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Preliminary Bat Roost Assessment

12 Russell Road, West Wittering, Chichester PO20 8EF

On behalf of Joe Haskell

19th March 2024

Quality Assurance

This report has been prepared by Emily Sabin. The methods and recommendations are based on the following:

- Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Report Writing 2017 (CIEEM, 2017)
- CIEEM Good Practice Guidance for Habitats and Species (CIEEM, 2021)
- Bat Conservation Trust (BCT) Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th Edition (BCT, 2023)

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1. Executive Summary

Site Details
<ul style="list-style-type: none"> • 12 Russell Road, West Wittering, Chichester PO20 8EF (OS Grid Reference: SZ793974)
Scope of Works
<ul style="list-style-type: none"> • Imprint Ecology was commissioned to undertake an assessment for bats at a site which is required to inform a planning proposal for the construction of new dormer windows and a hip to gable extension.
Key Ecological Constraints
<ul style="list-style-type: none"> • In Britain, all bat species and their roosts are legally protected under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended).
Results
<ul style="list-style-type: none"> • A site visit was carried out on the 12th March 2024. • A thorough inspection found no evidence of roosting bats using the building. In accordance with the Bat Conservation Trust’s (BCT) Good Practice Guidelines (Collins, J. 2023), the building was assessed to be of low suitability for roosting bats. • No other protected species surveys have been recommended.
Mitigation
<ul style="list-style-type: none"> • The work may be able to proceed lawfully provided the Method Statement for bats is adhered to. This will prevent any contravention of legislation protecting bats from being harmed or killed. This includes: checking the underside of each tile during tile removal around the chimney and at the end of the hip with the slipped tile, prior to works starting. A proportionate approach has been taken in this case, as no evidence of bats was found, there is a paucity of woodland and mature trees or other highly-suitable bat habitat in the immediate surroundings, and no large crevices or cavities were found. No other Potential Roost Features (PRFs) for bats were noted across the building that would otherwise mean further dusk emergence surveys would be required. This advice has been given alongside guidance in BCT Good Practice Guidelines (2023). • No external lighting/Artificial Lighting At Night (ALAN) will be installed on site. Construction lighting will kept to a minimum. If ALAN must be installed e.g. security lighting, this will be done under an ecologically sensitive scheme under BCT/ILP (2023) guidance.

- Any areas of construction materials or machinery on site are checked each morning before works begin, to rescue any small mammals, amphibians or reptiles that may be present.

Biodiversity Enhancement Recommendations

- Enhancements for bats, birds and other wildlife on site in line with local and national planning policies.

2. Introduction

2.1 Background and Proposed Development

Imprint Ecology was commissioned by Joe Haskell to undertake a Preliminary Bat Roost Assessment (PBRA) for bats, at 12 Russell Road, West Wittering, Chichester PO20 8EF (OS Grid Reference: SZ793974) hereafter referred to as ‘the site’. The proposed development is for the installation of dormer windows and a hip to gable extension.

2.2 Experience of Ecologists

George Sayer (BSc (Hons) Environmental Sciences, PgDip Endangered Species Recovery, MArborA, MCIEEM, Natural England Licence Holder – Bats Level 2 and GCN. Emily Sabin BSc (Hons) (Wildlife Conservation) AMRSB (MRSB from 1st April 2024), Accredited Agent under Natural England WML-CL18 Level 2 Bat Licence 2018-34434. She is a committee member of Sussex Bat Group and a bat rescuer, and has five years’ experience as an ecological consultant. She is pending approval for her recent “Full” membership application to CIEEM. Emily is also the Water Vole Officer at the People’s Trust for Endangered Species and coordinates the National Water Vole Monitoring Programme.

2.3 Purpose of the Report

This report contains the findings of an ecological assessment of the building and surrounding habitat. It seeks to identify potential ecological constraints that the proposals may have upon bats or other protected species and provides recommendations for further survey, impact avoidance, mitigation and enhancements where required.

This report is valid for a maximum of 24 months from the date of issue. Should the proposals or site alter in any way, an ecologist should be consulted to re-inspect the site and confirm that this report is still accurate.

2.4 Site Description

The site is located within a suburban setting of West Wittering, a coastal town 6 miles southwest of Chichester. The principal dwelling, 12 Russell Road, is set within a small plot, comprising sealed surfaces, buildings, modified grassland (frequently mown), and buildings. The wider environ comprises similar-sized houses and gardens, coastal habitats and foreshore, modified grassland for

amenity purposes and sealed surfaces. See Figure 1 for the site location and Figure 2 for an aerial view of the site.

Figure 2.1 - Site Location. Map data ©OpenStreetMap contributors 2024.

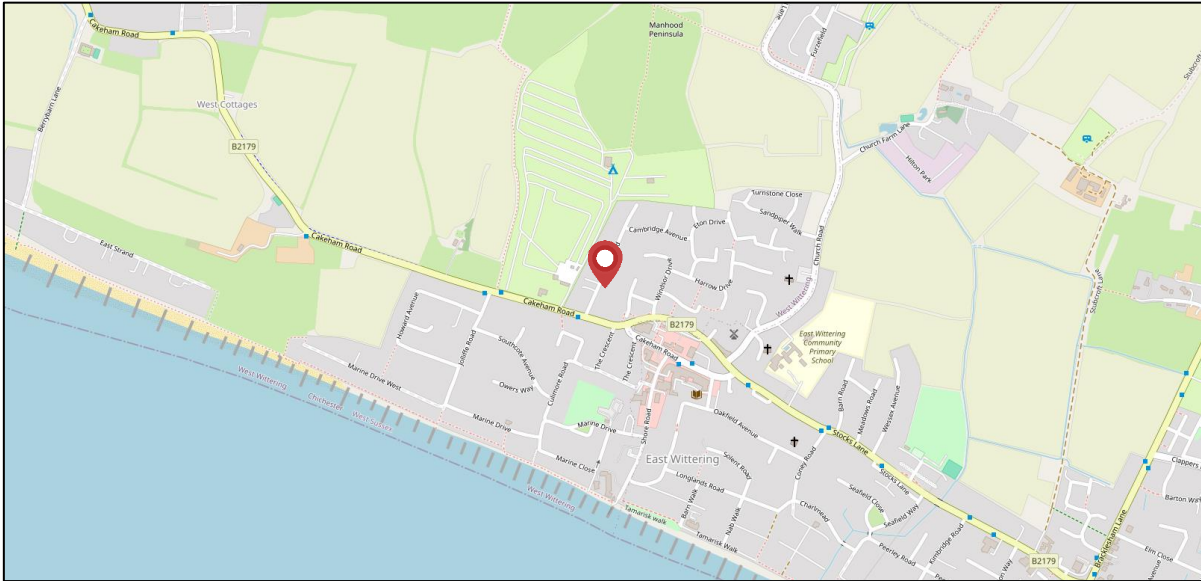


Figure 2.2 – Site boundary outlined in red. ©Google Earth (2024)



3. Planning Policy and Legislation

3.1 National Planning Policy

The National Planning Policy Framework (2021) outlines the government’s responsibility to minimise adverse impacts on biodiversity and bestow biodiversity net gains where possible. Paragraph 179 of the NPPF states that “*To protect and enhance biodiversity and geodiversity, plans should: /... promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*”

The NPPF is also complemented by the Circular 06/2005: Biodiversity and Geographical Conservation – Statutory Obligations and Their Impacts Within The Planning System (Office of the Deputy Prime Minister, 2005). Paragraph 99 states that “*It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.*”

3.2 Local Planning Policy

The site is within the Chichester District; the proposals should be assessed against the Chichester District Local Plan – Key Policies 2014-2029. Policy 49 covers Biodiversity; the following criteria must be met for planning applications to be supported:

1. *The biodiversity value of the site is safeguarded;*
2. *Demonstrable harm to habitats or species which are protected or which are of importance to biodiversity is avoided or mitigated;*
3. *The proposal has incorporated features that enhance biodiversity as part of good design and sustainable development;*
4. *The proposal protects, manages and enhances the District’s network of ecology, biodiversity and geological sites, including the international, national and local designated sites (statutory and non-statutory), priority habitats, wildlife corridors and stepping stones that connect them;*
5. *Any individual or cumulative adverse impacts on sites are avoided;*
6. *The benefits of development outweigh any adverse impact on the biodiversity on the site. Exceptions will only be made where no reasonable alternatives are available; and*

planning conditions and/or planning obligations may be imposed to mitigate or compensate for the harmful effects of the development.

3.3 Bats

British bats are fully protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). Additionally, all bat species are protected under Schedule 2 of the Conservation of Habitats and Species Regulations 2017 which defines European Protected Species (EPS). Bats and their habitats receive additional protection via the Countryside and Rights of Way (CRoW) Act, 2000, under the Bonn Convention (Agreement of Bats in Europe), and in Appendix II and III of the Bern Convention. Seven British bat species are listed under Section 41 of the NERC Act 2006.

This combined legislation means that it is a criminal offence to:

- Deliberately kill, injure or capture a bat
- Deliberately disturb bats, including in particular any disturbance which is likely to impair their ability to survive, to reproduce or to rear or nurture their young, or their ability to hibernate or migrate, or which is likely to affect significantly their local distribution or abundance
- Damage or destroy a breeding site or resting place of a bat
- Damage or destroy, or obstruct access to, any structure or place which any bat uses for shelter or protection
- Disturb bats while occupying a structure or place used for that purpose

A bat roost is a place or structure which a bat uses for shelter or protection. Bats are loyal to roosts, returning annually to the same place. Therefore, the legislation protects bat roosts regardless of whether or not bats are present at the time of survey or construction work.

If proposed development work is likely to destroy or disturb bats or a bat roost, Natural England would be consulted to obtain a European Protected Species Licence (EPSL). which would be subject to appropriate measures to safeguard bats. With suitable approved mitigation, exemptions can be granted from the protection afforded to bats under Regulation 39 by means of a EPSL.

The Natural Environment and Rural Communities Act (NERC Act) 2006, requires due consideration be given to biodiversity and its potential enhancement when considering proposed developments. The NERC Act defines a number of bat species as species of principal importance for consideration during planning.

4. Methods

4.1 Desk Study

A desk study was undertaken to obtain ecological information about the site in context with the surrounding area. The [Multi-Agency Geographic Information for the Countryside \(MAGIC\)](#) website was accessed on 12th March 2024 to identify local statutory designated sites, priority habitats and European Protected Species Licences (EPSLs) within a suitable radius of the site. The Site Check tool was used to set a buffer size for each respective data search.

Satellite imagery from Google Earth, MAGIC and Ordnance Survey maps were used to understand the site's connections to surrounding countryside. Given the overall scale and nature of the site and the proposals, a full data search from Sussex Biodiversity Record Centre (SxBRC) was not considered proportionate. This is in accordance with CIEEM (2020) guidance.

4.2 Site Assessment

A visual inspection of the site was undertaken by George Sayer (qualifications in Section 2.2) during daylight hours on 12th March 2024, commencing at 09:00hrs.

A camera, binoculars, telescopic ladders, and high-powered torches were used to search for evidence of bats and determine the potential for the building to support bats and other protected species.

The presence of potential roosting features (PRFs) and access/exit routes which bats could use to enter these features were surveyed. Evidence of use by bats was also looked for, such as scratch marks, urine stains, lack of cobwebbing, feeding remains e.g. moth wings, droppings, and actual bats. An assessment of potential commuting routes and surrounding habitat was also undertaken to determine their potential to support bats.

Bat PRFs are usually found in specific areas, such as joints, cracks, gaps and cavities within structures like mature trees and buildings. These were prioritised as areas to check for bat evidence. Roosting bat evidence is not easy to find and not always visible, so any potential roosting locations were also noted.

Following inspection, the building(s) were categorised as having the following suitability for bats: ‘high’, ‘moderate’, ‘low’, ‘negligible’ or ‘none’. These categories are based on observations made during the survey and in the context of the descriptions laid out in Table 1.

Table 1 - Categorisation of bat roosting potential of structures (adapted from Collins, J. 2023.)

Suitability	Description
Confirmed bat roost or resting place	Presence of bats or evidence of bats.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).

4.3 Site Inspection Constraints

One single site assessment represents a ‘snapshot’ in time, and it is possible that bats may not have been present at the time of survey but are present at other times of the year. For this reason, the building, surrounding habitats and connecting features were assessed for their potential to support bats, even where no direct evidence of bats was found.

5. Results

5.1 Desk Study

5.1.1 Statutory and Non-Statutory Designated Sites

12 Russell Road is not located within nor directly adjacent to any sites designated for nature conservation importance. There is one designated site within 1km of the site, as follows:

- The site falls within the impact risk zones for Bracklesham Bay SSSI, which lies 550m to the south. This SSSI consists of a long stretch of coast with some rough unimproved grazing pastures which are important for the bird populations they support. This importance is elevated as agricultural improvement continues to threaten and erode a habitat-type already scarce within the county. The coastal habitats include a small area of salt marsh, shingle bank, the rifes (wide flowing ditches) and associated reed beds, together with a long stretch of intertidal exposures of high geological interest.
- Solent Maritime, Special Area of Conservation (SAC) lies 900m southwest of the site. This is a complex SAC encompassing a major estuarine system on the south coast of England. Sediment habitats within the site include extensive areas of intertidal mudflats and sandflats, often supporting eelgrass (*Zostera spp.*), subtidal sandbanks, saltmarsh and natural shoreline transitions such as drift line vegetation.
- The site also falls 4km east of Chichester within the 5.6 km zone of influence for Chichester and Langstone Harbours SPA. It is therefore subject to the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended), along with relevant provisions within Policy 50 of Chichester District Council Adopted Chichester Local Plan: Key Policies 2014-2029.

5.1.2 Priority Habitats

The following protected/priority habitats lie within 1km of the site:

- Maritime Cliffs and Slopes

These habitats of Principal Importance are listed in Section 41 of the NERC Act, 2006. Section 40 places a duty on Local Planning Authorities to have due regard to biodiversity.

5.1.3 Protected Species

One European Protected Species Licence (EPSL) for bats has been granted within 2km of the site, as follows:

- Destruction of a common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus* and brown long-eared *Plecotus auritus* resting place, 100m east, granted in 2020

5.1.4 Other Species

The MAGIC online resource also confirmed that no other EPS licences have been granted within 2km of the site.

5.2 Site Assessment

The property at 12 Russell Road was a semi-detached brick-built rendered bungalow with a hipped roof. The roof was clad with modern clay tiles and half-round ridge tiles.

The roof appeared to be in a good state of repair overall, with one tile missing on the main roof just below the chimney on the eastern elevation and a slipped end of hip tile providing a limited suitability for opportunistic bats.

The eaves had timber fascia boards cut between each rafter, and these had degraded over time or lifted away creating small crevices behind. No evidence of bats was found in these gaps.

The windows and doors were made of uPVC materials and appeared in excellent condition and well-sealed to the building, with no visible damage that bats could exploit.

The loft void was large, draughty, and appeared to have been stripped of the interior felt lining leaving the underside of the tiles visible behind timber rafters. The void was filled with loose fibre insulation and boarding and there was artificial lighting present. There was no daylight coming in through the roof that suggested any suitable ingress opportunities for bats. No evidence of bats was found in the loft.

In accordance with Table 1 and the guidance in *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (4th edition) (Collins J (ed.) (2023), the building was assessed as having low suitability for bats. See photos 1-14.

Photo 1: Interior loft void



Photo 2: Interior loft void



Photo 3: Interior loft void



Photo 4: Interior loft void



Photo 5: Interior loft void



Photo 6: Interior loft void



Photo 7: Rear, east facing elevation



Photo 8: East facing roof. Slipped tile under chimney



Photo 9: Slipped tile at hip end



Photo 10: Broken fascia board



Photo 11: Front, west facing elevation



Photo 12: Front lawn



Photo 13: View looking west



Photo 14: Rear garden



5.3 Other Species

The property offers little in the way of suitable nesting opportunities for breeding birds and no evidence of nests was recorded during the survey. Nearby gardens provide a range of shrubs that could be used by a range of passerine bird species for nesting. The modified grassland and sealed surfaces that cover the site offer negligible suitability for reptiles, amphibians, and small mammals.

6. Mitigation

6.1 Designated Sites and Habitats

Given the intervening distances, and the small scale of the proposals, any impacts upon local designated sites would be of extremely minor magnitude and are highly unlikely to occur. Indirect impacts from traffic pollution during construction is possible. This increase in pollution would be minimal. No impacts upon bats or flightlines would occur, assuming basic avoidance measures are incorporated into proposals, meaning no impact would occur to the Singleton and Cocking Tunnels SAC qualifying features.

6.2 Bats – Method Statement

The building had a missing tile by the chimney, a slipped hip tile, and small gaps behind fascia boarding. But when combined with the paucity of nearby roosting and foraging habitat for bats, the building has been rated in accordance with the criteria given in Table 1 adapted from guidance in Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition) (Collins J (ed.) (2023), as having low suitability for roosting bats.

The assessment of the building was made in accordance with the latest official good practice guidelines (BCT, 2023). Section 5.2.44 states that:

“If the structure has been classified as having low suitability for bats (see Table 4.1), an ecologist should make a professional judgement on how to proceed based on all of the evidence available and the balance of probabilities. Thought processes and decision making should be adequately recorded as a paper trail. If all areas (including voids, cracks and crevices) of a structure have been inspected and no evidence found (and is unlikely to have been removed by weather or cleaning or be hidden), then further surveys are not appropriate. If complete inspection is not possible then proportionality must be considered. A single survey during the summer months may be adequate to ensure nothing obvious has been missed and/or precautionary measures could be applied during works. This is likely to be a more proportionate approach than carrying out multiple surveys.”

Given the small scale of the proposals it is considered highly unlikely that the development will have an impact upon any bat roosts or other wildlife, provided the mitigation measures below are followed. The proposals can proceed lawfully and with minimal risk to bats at this time provided the mitigation measures below are adhered to. Given the intervening distances and small residential

nature of the proposals, there are no adverse effects anticipated for designated site as a result of the proposed scheme.

No further surveys for bats are required at this time. Should works be delayed by more than 24 months beyond the date of this report, a re-inspection of the building by a suitably qualified bat ecologist should be conducted before proceeding.

- If the small number of tiles immediately surrounding the missing tile by the chimney are to be removed to accommodate the proposals, these will be removed individually with care, with the underside of each tile carefully checked for bats. The same method will apply to removing/disturbing the hip tiles where there is a small gap at the end of the hip due to tile slippage. Any fascia boarding that has degraded or lifted away creating a gap behind will be lifted away carefully, with the underside checked for bats.
- In the highly unlikely event that a bat is found, all work on site will stop and a licenced bat ecologist will be contacted immediately to determine how to proceed. Further dusk emergence surveys may be required and a European Protected Species Licence (EPSL) would be applied for.
- Lighting – No external lighting is being proposed on site. If lighting is proposed in future, this must be done under an ecologically sensitive lighting scheme. Artificial Light At Night (ALAN) adversely affects bats, invertebrates and other nocturnal animals (Bat Conservation Trust and the Institute of Lighting Professionals, 2023). ALAN creates a barrier for bats and disturbs their natural foraging and commuting patterns, and it must be avoided across the site.

If exterior lighting is to be installed on site, this will be kept to a minimum and the following measures will be taken:

- No exterior lighting, including during construction, will be directed at bat boxes, vegetation, or the oak tree at the rear of the site to the north which forms part of the Bat Movement Network
- Luminaires will face downwards and mounted horizontally, with no light output above 90° and no upward tilt.

- Security lighting will be set on motion sensors and set to a short timer. For residential purposes, a 1 or 2 minute timer is likely to be appropriate.
- All luminaires will lack UV elements when manufactured. Metal halide, compact fluorescent sources should not be used.
- LED luminaires will be used where possible due to their sharp cut-off, lower intensity, good colour rendition and dimming capability.
- A warm white light source (2700Kelvin or lower) will be adopted to reduce blue light component.

6.3 Other Species

- Construction – To be undertaken in accordance with best practice advice with regards to minimising dust, noise, light and emissions during and post-construction. The level of impact on designated sites and protected/priority habitats is expected to be negligible.
- All holes/excavations must be covered overnight, or provided with a safe escape route for small animals such as a gently sloping ramp e.g. a plank of wood with grooves/chicken wire wrapped over it for grip.
- Open pipework must be checked they are empty and then closed off at the end of each working day to avoid small animals entering them.
- Any areas affected by the installation of scaffolding or machinery on the ground are checked each morning before works begin, to rescue any small mammals or reptiles that may be present.
- Any materials like wood and rubble piles should be stored on hard surfaces or on pallets to elevate them off the ground and discourage small animals sheltering within them.
- Pollution – Silt and water run-off must not pollute the site. Any chemicals or fuel must be stored appropriately, fully-sealed and kept on existing hard surfaces.
- The lawn immediately surrounding the construction zone shall continue to be kept cut to ensure small animals are not be sheltering within the construction zone.

7. Enhancements for Biodiversity

In addition to mitigation, development proposals are expected to demonstrate an overall positive impact on the natural environment as set out in local and national planning policies.

The following ecological enhancements may be considered on this site in order to result in a net gain in biodiversity.

- One integrated bat box, external* bat box or tile with a suitable gap (or readymade ‘bat tile’) could be incorporated into the designs. Erected at least 3-5m above ground, facing between southwest and southeast, receiving several hours of sunlight during the day. No artificial lighting will shine on any new bat roosting opportunities. See Figures 7.1–7.4 for examples.

**WoodStone/Woodcrete boxes are recommended rather than timber boxes. They safeguard against attacks from predators and the material insulates the box which creates a more consistent internal temperature.*

Figure 7.1 – [‘Chillon’ Woodstone Bat Box](#)



Figure 7.2 – [Beaumaris Woodstone Bat Box](#)



Figure 7.3 – Slate Bat Access Tile



Figure 7.4a (left) and 7.4b (right) – [BirdBrickHouses Integrated Bat Boxes](#)

(7.4b is suitable to install behind timber cladding)



- One bird box is recommended to increase the number of bird nesting opportunities on site. An external WoodStone/Woodcrete bird box could be installed onto the principal dwelling building or an outbuilding, facing between northwest and northeast. See Figures 7.5–7.8 for suitable examples of bird nesting opportunities. Similar options are available elsewhere.

Figure 7.5 – [BirdBrickHouses](#) integrated bird box.



Figure 7.6 – [Vivara Pro External Bird Box](#)



Figure 7.7 – [Vivara Pro](#) Open-fronted bird box (suitable for wrens/robins if installed within a shrub or hedgerow)



Figure 7.8 – [Vivara Pro](#) Woodstone House Sparrow Terrace External Bird Box



- Pollinator-friendly flowers grown around the garden in beds, pots, or in hanging baskets will improve its ecological value greatly. Always try to choose organic, pesticide-free plants and seeds. Plants should be chosen from the [RHS 'Plants for Pollinators' lists](#). Alternatively, the following list of low-maintenance flowering plants has been recommended by the ecologist for this site:

- Borage *Borago officinalis*
- Bugle *Ajuga reptans*
- Catmint *Nepeta spp.*
- Chives *Allium schoenoprasum*
- Cranesbill geranium *Geranium spp.*
- English lavender *Lavandula angustifolia*
- Nasturtium *Tropaeolum majus*
- Rosemary *Rosmarinus officinalis*
- Sunflower *Helianthus annuus*
- Thyme *Thymus spp.*
- Winter-flowering heather *Erica carnea*

- A small solid wooden hedgehog house (Figure 7.9) could also be installed in a quiet corner of the garden, sheltered in a shrub, away from areas prone to flood. Information for providing a hedgehog friendly garden can be found [online here](#).

Figure 7.9 – Solid Wooden Hedgehog Box



8. Conclusion

Imprint Ecology Limited was commissioned by Joe Haskell to undertake a Preliminary Bat Roost Assessment at 12 Russell Road, West Wittering, Chichester.

A daytime Preliminary Bat Roost Assessment was carried out on 12th March 2024. The building appeared to be in a very good state of repair, with a limited number of PRFs identified on the main roof of the building in the form of a missing tile, slipped hip tile and small gappy fascia boards. The building was assessed as having low suitability for bats overall, but due to a paucity of suitable bat foraging and roosting habitat nearby, no evidence of bats, and no large voids inaccessible to inspect during the survey, no further surveys have been recommended. A Method Statement for bats and precautionary mitigation measures have been devised to safeguard bats and other wildlife that may use the site.

Given the nature of the proposals, impacts upon nearby designated sites or habitats is considered to be negligible.

The suggested ecological enhancements will result in a positive net gain over time in line with local and national planning policies.

9. References

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