

# Ref 1057b: Bat Mitigation Plan for the clubhouse building (B1) at the former Kent and Surrey Golf & Country Club, Edenbridge

## 1 INTRODUCTION

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ECOassistance undertook a full suite of bat emergence surveys on the clubhouse building (Hereafter: B1) during the peak survey season of 2023. The objective of the surveys was to determine whether bats were roosting within the fabric of the structure.

During the surveys a peak count of three individual common pipistrelle *Pipistrellus pipistrellus* bats were found to be using B1 as a place of rest or shelter as defined under The Conservation of Habitats and Species Regulations 2017. The places of rest or shelter shall hereafter be referred to as 'roosts'.

Bats were observed by the surveyors and infra red videography equipment emerging from a total of four separate roost access points. The location of the emergence points and the survey visit during which the observations were made are shown in Figure 1 below.

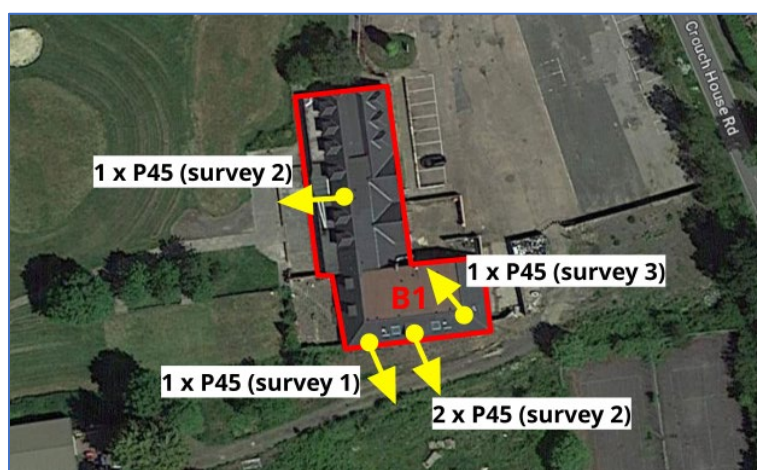


Figure 1: Location of bat emergences

Common pipistrelle, the species found to be roosting within the structure are considered widespread and abundant in southeast England. The low number of individuals indicate that the bat roosts contained within B1 are of site level importance.

B1 is to be demolished to make way for redevelopment of the site.

Despite the low significance in terms of demography of the bats that are present, the roosting spaces and the bats are protected by law and works to impact them must be avoided if possible and if not works must be licensed by Natural England with appropriate mitigation and compensation provided.

This mitigation plan details what further actions pertaining to bats are required in order for works to go ahead.

## 2 AVOIDANCE, MITIGATION AND COMPENSATION

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Natural England's (NE) standing advice on protected species is to follow the mitigation hierarchy: avoidance-mitigation-compensation. The highest priority is to avoid impacts. Where this is not possible, negative impacts must be mitigated and any losses compensated.

The bat roosts identified will be directly impacted by the development plans which include demolition of the existing structure. The loss of the identified roosting spaces is therefore considered to be unavoidable under the proposed scheme of works.

In order to mitigate the impact of any roost loss bat boxes will need to be provided as near to the roosts as possible prior to any works taking place.

In order to mitigate potential for harm to the bats which may be present, works to impact the roosts must be supervised by a licensed bat worker as well as under a site specific derogation licence.

### 2.1 LICENSING

A NE licence known as a European Protected Species licence (EPSL) is required and must be granted prior to works commencing in order to impact bats and/or their roosts lawfully. In order for an EPSL to be granted the application must satisfy the following three tests:

1. The activity must be for a certain purpose - for example, for scientific research or in the public interest;
2. There must be no satisfactory alternative that will cause less harm to the species; and
3. The activity must not harm the long-term conservation status of the species - you may need to create new habitats to offset any damage.

The landowner/developer in this instance is likely to be successful when applying for an EPSL because:

1. Derogation licenses are granted for the purposes of development. In this instance to provide much needed accommodation;
2. It is not possible to retain the roosting feature during works which will facilitate redevelopment of the site;
3. The roosts are of site level importance only and the impact is considered: local/negligible because they are unlikely to be the only day roosts used by the animals.

In line with the two most recent versions of the bat mitigation guidelines produced by NE (formerly English Nature), mitigation and compensation requirements for impacting the types of roost present include:

- Flexible (in terms of timing and type) (CIEEM 2023); and
- There is flexibility over provision of bat boxes and no conditions about timing or monitoring (English Nature: Bat Mitigation guidelines).

The roosting bats have been shown to use four roost entrance/exit points within the fabric of the structure.

- In line with guidance there should be no net loss of roosting spaces and/or entrance/exit points;
- The proposed works should also seek to enhance the favourable conservation status of the bats that are present.

An appropriate and proportional mitigation plan for the site is provided below.

### 3 MITIGATION PLAN FOR BATS AND BAT ROOSTING SPACES

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Works to the roof coverings of B1 **should not** be carried out during the Winter to avoid potentially disturbing hibernating bats. Work to remove the roof coverings and other potential roosting features (PRF) should be undertaken within the period mid-March to mid-October inclusive or as dictated by the EPSL licence conditions.

A licensed bat worker will be present on site during works to the roofs which will include removal of areas of the roof coverings and destruction of PRFs. The bat worker will identify the areas and all PRFs to the site workers and ensure they are removed in accordance with the approved method statement. These will include the entire south facing roof pitch at the southern end of B1; the central section of the west facing roof pitch on the western side of B1; and all PRF which are present as identified by the bat worker.

Scaffolding or an appropriate platform such as a MEWP (plus operative) will be required to allow the bat worker and demolition worker(s) easy access to the known roosting features and additional PRFs identified by the bat worker.

## 4 METHOD STATEMENT

1. Prior to all works, all site personnel will be given a toolbox talk by the licensed bat worker to outline the method statement and how it mitigates the risk of disturbing or injuring bats. The toolbox talk will include details of the legal protection and status afforded to all UK bat species and a general overview of their ecology and habits.
2. Prior to demolition works, two multi purpose bat boxes of the woodcrete variety will be installed onto mature trees as near as possible to B1 for the purpose of receiving bats captured during the licensed works. The siting of the bat boxes will be as directed by the licensed bat worker and must have unobstructed flight lines to the roost entrances. The bat boxes should be of the type shown in the screenshot below or have equivalent specifications to those that are shown. The same model of bat box is available from a number of distributors.

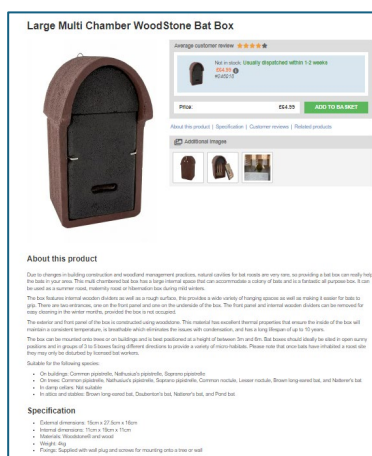


Figure 2: suitable bat boxes for mitigation

3. A soft strip to include careful removal of tiles around known roosting areas and any additional PRF identified by the licensed bat worker as detailed above will be undertaken by hand and under the supervision of the licensed bat worker.
4. All bats that are found will be inspected for injury by the licensed bat worker and standard identification including species, sex and breeding status will be recorded prior to the animals being placed into a suitable holding container and taken to and placed into one of the bat boxes.

If bats are injured they will be taken immediately to the nearest wildlife vet for treatment.

Works will not continue if the licensed bat worker leaves the site.

Details for a local trusted wildlife vet to be used in the instance of a bat or other wild animal becoming injured during the works will be provided as part of the EPSL application.

5. Habitat enhancements for the species known to be present will be provided in addition to any mitigation and compensation measures to deliver net gain for bats at the site. Recommendations for site-wide enhancements are provided below.

*If any bats are found during the demolition works that are not covered under the EPSL, the ecologist will contact Natural England for further advice and/or to make a licence amendment. All work must stop during consultation with Natural England.*

- Once all PRF have been removed under supervision, demolition work can continue without the need for a bat worker to be present.

Please also note that:

Monitoring of the site following completion of construction works will not be required as a condition of the mitigation licence due to the low conservation status of the bat roosts that are present.

## 5 ENHANCEMENTS

In order to ensure the works deliver a net gain for bats in line with National Planning Policy the following site enhancements are recommended:

- The installation of enhancements to promote invertebrates such as a single log pile, to measure c.2m(L) x 1m(W) x 0.5m(H), at the base of or near to a boundary feature will improve the area for bats;
- All new shrub and tree planting at the site should comprise native species only;
- 4 x integrated bat boxes suitable for pipistrelle bats will be installed into elevations of some of the new build properties during construction. The bat boxes will be installed at 3m/4m height and have clear flight lines to vegetated boundary habitats.

The integrated bat boxes should be of the crevice type so that they are suitable for the pipistrelle bats known to be present. A wide range of crevice boxes are available and should only be procured from a trusted wildlife equipment supplier such as NHBS or the nestbox company because they form part of the structure. The specifications for an integrated eco bat box are shown in Figure 7 below and these are recommended.

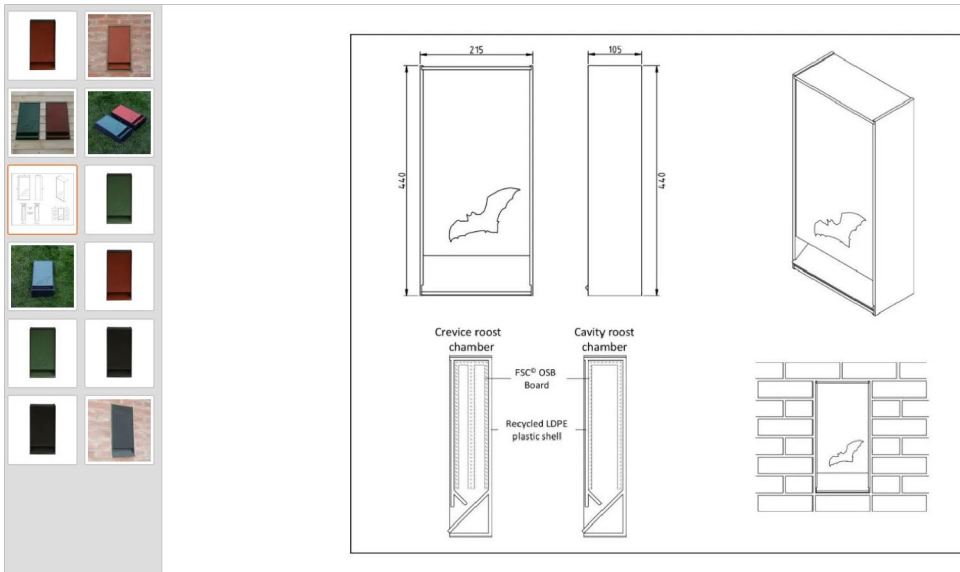


Figure 3: integrated eco bat box design specifications