

Luccombe Manor Hotel Shanklin Isle of Wight

Bat & Nesting Bird Mitigation Strategy

July 2022



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Luccombe Manor Hotel Shanklin Isle of Wight

Bat & Nesting Bird Mitigation Strategy

1.0 Introduction

1.1 Background

A planning application has been submitted to allow development of an extension to the existing Luccombe Manor Hotel, located on Popham Road, Shanklin, Isle of Wight PO37 6RG (SZ583 808) (**Map 1**). The proposals involve replacing the existing flat-roofed, two-storey southern extension with a larger three-storey extension with pitched roof. The extension will extend from the existing southern gable of the hotel and therefore will affect this edge of the existing pitched roof. However, the existing loft space that extends through the complex pitched roofs of the hotel will remain unaltered.

In order to provide information regarding potential ecological impacts of the proposals a bat and nesting bird survey was considered necessary. Graham Street, of Bat Consultancy & Advisory Service on the Isle of Wight, completed a full bat and nesting bird survey of the property on behalf of the property owner (Garden Isle Hotels) in May/June 2022.

This document details a proposed bat/bird mitigation strategy for the intended building work at Luccombe Manor Hotel, based on Graham Street's survey findings (as detailed in the Bat Survey Report, May/June 2022 – **Appendix II**), for submission with the planning application.

1.2 Legislation & Policy

1.2.1 Legislation relating to Bats

In summary, all native bat species in the UK are fully protected from harm/disturbance, and their roost sites (including access points) are protected from damage, via:

- The Wildlife & Countryside Act, 1981 (as amended) (through inclusion on Schedule 5); and
- The Conservation of Habitats and Species Regulations 2017 (as amended). (aka '*The Habitats Regulations*')

Further details of the legislative protection afforded to bats are provided at **Appendix I**.

1.2.2 Legislation relating to Birds

In the UK, all wild birds, their eggs, young and nests (whether in use or being built) are afforded protection via The Wildlife & Countryside Act, 1981 (as amended) from intentional harm or taking.

Any species included on Schedule 1 of the Wildlife & Countryside Act 1981 are also protected from disturbance while it is building a nest or is in, on or near a nest containing eggs or young. The dependent young of Schedule 1 species are also protected from disturbance. However, it is considered unlikely that any Schedule 1 bird species would occur at this site.

Measures may therefore be required to avoid causing harm to birds, their nests (while in use or being built), eggs and/or young in order to comply with the legislation.

1.2.3 Biodiversity Action Plans / Species of Principal Importance

Following UK devolution, the UK Post-2010 Biodiversity Framework was set up in 2012, and succeeds the previous UK BAP. This sets out the aims and activities required to achieve identified targets to halt the decline in biodiversity across the various countries that make up the UK.

Lists of Priority species and habitats were devised for the purposes of the previous UK BAP, which were identified as most threatened in the UK and required action plans to aid their recovery. These lists remain an important reference source and have been used to revise the statutory lists of priorities for England and the other countries of the UK, to allow for a country-level approach rather than UK-wide as before.

The Countryside & Rights of Way (CROW) Act, 2000 requires that Government departments have regard to the purpose of conserving biological diversity in accordance with the Biodiversity Convention 1992 and to promote the action required to further the conservation of species published on Biodiversity Action Plans (BAPs).

Further, The Natural Environment and Rural Communities (NERC) Act (2006) places a duty upon public bodies in England and Wales (including Local Planning Authorities) to have regard to the purposes of conserving biodiversity in exercising their functions. A list of 'habitats and species of principal importance for the conservation of biodiversity in England' was drawn up, as required by the NERC Act, to help guide decision-makers in this respect. The list includes all the habitats and species listed in the UK Biodiversity Action Plan as requiring action, with the addition of Hen Harrier.

Bat species of principal importance or priority species (as revised in 2012 for England) include Soprano Pipistrelle bat, Brown Long-eared Bat, Barbastelle, Bechstein's bat and Noctule.

Bird species of principal importance or priority species include: House Sparrow, Common Starling and Song Thrush, etc.

1.2.4 Planning Policy

National Planning Policy

The Government's planning policies for England, including how the Natural Environment should be considered, are contained within the National Planning Policy Framework (NPPF), as revised most recently in July 2021 (www.gov.uk/guidance/national-planning-policy-framework).

Underpinning the entirety of the NPPF is a clear presumption in favour of sustainable development.

The guidance encourages the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.

Local planning authorities are also instructed to apply the following principles when determining a planning application:

- 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) ...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.

The Government's Planning Practice Guidance contains up to date (last updated 2021) guidance on implementing the requirements of the NPPF (www.gov.uk/guidance/natural-environment). The guidance states that planning authorities need to consider the potential impacts of development on protected and priority species. Natural England's standing advice on protected species provides the LPA with advice on dealing with protected species issues. The guidance states that 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. Even where an EIA is not needed, the guidance indicates that an ecological survey might still be appropriate, for example, where protected species may be present or where biodiverse habitats may be lost. LPAs should require ecological surveys only where clearly justified.

The ODPM Circular 06/2005 contains further administrative guidance on the application of the law relating to planning and nature conservation in England, and should be read in conjunction with the NPPF and PPG. The Circular advises that the '*presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat.*'

It is also stated in the Circular that it is '*essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted.*' However, it is also noted that '*developers should not be required to*

undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by the development.

Isle of Wight Local Development Plan

The following sections of potentially relevant policies are contained in the Island Plan Core Strategy, adopted March 2012:

SP5 Environment

The Council will support proposals that protect, conserve and/or enhance the Island's natural and historic environments. All development proposals will be expected to take account of the environmental capacity of an area to accommodate new development and, where appropriate and practicable, to contribute to environmental conservation and enhancement.

.....

Development that has a demonstrable adverse impact on the Island's natural, historic and built environments should be avoided.

.....

DM12 Landscape, Seascape, Biodiversity and Geodiversity

The Council will support proposals that conserve, enhance and promote the landscape, seascape, biodiversity and geological interest of the Island. Development proposals will be expected to:

.....

5. Positively contribute to meeting the aims and objectives of the Isle of Wight's Local Biodiversity Action Plan and Local Geodiversity Action Plan.

.....

2.0 Overview of Survey Findings

2.1 Summary of Bat Survey Results

The full bat survey methodology and findings are contained in Graham Street's Bat Survey Report of Luccombe Manor Hotel, May/June 2022 (**Appendix II**). These survey results are also summarised on **Map 2**.

This survey involved completion of a daytime preliminary survey (internal & external survey) of the Hotel building in May 2022, followed by a further two internal loft surveys in May and June 2022. Two dusk emergence and one dawn re-entry survey were completed in May and June 2022, concentrating on monitoring the southern, eastern and northern sides of the existing pitched roofs. The surveys complied with published BCT Bat Survey Guidelines (Collins, 2016).

The surveys resulted in the discovery of roost sites used by a single Serotine Bat and a single Whiskered/Brandt's Bat. Both bats were observed in the hotel loft on single occasions towards the northern side of the lofts. The Serotine bat droppings indicate regular use of the loft as a day roost by this single bat. The Whiskered/Brandt's bat appears to have utilised the loft space opportunistically for a very short period, since there were virtually no bat droppings present within the loft space. Both bat roosts, and evidence of bat activity (i.e. droppings) are located towards the northern side of the complex roof space, away from the area to be affected by the proposed extension. Bat access gaps to the loft exist at the eaves on all sides of the pitched roof. No evidence of any bat activity was found near to the southern gable, which would be affected by the proposed extension. (see **Map 2**)

The existing two-storey, flat-roofed, southern extension (**Map 2**) was found to contain no potential bat roost access gaps/crevices and is therefore considered to have negligible potential suitability for bat roosts. (**Appendix II**)

2.2 Nesting Bird Survey Results

An active Jackdaw nest was discovered at the south-western corner of the existing loft space, adjacent to the southern gable in May 2022. This had been vacated by 3 June 2022. Access to the nesting site by the birds appears likely to be under lead flashing at the western corner of the southern gable (**Appendix II**).

3.0 Assessment of Impacts

3.1 Likely Impact on Bats

The proposed extension to the property is unlikely to have any significant impact on bats or their roost sites.

The existing loft space will remain unaltered, while the southern gable (from which the new building would extend) will remain intact. Therefore, the identified bat roost sites within the loft will not be damaged.

In addition, all identified bat roosts, and any evidence of bat activity, is located well away from this southern gable towards the northern part of the loft space. Therefore, any bats present in the loft at the time are unlikely to be significantly disturbed during the building work which would be adjacent to the intact southern gable on the exterior.

It has not been possible to confirm the bat roost access point(s) during the current surveys. However, with all evidence of bat activity being confined to the northern part of the lofts, and no evidence present anywhere near the southern gable, it is considered very likely that the gaps at the northern side of the roof space are used by the bats for loft access. The proposed work, which will affect the southern gable only, is therefore unlikely to affect bat access points to the loft/roost sites.

3.2 Likely Impact on Nesting Birds

The proposed work has potential to result in harm to a nest site previously used by Jackdaw, depending on the timing of the work and whether the nest is re-used in the future. While a direct impact to the nest site is unlikely (given that the southern gable wall will be retained), access to the nest site by the birds at the south-western corner is likely to be affected resulting in potential significant disturbance, possible abandonment of the nest/young by the adults and/or prevention of adults feeding young or birds being trapped in the loft.

3.3 Legal Considerations

3.3.1 Bats

In summary, bats are legally protected from disturbance/harm and their roost sites (including access points) are legally protected from damage (**Appendix I**). If the proposed work is reasonably likely to result in such impacts (i.e. result in an offence), a licence can be obtained from Natural England (subject to certain conditions) to allow the proposed work to proceed lawfully.

Based on current survey findings and impact assessment (**Section 3.1**, above), an EPS license is not considered necessary to allow the proposed building work to proceed, as a breach of the legislation is unlikely.

However, precautionary mitigation measures are considered appropriate to ensure a breach of the legislation does not occur (see **Section 3.3**, below).

3.3.2 Nesting Birds

All birds, their nests/eggs/young are legally protected in the UK from harm (see **Section 1.2.2**, above).

Consequently, if nesting birds are present at the time and are likely to be affected by the proposed work, measures would be required to ensure the birds, nests/eggs/young are not harmed. (see **Section 3.3.2**, below).

3.4 Mitigation Strategy

3.4.1 Bat Mitigation

A precautionary approach will be implemented in order to ensure bats are not affected during the building work, as follows:

Mitigation Measures during Building Work

- Based on current findings, timing restrictions to the building work is not considered necessary.
- Immediately prior to commencing building work that affects the southern gable, an ecologist will check the loft for any roosting bats. The ecologist will then brief the contractors with respect to the presence/location of any bats, locations of known/potential roost sites, legal protection and mitigation measures to be implemented. The ecologist's contact details will be provided to the contractors.
- In the unlikely event that any bats are discovered in the absence of the ecologist, work will stop immediately and the ecologist contacted for further advice. The ecologist will go to the site to check the situation, rescue any bats as necessary and assess whether the work is able to continue without a breach of the legislation. If an EPS license is deemed necessary (i.e. if a breach of the legislation is considered likely), the work in that area will be postponed until a license has been obtained. The ecologist will supervise any remaining work in that location where bats could remain present.

3.4.2 Nesting Bird Mitigation

If nesting birds are present at the time of work, the access point to the nest must remain available with a buffer zone of no disturbance of at least 5m around the access point/nest site. If there are no nesting birds present at the time, a breach of the legislation would not occur and no mitigation is needed.

Consequently, it is recommended that the access hole at the western corner of the southern gable is blocked during the winter (prior to February) to prevent access by birds, to allow work to continue during the nesting season (i.e. March-August, incl). Immediately before blocking the hole, an ecologist should check the loft to confirm an absence of any birds to prevent possible trapping of individuals. The ecologist should then re-check the loft for any nesting birds immediately before work begins, if between March-August, incl.

Where blocking of the access hole is not possible and/or the birds have managed to gain access to the loft, work that would affect the nest/eggs/young should be avoided until the young have fledged and left the nest (expected by June). An ecologist should check the loft for any active nests or bird presence prior to commencing such work, with the work only continuing where there are no active nests present, or they are unlikely to be

affected. It would therefore be advisable to avoid those elements of the work that have potential to affect nesting birds during the bird nesting season (i.e. avoid March-August, incl) if possible.

3.5 Ecological Enhancement

In accordance with planning policy, further ecological enhancement measures will be provided as part of the proposed development, as follows:

A new large loft space will be created over the proposed three-storey extension at the southern side of the hotel (**Map 3**). This will provide a further uncluttered loft space, with variable temperatures, suitable for use by bats. The loft will measure approximately 1.8m height, 6.5m wide and 26m long. To ensure its suitability the roof will have a traditional cut roof structure (i.e. avoiding trussed rafters) and bitumen underfelt will be used beneath the roof slates (avoiding use of breathable roofing membranes).

Access to this loft space will be available via a gap created at the top of the new southern gable (min. 15mm x 40mm, at the top edge of the cladding or via a gap at the back edge of the soffit) and over the gable wall. Bat access will also be created from the existing loft via a large gap (at least 200mm height & width) created at the apex of the old adjoining southern gable (see **Map 3**).

In addition, a small access gap will be created at the top of the timber wall cladding on two of the rear(western) gables of the new extension and one gap at the top of timber cladding on an east-facing gable (with no balcony below), to allow bats access to crevices behind the cladding (**Map 3**). These gaps will measure 40mm long by 15mm tall, positioned at the back edge of the soffit or behind a bargeboard (which would be stepped out from the wall by at least 20mm), as appropriate. Breathable lining membranes must be avoided behind the timber cladding where bat access gaps are provided.

4.0 Conclusions

A full bat and a nesting bird survey have been completed at Luccombe Manor Hotel by Graham Street (May/June 2022). The findings indicate use of the main hotel loft space by x1 Serotine bat (day roost) and opportunistically by x1 Whiskered/Brandt's Bat (brief visit). An active Jackdaw nest was also identified in the south-western corner of the loft (adjacent to the southern gable).

The proposals will involve replacing the existing two-storey, flat-roofed southern extension with a larger three-storey, pitched roof extension. The existing loft space (containing the bat roosts within the northern end), however, will be retained unaltered and therefore the identified roost sites will remain unaffected. With retention of the southern gable to the loft, any bats within the far side of the loft at the time are unlikely to be disturbed. The evidence suggests likely use of access gaps at the northern side of the roof, and therefore loss of gaps at the southern gable as a result of the extension is unlikely to affect bat roost access points.

In light of the predicted impacts, an EPS 'bat' license is not considered necessary to allow the proposed building work to proceed, in accordance with UK legislation.

Minimal precautionary mitigation measures, which aim to ensure bats are not affected by the work, have been proposed.

Additional mitigation measures are proposed to ensure any nesting birds are not harmed during the work, as required by UK legislation. Avoiding work during the nesting season (i.e. avoid March-August, incl) is the most effective measure to avoid impact, if possible.

Ecological enhancement measures are also proposed, including provision of additional suitable and accessible loft space for bats (with bat access opportunities through to the existing loft space), and creation of additional access gaps to crevices behind the proposed timber cladding on the eastern and western walls of the extension.

5.0 References

Collins, J (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn)*. The Bat Conservation Trust, London.

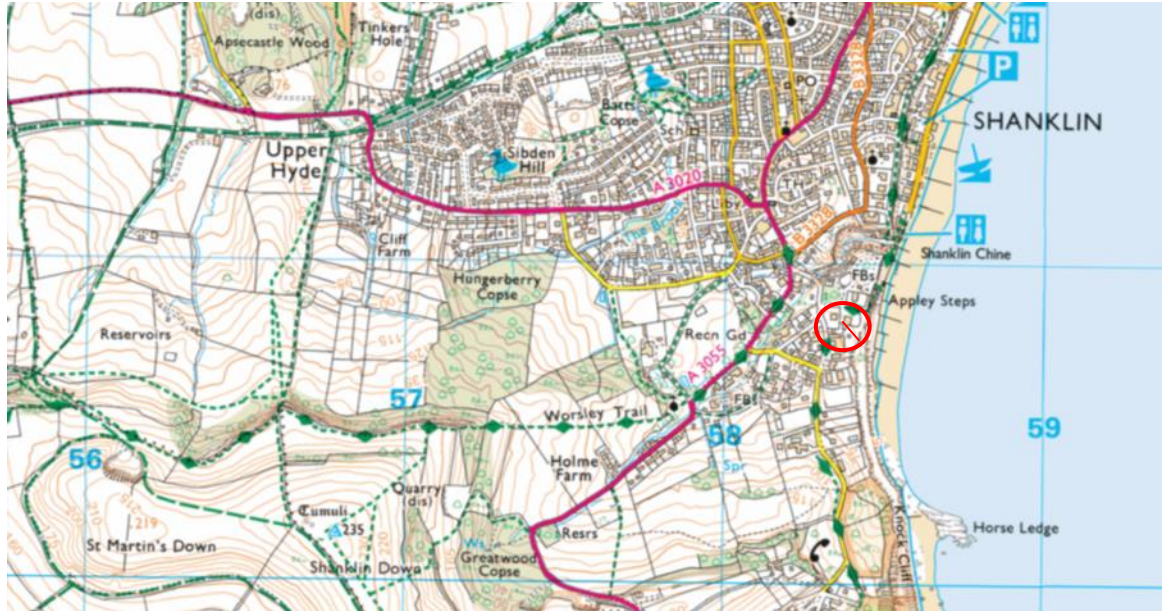
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Mitchell-Jones (2004). *Bat Mitigation Guidelines*. English Nature. Peterborough.

Wray S, Wells D, Long E, Mitchell-Jones T (2010). *Valuing Bats in Ecological Impact Assessment*. In Practice, no. 70, December 2010, pp 23-25. IEEM

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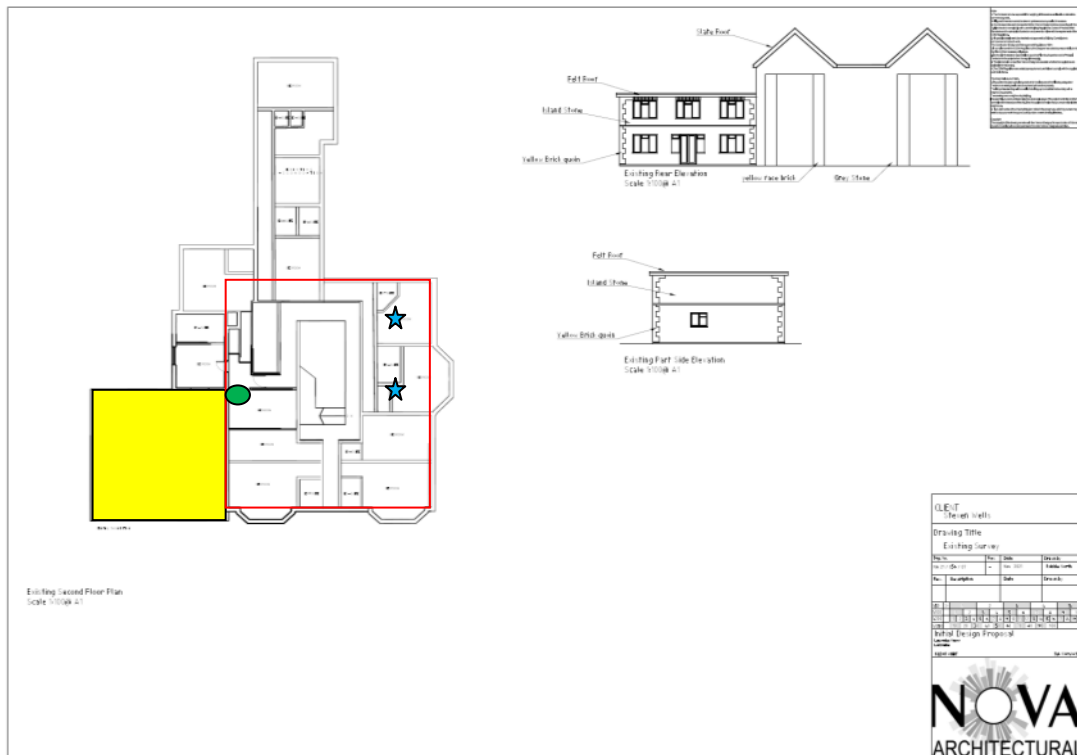
Map 1 – Site Location



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Luccombe Manor Hotel, Shanklin Isle of Wight

Map 2 – Bat/Bird Survey Summary Results



- Two-storey flat-roofed, southern extension (to be replaced with 3-storey, pitched roof extension)
- Approximate extent of loft space within complex pitched slate roof
- Location of identified bat roosts
- Location of active Jackdaw nest (May 2022), with adjacent access

Luccombe Manor Hotel, Shanklin Isle of Wight

Map 3 – Ecological Enhancements



- New uncluttered loft space, suitable for bats (breathable roofing membranes to be avoided), measuring approx. 1.8m height, 6.5m wide & 26m long.

- Bat access gap into loft space (via 15mm x 40mm gap at the eaves)

- Access hole at the top of the retained southern gable wall (at least 200mm tall/wide)

- Access gaps (15mm x 40mm) at the top of timber cladding, to allow bats access to crevices behind the cladding (breathable lining membranes to be avoided)

Appendix I

LEGISLATION RELATING TO BATS

All native species of bat in the UK are afforded full legal protection via:

- The Wildlife & Countryside Act, 1981 (as amended) (through inclusion on Schedule 5);
- The Conservation of Habitats and Species Regulations 2017 (as amended).

In summary, these legislative instruments make it an offence, with certain exceptions, to carry out the following:

- Damage/destroy a bat roost (breeding site or resting place);
- Deliberately kill, injure or capture bats;
- Deliberately disturb bats (whether in a roost or not);
- Intentionally or recklessly disturb bats while they are occupying a bat roost.
- Intentionally or recklessly or obstruct bat access to a roost site.

A bat roost may be any structure a bat uses for breeding, resting, shelter or protection. It is important to note that since bats tend to reuse the same roost sites, legal opinion is that a bat roost is protected whether or not the bats are present at the time.

Under The Conservation of Habitats and Species Regulations 2017, with respect to the *deliberate disturbance* offence, the legislation states that in particular this would be any disturbance which is likely –

- a) to impair their ability -
 - (i) to survive, to breed or reproduce, or to rear/nurture their young; or
 - (ii) to hibernate or migrate; or
- (b) to affect significantly the local distribution or abundance of that species.

The Wildlife & Countryside Act, 1981 (as amended) retains defences in law, in particular where *'the act was an incidental result of a lawful operation and could not reasonably have been avoided'*.

Also, under this legislation it is a defence to a charge of disturbing a Schedule 5 species if the action took place within a dwelling-house. This defence cannot be relied on, except in the living-area of a dwelling-house, unless Natural England have been notified and allowed a reasonable time to advise on whether the proposed operation should be carried out and, if so, the method to be used

(For full details and exact wording of the legislation refer to: The Habitats and Species Regulations 2017(as amended) and The Wildlife & Countryside Act 1981(as amended)).

Licences for development-related Activities

Where a lawful operation (e.g. development work which has full planning permission) is required to be carried out but which is likely to result in an offence under the Habitats Regulations 2017 (as amended), a licence may be obtained from Natural England to allow the operation to proceed. However, in accordance with the requirements of the Regulations, a licence can only be issued where the following requirements are satisfied:

- The proposal is necessary '*to preserve public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment*';
- '*There is no satisfactory alternative*';
- The proposals '*will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range*'.

Full planning permission is required to apply for a licence (where such a consent is necessary for the work to be carried out). In addition, a method statement which details the survey results, methodology of work to be undertaken, mitigation and compensation measures, must be submitted to Natural England with the licence application.

For those situations where a low impact is predicted, an application can be made to use the Bat Mitigation Class Licence (BLICL), subject to meeting the required criteria.

Bats which are Incidentally Discovered During Works

Where a satisfactory survey has resulted in no evidence of bats being found so that a licence is not deemed necessary, and bats are then incidentally discovered during building work, it is essential that work stops immediately and further advice is obtained from an ecologist/bat worker. An assessment should then be completed to determine whether the work could proceed without committing an offence. A licence should be applied for if it is not possible to avoid committing an offence.

Appendix II

Bat Survey Report (Graham Street, May/June 2022)

LUCCOMBE MANOR HOTEL
POPHAM ROAD
SHANKLIN
ISLE OF WIGHT
PO37 6RG

BAT SURVEY

MAY/JUNE 2022

BY

GRAHAM STREET

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LUCCOMBE MANOR HOTEL
POPHAM ROAD
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METHOD STATEMENT

BAT SURVEY

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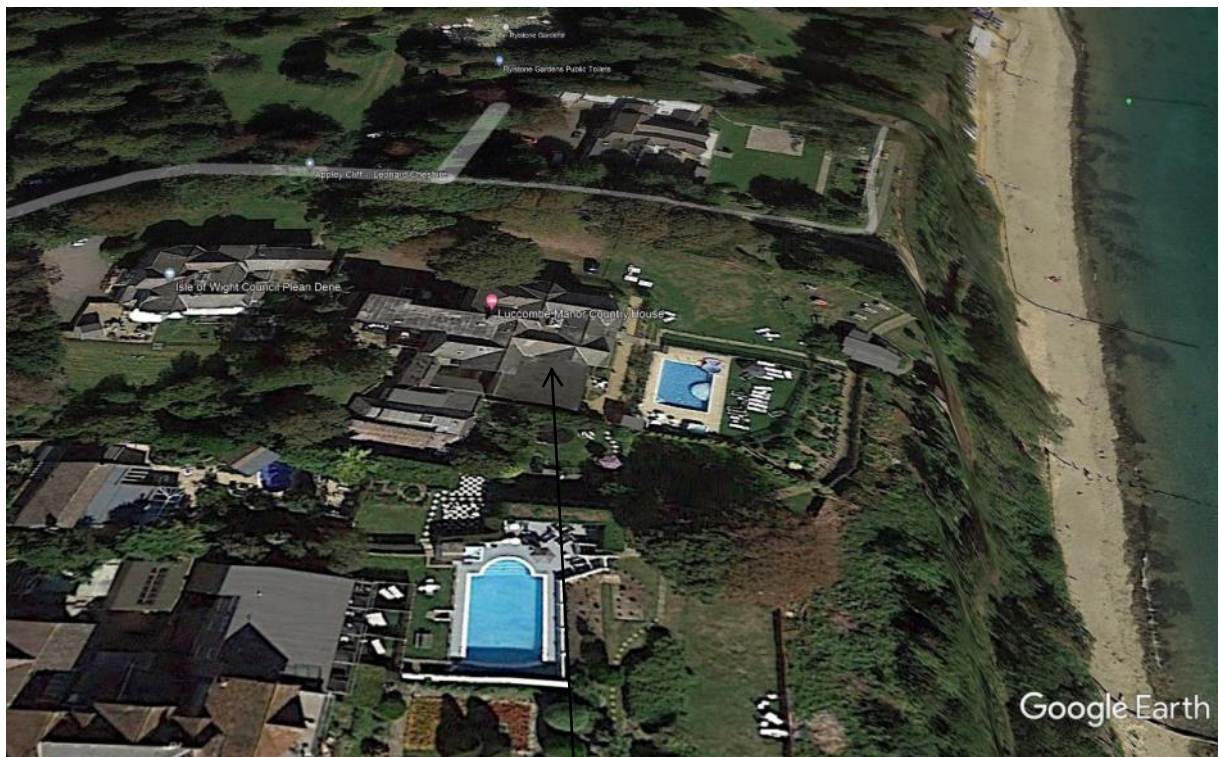
B INTRODUCTION

Report of external, internal visual bat surveys, two dusk time emergence bat surveys and a dawn return survey carried out at Lucombe Manor Hotel, Popham Road, Shanklin, Isle of Wight, PO37 6RG. Initial external and internal bat surveys were carried out on Wednesday 4th May 2022 with follow up internal loft space checks on, Friday 20th May and Friday 3rd June 2022, dusk emergence bat surveys were carried out on Wednesday 4th May and Friday 20th May 2022 and a dawn return survey carried out on Monday 6th June 2022.

A bat survey was requested Mr Steven Wells Director of Garden Isle Hotels who is planning to reconfigure the flat roofed two storey extension on the south side of the Lucombe Hall Hotel to a three storey extension with a different roof aspect.

C LOCATION

Lucombe Hall Hotel is located on the sea front cliff tops at Lucombe.



Google earth view of Lucombe Hall Hotel

D SITE DESCRIPTIONS

Luccombe Hall Hotel is a large Victorian Hotel stone block built with cavity walls and multiple pitched unlined natural slate roofs. A large two storey extension has been added to the west side of the original hotel it is stone block built with cavity walls and a bitumen covered flat roof. There is a smaller two storey extension that has been added to the south side of the original hotel it is stone block built with cavity walls and a bitumen flat felt roof. This two storey south side extension is the extension that Mr Wells is applying to re-configure into a three storey extension to give additional bedrooms this re-configuration will impact on the loft space to on the south side of the original part of the hotel.



External views of the hotel



View of the two storey extension that is to be re-configured and the area of the original hotel where it will be added to (photograph taken from on top of the roof of the two storey extension)

E SURVEY METHODOLOGIES

A visual external survey was carried out using Nikon Aculon hi powered binoculars; a visual internal inspection of the loft space of the hotel was carried out using a ladder, hand held and head torches. Dusk time emergence surveys and a dawn return survey were carried out using two surveyors per night/dawn using Elekon electronic M bat detector loggers.

F OBJECTIVES OF THE SURVEY

To determine whether bats are roosting internally or externally in any part of the surveyed hotel or have done so at any time in the past.

Buildings are used as roosting sites by a variety of different bat species at different times of the year for different reasons. Bats that commonly use buildings as roosting sites are Pipistrelle, Long-eared, Serotine, Noctule, Natterer's, Whiskered and Brandt's.

Visual evidence of bats may include live active bats, torpid (inactive) bats, dead bats or skeletons, dismembered insect remains (moth wings etc.), staining or scratch marks and/or droppings around holes in walls, staining or scratch marks and/or droppings around gaps between roof timbers, fascia boards, soffits, hanging tiles or on window sills, ledges, or any other flat surfaces.

G Bat Surveys

External survey

The original Victorian part of the hotel was checked visually from the ground using high powered binoculars looking for possible bat roosting sites or potential access points to roof space that would be affected by the re-configuration of the south side two storey extension, some of this could also be checked by accessing the top of the south side two storey extension via an adjacent bedroom window. There are a number of potential access points into the roof space in the area that will be affected by the re-configuration of the two storey extension. This area will be more thoroughly checked during the dusk and dawn surveys. There is no potential bat roosting on the south side two storey extension due to it being a flat roof and that all the fascia boards are tightly sealed to the external walls.

Although the proposed redevelopment of the two storey south side extension only directly affects the single south side gable end wall there are possible other bat access points between soffits and walls of the north side.



Potential bat roosting accesspoints on the south side gable end of the original building above the two storey south side extension that would be affected by the proposed development.



Possible other bat access points between soffits and walls of the north side.



Tight fitting fascia boards all around the south side two storey extension

Internal Survey

Wednesday 4th May 2022

All of the loft areas of the original Victorian part of the hotel were accessed through a single loft hatch, from this entrance all of the roof spaces could be walked around and inspected for evidence of bat occupation or evidence of past bat roosting activities. Generally the loft space is quite well lit due to a roof light window and the majority of the roof timbers are heavily cobwebbed laced although there are areas where it is free from cobwebs and is quite dark. It was in these areas that both old and new bat droppings were found on the fibre glass insulation and floor joists, a single Serotine

bat was found to be roosting in the roof timbers. No other roosting bats were found during this internal roof check.

It was then decided to carry out a second internal roof space check prior to the second dusk emergence survey to see if any other bats have joined the single original Serotine bat, this was carried out on Friday 20th May 2022, the original single Serotine was not found to be roosting anywhere in the roof space but a single Whiskered/ Brandt's was found to be roosting in another previously checked part of the roof space. This appears to be a visiting roof space visitor as there was not enough bat droppings on the fibreglass insulation to collect for DNA sampling and testing. A third internal roof space check was then carried out on Friday 3rd June 2022 prior to the dawn return being carried out on Monday 6th June 2022. Upon the this third internal roof space check it was found that both bats had vacated the previously inspected roof space and no bats were now roosting anywhere within the inspected roof space.



General views of the roof space



Views of old and new Serotine bat droppings

Position of bat droppings in roof space





View of roosting Serotine bat



View of roosting Whiskered/Brandt's bat

H Dusk/Dawn surveys

Luccombe Manor Hotel surveyor positions



Due to the large west side extension and outlying buildings it was impossible to cover all roof aspects therefore the surveyor positions were positioned to maximise cover of areas that would be affected by the proposed south side extension.

Surveyor 1 was actually on top of the two storey south side extension directly in front the south side gable end that will be affected by the proposed development. This was accessed via an adjoining bedroom window.



South side gable ends covered by surveyor 1 from on top of the south side extension



East side gables and north side covered by surveyor at position 2

Bat Emergence Survey Form

Site Name		Luccombe Hall Hotel
Date		04/05/2022
Surveyor names		Graham Street and Lewis Travis
Surveyor location		Positions 1 & 2
Sunset/sunrise time		20:29hrs
Survey start time		19:55hrs
Survey end time		22:00 hrs
Weather conditions		Clear Sky
Wind speed and direction		North westerly 10mph gentle breeze
Start Temperature		12 degrees centigrade
End Temperature		11 degrees centigrade
Equipment used		Elekon bat logger scanners
Time 24 (hr)	Frequency Khz	HNS=Heard Not Seen. EMD=Emerged, During Survey. Com=Commuting. FF=Forage and Feeding.
		Position 1 Graham Street
20:43	48	Passing single Common Pipistrelle bat to west of position 1
2045-20:52	48	Foraging and feeding single Common Pipistrelle bat along tree line to west of position 1
21:22	48	HNS
21:30	46	HNS
		No further bat activity was recorded after this time and no bats emerged from the building at this position during the survey
		Position 2 Lewis Travis
20:55	46	Foraging single Common Pipistrelle bat along hedgerow adjacent to position 2
20:58	47	Foraging single Common Pipistrelle bat along hedgerow adjacent to position 2
21:15 - 21:22	48-50	A number of recordings all HNS possibly bats along hedgerow
21:29	49	HNS
		No further bat activity was recorded after this time and no bats emerged from the building at this position during the survey

Bat Emergence Survey Form

Site Name	Luccombe Hall Hotel	
Date	20/05/2022	
Surveyor names	Graham Street and Lewis Travis	
Surveyor location	Positions 1 & 2	
Sunset/sunrise time	20:53hrs	
Survey start time	20:25hrs	
Survey end time	22:30 hrs	
Weather conditions	Partial Cloud	
Wind speed and direction	North easterly 15mph moderate breeze	
Start Temperature	14 degrees centigrade	
End Temperature	12 degrees centigrade	
Equipment used	Elekon bat logger scanners	
Time 24 (hr)	Frequency Khz	HNS=Heard Not Seen. EMD=Emerged, During Survey. Com=Commuting. FF=Forage and Feeding.
		Position 1 Graham Street
21:13	48	Foraging and feeding single Common Pipistrelle bat along tree line to west of position 1
21:15-21:22	48	Foraging and feeding single Common Pipistrelle bat along tree line to west of position 1
21:25	48	HNS
21:30	46	HNS
		No further bat activity was recorded after this time and no bats emerged from the building at this position during the survey
		Position 2 Lewis Travis
21:15	46	Foraging single Common Pipistrelle bat along hedgerow adjacent to position 2
21:25	47	Foraging single Common Pipistrelle bat along hedgerow adjacent to position 2
21:32	48	Commuting bat from hedgerow travelling eastwards
21:42	38	HNS possibly Myotis bat
21:44-21:47	47	Several HNS readings
		No further bat activity was recorded after this time and no bats emerged from the building at this position during the survey

Bat Emergence Survey Form

Site Name	Luccombe Hall Hotel	
Date	06/06/2022	
Surveyor names	Graham Street and Lewis Travis	
Surveyor location	Positions 1 & 2	
Sunrise time	04:54hrs	
Survey start time	03:15hrs	
Survey end time	05.25 hrs	
Weather conditions	Partial Cloud	
Wind speed and direction	North easterly 13mph moderate breeze	
Start Temperature	13 degrees centigrade	
End Temperature	14 degrees centigrade	
Equipment used	Elekon bat logger scanners	
Time 24 (hr)	Frequency Khz	HNS=Heard Not Seen. EMD=Emerged, During Survey. Com=Commuting. FF=Forage and Feeding.
		Position 1 Graham Street
03:50	44	HNS Common Pipistrelle bat
03:58	45	HNS Common Pipistrelle bat
04:05	45	HNS Common Pipistrelle bat
04:11	46	HNS Common Pipistrelle bat
04:25	46	HNS Common Pipistrelle bat
		No further bat activity was recorded after this time and no bats returned to the building at this position during the survey
		Position 2 Lewis Travis
03:27-03:36	45-48	HNS six recordings of single common Pipistrelle bats
03:46-04:11	47	Foraging single Common Pipistrelle bat along hedgerow adjacent to position 2
04:20-04:38	48	Foraging single Common Pipistrelle bat along hedgerow adjacent to position 2
21:42-04:46	44	HNS Several more recordings of Common Pipistrelle bat possibly other side of hedgerow
		No further bat activity was recorded after this time and no bats returned to the building at this position during the survey

I Bat Survey summary

A single Serotine and a Whiskered/Brandt's bat were seen during the internal roof space checks although they were only there on single occasions, taking this into consideration and the evidence in the form of Serotine bat droppings within the roof space it was decided that a mitigation strategy would be needed for the re-configuration of the two storey south-side extension. It is important to note that both the Serotine and Whiskered/Brandt's bat found in the loft space along with the droppings are not in the area where the extension to the building is to be undertaken.

J Legislation

All eighteen native species of British bats and their roost sites are fully protected by

The Wildlife and Countryside Act 1981 (as amended) (through inclusion on schedule 5):

The Conservation (Natural Habitats & c) Regulations 1994 (The Habitats Regulations) which implements the EC Directive 92/43/EEC in the UK

In addition, The Countryside & Rights of Way (CROW) Act 2000, has amended the Wildlife & Countryside Act 1981

Taken together, these legislations make it illegal to:

Intentionally or deliberately kill, injure or capture bats;

Deliberately disturb bats:

Recklessly disturb roosting bats or obstruct access to their roosts;

Recklessly damage or destroy bat roosts;

K References

Bat Conservation Trust. *Bat Surveys – Good Practice Guidelines*. Bat Conservation Trust, London.

Greenaway, F. & Hutson, A.M. (1990). *A Field Guide to British Bats*.
Bruce

Coleman Books, Uxbridge.

Mitchell-Jones, A. J. (2004). *Bat mitigation guidelines*. English Nature,
Peterborough.

Natural England Bats in Traditional Buildings

Appendix

During the internal roof space surveys an active Jackdaws nest was found with two chicks. These chicks had fledged and left the nest by the time the last internal check was carried out on Friday 3rd June 2022. Access by the adults is unclear as they were not seen entering or exiting the roof space but it is assumed they enter under flashing up into where nest is located which is just inside the south gable end wall above the south side flat roof extension. Consideration should be taken into account if and when building work commences. Work must not start if there is an active nest within the loft space as active birds nest of any species are protected by law under the Wildlife and Countryside act of 1981.



Jackdaw chicks in the nest



possible entry point of adult Jackdaws

Bat survey carried out by Graham Street
Natural England License number 2015-13350-CLS-CLS