

# ECOLOGICAL METHOD STATEMENT (BATS)

## *For Breckey Ley, Nowton, Suffolk*

### **SECTION A: SITE DETAILS**

**Site Name:** Breckey Ley, Nowton, Bury St Edmunds, IP29 5LT,

**Planning Reference Number:** DC/22/0105/FUL

**Grid Ref:** TL 86332 62346

**Client:** Mr. Graham Snudden, Peacock House, Little Whelnetham, Suffolk, IP30 0DG

**Agents:** Ms Holly Galbraith - Niall McLaughlin, Architects, Bedford House, 125-133 Camden High Street, London, NW1 7JR

**Licenced Ecologist:** Sue Morgan, ECol, CEnv, Natural England Licence holder Class Licence CL18  
Registration number: 2015-11320-CLS-CLS for the surveying & handling of bats in all counties of England.

**Location:** Nowton, Suffolk

**Proposed Works:** - a. single dwelling, b. demolition of the Dower House, c. single storey workshop with covered parking, d. orangery, e. installation of a LZC ground source heat pump, f. new landscaping including tree planting, driveway, two natural ponds and infilling a disused outdoor pool, g. alterations to the residential curtilage.

**Planning Officer:** (if known): Amey Yuill, Senior Planning Officer. West Suffolk Council.

## **SECTION B: DETAILS OF INTEREST/FEATURES**

A Bat Scoping Survey of The Dower House was conducted in July 2021. This survey found evidence of at least two bat species: brown long-eared bat (*Plecotus auritus*), and *Pipistrellus sp.* There was evidence in the form of 100+ old droppings of brown long-eared bat in the loft areas of the northeast, southeast, and southwest gables of the main house roof (predominantly to the southwest and southeast), and (30 + old droppings) of *Pipistrellus sp.* in the large loft area above the extension to the north.

Following this discovery, a series of three bat activity surveys were undertaken between July and August 2021 to inform the clients of any potential mitigation for the proposed works to proceed without committing an offence. The surveys were conducted following industry guidelines<sup>1</sup> and consisted of one dusk and two subsequent dawn surveys.

During the activity surveys the following species were recorded and/ or seen by surveyors within the grounds: common pipistrelle (*Pipistrellus pipistrellus*), noctule (*Nyctalus noctula*), unidentified *Myotis sp*, brown long eared bat, serotine (*Eptesicus serotinus*), and soprano pipistrelle (*Pipistrellus pygmaeus*).

Pipistrelle bats foraged to the fore of the southeast (rear) elevation, flying back and forth over the lawned area and between the bordering trees. From observations on the dawn surveys indications are there is a common pipistrelle roost beyond the site to the northeast.

Brown long-eared bats foraged close to the house on the one dusk survey – feeding among vegetation to the southeast garden area, and one individual was recorded on the second dawn survey. Both noctule and serotine were recorded in the distance on both dusk and dawn surveys. Unidentified *Myotis sp* was recorded within the grounds to the south/southwest on the dusk survey. No bats were observed emerging from or re-entering The Dower House.

Due the detection of droppings within the loft areas during the scoping survey, Song Meter SM4BAT ZC Bioacoustics recorder were left in the loft areas at the height of the season. Subsequent sound analysis revealed no evidence of bat registrations.

The loft was also re-checked internally prior to the dusk survey and after the second dawn survey and there appeared to be no fresh droppings on insulation material, or any evidence of roosting bats.

---

<sup>1</sup>Bat Surveys for Professional Ecologists Good Practice Guidelines, Bat Conservation Trust, London, 2016.

### Summary of Survey Findings:

This total lack of registration, together with any evidence of bats emerging or re-entering the building on any survey lead to the conclusion in 2021 that the droppings were historic, and that was no longer bat presence within.

Based on the above, no further surveys or European Protected Species (EPS) licence of derogation will be required for the proposed works to proceed.

However, as there is a strong bat presence within the grounds, and bats have been using The Dower House in the past, this Bat Method Statement (BMS) detailing all working methods and timings has been prepared by a Suitably Qualified Ecologist (SQE) to allow works to be carried out without an EPS licence. Please see the requirements for this site within. This BMS has been prepared in order to fulfil Condition 11 of Planning Permission:

11 Prior to commencement a Bat Method Statement shall be submitted to and approved in writing by the local planning authority. This will contain precautionary mitigation measures and/or works to reduce potential impacts to bats during the construction phase.

The measures and/works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter.

Reason: To conserve Protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (Priority habitats & species) as updated by the Environment Act 2021 and to ensure that the land is used in such a manner as to improve its ecological and nature conservation value, in accordance with policies DM11 and DM12 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 15 of the National Planning Policy Framework and all relevant Core Strategy Policies. This condition is required to be agreed pre-commencement as it is essential that these details are agreed prior to any works taking place.

## **SECTION C: MITIGATION PLAN SUMMARY**

*Summary of Mitigation Measures to be implemented (please answer YES/NO for relevant techniques)*

Avoidance of harm through best practice YES

Measures to deter individuals from location NO

Capture and translocation of individuals UNLIKELY

Controlled destruction of place of shelter (incl. breeding sites) NO

Replacement of place of shelter/breeding site NO (but new roost provision is to be made).

Habitat enhancement measures YES

EPS/NE Licence Required for Works NO

## **SECTION D: BIODIVERSITY MITIGATION METHOD STATEMENT**

*Please list as bullet points key mitigation measures that must be applied to avoid harm to protected species.*

- Prior to demolition works commencing, a Natural England Licenced Ecologist must inspect all areas of previous bat presence to ensure that no bats are present.
- Prior to works commencing a 'Toolbox talk' is to be given by the ecologist to ALL contractual personnel working on the lodge. This talk (detailed in the appendix) will outline the European and UK legislation regarding bat species, and the relevant health issues, as well as the correct working methodology.
- The ecologist will remain on site until the roof of The Dower House and all areas of potential bat occupation have been checked prior to demolition to ensure that best practice measures are implemented.

**SECTION E: BIODIVERSITY COMPENSATION AND ENHANCEMENT MEASURES**

*Please summarise any biodiversity compensation / enhancement measures to be secured in accordance with PPS9 and Section 40 of the NERC Act 2006.*

**4 new bat boxes are to be installed across this site:**

1 x 1FQ Schwegler Bat Roost (For External Walls) to be installed on the south east elevation of The Stables Block. Both the bat box and its proposed location are below.



3 x Schwegler Bat Box 2F (universal) are to be installed on trees within the site area. These trees and the bat box are illustrated below.



Bat Box 2F

2 bat boxes to be installed on the Monolith to the east site boundary and 1 bat box on the Corsican pine (*Pinus nigra*) T068 on FLAC tree survey<sup>2</sup> situated to the south east.



Bat boxes can be installed at any time of year, but they are more likely to be used during their first summer if they are put up before the bats emerge from hibernation in the spring.

All bat boxes should be positioned at a height of 3-6 metres (the higher the better) in an open, sunny position (6-8 hours of direct sunlight, or in a location where it receives the morning sun, ideally at least 4 m above the ground (where safe installation is possible). They should be positioned away from artificial light sources (to protect them from predation) and sheltered from strong winds. They should be exposed to the sun for part of the day (usually south, south-east or south-west).

### **Bat loft to be constructed in the Stables Block**

A new bat loft is to be created in the Stables Block building situated to the west site boundary.

The construction of this loft will be checked by the EcoW on site. Please see details in the diagram below, and please see location of all bat mitigation measures on the plan below.

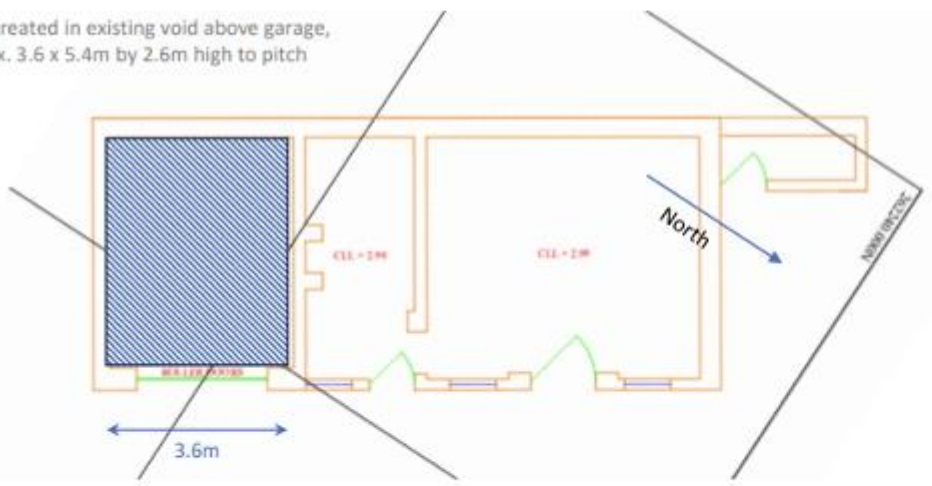
---

<sup>2</sup> Land off Nowton Road, Baseline Tree Survey BS5837:2012, - RAVEN Veteran Tree Identification. *FLAC Instruction ref:* CC41-1007, March 2021.





Bat loft created in existing void above garage, approx. 3.6 x 5.4m by 2.6m high to pitch

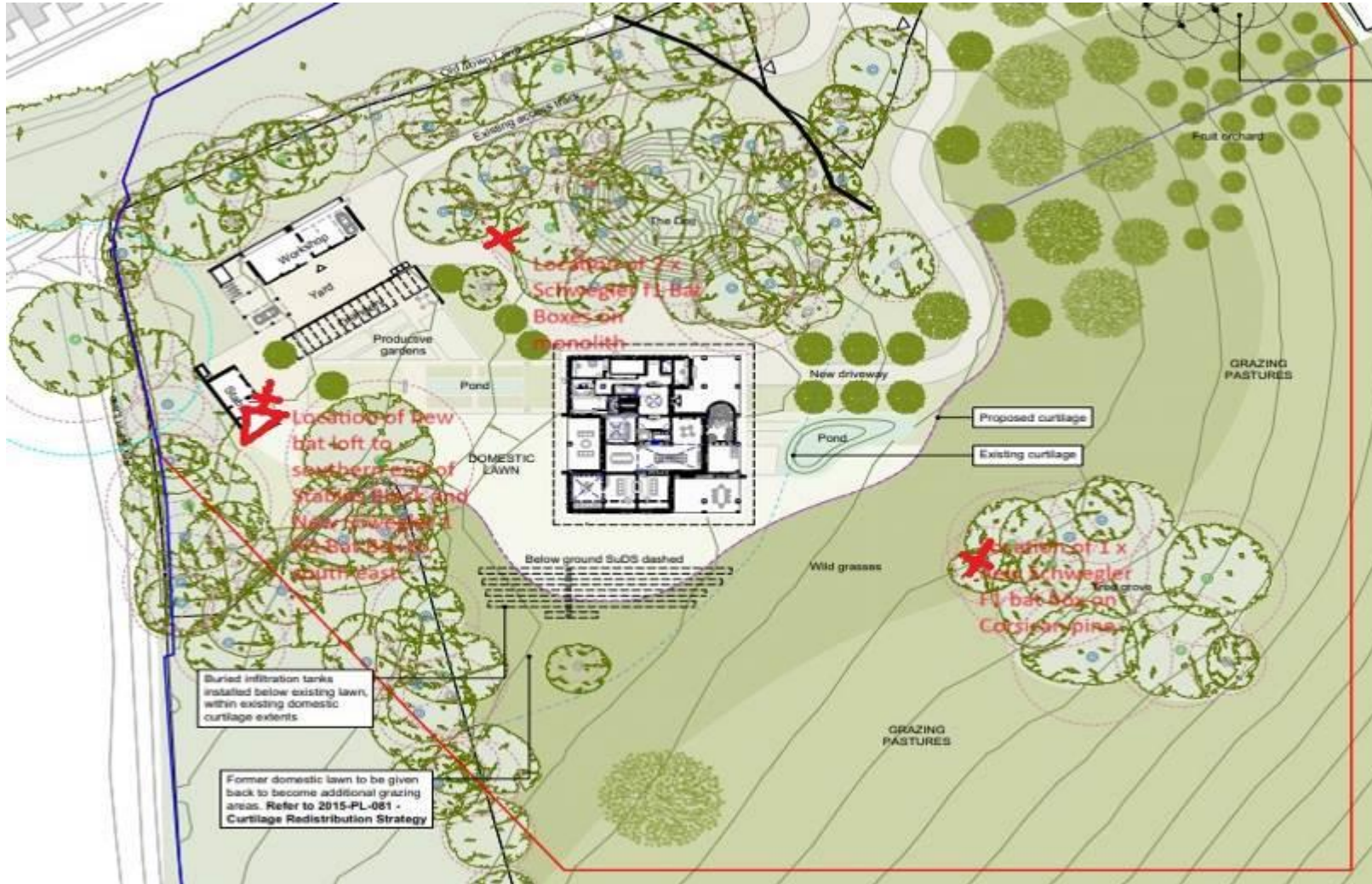


Proposed bat loft to be installed in existing stable block at Breckey Ley.

Graham Snudden 2<sup>nd</sup> November 2023



Locations of proposed Bat Mitigation superimposed on existing works plan (Copyright Niall McLaughlin Architects).





## Lighting

Lighting a known bat roost or disrupting a bat foraging or flight line areas is an offence. External lighting should be kept to a minimum on this site, as bats are known to be using it for commuting and foraging as well as roosting.

Any proposed lighting on the site, either for security during the construction phase, or as part of the finished development, must consider the guidelines pertaining to Bats and Lighting, particularly as the site is a known bat commuting/foraging bat area.

The brightness of a full moon is around 0.27 lux and of a perfect starry night on a new moon is around 0.001 lux. We believe that most bat emergence is from around 1 lux for late emerging species to 14 lux for those that emerge earlier.

To avoid contravening the Wildlife & Countryside Act (1981) we are required not to disturb bats. This could include directly illuminating either their roosts or the paths they follow to their feeding grounds as from past research we know that the majority of species of bat in this country avoid illuminated areas.

Particular care has been given to the accompanying external lighting plans for this site<sup>3</sup> both of which have been checked by a licenced bat ecologist.<sup>4</sup> Please see accompanying documentation, including the CEMP<sup>5</sup> for this site which stipulates the times of use for all lighting used in the three phases of this project.

## Timber treatments

Any timber treatments that are required will follow guidelines published by Natural England. The appointed EcoW will advise accordingly. Permethrin and cypermethrin compounds are the most 'bat friendly' wood treatments currently available. A List of approved timber treatments will be supplied to both the client and contractors by the EcoW.

---

<sup>3</sup> 1517 – Breckey Ley, External Lighting Report, Skelly & Couch Ltd, Rev 2.0 / 14/01/2022. Breckey Ley, Proposed Garden Lights, Luke Heydon Gardens, Drawing No: 001 Lights, 06/11/23.

<sup>4</sup> Sue Morgan, ECol, CEnv, Natural England Licence holder Class Licence CL18 Registration number: 2015-11320-CLS-CLS for the surveying & handling of bats in all counties of England.

<sup>5</sup> Construction Environmental management Plan, Breckey Ley, Anglian Ecology, November 2023.

## Scaffolding

All areas of The Dower House which could potentially provide bat roosting must be checked by the EcoW prior to scaffolding being used in the demolition process.

## Non-bitumen-coated roofing membranes (formerly known as breathable roofing membranes).

The current advice<sup>6</sup> is that when roofing felt is to be installed in a roof that could potentially be used by bats, then only bituminous roofing felt that does not contain polypropylene/polyethylene filaments should be used. An example is bitumen felt type 1F, which is hessian reinforced. Bituminous felt is dark-coloured, with a rough surface that bats can grip onto and will help maintain a suitable and safe environment for bats within the roof structure. Sarking boards may be an alternative to bituminous felt.

Non-bitumen-coated roofing membranes (formerly known as breathable roofing membranes, modern roofing membranes, BRMs or MRMs) should not be installed into a roof that is used or is likely to be used by bats as these are made from spun-bond polypropylene/polyethylene filaments. The long fibres that make up non-bitumen-coated roofing membranes can be pulled out by roosting bats and pose an entanglement threat to the bats.

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).

---

<sup>6</sup> Natural England's free advice service: <https://www.bats.org.uk/advice/im-working-on-a-building-with-bats/getting-personalised-advice/free-bat-advice-service-england>

**SECTION F: DECLARATION (N.B. TO BE FILLED IN BY APPLICANT)**

I hereby confirm that the measures set out in this biodiversity mitigation plan will be completed in full. ....

Applicant Name (Print): Or Agent Name (Print): Date (DD/MM/YYYY): .....

## **APPENDIX**

### EXAMPLE OF TOOLBOX TALK TO BE GIVEN ON THIS SITE

Contents of Toolbox talk to contractors.

#### 1. Health issues

Contractors must be made aware of:

1. The health and safety issues with regard to air borne particles of bat droppings and bat urine (possible risk of gastro-intestinal infection through hand-to-mouth transfer).
2. The possible health risks associated with European Bat Lyssavirus (EBL) from a bite or scratch from an infected bat, or if saliva or nerve tissue from an infected bat gets into a person's eye or comes into contact with mucous membranes.
3. The importance of wearing gloves at all times when handling or disposing of a dead bat.
4. The correct methods of disposal of dusty dry materials which may contain bat droppings, i.e., carefully wetting dust with water spray to reduce the amount of dust aerosolised, or the use of an industrial vacuum cleaner with a high-efficiency filter to bag contaminated material.
5. Never pick up or touch a live or dead bat without wearing gloves.

#### **What is rabies?**

Rabies is an infection caused by a virus, of which there are different types.

In humans, the virus usually enters the body through a bite and travels up the nerves to eventually infect the brain. Once established in the body it is almost always fatal.



## **What are European Bat Lyssaviruses (EBLV)?**

EBLV are related to but different from the virus that causes 'classical' rabies (found in foxes and other animals in Europe). There are two types of EBLV with Type 1 being more common. Unlike the 'classical' rabies virus, it is very rare for EBLV to infect animals other than bats.

In some parts of Europe, mainly in the Netherlands, Spain, Denmark, and Germany, about 700 bats have been confirmed as infected with EBLV (almost exclusively Type 1) in the last 25 years.

In the UK, the Veterinary Laboratories Agency has tested more than 6000 bats over the past 15 years and found only six with EBLV.

The first was from East Sussex in 1996 although it may have come from outside the UK. The most recent was in Shropshire in 2007.

All were Daubenton's bats with Type 2 EBLV. EBLV has not been found in the UK in Daubenton's bats rarely roost in houses. More work is being carried out to find out just what proportion of bats does actually carry the virus in the UK.

## **What should you do if you are in contact with a bat?**

If you have been bitten or scratched by a bat you should immediately wash the wound with soap and water. This alone is very effective in reducing any risk, but you must also seek medical advice to see whether additional treatment is required.

If you have already been vaccinated, you may be given booster injections.

If you have never been vaccinated, you may need to immediately start a course of vaccinations. In cases where doctors consider that there is a high risk of developing infection, they may give you rabies immunoglobulin injections for additional protection.

Wherever possible you should keep any bat that has bitten or scratched you or someone else. It might be necessary to have it tested for EBLV, particularly if it has been showing any signs of illness or unusual behaviour.

Any bat suspected to be infected with EBLV must, by law, be reported to the Animal Health Divisional Office duty vet.

## 2 Legal obligations

Contractors must be made aware of:

- a. Their legal obligations regarding the discovery of a Protected Species during the course of works.
- b. How to recognise bat droppings, likely species present.
- c. The importance of contacting a licenced bat ecologist should bat(s) be found during works, and the fact that all work must stop on such an occurrence.

## 3 What to do if bats are found on site.

- a. Contractors must be made aware of:
- b. Never pick up or touch a bat without wearing gloves.
- c. Phone the Licenced Bat Ecologist for the Site.

In warm weather, active bats are likely to fly off promptly because of the disturbance, although bats generally do not appear to have a 'flight' response like birds and may stay in the roost site unwilling to move.

Bats disturbed in cold conditions, when they are using torpor to conserve energy, will not move at all, and may appear dead. A bat in deep torpor can drop its heart rate to four beats a minute and may only take one breath a minute.

Ideally, both active and torpid bats should be captured and transferred into shelter, such as a bat box fixed to a tree, in a safe area nearby.

Where possible it is best to avoid bats flying off in the day as they may fall victim to birds of prey. However, if there are other trees nearby with suitable roosting opportunities, they may already know of a suitable alternative roost site, although it is always advisable to try and track where they fly, because this may also be a site affected by possible tree works in the future.

Where bats are found outside a roost, they should be transferred to a suitable place of shelter as soon as possible. If bats need to be retained temporarily until a licensed bat expert can arrive on site, it is important to ensure that they are kept in a secure, quiet place that will not overheat.

Bats must be kept safely and securely (e.g., from predators or from the general public) even though they may be unattended for a time while operations continue.

Bats are very fragile, please handle them carefully, it is usually best to cover them with a light weight cloth, then using a gloved hand, pick them up, and place them in a receptacle which can keep them secure but still allows air for them to breathe.

If there is a significant delay (of over an hour) until the ecologist arrives then, especially in hot weather, it is important to place water in with the bat. This can be done by either soaking a small amount of porous material – such as sponge, or by filling a tiny milk- carton top sized container and placing this in with the bat(s).

If possible, re-cover the bat or leave it alone, and work away from the area altogether, or if necessary, stop all work on site.

#### 4 Method of working on site.

- a. Ensure there are no bats present in any areas of the proposed works (ask an ecologist if you are unsure).
- b. If working near *large* piles of droppings wear the standard facemasks as issued to avoid inhalation.
- c. Work carefully and slowly around areas where visibility is limited such as eave edges and crevices at timber joins.
- d. Always check for potential bat presence in cavities, which should then be temporarily blocked if bats are absent, or fitted with an appropriate exclusion device if there is uncertainty.
- e. Be aware that smallest bats can enter a gap just 8 mm wide. Crevice-dwelling bats can crawl into their roosts via small gaps in the range of 15 -20 mm high by 20 – 50mm wide.

Further information

Bats usually enter a building at points between from 2 - 7m.

Roof-void dwelling bats typically need timber joists or beams on which to roost.

If any chemicals are used, they must be from the Natural England approved list (TIN092) and need to be applied with care in the appropriate fashion (largely 'painted' on). A copy of this list is available from the ecologist.

**The Contact Details for the site ecologist are:**

**Sue Morgan Tel: 07753 406866 / 01379 388030.**

**Email: [suemorgan06@hotmail.com](mailto:suemorgan06@hotmail.com)**

Site Name: Breckey Ley, Nowton, Suffolk

To comply with the recommendations Sue Morgan (Natural England Licence Holder for the Surveying & Handling of Bats Number 20112718) will act as EcoW for this site on:

Date(s) of site visit(s) .....20...

.....

.....20...

Toolbox Talk Given To:

Site Manager

DOCUMENT ENDS.