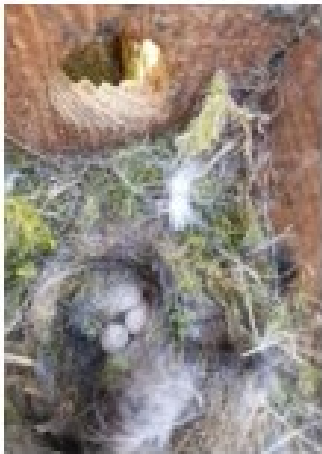


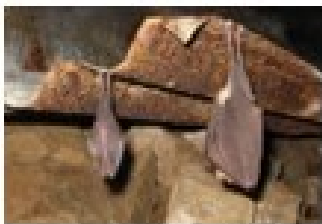
PRELIMINARY ROOST & NEST ASSESSMENT

No Bats No Birds



Sidmouth Independent Lifeboat
The Lifeboat Station
The Esplanade
Sidmouth
Devon
EX10 8BE

SY 12819 87284



Ecological Surveys Ltd
Director – Paul Diamond

Bat Class Licence Holder 1 and 2



1. Contract Details

Client:	Sidmouth Independent Lifeboat	
Architect/Planning Consultant:	Danielle Tucker – Studio Four Architects	
Report ref:	PRNA_Sidmouth Independent Lifeboat Station_March 2024	
Date of Survey & Report Expiry	23/01/2024	23/01/2025
Other report ref. if applicable:	N/A	
Surveyor:	Paul Diamond. Cert (Hort), BSc (Hons), MSc, MCIEEM; MArborA; Associate Member of the Landscape Institute Bat Class Licence Holder 1 and 2	
Date of report:	12/03/2024	
Author:	Georgia Watts MSci (Hons)	
Verified by:	Paul Diamond. Cert (Hort), BSc (Hons), MSc, MCIEEM; MArborA; Associate Member of the Landscape Institute Bat Class Licence Holder 1 and 2	
Latest Issue, date:	March 2024	
Ecological Surveys Ltd:	www.ecological-surveys-ltd.co.uk help@ecological-surveys-ltd.co.uk	
Telephone:	07736 458609	
Registered No:	08262462	
VAT Registration No:	224 3182 38	

Contents

1. Contract Details.....	2
2. Executive Summary of Findings – Bats & Birds	5
3. Survey Objectives & Methods	7
4. Project Details	10
5. Mitigation – Bats and Birds	15
6. Enhancement	17
7. Conclusions	18
8. References	19
9. Appendices.....	20
10. Appendix 1: Legislation Bat and Bird Species.....	20
11. Appendix 2: Why the need for a Bat Scoping Survey?.....	22
12. Appendix 3: Assessing the Potential Value for Buildings.....	24
13. Appendix 4 Non-Classic Hibernation Roost	25
14. Optimum season for works in different types of roosts.....	26
15. Appendix 4: Bat Species	29



Notice

Ecological Surveys Limited was commissioned to undertake an Internal / External Bat and Protected Species Scoping Survey of the above site proposed for development. This report details the results and conclusions of this survey with due diligence to associated legislation and policy.

- *Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th edition.*
- *UK Bat Mitigation Guidelines – 2023 – V1.1* www.cieem.net.

The results of this survey are deemed to be valid for 12 months from date of survey, where the works undertaken, and the boundary of the site remain as indicated. If development works are to be carried out after this time has elapsed, or amendments are made to the boundary line which affect alternative structures or additional features commonly associated with bats, an updated survey will be required.

This survey was undertaken with all proper and reasonable skill and care in a professional manner and in accordance with accepted standards, methodologies and guidelines.

This report is based on the evidence recorded at the site at the time of the survey. The information gathered is considered sufficient to provide an assessment of the ecological interest on the site and justify the recommendations provided in this report.

Refer to [Appendix 1: Legislation Bat and Bird Species](#) for details of Bat and Bird Law and Legislation and <http://www.nwcu.police.uk/> regarding avoiding committing wildlife crime.

2. Executive Summary of Findings – Bats & Birds

BATS – Legislative Context

The developer must comply with the legal protection of onsite & offsite protected habitats & species.

[Source: Habitats Regulations (transposing the EC habitats Directive: Conservation of Habitats and Species regulations 2010 (as amended) & Wildlife & Countryside Act 1981 (as amended)]

1 Structure Surveyed & Assessed

1.1.1 Block-built structure used as a lifeboat station.

Note: When assessing a structure for the presence / potential presence of bats, two distinct considerations are necessary:

- a) Is the structure occupied or potentially suitable for bats during the active season, generally accepted as April – September inclusive.
- b) Is the structure occupied or potentially suitable for bats during the less active period (October - November and March) or during the Hibernation period (December – February inclusive).

2 Proposed Project

2.1.1 Description: It is understood the proposed works include the extension of the existing structure to the east.

An Illustrated Design of proposed works has been provided at this stage.

3 Summary of Perceived Impacts

Significant harm to recorded species & habitats must be avoided, firstly through the project design, whenever feasible, or through mitigation or compensation – as applicable.

3.1.1 Impact to roosting bats is not predicted.

Confirmed Bat Roost?			Suitability for Roosting Bats?		
Non-Hibernation	Non-Classic Hibernation	Classic Hibernation	Non-Hibernation	Non-Classic Hibernation	Classic Hibernation
No	No	No	No	No	No
No/Negligible value: - Building with no, or discounted features, incapable of supporting roosting bats.					



4 BIRDS - Legislative Context

All wild birds, their nests and young are protected throughout England and Wales by the Wildlife & Countryside Act 1981 (as amended). It is illegal to kill, injure or take any wild bird, or damage or destroy the nest or eggs of breeding birds. The legislation applies to all bird species, common and rare.

5 Summary of Perceived Impacts

Significant harm to any recorded species & habitats must be avoided, firstly through the project design, whenever feasible, or through mitigation or compensation. (Refer to Mitigation /Compensation Sections) as applicable.

5.1.1 Evidence the structure is presently utilised by nesting birds: None/ negligible.

6 Additional Protected Species/Habitats - Protected Species - Legislative Context

Ecological Surveys Ltd has a professional obligation to record and report protected species which might or will be affected by the proposed works onsite. ESLtd will highlight where mitigation or further surveys will be necessary to protect species in order that the client/developer does not accidentally contravene the law.

[Source -www.gov.uk/guidance/protected-species-how-to-review-planning-applications].

If the presence of further protected species is suspected prior to works proceeding where disturbance, harm or death might occur owing to the proposed works, consultation with the acting ecologist is imperative to prevent a potential Wildlife Offence.

6.1.1 Habitat/Species - No further habitats or protected species potential exists in association with this development.

6.1.2 Good practice for the protection of any species is a requirement. Refer to Point 15.

7 Constraints

There were no perceived constraints to the survey of the dwelling which would trigger further investigation or Phase 2 Bat Emergence Surveys or Phase 2 Bird Surveys.

Internal and external surfaces were fully inspected, and a compliant assessment made of the roof structure. The survey effort was considered sufficient to draw appropriate conclusions.

It took into account the time of year (optimal period is April – September) and likely availability of evidence, with appropriate emphasis on suitable roosting or nesting conditions, opportunities for potential access through ingress points, free-flight, crawl spaces externally and internally, and features that may have been hidden from full view.

8 Developer's Next Step

This report is ready to be submitted to the local planning authority.

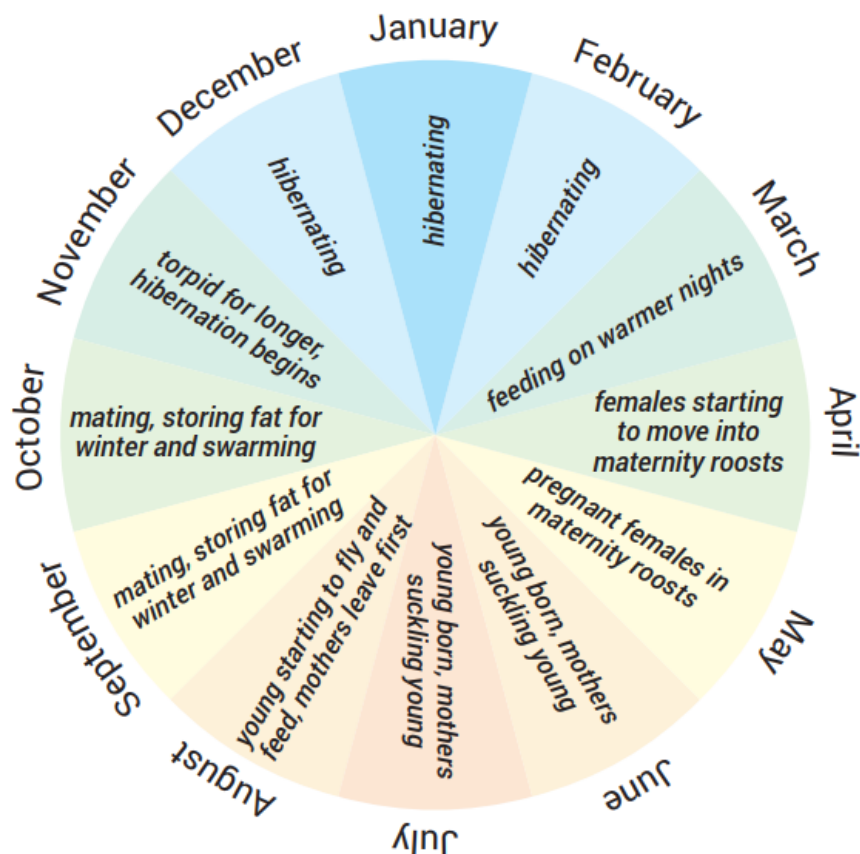
3. Survey Objectives & Methods

9 The survey specifically aimed to identify the following:

- The presence of, or past use of the site by, any species of bat.
- The presence of, or past use of the site by, barn owl, or other nesting birds.
- The site's potential for use by any of the above.
- Any other ecological issues/concerns relating to the proposal.

When assessing a structure for the presence / potential presence of bats, two distinct considerations are necessary.

1. Is the structure occupied or potentially suitable for bats during the active season, generally accepted as April – September inclusive.
2. Is the structure occupied or potentially suitable for bats during the less active period (October - November and March) or during the Hibernation period (December – February inclusive).



Previous guidance indicated a simple demarcation line between generally warm and dry roosts which could be used throughout the active period either by individual bats for a range of purposes or maternity roosts such as the lofts of typical houses and cold, damp roosts such as caves, mines, ice houses, lime kilns and cellars.

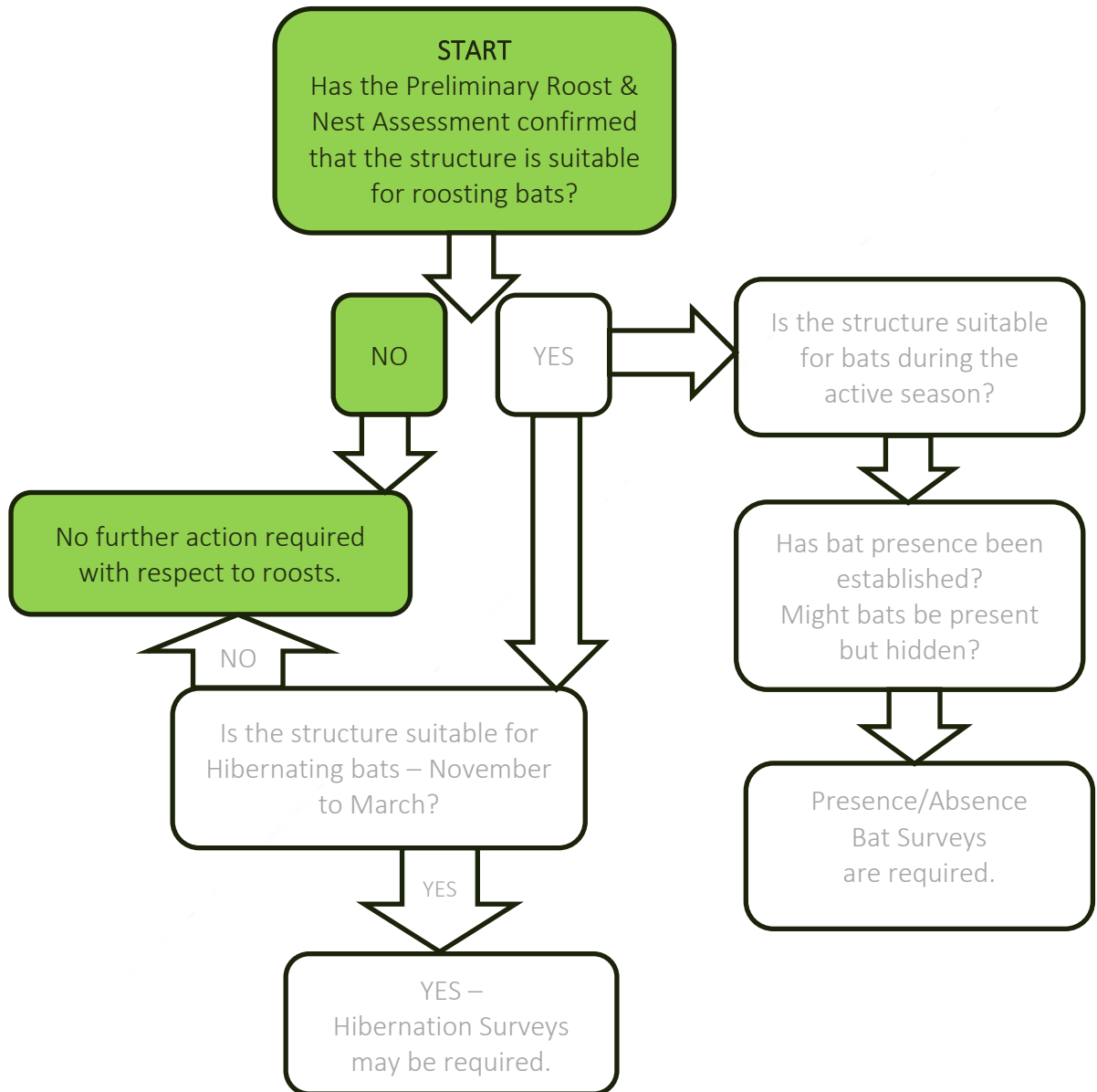
However, changes to previous published guidance now require an assessment of a third potential roost type – the newly named ‘non-classic hibernation roost’.

Recent research is indicating that bats may not be hibernating in the manner they were long believed to have done. This might be due to climate change, but it is now considered that bats may be more active

than traditionally believed during the winter months. This means that bats may enter a lesser form of hibernation known as torpor, rather than full hibernation from which they awaken more frequently and may emerge to drink or forage throughout the winter period. Consequently, bats would not require the cold / damp 'classic hibernation roosts' which provided a high humidity to prevent them dehydrating whilst in hibernation.

This means that specific consideration must be given to bat presence in non-classic hibernation roosts: literally almost any structure could offer at least some potential in this context.

The flow diagram is completed in green to indicate the pathway of assessment for this site.



Internal & External Inspection

The aim of the survey was to assess levels of usage of specific structures or potential for usage by bats and birds through the presence of actual animals or their field signs. The survey was conducted with the aid of head and hand-held torches, an endoscope, close-range binocular/monocular, Bat-box Duet and a digital camera. Images and samples (where available) were taken for supporting evidence.

Interior: - The interior spaces were checked for light ingress and access points for bats and birds. Bat droppings, insect prey remains, urine stains, oil stains from bats repeatedly moving over a small area and polishing the surface and the potential presence of bats either dead or alive was considered. Bird droppings, whitewash, pellets, nesting materials, birds, dead or alive, and potential for nesting was considered, including areas hidden from sight.

Exterior: - The building exteriors were searched visually using binoculars or a close range monocular and photographed with a digital zoom camera for field evidence of bats or birds, with particular attention being paid to sheltered areas such as window ledges and pipes where bat/bird droppings might lie undisturbed from the weather and areas hidden from sight.

4. Project Details

10 Assessment of adjacent and surrounding habitat:

- 10.1.1 *The structure surveyed is not located within or adjacent to any significant land or marine designations which the proposed works might negatively impact. The closest designated sites are Sidmouth to West Bay SAC and Sidmouth to Beer Coast SSSI which are both 100m to the east of the structure surveyed.*
- 10.1.2 *Habitats comprise mainly urban residential and coastal with some rural agricultural, which may be potentially suited to either foraging and commuting bats or birds, but in this case offer less than ideal direct habitat corridors to the property surveyed. However irrespective of potential commuting routes, the survey revealed that the property had no evidence of bat usage and negligible potential to be used as a roost.*

Associated Nearby Habitat & Red Line Boundary Map.





11 Building / Structure Descriptions

The buildings were assessed against the criteria laid out in [Appendix 3: Assessing the Potential Value for Buildings](#).

11.1.1 Structure: Block-built lifeboat station with a slate roof.

External features: Roof slates and barge boards are tight fitting and ridge tiles well mortared.

Internal features: The main structure has no internal void and the underside of the roof, which is insulated with polystyrene sheeting, is visible internally. The inside is light and airy and kept open for 8 hours each day. The office structure has vaulted ceilings and a small inaccessible void.

Associated habitat: The site and its surroundings are sealed surfaces. The site is also constantly exposed to the sea breeze as it is adjacent to the shore.



Southern elevation



Eastern elevation – office structure



Western elevation



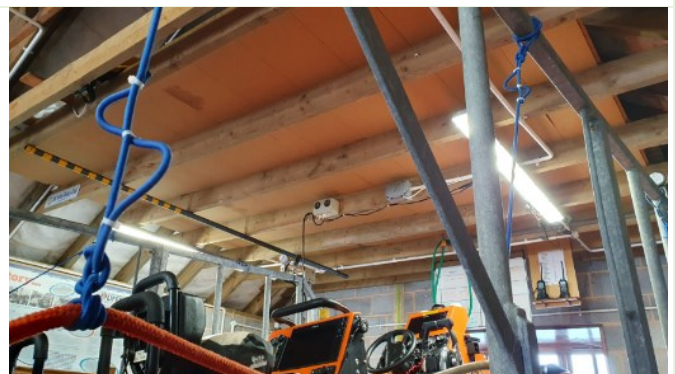
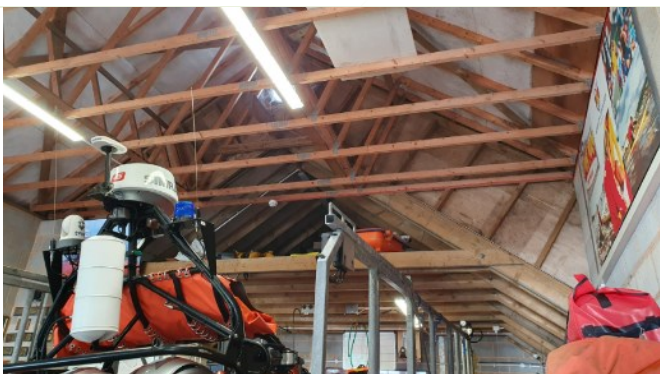
Northern elevation – rear garage



Very tight barge boards throughout



Tight roof slates and ridge tiles



Internal main structure



Internal roof of rear garage



Vaulted ceiling of office structure

Results and Assessment

12 Rationale: Bats

The building exteriors were searched visually using binoculars or a close range monocular for evidence of bats, with particular attention being paid to sheltered areas such as window ledges and pipes where bat droppings might lie undisturbed from the weather and areas hidden from sight.

The interior spaces were checked for light ingress and access points for bats. Bat droppings, insect prey remains, urine stains, oil stains from bats repeatedly moving over a small area and polishing the surface and the potential presence of bats either dead or alive was considered including areas hidden from sight.

12.1.1 Externally there were no/negligible ingress points, no evidence, or other potential roosting sites recorded. Features commonly associated with bat roosting:

- roof tiles/slates,
- barges/soffits,

are tight and secure with no gapping, crawl spaces or free flight.

12.1.2 Where negligible external features have been identified – these features are discounted because:

No evidence of bat roosting, droppings, feeding remains, staining or other signs were recorded within the structure/s surveyed.

External features do not permit free flight or ingress onto wall tops or into wall cavities, precluding crevice dwellers.

The main structure is light and open, making it too exposed for roosting bats.

Where structures are without a void, or are flat roofed, such as this, the external features are carefully examined to ensure no ingress might exist that would enable crevice dwelling bats to be hidden from view, for example, within wall cavities.

13 Predicted Impact to Protected Habitat/Species.

The LPA will consult the associated planning documents submitted with this application to ensure the understanding of the works within this report reflects those submitted as the final Illustrated Proposal.

- If bats were present, it would be expected that at least some evidence would be present. Features generally and specifically associated with bats are not evident or are of negligible significance and can be discounted. Therefore, no loss to roosting features are expected under this development. Active or hibernation roosting is highly unlikely within this structure.

Phase 2 Survey for Bats

Further Phase 2 Bat Emergence Surveys are not considered necessary.

Advisory

Whilst no evidence of bats exists at present, it might be possible for bats to become associated with this structure in the future, where forces such as nature or impacts to this structure occur.

Lack of evidence at point of survey does not discharge the client/agent of their responsibilities to protected species.

Irrespective of survey findings, contractors should be made aware that there is always the potential presence of bats in association with roofing layers, ridgelines and wall tops. In the event that a bat is found during works, all activities near the discovered bat(s) will cease and advice sought from Ecological Surveys Ltd or the Bat Conservation Trust Helpline (Tel: 0345 1300 228). Bats should not be handled (unless with gloves) and only to protect them from harm.

Wherever possible, any species should be left in situ until advice is obtained.

14 Rationale: Birds

Nests and nesting material were not recorded.

- 14.1.1 *Active future nesting could occur upon external walls (House martins) or on roof areas (gulls), or within any voids.*

Predicted Impact to Protected Habitat/Species.

Illustrated Proposal

The LPA will consult the associated planning documents submitted with this application to ensure the understanding of the works within this report reflects those submitted as the final Illustrated Proposal.

- 14.1.2 *Features generally and specifically associated with birds are not evident or are of negligible significance and can be discounted. Therefore, no loss to nesting features are expected under this development.*

- 14.1.3 *A Phase 2 Bird Survey is not considered necessary.*

- 14.1.4 *Mitigation to recreate nesting habitat is not required.*

Bird Nesting Advisory

It is possible that bird nests could be newly established in association with this site during future bird nesting seasons. The bird nesting season generally extends from March to August inclusive, although, depending upon the species, geographical area and the weather conditions, nesting can extend outside this period and it is the nesting behaviour that must be observed, not the supposed time frame. For example, collared doves (*Streptopelia decaocto*) and barn owls (*Tyto alba*) have been observed to nest in every month of the year.

All British birds and their nests are protected whilst in use; therefore, if a nest is found during construction work, all activity must cease within proximity and ecological advice sought immediately.

5. Mitigation – Bats and Birds

Under the National Planning Policy Framework (NPPF), Local Planning Authorities (LPAs) have an obligation to promote the preservation, restoration and recreation of priority habitats, ecological networks and the protection and recovery of priority species as identified under the Natural Environment and Rural Communities Act (2006). Local Planning Authorities will seek to produce a net gain in biodiversity by requiring developers to design wildlife into their plans and to ensure that any unavoidable impacts are appropriately mitigated for. Mitigation is the process of replacing any ecological / biodiversity losses because of development.

14.1.5 *Mitigation specifically for roosting bats and nesting birds is not required.*

14.1.6 *Good Practice for the protection of any species is a requirement. Refer to Point 15.*

15 Impact Avoidance During the Construction Phase

All activities on site will bear in mind the potential for wildlife or the environment being harmed through the process of development from inception to end. A proactive approach for the lawful protection of wildlife and the environment regarding use of materials, machines, chemicals, and human activity on site will be implemented.

- Contractors must ensure that no harm can come to wildlife by maintaining the site efficiently, clearing away any material such as wire in which animals can become entangled and preventing access to toxic substances.
- Trenches or large excavations will be covered overnight to prevent wildlife such as badgers or hedgehogs falling in and failing to escape. If this is not possible, then a strategically placed plank might provide a means of escape.
- Any large bore pipes will be capped at the end of the day to reduce the potential for badgers and other wildlife entering and becoming trapped.
- Areas that are being retained will be protected from damage during construction by erecting Heras (or similar) fencing around these features. The fencing will be erected outside the line of the canopy as this helps protect the roots from compaction of the soil.
- Any areas proposed for planting post-development will be fenced off where possible to prevent compaction of the soil through vehicle movements.
- If there is a substantial delay before development commences, the site will be maintained in a way that would prevent wildlife colonising it and causing constraints in the future. Such management will include mowing grassland at least twice a year and preventing scrub encroachment.
- Piles of brush wood and or log piles will be carefully inspected for signs of wildlife prior to their removal. This is especially crucial during the period March – September (inclusive) as some species of bird choose such sites to construct their nests. Ideally removal of such features will be done outside of the nesting season. If this is not possible, it is recommended that these features are covered in such a way as to exclude / prevent birds/hedgehogs and / or reptiles taking up residence.
- If nesting birds or reptiles be discovered, work must cease immediately, and ecological advice sought.
- All hedgerows / trees / shrubs removal will be done outside of the bird nesting season March – September (inclusive). If removal is not possible during this period, careful checks of such, must be conducted by a suitably experienced ecologist prior to works commencing.

16 Additional Protected Species/Habitat Constraints & Mitigation

Lighting Strategy

The Wildlife and Countryside Act 1981 (as amended) protects all bats from 'intentional' or 'reckless' disturbance. Lighting in the vicinity of a bat roost could constitute an offence since **it causes disturbance and potential abandonment of the roost**. This intimate connection with the dark provides them a safe and secure environment in which to search for their meals; insects like moths, termites, beetles, flies, etc. Artificial lighting persuades the bat it is not yet time to hunt and prevent bats from emerging from their roost, leading to entombment and death. [Sources – Wildlife & Countryside Act 1981 (As amended.)

The overarching aim is to decrease light intensity, avoid the UV spectrum: attracting insects is NOT an aim.

16.1.1 Habitat onsite comprises sealed surfaces and offers negligible potential for foraging and commuting bats.

6. Enhancement

The National Planning Policy Framework (NPPF) sets out the UK Government's national policies on enhancement of biodiversity and promotion of ecosystem services through the planning system.

Under NPPF, Local Planning Authorities (LPAs) have an obligation to promote the preservation, restoration and recreation of priority habitats, ecological and the protection and recovery of priority species as identified under the Natural Environment and Rural Communities Act (2006).

LPAs will therefore seek to produce a net gain in biodiversity by requiring developers to design wildlife into their plans and to ensure that any unavoidable impacts are appropriately mitigated for.

As a minimum LPAs now expect any new structure to include bat roost or bird nesting provision.

Enhancement for Birds: -

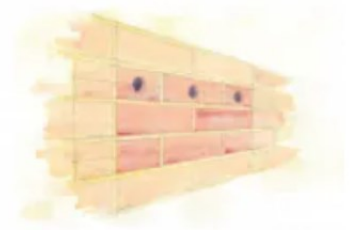
Birds must be accommodated by either adapting the structure of a building to allow access to parts otherwise sealed by modern construction, or through the provision of purpose-built nesting boxes.

The client must:

- Incorporate features which support the nesting of birds in the construction of new development on the north or east orientation to avoid eggs and chicks overheating at a height of 3m+ to prevent predation or vandalism.
- Only boxes of robust or permanent construction – preferably those constructed to be incorporated within the building fabric itself – are likely to be suitable. Some account must be taken of the potential need to maintain, and in the case of wall mounted units, replace boxes after a number of years in use.
- Generally, only where it is not possible to build a bird nesting box into a structure for construction reasons, will externally mounted boxes be acceptable to the LPA.

The illustrated type or similar provision and functionality is required to enhance this site post development. The sparrow terrace should be erected as high as possible within the structure.

[Equipment Shop \(nhbs.com\)](http://nhbs.com) Other providers of provision are available.



Terraced Sparrow Box -
Custom Brick Facing



1SP Schwegler Sparrow
Terrace

7. Conclusions

The application site has been surveyed and the results assessed.

- 16.1.2 *The final assessment concludes that the initial survey confirmed that the structure does not offer suitability for hibernating roosting bats or bats roosting during the active season and therefore, no further action is required with respect to bat roosts.*
- 16.1.3 *Mitigation for bats, apart from the application of a Lighting Strategy to protect onsite commuting/foraging habitat, is therefore not a requirement, neither are additional bat surveys.*
- 16.1.4 *Advisories have been provided regarding future occupation by bats.*
- 16.1.5 *Active or inactive bird nests were not recorded as present, therefore, unmitigated works/development at this site, at this present time, are not considered likely to cause disturbance, harm or death to either protected species: bats or birds.*
- 16.1.6 *Advisories have been provided regarding future occupation by birds.*
- 16.1.7 *Enhancement of the site post development is required. The habitat value has been taken into account when making enhancement recommendations. It is considered that enhancement for birds will be of value owing to the habitat onsite/offsite offering biodiversity value for this species.*
- 16.1.8 *Providing Enhancement recommendations are agreed and enacted, there would appear to be no ecological reasons why this proposal should not go ahead.*
- 16.1.9 *Enhancement / Mitigation might be subject to Conditioning within any granting of Planning Permission.*
- 16.1.10 *The Local Planning Authority (LPA) 'Building Control' will ensure that Mitigation / Enhancement measures have been implemented as per recommendations.*
- 16.1.11 *Please refer to client/agent personal responsibilities: [Appendix 1: Legislation Bat and Bird Species](#) and [Enhancement](#).*

8. References

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- Cornwall Council (2018). *Accommodating swallows, swifts and house martins: Guidance notes for developers, builders, surveyors, architects & house holders*. Cornwall Council, Truro. <https://www.cornwall.gov.uk/media/3626630/Accommodating-swallows-swifts-and-house-martins.pdf>.
- Cornwall Planning for Biodiversity Guide (2018) <https://www.cornwall.gov.uk/media/35514048/biodiversity-spd-v7.pdf>
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- Mitchell-Jones A.J. & Mcleish A.P. (2004). *The Bat Workers Manual*, 3rd Edition. Joint Nature Conservation Committee, Peterborough. <http://www.jncc.gov.uk/page-2861>.
- Mitchell-Jones, A.J. 2004. *Bat Mitigation Guidelines*. English Nature, Peterborough.
- Purbeck Technical Design Guidance Bats and Birds, 2014.
- UK Bat Mitigation Guidelines – 2023 – V1.1 www.cieem.net.
- UK Biodiversity Action Plan. www.ukbap.org/uk.
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- Wildlife & Countryside Act 1981, as amended. HMSO.

9. Appendices

10. Appendix 1: Legislation Bat and Bird Species

Bats

All bat species and their roosts are legally protected in the UK. All bats are listed as European protected species of animals in the European Union's Council Directive 92/43/EEC of 21 May 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora, better known as the Habitats Directive. This Directive is implemented in the UK by The Conservation of Habitats and Species Regulations 2010 (better known as the Habitats Regulations).

There is also some protection for bats and roosts in England and Wales under the Wildlife & Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000). For practical purposes, the protection of bats and their roosts now falls mostly under the Habitats Regulations.

In summary, it is an offence to

- Deliberately, capture, injure or kill a bat.
- Deliberately, disturb in a way that would significantly affect their local distribution or abundance, or affect their ability to survive, breed or rear young.
- Damage or destroy a roost (this is an 'absolute' offence).
- Possess, control, transport, sell, exchange or offer for sale/exchange any live or dead bat or any part of a bat.

('Deliberately' may be interpreted as someone who, although not intending to injure, kill, etc. performed the relevant action, being sufficiently informed and aware of the consequences their action will probably have.)

A person who needs to carry out actions that would result in an offence being committed should apply for a derogation licence from Natural England. They have powers to grant Habitats Regulations derogation licences in certain circumstances, for certain reasons and with certain terms attached, so that the licence holder remains within the law. Application for a derogation licence should be made in plenty of time, and the services of a bat expert utilised in making the application. It is an offence to make a false statement to obtain such a licence.

This information is not provided as legal advice and before making decisions relating to the law a qualified legal representative should be consulted.

Birds

All wild birds, their nests and young are protected throughout England and Wales by the Wildlife & Countryside Act 1981 (as amended). It is illegal to kill, injure or take any wild bird, or damage or destroy the nest or eggs of breeding birds. The legislation applies to all bird species, common and rare. In addition



to the protection afforded to all wild birds, rarer or particularly vulnerable species listed on Schedule 1 of the 1981 Act, such as the barn owl, receive enhanced protection when breeding. Schedule 1 species, including their dependent young, are protected from intentional or reckless disturbance whilst at or near the nest, in addition to the protection afforded the more common species.

If nests, whether completed or in the process of being built, are found on site, any works with the potential to damage or destroy the nest, eggs or young birds, must stop until the birds have completed breeding. This includes any activity that could potentially cause an adult bird to desert the nest resulting in death or egg failure. Nesting sites should be inspected only by experienced ecologists.

Any disturbance of a breeding bird on Schedule 1 is an offence, regardless of whether this impacts upon the breeding attempt. These nests can only be visited by an ecologist with a licence for the specific species concerned.

Birds might nest on machinery or scaffolding and other temporary site structures. If this happens the equipment cannot be used until the birds have finished nesting and such areas might need to be sealed off to prevent disturbance.

Breaking the law can lead to fines of up to £5000 per offence and potential prison sentences of up to six months. Vehicles implicated in an offence can be compounded and both the company, and/or the individual(s) concerned, can be held liable.

11. Appendix 2: Why the need for a Bat Scoping Survey?

A Bat Survey is ordinarily triggered when there is to be:

Conversion, modification, demolition or removal of buildings (including hotels, schools, hospitals, churches, commercial and derelict buildings) which are:

- Agricultural buildings (e.g. farmhouses, barns and outbuildings) of traditional brick or stone construction and/or with exposed wooden beams.
- Buildings with weather boarding and/or hanging tiles that are within 200m of woodland and/or water.
- Pre-1960 detached buildings and structures within 200m of woodland and/or water.
- Pre-1914 buildings within 400m of woodland and/or water.
- Pre-1914 buildings with gable ends or slate roofs, regardless of location.
- Located within, or immediately adjacent to woodland and/or immediately adjacent to water.
- Dutch barns or livestock buildings with a single skin roof and board-and-gap or Yorkshire boarding if, following a preliminary roost assessment, the site appears to be particularly suited to bats.
- At the behest of the LPA / County Ecologist.
- Further details of other triggers can be found below.

Development and Planning Trigger for Bat Surveys

Development and planning trigger list for bat surveys, which can be adapted to local circumstances (taken from the Association for Local Government Ecologists (ALGE) template for biodiversity and geological conservation validation checklists 2007, available from <http://alge.org.uk/publication/index.php>).

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| <p>(1)</p> | <p>Conversion, modification, demolition or removal of buildings (including hotels, schools, hospitals, churches, commercial premises and derelict buildings) which are:</p> <ul style="list-style-type: none"> ➤ Agricultural buildings (e.g. farmhouses, barns and outbuildings) of traditional brick or stone construction and/or with exposed wooden beams; ➤ Buildings with weather boarding and/or hanging tiles that are within 200m of woodland and/or water; ➤ Pre-1960 detached buildings and structures within 200m of woodland and/or water; ➤ Pre-1914 buildings within 400m of woodland and/or water; ➤ Pre-1914 buildings with gable ends or slate roofs, regardless of location; ➤ Located within, or immediately adjacent to woodland and/or immediately adjacent to water; ➤ Dutch barns or livestock buildings with a single skin roof and board-and-gap or Yorkshire boarding if, following a preliminary roost assessment, the site appears to be particularly suited to bats. |
| <p>(2)</p> | <p>Development affecting built structures:</p> <ul style="list-style-type: none"> ➤ Tunnels, mines, kilns, ice-houses, adits, military fortifications, air-raid shelters, cellars and similar underground ducts and structures; unused industrial chimneys that are unlined and brick/stone construction; ➤ Bridge structures, aqueducts and viaduct (especially over water and wet ground). |

<p>(3)</p>	<p>Floodlighting of</p> <ul style="list-style-type: none"> ➤ Churches and list buildings, green space (e.g. sports pitches) within 50m of woodland, water, field hedgerows or lines of trees with connectivity to woodland or water; ➤ Any building meeting the criteria listed in (1) above.
<p>(4)</p>	<p>Felling, removal or lopping of:</p> <ul style="list-style-type: none"> ➤ Woodland; ➤ Field hedgerows and/or lines of trees with connectivity to woodland or water bodies; ➤ Old and veteran trees that are more than 100 years old; ➤ Mature trees with obvious holes, cracks or cavities, or that are covered with mature ivy (including large dead trees).
<p>(5)</p>	<p>Proposals affecting water bodies:</p> <ul style="list-style-type: none"> ➤ In or within 200m of rivers, streams, canals, lakes, reed beds or other aquatic habitats.
<p>(6)</p>	<p>Proposal located in or immediately adjacent to:</p> <ul style="list-style-type: none"> ➤ Quarries or gravel pit; ➤ Natural cliff faces and rock outcrops with crevices or caves and swallets.
<p>(7)</p>	<p>Proposals for wind farm developments</p> <ul style="list-style-type: none"> ➤ of multiple wind turbines and single wind turbines (depending on the size and location) (NE TIN 051 – undergoing updates at the time of writing)
<p>(8)</p>	<p>All proposals in sites where bats are known to be present¹</p> <ul style="list-style-type: none"> ➤ This may include proposed development affecting any type of buildings, structures, features or location.
<p>Notes:</p> <p>¹ : Where sites are of international importance to bats, they may be designated as SACs. Developers of large sites 5-10km away from such SACs may be required to undertake a HRA.</p>	

12. Appendix 3: Assessing the Potential Value for Buildings

Classification Criteria

It should be noted that the grading system below only reports on the situation at the time of survey; should bat activity levels change after the initial survey, or should the buildings be modified (for example if roof tiles are removed or fascia boards develop cracks), the category may need revision.

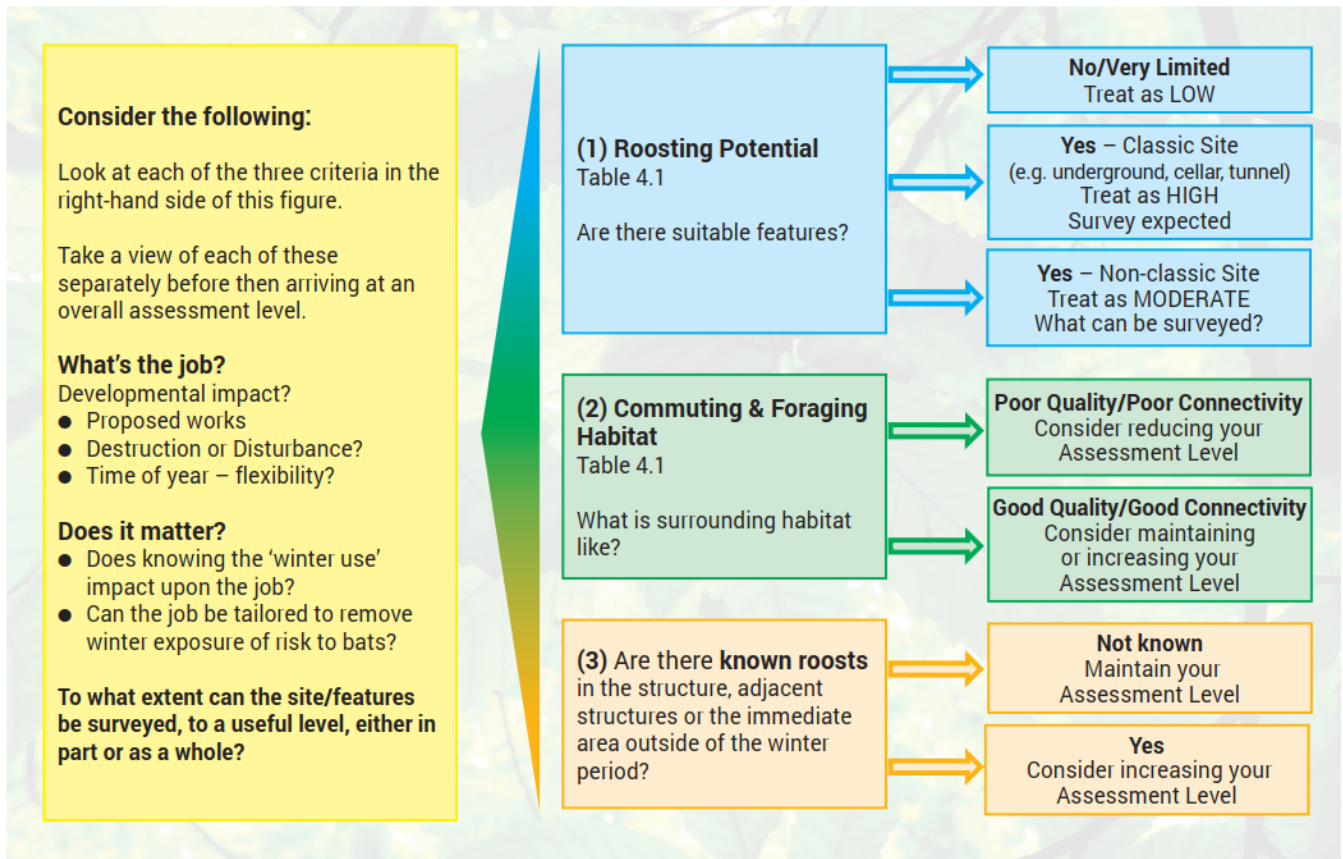
Category (Potential value)	Description
<i>Please note: Intermediate categories (e.g. Low – Moderate value) may apply.</i>	
No/Negligible value	Buildings with no or very few features capable of supporting roosting bats. Often buildings are of ‘sound’ well-sealed structure or have a single skin and no roof void. They tend to have high interior light-levels, and little or no insulation. Buildings
<p>*Low value</p> <p><i>‘Low’ is defined as the potential for low numbers of bats to be present.</i></p> <p><i>Not that the structure is consider to offer low potential to roosting bats</i></p>	Buildings of largely unsuitable construction, but with few features of potential value to bats (e.g. gaps above windows, apparently shallow crevices). No supporting evidence (e.g. droppings / staining) found. Buildings may be surrounded by poor or sub-optimal bat foraging habitat, as is often the
<p>*Moderate value</p> <p><i>‘Moderate’ is defined as the potential for moderate numbers of bats to be present.</i></p> <p><i>Not that the structure is consider to offer moderate potential to roosting bats</i></p>	Buildings usually of brick or stone construction with a number of features of obvious potential value to roosting bats e.g. loose roof / ridge tiles, gaps in brickwork, gaps under fascia boards, and/or warm sealed roof-spaces with under-felt.
<p>*High value</p> <p><i>‘High’ is defined as the potential for high numbers of bats to be present. Not that the structure is consider to offer high potential to roosting bats</i></p>	Buildings with a large number of features of obvious potential value to bats (as above). Bats may be suspected to roost within the building (at least at certain times of year), but no supporting evidence found.
<p>Confirmed roost.</p> <p><i>It is perfectly possible to have a confirmed roost present and simultaneously have a ‘low/moderate/high’ categorisation too.</i></p>	Bats discovered roosting within the building or recorded emerging from / entering the building at dusk and / or dawn. Building found to contain conclusive evidence of occupation by bats, such as bat droppings. A confirmed record (as supplied by an established source such as the local bat group) would also apply to this category.

*BCT do not define how many bats are estimated to be potentially present in the low/moderate/high categories.

13. Appendix 4 Non-Classic Hibernation Roost

The following Flow Chart combines the guidance from the latest iteration of Bat Surveys for Professional Ecologists: Good Practice Guideline (4th Edition) Collins, J. (ed) (2023) Bat Conservation Trust, London and the recently issued Mitigation Guidance issued by CIEEM and providing guidance on mitigating impacts to roosts and the process to adhere to best practice for EPSL applications and when works can be undertaken without an EPSL.

Figure 4.1. A rationale for undertaking an assessment of roosting potential for winter roosting in non-classic hibernation sites (e.g. most buildings).



Classic hibernation sites are straightforward to ascertain and if present, will always be surveyed to a greater or lesser degree based on the other factors.

The starting position for surveyed structures even if considered not to have suitable features is 'Low'. If the other factors in the table are considered, this means a structure previous considered not to have hibernation potential under previous guidance, will be assessed as low, moderate or even high.

Structures assessed as offering *High* potential will need to be surveyed throughout the winter.

Guidance now suggests that alternative 'complementary methods' of surveying include the use of automated bat detectors being left in situ – however (and the latest Mitigation guidance points this out), this might record bats passing rather than roosting so is by no means a conclusive method of establishing presence.

As a minimum, physical surveys should usually be spread four weeks apart during what are predicted to be the coldest months of the year in question. Cold weather in the week preceding the surveys is likely to result in larger numbers of bats entering hibernacula.

If these surveys reveal *interesting results* (e.g. rare or edge-of-range species, species assemblages, larger numbers of bats) then guidance states that it may be necessary to carry out further surveys over and above these, to identify bats moving around between sites.

Additionally, automated / static surveys for winter activity within structures with a *moderate to high* likelihood of bats being present should be undertaken over a minimum of two weeks per survey each month from November to March.

14. Appendix 5 Optimum season for works in different types of roosts.

[Source - UK Bat Mitigation Guidelines – 2023 – V1.1 www.cieem.net.]

The period of works may be extended if the way in which the bats use the site is well understood.

Roost type	Months to avoid	Optimum period for carrying out works (some variation between species and weather-dependent)
Maternity	May-August (potentially September)	September to end April
Hibernation (not used for swarming)	November to March	April to end October [see also 6.2.14 et seq]
Hibernation and swarming site	August to March (key); potentially July until April	April to July (potentially later, depending on site and nature of works)
Mating/swarming: not used for hibernation	August to October (key); potentially July until mid-November Also April-early May in at least some species	Mid-November – end March (potentially later, maybe species - specific) Broader restrictions if site also used for hibernation: see above
Non-breeding summer roost	None	No restrictions – assuming bats can be excluded if present in small numbers or otherwise safely managed

a. See Section 6.9 for the timing of bat exclusions.

b. Furmankiewicz et al., 2013

6.2.10. Similarly, whilst **Table 6.1** sets out the ‘optimum season’ for works affecting winter roosts, this applies most usefully to what might be called ‘classic’ hibernation sites, i.e. sites providing cool stable conditions which tend to support larger numbers of hibernating bats (or possibly smaller numbers, but over several years). However, many bats do not use such sites during the winter months, instead roosting individually or in small numbers in buildings (particularly pipistrelles) or in trees. In addition, when prevailing conditions are favourable, many bats are frequently found in thermally unstable roost sites and not necessarily in hibernation torpor.

6.2.11. It would therefore not be appropriate to avoid all work to any building or trees which could support a bat during the winter months as, whilst bats may be found almost *anywhere* (e.g. under roof tiles, soffits, wall-plates, or cladding that provide PRFs), they are not *everywhere*. Preventing all works to structures and trees for the entirety of the period November to March in case a winter-roosting bat could be present, however low the risk, is therefore impractical and disproportionate. For instance, for large-scale Local Authority roofing projects (thousands of properties in any year), it is simply not possible for all roof-strips to be carried out only in spring and autumn. For trees, the winter period is the most common for forestry operations (Davidson-Watts, pers.comm.).

6.2.12. Repeated disturbance to hibernating bats can seriously deplete their food reserves but, as noted by Mitchell-Jones (2004), unless significant numbers of hibernating bats are known to be present, there is no advantage in requesting a deferment of scheduled building works. It is therefore important to assess hibernation potential when determining whether works can safely continue during colder weather. This assessment (and the supporting rationale) should be fully documented, and updated whenever new information comes to light (i.e. survey data)

6.2.13. For working on trees in winter, particularly in woodland, an understanding of the likely value of the roost resource in all seasons would be part of the approach to survey and assessment, and is covered in revisions to published UK bat survey guidance (Collins, 2023). However, the SNCBs' current position is that an identified tree roost cannot be removed in winter, even when it can be demonstrated that bats are absent from a roost (see para 6.5.19) (6.5.19. *The process of blocking/excluding PRFs in autumn so that trees can be felled in the subsequent winter maybe necessary to work around seasonal licensing restrictions*)

6.2.14. An assessment of 'non-classic' winter potential is not always undertaken for the purposes of planning. In addition, the vast majority of re-roofing works (by far the largest category of works affecting such 'non-classic' hibernation sites) do not require planning consent. This section is therefore included to guide such an assessment, prior to winter working on any type of site where 'non-classic' features may be present (i.e. most types of building)

6.2.15. For 'non-classic' hibernation sites, particularly those within/behind external features of buildings or cavity walls, the extent to which they can be surveyed is limited. Often only a destructive search would be definitive, and therefore counter-productive. A static detector placed outside a structure might pick up bats flying past on warmer nights rather than confirm winter use. This may give a useful understanding of winter bat activity if a number of buildings are being affected, but is unlikely to be helpful in relation to a specific building.

6.2.16. For void-dwelling species which can linger into winter (notably brown long-eared bat, serotine) but not always visibly so (e.g. where there is deep insulation obscuring joists or the peak of the void is well above head height, preventing close inspection), visual inspections supported by static detectors within the void, during conditions which include periods suitable for bats to be active (Park, Jones & Ransome, 2000)⁴⁷, (Hope & Jones, 2013), can indicate continued presence or almost-certain absence. *It is important that the detectors are there for a sufficiently long period, to be judged by the prevailing conditions, but not fewer than five suitable days. Daily temperatures within the void and ambient external temperatures should be monitored.*

6.2.17. A rationale for undertaking a winter assessment is shown below in **Figure 6.1** (with thanks to Neil Middleton, BatAbility Courses & Tuition). The results of this assessment should guide the approach to mitigation, notably timing restrictions. The assessment should consider: the suitability of features to support roosting bats or to allow access for roosting bats; the temperature and humidity conditions likely to be present within the structure during the winter period and the suitability in this respect for it to be used by hibernating bats; the surrounding habitat, in terms of its potential for use by bats outside of the hibernation period for commuting and/or foraging purposes (i.e. is it reasonable that bats are familiar with the area and therefore may be aware of suitable roosting locations within the site); and the presence of known roosts within the structure, or adjacent structures, or surrounding area during the active season.

6.2.18. The last point should be informed by surveys undertaken at other times of the year, where possible.

6.2.19. If works are required that could in principle affect bats, a risk-based approach is required, dependent on the likelihood of encountering bats, the status of the work, and weather/temperatures experienced. The likelihood of species other than pipistrelles should be considered (brown long-eared bats and whiskered bats are the next most commonly found under external features). The rationale for continuing in adverse conditions should be recorded.

6.2.20. Consideration should also be given as to whether any proposed works would constitute a single disturbance event (likely to be tolerable) or carries a risk of repeated disturbance/arousal (ideally to be avoided).

6.2.21. *Where the assessment determines that the likelihood of finding bats in winter is negligible or low, then works should be able to proceed without any temperature restrictions. Any bats found would be treated as 'unexpected finds'*⁴⁸. Records of bats (or evidence that bats have been present) should be collated to inform future approaches to working in the hibernation season (see APPENDIX 7).

⁴⁷. Park et al. (2003) note that bats arouse periodically from hibernation even when they are unlikely to feed, drink or mate (and thus may not leave the roost); that arousals are normally synchronised to dusk so that foraging opportunities can be exploited if they arise; and that the minimum temperature thresholds for the flight of many insects can be as low as 8°C. Hope and Jones (2013) found similar patterns of arousals linked to dusk in Natterer's bats. Avery (1985) showed that pipistrelles will leave hibernation to feed in any winter month during the period of hibernation, and on a third of all winter nights.

⁴⁸. This would also be the case if surveys had not previously established the presence of an opportunistic/transitional roost for which a licence had been sought, as it is not possible to apply for a licence on a precautionary basis.

6.2.22. *Where the assessment determines that the likelihood of finding bats in winter is moderate, but that only very small numbers of bats are likely to be found (if any, based on an understanding of how bats appear to be using the site in question), then risk of harm for any torpid bats found can be reduced by only stripping roofs when: it is dry/calm; and temperatures are no lower than 8°C for at least an hour or two from dusk on 3-4 consecutive nights (which would be sufficient for bats to be active and to feed).*

6.2.23. In addition (and as for works at other times of the year): the works should be covered by a method statement appropriate to the level of risk (see Section 6.10); care facilities for any bats found should be in place (see 6.9.17)

6.10. Precautionary working method statements (PWMSs)

6.10.1. A licence is not always necessary. Good practice and avoidance measures are promoted by all the UK SNCBs to minimise the impact of a proposed activity on wildlife, and in particular EPS, to avoid committing offences. Licensing should be seen as the last resort where all other alternative ways of avoiding impacts on the species have been discounted.

6.10.2. The need for a licence may be avoided through appropriate timing (see **Section 6.2**), or where working methods are in place to ensure the roost is not impacted. For example: the roost is not directly affected, connectivity to adjoining habitat can be maintained, and there is a buffer within which plant and materials are not stored or active nearby; or low-impact refurbishment works are undertaken in the same building as the roost, but the roost and its access are left intact, and working methods avoid disturbance (see **2.5.6**) even when the roost is occupied.

6.10.3. Another example where a non-licensable approach to works can be adopted includes buildings of 'low potential' with no evidence of use, but where the presence of a bat (or very low numbers of bats) cannot be ruled out even where the requisite number of surveys have been completed. In these circumstances, a precautionary approach to design and construction methods is sensible.

15. Appendix 6: Bat Species

1	Alcathoe	<i>Myotis alcathoe</i>
2	Barbastelle	<i>Barbastella barbastellus</i>
3	Bechstein's bat	<i>Myotis bechsteinii</i>
4	Brandt's bat	<i>Myotis brandtii</i>
5	Brown long-eared bat	<i>Plecotus auritus</i>
6	Common pipistrelle	<i>Pipistrellus pipistrellus</i>
7	Daubenton's bat	<i>Myotis daubentonii</i>
8	Greater horseshoe bat	<i>Rhinolophus ferrumequinum</i>
9	Greater mouse-eared bat	<i>Myotis myotis</i>
10	Grey long-eared bat	<i>Plecotus austriacus</i>
11	Leisler's bat	<i>Nyctalus leisleri</i>
12	Lesser horseshoe bat	<i>Rhinolophus hipposideros</i>
13	Nathusius' pipistrelle	<i>Pipistrellus nathusii</i>
14	Natterer's bat	<i>Myotis nattereri</i>
15	Noctule	<i>Nyctalus noctula</i>
16	Serotine	<i>Eptesicus serotinus</i>
17	Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>
18	Whiskered bat	<i>Myotis mystacinus</i>