

20 April 2023

John Parker c/o Ken Gorman
KPG Design Associates
Festival House
Jessop Avenue
Cheltenham
GL50 3SH

Dear Mr Parker,

**Preliminary Roost Assessment – Barn at Harpers Farm, Ashleworth, Gloucestershire,
GL19 4JG**

I am writing to provide you with a short, written report of my survey findings at the above site on 20 March 2023. The site is centred on Ordnance Survey grid reference SO 813 260. I am a licensed bat surveyor (Natural England licence: 2023-11106-CL17-BAT). I used the following equipment during the survey: telescopic ladder, high-powered torch with red filter, binoculars and collecting pots for droppings.

Access to the entire site was made available and no significant survey limitations were encountered. Weather conditions on the date of survey were cloudy with a slight breeze, the maximum daytime temperature was 12°C.

I understand the development proposals are for the conversion of the barn into single-storey student accommodation.

Legislation:

Bats are a European Protected Species (EPS), and are listed in Annex IV of the EC Habitats Directive 1992, which affords strict protection to bats and their roosts. Actions and activities that are prohibited are:

- deliberate capture, injury or killing of a bat;
- deliberate disturbance of a bat and in particular disturbance which is likely to; impair their ability:
 - to survive, to breed or reproduce, or to rear or nurture their young, or

- to hibernate or migrate; or
- to affect significantly the local distribution of abundance of the species to which they belong.
- damage or destruction of a breeding site or resting place (even unoccupied); and
- possessing, controlling, transporting, selling or exchanging, or offering for sale or exchange, any bat or any part of a bat or anything derived from one.

Results:

Area / Feature	Observations
Barn at Harpers Farm	<p><u>External Description:</u></p> <p>The Barn at Harpers Farm is a single-storey structure of breezeblock construction, with a pitched roof overlain with clay tiles. Timber cladding is present on the external northern and southern gable end walls.</p> <p>The breezeblocks are in good condition with mortar intact, presenting no opportunities for roosting bats.</p> <p>Ridge tiles are lifted at both gable ends and there is missing mortar between and underneath tiles along the length of the ridge. There are numerous lifted, missing and slipped slope tiles which provide a suitable niche for crevice dwelling bats such as pipistrelles (<i>pipistrellus</i> sp.).</p> <p>There are several gaps between the overlapping timber cladding at the northern and southern gable ends. Open gaps show that the wall is lined with a breathable membrane between breezeblocks and cladding. No signs of bat related activity (e.g., droppings) were observed in association with any of the gaps. Cobwebs were present on some of the gaps.</p> <p>Eaves are open on all aspects of the building, and there are doorway openings in the northern and eastern walls which provide access points for bats into the internal area.</p>



Plate 1: typical view the Barn at Harpers Farm. Photograph looking east.



Plate 2: gaps in the mortar of ridge tiles.

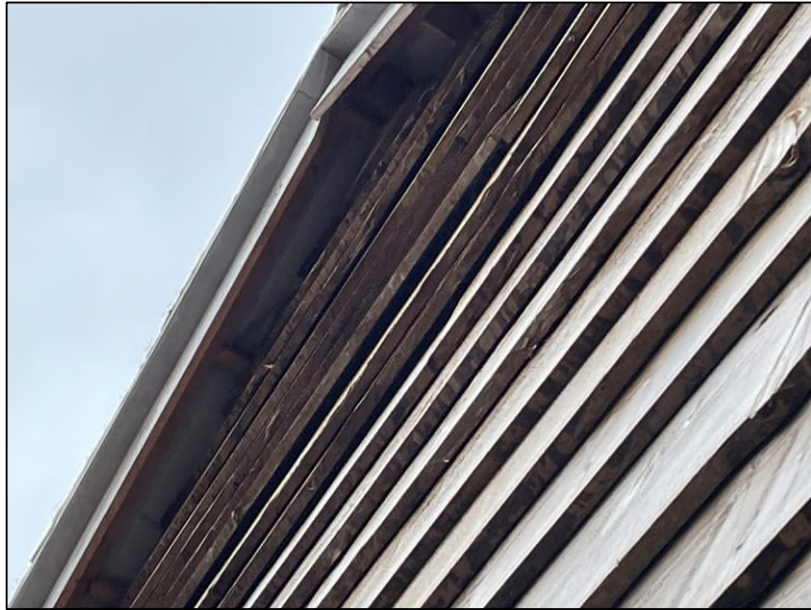


Plate 3: open eaves and gaps in timber cladding.

Internal Description:

The internal area of the barn is approximately 150m² and is open to pitch. The roof is lined with a breathable membrane, there is a trussed roof structure and timber rafters are exposed. Timber rafters are in good condition, with no gaps observed between joists. Old bird nesting material was observed within the roof structure.

The internal wall structure comprises breezeblocks on all elevations, with chipboard at the gable ends of the roof. The mortar between the breezeblocks is in good condition, with no cracks or crevices.

The barn has high light levels due to the wall openings on the northern and eastern elevations. Conditions are draughty and damp, indicating that the barn is susceptible to adverse weather conditions.

No obvious signs of bat roosting activity were observed inside the barn.



Plate 4: typical view inside the barn.



Plate 5: roof structure including chipboard gable end wall, trussed rafters, and breathable membrane lining.

Foraging / Commuting Habitat Potential			
High quality semi-natural habitats	Within immediate vicinity (<250m)	Within wider landscape (<2km)	Comments
Broadleaved/mixed woodland Waterbodies Tree lines/stands Mature hedgerows	<input type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	Harpers Farm is located off Nup End Lane in Ashleworth. The surrounding habitat comprises agricultural fields connected via mature hedgerows providing suitable linear features for commuting and foraging bats and connectivity to the wider landscape. A pond is located 100m north-east of the barn presenting additional foraging opportunities. The River Severn is located within 1km south-east; offering further high-quality habitat within the wider landscape.
General Landscape Character	Agricultural		
Negative Characters		Positive Characters	
Highly urbanised environment <input type="checkbox"/> Night lighting (significant) <input type="checkbox"/> Isolated from high-value habitat <input type="checkbox"/> Modern building construction <input type="checkbox"/> Human disturbance (significant) <input checked="" type="checkbox"/> High exposure (altitude, prevailing winds) <input type="checkbox"/> Nearby buildings modern or isolated <input type="checkbox"/>		Rural environment <input checked="" type="checkbox"/> Absence of night lighting <input checked="" type="checkbox"/> Good connectivity to high-value habitat <input checked="" type="checkbox"/> Building construction suitable for bats <input checked="" type="checkbox"/> Absence/Minimal human disturbance <input type="checkbox"/> Low exposure (altitude, prevailing winds) <input checked="" type="checkbox"/> Cluster of suitable old buildings <input checked="" type="checkbox"/>	
Other <input type="checkbox"/> specify		Other <input type="checkbox"/> specify	
Conclusion: (Collins 2016)	High - Continuous, high-quality habitat that is well connected to wider landscape, that is likely to be used regularly by commuting/foraging bats.		

Conclusion:

Conclusion – Building Suitability for Bats (see Collins 2016)	
Barn at Harpers Farm	Moderate - A structure with one or more potential roost sites that could be used by bats on a regular basis.

A detailed internal and external inspection of the Barn at Harpers Farm has identified various potential roosting features (PRFs) for bats. The barn is located within an agricultural setting with high-quality foraging and commuting habitat (agricultural fields, tree lines, hedgerows, ponds) in the immediate surrounding area.

The external PRFs (under roof tiles, under timber cladding) are considered to offer **moderate potential** for roosting bats (with reference to Collins, 2016). The internal barn area offers sub-optimal roosting conditions for bats, due to the large open entrances making the barn

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susceptible to high light levels, weather effects, and temperature changes. In addition, the barn is currently used for storage and human disturbance levels are high throughout the working day.

On account of the proposed barn conversion requiring only internal works that are not due to affect external PRFs and the unsuitable condition inside the barn for roosting bats, the likelihood of the proposals resulting in an offence under wildlife law, is considered to be **negligible**, provided a precautionary approach (below) is followed. However, should proposals change and work to the external roof structure be required, further survey work is likely to be required to confirm presence/absence of roosting bats.

During the survey, evidence of nesting birds was recorded within the internal roof structure of the barn. As such, precautionary measures have been detailed below to help mitigate and compensate for potential development impacts on nesting birds.

As development proposals are for the conversion of an existing building, remaining inside the existing footprint, and no habitats are due to be impacted, a Biodiversity Net Gain Assessment is not considered to be applicable for this site.

Recommendations:

The following recommendations are made to ensure compliance with wildlife legislation, government guidance and best practice.

1. No further presence/absence surveys are required to support the planning application for this site as the potential for bats to occur and significant impacts to arise during works is considered to be negligible.
2. As a precautionary approach, it is recommended that a licensed bat worker remains 'on-call' during the development works. In the event that roosting bats are discovered, work must cease immediately, and the on-call ecologist contacted, they will liaise with Natural England (as required) to advise on any licensing requirements to allow lawful completion of the work.

3. In line with Government policy on biodiversity, a single bat box should be installed within the landownership of Harpers Farm. The box should be integrated within an existing built structure (e.g. lbstock enclosed bat box, Habibat bat box, Schwegler Wall-mounted Bat Shelter 2FE, Habi-Sabi Bat Box or Schwegler 2FR Bat Tube) or installed on a suitable mature tree (e.g. Schwegler 2F Bat Box). The box should be installed at least 4m above ground-level, and not placed directly above windows.
4. Due to the suitability of the building for nesting birds, development works should be undertaken outside the bird nesting season (March – August, inclusive) or otherwise under direct supervision of a suitably qualified ecologist who will be able to identify nesting birds and advise of appropriate safe working distances. Active nests must be left undisturbed until young have fledged, as advised by the ecologist.
5. To compensate for the loss of bird nesting opportunities through proposals, it is recommended that an integrated or traditional wall-mounted bird box is installed. Suggested boxes include a sparrow terrace, (e.g., 1Sp Schwegler Sparrow Terrace), or traditional bird box (e.g., Vivara Pro Seville 32mm WoodStone Nest Box). The nest box should be installed on elevations between north and east, at eaves height and not directly over windows and doors.
6. This report is considered valid for 12 months for planning purposes (CIEEM, 2019). Update surveys may be required to reassess the condition of the site (and its suitability for bats) should this period be exceeded.

I trust the above information is clear and satisfactory to requirements. Please do not hesitate to contact me should you require any additional information or clarification.

Kind regards,

Gina Williams
Assistant Ecologist

REFERENCES & BIBLIOGRAPHY

Altringham, J. D. (2003). *British Bats*. Harper Collins Publishers, Glasgow, UK.

Bat Conservation Trust (2022). *Interim Guidance Note: Use of night vision aids for bat emergence surveys and further comment on dawn surveys*. Bat Conservation Trust, London, UK.

<https://cdn.bats.org.uk/uploads/images/Interim-guidance-note-on-NVAs-May-2022-FINAL.pdf?v=1652957834>

Bat Conservation Trust & Institute of Lighting Professionals (2018). *Bats and artificial lighting in the UK- Bats and the built environment series*. Institute of Lighting Professionals, Warwickshire, UK.

CIEEM (2019). Advice Note on the lifespan of ecological reports & surveys. Chartered Institute of Ecology and Environmental Management, Winchester, UK.

<https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>

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

Dietz, C., Helversen O & Nill, D (2009). *Bats of Britain, Europe & Northwest Africa*. A & C Black, London, UK.

English Nature (2002). *Bats in roofs: a guide for surveyors*. English Nature, Peterborough, UK.

Her Majesty's Stationary Office (1981). *The Wildlife and Countryside Act*. Her Majesty's Stationary Office, London, UK.

Her Majesty's Stationary Office (2006). *The Natural Environment and Rural Communities (NERC) Act*. Her Majesty's Stationary Office, London, UK.

Her Majesty's Stationary Office (2017). *The Conservation of Habitats and Species Regulations*. Her Majesty's Stationary Office, London, UK.

Her Majesty's Stationary Office (2019). *The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019*. Her Majesty's Stationary Office, London, UK.

Hutson, A.M. (1993). *Action plan for the conservation of bats in the United Kingdom*. London: The Bat Conservation Trust.

Joint Nature Conservation Committee (2004). *Bat Worker's Manual (3rd Edition)*. Joint Nature Conservation Committee, Peterborough, UK.

Mathews F, Roche N, Aughney T, Jones N, Day J, Baker J, Langton S. (2015). *Barriers and benefits: implications of artificial night-lighting for the distribution of common bats in Britain and Ireland*. Phil. Trans. R. Soc. B 370: 20140124. <http://dx.doi.org/10.1098/rstb.2014.0124>

Mitchell-Jones, A.J. (2004). *Bat Mitigation Guidelines*. English Nature, Peterborough, UK.

Natural England (2022a). *Guidance - Bats: advice for making planning decisions. How to assess a planning application when there are bats on or near a proposed development site.* [Bats: advice for making planning decisions - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/bats-advice-for-making-planning-decisions)

Natural England (2022b). *Guidance - European protected species policies for mitigation licences. Ecologists can use European protected species (EPS) policies on development sites to benefit EPS by changing survey, mitigation or compensation methods.* [European protected species policies for mitigation licences - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/european-protected-species-policies-for-mitigation-licences)

Neuweiler, G. (2000). *The Biology of Bats*. Oxford University Press, Oxford, UK.

QUALIFICATIONS & EXPERIENCE

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Gina Williams

Gina is an Assistant Ecologist who joined Focus Environmental Consultants in April 2022. Gina is proficient in surveying for European Protected Species including bats and great crested newts. She holds a Natural England survey licence (Class 1) for bats and is also a skilled tree climber, experienced in surveying for tree-roosting bats. Gina is also a competent surveyor of badgers, birds, and reptiles. Further ecological experience includes working as an accredited agent under Natural England licences to close and disturb badger setts. Gina holds a Level 3 Diploma in Ecology and is a Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM).

This report has been checked for quality and content by:

Fern Fellowes-Day BSc (Hons) MSc MCIEEM MRSB

Fern has over eighteen years of professional experience in the ecological consultancy field. She holds BSc (Hons) in Zoology from the University of Wales, Aberystwyth and MSc in Habitat Creation and Management from Staffordshire University. Fern has considerable experience in conducting Preliminary Ecological Appraisals, Ecological Impact Assessments (EclA) and Habitat Regulations Assessments (HRA). Fern's particular expertise is with protected species surveys. As a Registered User of the CL35 Badger Class Licence she has extensive knowledge in dealing with the badgers, with practical experience in artificial sett design and creation and has held numerous Natural England licences to close or disturb badger setts. In addition, Fern holds survey licences for great crested newts, bats and white-clawed crayfish. Fern has held Natural England Mitigation (development) licences for great crested newts (including being a Registered Consultant for the new great crested newt Low Impact Class Licence (LICL)) and Conservation licences for white-clawed crayfish. She is particularly experienced in dealing with newt issues affecting the quarrying, mineral extraction and landfill industry.