sensitivity of the data itself. Aval consulting Group cannot take responsibility for the accuracy of external data sources and as such discrepancies and inaccuracies may occur. Any distances, locations or dimensions appearing in the report should be considered as estimates.

We encourage the client and authorised users of the report to remove any information containing records of protected species locations within the report prior to publishing in the public domain in order to prevent human interference.

4 Results and Evaluation

4.1 Overview

The following section sets out the desk study results in relation to ecology and the survey results. Relevant ecological information is available from several sources including local, regional, and national ecological reports and websites. For the purpose of this assessment, some data has been obtained from Defra provided geographical sources¹.

4.2 Designated Sites and Landscape

Details of any statutory designated sites within a 5km radius of the survey site, including their reasons for notification, are provided in Table 2 below. A map of the sites are located in Appendix B.

Table 2: Designated sites within a 5km radius of the survey site.

Site Name	Designation	Distance and direction from site	Further Information
Tring Reservoirs	SSSI	1.3km north	This site is currently a Site of Special Scientific Interest (SSSI) (99.95 Ha).
Aston Clinton Ragpits	SSSI	1.5km west	This site is currently a Site of Special Scientific Interest (SSSI) (2.51 Ha).
Dancersend	SSSI	1.5km south-west	This site is currently a Site of Special Scientific Interest (SSSI) (47.11 Ha).
Tring Woodlands	SSSI	1.7km south-east	This site is currently a Site of Special Scientific Interest (SSSI) (24.19 Ha).
Oddy Hill and Tring Park	SSSI	2.4km south-east	This site is currently a Site of Special Scientific Interest (SSSI) (36.01 Ha).
Weston Turville Reservoir	SSSI	4.2km south-west	This site is currently a Site of Special Scientific Interest (SSSI) (19.04 Ha).
Pitstone Quarry	SSSI	4.3km north-east	This site is currently a Site of Special Scientific Interest (SSSI) (10.32 Ha).

Defra (2022) has been used to undertake a review of the proposed site and surrounding area. The site is situated in a residential area of Tring. The landscape within the immediate vicinity of the site comprises a good mix of habitats, including broadleaved woodland, waterbodies, residential dwellings and associated gardens. There are areas of scattered woodland and waterbodies listed table 3 below. These areas could provide suitable bat foraging and commuting habitat for bats. Priority habitats within 2km of the site are listed in Table 3.

¹ De Figure 3.1 Area surrounding potential development site (highlighted in red) (Source: Defra). Defra (2022). Multi-Agency Geographic Information for the Countryside (MAGIC) AVAL Consulting Group Limited, Newhaven Enterprise Centre, Denton Island, Newhaven, BN9 9BA T +44 (0)333 006 2524 | E contact@aval-group.co.uk | W www.aval-group.co.uk

Table 3: Priority habitats within 2km of the site

Habitat	Closest distance from site
Broadleaved Woodland	200m north-west
Broadleaved Woodland	560m south-west
Broadleaved Woodland	600m north-west
Chalk River	610m north-west
Broadleaved Woodland	650m north-east
Broadleaved Woodland	670m north-west
Broadleaved Woodland	700m south-east
Broadleaved Woodland	870m south-east
Ancient and Broadleaved Woodland	960m south
Ancient Replanted and Broadleaved Woodland	1km south-west
Broadleaved Woodland	1km south-west
Chalk River	1.4km north
Broadleaved Woodland	1.4km north
Broadleaved Woodland	1.5km south-east
Broadleaved Woodland	1.6km west
Ancient and Broadleaved Woodland	1.6km south-east
Broadleaved Woodland	1.6km north-west
Broadleaved Woodland	1.8km south-west
Chalk River	1.8km north-west
Broadleaved Woodland	1.9km north-east
Chalk River	1.9km north-east

4.3 Data Search and Historical Records

Defra (2022) was used to provide bat records for within 2km of the site. This was primarily due to the nature of the proposed development. Results of bat records within a 2km buffer can be seen below in table 4.

Table 4: Bat records within 2km buffer

Bat Record	Distance from Site	Start and End Date	Bat Species Present
Granted European Protected Species Applications (England)	0.6km north-west	01/02/2012-30/05/2012	<i>Plecotus auritus</i>
Granted European Protected Species Applications (England)	1.1km south-east	20/07/2018 – 31/07/2023	<i>Pipistrellus pipistrellus</i> , <i>Pipistrellus pygmaeus</i>

4.4 Field Survey Results

The main residential building on site and all outbuildings were surveyed. The weather conditions recorded at the time of the survey are shown in Table 5.

Table 5 : Summary of conditions during survey

Abiotic Factor	Survey 1	Survey 2
Survey type	Preliminary Bat Roost Survey	Preliminary Bat Roost Survey (Outbuildings)
Date completed	08.08.22	29/03/2023
Temperature °C	20 °C	12°C
Precipitation	None	Yes
Weather Conditions	Partial cloud, moderate wind	Cloudy

4.5 Site Feature descriptions and photos

There is one residential building and several outbuildings on site, which were inspected during the Preliminary Bat Roost Survey. The results of the Preliminary Bat Roost Survey are summarised in below and the location of the building is shown in Appendix 1. Photograph references relate to the building description below.

Table 6: Site features and descriptions linking to photos in Appendix B

Building Reference	Use by bats	Use by birds	Bat signs, access points and features
A	Negligible	No	N/a
B	Negligible	No	N/a
C	Negligible	No	N/a
D	Negligible	No	N/a
E	Negligible	No	(Mouse droppings in loft, not bat)
F	Negligible	No	N/a
G	Negligible	No	N/a
H	Negligible	No	N/a
I	Negligible	No	N/a
J	Negligible	No	N/a
K	Negligible	No	N/a
L	Negligible	No	N/a
M	Negligible	No	N/a
N	Negligible	No	N/a
O	Negligible	No	N/a

The property is detached with a pitched roof covered in interlocking roof tiles. An outbuilding exists in close proximity to the main residential building. Roof tiles look to be intact with no notable gaps. The property looks to be in good condition externally. The exterior walls are intact and of a good condition, without any visible cracks or holes. No evidence of bat activity was found on the exterior or interior of the buildings. The interior of both buildings is in reasonable condition. The main loft space had potential mouse droppings (Appendix B).

Several outbuildings, including stables and an office, are also located south of the main residential property. The office and stables had pitched gable-ended roofs of corrugated iron and the walls look to be in good condition with no visible cracks, holes or access points (Building References J, K and O). Outbuildings for storage also had roofs of corrugated iron, in a flat roof structure (Building References I and L), and had high levels of natural light (Building References G, H and I). The office also has no separated roof

voids, and looks to be used frequently with high levels of artificial light (Building References M and N). No evidence of bat activity was found in any of the outbuildings.

From our desk survey bat activity in the surrounding area is low. In addition, from the onsite external and internal inspection of the buildings, the risk of bat roosts within the buildings are negligible. This indicates that there are negligible habitat features on site likely to be used by roosting bats. As a result of this no further surveys are required, however, due to the nature of the development, precautionary measure of work will be required as explained in Section 5.

5 Mitigation

No specific mitigation measures are considered necessary due to the negligible risk of potential bat roosts. However, it is understood that regulations will be followed during the demolition phase as explained below.

Precautionary methods of work will be required. This precautionary method of work will encompass the following:

- Works to remove the slates and timbers, and works to remove walls are undertaken with care, by hand.
- During such works, slates and timbers must be checked for the presence of bats and for signs of bats (droppings).
- If bats or signs of bats are found during works, works must stop and an ecologist contacted for advice.

6 Conclusions

This report provides an assessment and evaluation of a Preliminary Bat Roost Survey of the following potential key impacts associated with the proposed development at Drayton Manor Lodge, Tring Hill, Aylesbury Road, Tring HP23 4LD.

To gain an understanding of the importance of the defined survey area for bats.

- To identify potential bat roosts provided by buildings within the site;
- To determine the presence/likely absence of roosting bats within suitable features
- Identify bat species and numbers present;
- To determine levels of bat foraging and commuting activity within habitat potentially affected by the proposed development.

A Preliminary Bat Roost Assessment has been undertaken for the proposed development. The development is not anticipated to have any significant or adverse impacts on any bat species either on site or in surrounding habitats.

The proposed work is not expected to disturbance that would significantly affect the ability for bats to survive, breed, reproduce, nurture young and hibernate.

Buildings assessed as comprising negligible suitability for roosting bats do not normally require further surveys. However, if bats are found during any stage of the development, work should stop immediately, and a suitable ecologist should be contacted for further advice.

It can, therefore, be concluded that the proposed development is not considered to conflict with any national, regional or local planning policies and will not have any significant or adverse impacts on any bat species either on site or in surrounding habitats, providing precautionary methods of work are abided by.

Appendices

[Appendix 1:Existing Plans](#)

[Appendix 2 :Survey Pictures.](#)

[Appendix 3:Proposed Plans](#)

Appendix 1: Site Location Plan

Please refer to planning portal for most up to date versions submitted by the client.

Appendix 2: Site Pictures

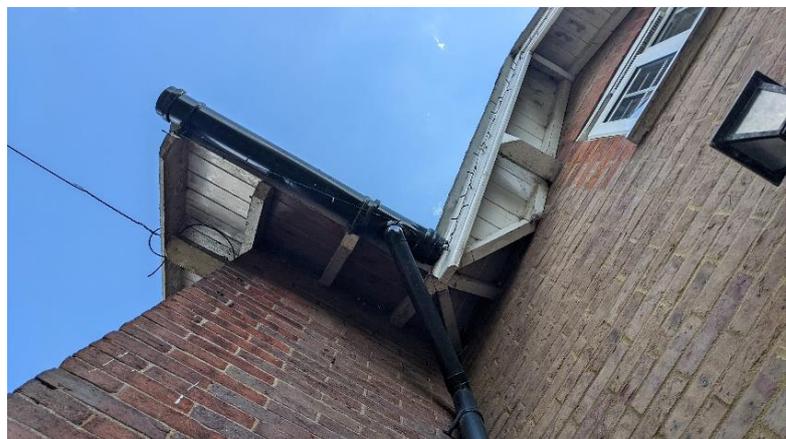
Building Reference – A



Building Reference – B



Building Reference – C



Building Reference – D



Building Reference – E



Building Reference F



Building Reference G



Building Reference H



Building Reference I



Building Reference J



Building Reference K



Building Reference L



Building Reference M



Building Reference N



Building Reference O



Appendix 3: Proposed Plans

Please refer to planning portal for most up to date versions submitted by the client.