Preliminary Roost Assessment

21 Glebe Gate, Dewsbury, Wf12 0JX

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Industry Guidelines and Standards

This report has been written with due consideration to:

- Chartered Institute of Ecology and Environmental Management (2017). Guidelines for Preliminary Ecological Appraisal. 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.1. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2017). Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2020). Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- British Standard 42020 (2013). Biodiversity – Code of Practice for Planning and Development.
- British Standard 8683:2021 (2021). Process for Designing and Implementing Biodiversity Net Gain.

Proportionality

The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate.

This approach is enshrined in Government planning guidance, for example, paragraph 174 of the National Planning Policy Framework for England.

The desk studies and field surveys undertaken to provide a Preliminary Ecological Appraisal (PEA) might in some cases be all that is necessary.

(BS 42020, 2013)

Executive Summary

Arbtech Consulting Limited was instructed by Moazzam Mahmood to undertake a Preliminary Roost Assessment (PRA) at 21 Glebe Gate, Dewsbury, Wf12 0JX (hereafter referred to as "the site"). The survey was required to inform a planning application for the erection of extensions and alterations (hereafter referred to as "the proposed development").

Recommendations - This is work you will need to commission (if any) to obtain planning permission and comply with legislation

The building has **low** habitat value for supporting roosting bats. Therefore, **one** bat emergence and re-entry surveys is required during the active bat season (May – September) in line with best practice. These will be required to inform a planning decision and a subsequent application for a European protected species mitigation licence (EPSML) (if necessary). See section 4.2 for full details.

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed by Moazzam Mahmood to undertake a Preliminary Roost Assessment (PRA) at 21 Glebe Gate, Dewsbury, WF12 0JX (hereafter referred to as "the site"). The survey was required to inform a planning application for the erection of extensions and alterations (hereafter referred to as "the proposed development"). A plan showing the proposed development is provided in Appendix 1.

The aim of the PRA was to determine the presence or evaluate the likelihood of the presence of roosting bats, and to gain an understanding of how bats could use the site for roosting, foraging or commuting. This has been undertaken with due consideration to the "Bat Surveys for Professional Ecologists —Good Practice Guidelines" publication (Collins, 2016).

No previous ecology reports have been produced for this site by Arbtech Consulting Ltd or, to the author's knowledge, by any other consultancy.

1.2 Site Context

The site is located at National Grid Reference SE25611837 and has an area of approximately 0.1ha comprising of one building with associated garden.

A site location plan is provided in Appendix 2.

1.3 Scope of the Report

This report provides a description of all features suitable for roosting, foraging and commuting bats and evaluates those features in the context of the site and wider environment. It further documents any physical evidence collected or recorded during the site survey that establishes the presence of roosting bats. It provides information on possible constraints to the proposed development as a result of bats and summarises the requirements for any further surveys to inform subsequent mitigation proposals, achieve planning or other statutory consent and to comply with wildlife legislation.

To achieve this, the following steps have been taken:

- A desk study has been carried out.
- A field survey has been undertaken, including an external survey and internal inspection of built structures where possible, to determine the presence or the suitability of any features which bats could use for roosting and to assess the suitability of the site's bat foraging and commuting habitat.
- An outline of potential impacts on any confirmed or unidentified roosts has been provided, based on the proposed development.
- Recommendations for further surveys and mitigation have been made, along with advice on the requirements for a European Protected Species Licence (EPSL) application if appropriate.
- Opportunities for the enhancement of the site for roosting, foraging and commuting bats have been set out.

2.0 Methodology

2.1 Desk Study

The desk study included a 2km radius review of statutory designated sites with bat qualifying interests and granted EPSL records for bats held on magic.gov.uk database. An assessment of the surrounding landscape structure was also completed using aerial images from Google Earth and OS maps.

2.2 Field Survey

The survey was undertaken by Matthew Edwards (Accredited Agent on Natural England Bat Licence Number: 2016-22119-CLS-CLS.) on the 14th June 2022.

The PRA focussed on one building which will be affected by the proposed development as well as providing an overview of the wider site and the surrounding landscape for bat roosting, foraging and commuting habitat.

For any surveyed buildings:

A non-intrusive visual appraisal was undertaken from the ground, using binoculars to inspect the external features of the building for features which bats could use for roosting, including access or egress points and for signs of bat use including droppings, scratch marks, insect remains and urine smear marks. An internal inspection of the building was also made, including the living areas and any accessible roof spaces, using a torch and ladders. The surveyor paid particular attention to the floor and flat surfaces, window shutters and frames, lintels above doors and windows, and carried out a detailed search of numerous features within the roof space. An endoscope was used to complete a close-up inspection of any accessible features, where appropriate.

2.3 Breeding Birds and Other Incidental Observations

The surveyor also made note of any other ecological constraints observed during the survey, notably the likelihood of presence or signs of breeding birds, and the suitability of the site for barn owls *Tyto alba*.

2.4 Suitability Assessment

Built structures were categorised according to the likelihood of bats being present and the types of roost that the identified features could support. This is summarised in Table 1 for buildings below. Roost suitability is classified as high, moderate, low and negligible and dictates any further surveys required before works can proceed.

Table 1: Features of a building that are correlated with use by bats

Classification	***Feature of building and its context***
Moderate to high	Buildings or structures with features of particular significance for larger numbers of roosting bats e.g. mines, caves, tunnels, icehouses and cellars. Habitat on site and surrounding landscape of high quality for foraging bats e.g. broadleaved woodland, tree-lined watercourses and grazed parkland.

	Site is connected with the wider landscape by strong linear features that would be used by commuting bats e.g. river and or stream valleys and hedgerows. Site is proximate to known or likely roosts (based on historical data). Buildings with high suitability could support roosts of high conservation value such as maternity or hibernation roosts.
Low	A small number of possible roost sites or features, used sporadically by individual or small numbers of bats. Potential roost features may be suboptimal for reasons such as shallow depth, poor thermal qualities or upwards orientation with exposure to inclement weather or predators. Habitat suitable for foraging in close proximity, but isolated in the landscape. Or an isolated site not connected by prominent linear features. Few features suitable for roosting, minor foraging or commuting.
Negligible	Unsuitable for use by bats.

2.5 Limitations

It should be noted that whilst every effort has been made to describe the features on site in the context of their suitability for roosting bats, this does not provide a complete characterisation of the site. This survey provides a preliminary view of the likelihood of bats being present. This is based on suitability of the habitats on site and in the local area, the ecology and biology of bats as currently understood, and the known distribution of bats as recovered during the desk study. Bats are highly mobile creatures that switch roosts regularly and therefore the usage of a site by bats can change over a short period of time.

A biological records data search has not been undertaken. However, given the location of the site, the nature of the habitats present and the assessed suitability of the site for protected or notable species, it is not anticipated that the purchase of biological records data will add any significant weight or alter the conclusions and recommendations outlined in this report.

These limitations have been taken into account during the evaluation of the site and requirement for further surveys and mitigation.

3.0 Results and Evaluation

3.1 Desk Study Results

A summary of desk study results is provided below.

3.2 Designated Sites

Details of any statutory designated sites with bat qualifying interests within a 2km radius of the site, including their reasons for notification, are provided in Table 2 below.

Table 2: Statutory designated sites with bat qualifying interests within 2km radius of the site

Designated site name	***Distance from site (approx.)***	***Reasons for notification from Natural England***
Sparrow Wood Local Nature Reserve	1.9km north-west	Woodland habitat with the associated wildlife and flora.

3.3 Landscape

A review of aerial photographs (Google Earth) the magic.gov.uk database and OS maps has been undertaken. Collated together, the value of the landscape for bats is described below:

The site is in a rural area Yorkshire. The landscape is dominated by large arable fields with small, scattered woodland copses and tree lines around the area, which could be used by bats for roosting, foraging and commuting. One area of ancient woodland is located ~1.4km to the south that could be an important local habitat for bats. Scattered irrigation ditches around the area will provide abundant insect foraging for bats.

3.4 Historical Records

No bat records have been returned by West Yorkshire Ecology (WYE) within 2km of the site.

No EPSL records for bats have been returned within 2km of the site.

3.5 Field Survey Results

The PRA focussed on one building which will be affected by the proposed development as well as providing an overview of the wider site and the surrounding landscape for bat roosting, foraging and commuting habitat. The results of the field survey are illustrated in Appendix 3. The weather conditions recorded at the time of the survey are shown in Table 3.

Table 3: Weather conditions during the survey

Date: 14/06/2022	
Temperature	17°C
Humidity	56%
Cloud Cover	10%
Wind	2mph
Rain	None

B1 Exterior

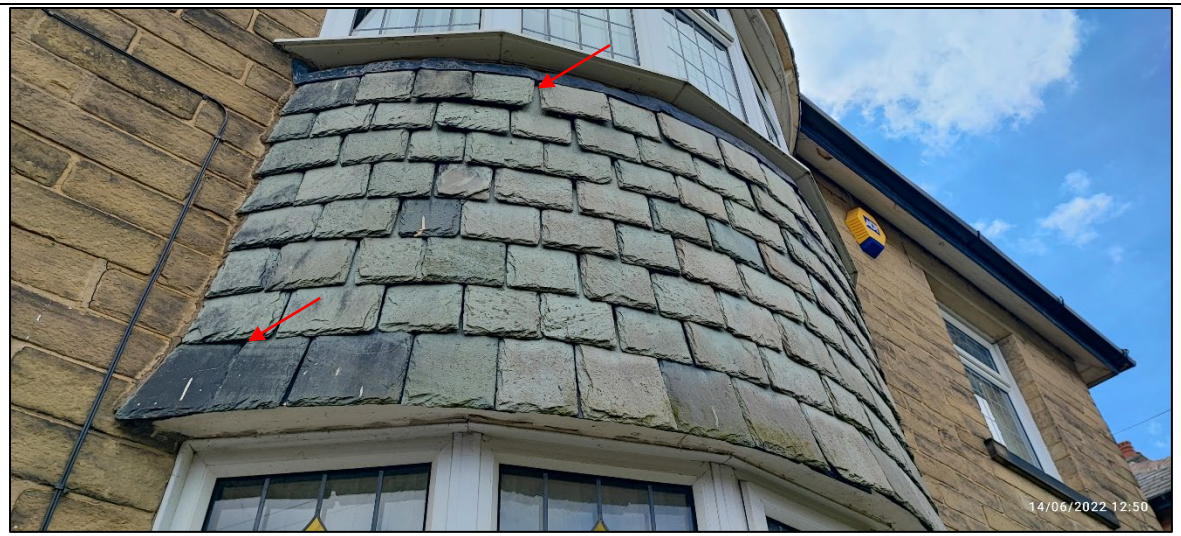
B1 – northern elevation (pictured opposite).

B1 is a detached two-storey brick-built building with a pitched and roof clad in slate roof tiles. The roof tiles are in very good condition with no raised tiles under which bats could roost. However, missing mortar is present on one ridge tile that could provide a sub-space between the ridge tile and mortar for crevice dwelling bats (red circle opposite).

Additionally, hanging tiles on the northern elevation provide gaps that could be utilised by crevice dwelling bats (yellow circle opposite).

The doors and windows are are in excellent condition with no suitable bat roost sites.

The brickwork around the building is rendered and is in excellent condition with no gaps or cracks in which bats could roost.

B1 – northern elevation (pictured opposite). The red arrow opposite showing missing mortar on ridge tile that could be utilised by crevice dwelling bats.	
B1 – northern elevation (pictured opposite). Red arrows showing gaps in hanging tiles that could be utilised by crevice dwelling bats.	

B1 – northern elevation (pictured opposite). Red arrows showing gaps in hanging tiles that could be utilised by crevice dwelling bats.	
B1 – southern elevation (pictured opposite). The eastern, southern and western elevations were in excellent condition and provided no features that could be utilised by bats.	

B1 Interior

B1 – loft space (pictured opposite).

There is one loft space within the main roof void of B1. The roof structure is built from modern timber beams including the ridge beam. There is no bitumen felt lining, therefore, no roof sub-space that crevice dwelling bats could utilise. There are cobwebs around the ridge beam and roof to floor cobwebs which could indicate a lack of internal flying activity from void dwelling bats. No daylight enters the loft space which indicates that it is well sealed.

B1 Evidence of bats

There was no evidence of bat activity located internally in B1. There was no evidence of bat use (e.g. bat droppings) found on external features. However, this kind of evidence is easily weathered away on the exterior of buildings and is rarely visible.

B1 Breeding birds and other incidental observations

There was no evidence of nesting birds located internally or externally on the survey building.

4.0 Conclusions, Impacts and Recommendations

4.1 Informative Guidelines

A summary of the relevant legislation and planning policies is provided in Appendix 4.

Bats

Bats are protected under the Wildlife and Countryside Act and the Conservation of Habitats and Species Regulations 2017 (amended by the Conservation of Habitats and Species Regulations (amendment) (EU Exit) Regulations 2019).

There are three possible outcomes of this survey, each with specific recommendations. These are outlined below:

Confirmed bat roost

Best practice survey guidelines (Collins, 2016) recommend additional surveys for confirmed roosts. Three further surveys are required to characterise the bat roost present including species, roost type and access points to inform an EPSL application to Natural England. Surveys must be completed during the active bat season (May – September). At least two of the surveys should be completed during the optimal survey period mid-May to August, and at least on the surveys should be a dawn re-entry survey.

Low, moderate or high likelihood of a bat roost present

Best practice survey guidelines (Collins, 2016) recommend additional surveys for features assessed as having low to high suitability for roosting bats. One, two or three further surveys are required to confirm presence or likely absence of a bat roost, based on a low, medium or high roost likelihood evaluation. Surveys must be completed during the active bat season (May – September). If more than one survey is recommended, at least one of them should be completed during the optimal survey period mid-May to August, and at least one the surveys should be a dawn re-entry survey. If two or one further survey is recommended these surveys must be completed during the optimal survey period (mid-May to August). For low and moderate roost likelihood evaluation the survey effort recommended at this stage is iterative and if bats roosts are confirmed in the building, a further survey will be required to provide sufficient information to inform an EPSL application to Natural England.

Negligible likelihood of a bat roost present

Buildings assessed as comprising negligible suitability for roosting bats do not normally require further surveys. However, if bats are found during any stage of the development, work should stop immediately, and a suitably qualified ecologist should be contacted for further advice.

Birds

Legislation protects all wild birds whilst they are breeding, and prohibits the killing, injuring or taking of any wild bird or their nests and eggs. Certain species of bird, including the barn owl, are subject to special provisions; it is an offence to disturb any bird or their young during the breeding season.

4.2 Evaluation

Taking the desk study and field survey results into account, Table 4 presents an evaluation of the value of the site for bats and also details any other ecological constraints identified such as nesting birds in relation to the proposed development.

Table 4: Evaluation of the site for bats and any other ecological constraints

Feature	***Survey conclusions (with justification)***	***Foreseen impacts***	***Recommendations*** *Measures required to adhere to guidance, legislation and planning policies.*	***Biodiversity Enhancements*** *The Local Planning Authority has a duty to ask for enhancements under the NPPF (2021)*
B1 Bats	The building has a **low** habitat value for supporting roosting bats. There are minor suitable roosting features externally in the form of missing mortar on ridge tiles and gaps in hanging tiles on the northern elevation that could be used by low numbers of common crevice dwelling bat species.	As the proposals include the renovation and extension of this building, any bat roosts present would be destroyed. This could result in death, injury or disturbance of bats.	One bat emergence and re-entry survey is required during the active bat season (May – September) to confirm presence or likely-absence of a bat roost in the building. The survey must be completed during the optimal survey period mid-May to August inclusive. Sub-optimal: early May and September. The survey can be either a dusk emergence or dawn re-entry survey. Two surveyors are required to provide full coverage of the building. If bat roosts are confirmed in the building two additional survey will be required to inform a European protected species mitigation licence application to Natural England once planning permission has been granted. At least one of the additional surveys will need to be completed during the peak survey period.	To be confirmed upon completion of the surveys.
B1 Nesting birds	The building offers no opportunities for nesting birds.	None.	None.	The installation of a minimum of one bird box on on retained buildings will provide additional nesting habitat for birds e.g. Schwegler 1SP Sparrow Terrace (buildings) Or a similar alternative brand. Sparrow boxes should be positioned at the eaves of a building and can be incorporated into the fabric of the building during construction.

5.0 Bibliography

- British Standard 42020 (2013). Biodiversity – Code of Practice for Planning and Development.
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Appendix 1: Proposed Development Plan

NOTES :

1. All work to be carried out in accordance with current building regulations & codes of practice.
2. Do not scale the drawings.
3. This drawing and the design is the copyright of FBS and is not to be used for any purpose without their consent.
4. All the dimensions/site levels to be confirmed on site..
5. Although every effort has been taken to check survey/site information used on this drawing, FBS LTD is not responsible for its accuracy.

All new Proposed site windows to be obscure glazed windows

CDM Regulations - The client and the contractor must be abide by the construction design and management regulation 2015 which relate to any building works which: (a) Last longer than 30 working days and has more than 20 workers working simultaneously at any point in the project. or: (b) Exceeds 500 persons a day.

Please refer to http://www.hse.gov.uk/pubns/indg411.htm for guidance and compliance. for the cdm regulation the client will be employing one contractor and fbs responsibility for the project will be for the design only and does not include any project management.

REV. No.	Date	Description

CLIENT

Mr Moazzam Mahmood

FAISAL BUILDING SOLUTION

PROJECT NAME

21 Glebe Gate, Thornhill- WF12 0JX

DRAWING TITLE	DRAWN BY/ CHECKED BY
Proposed Elevations	MR/SM

PHASE	SCALE	SHEET NO.	PROJ.NO.
Planning Application	1:50 @ A1	AR–05	C22018

Appendix 2: Site Location Plan

Appendix 3: Bat Survey Plan

Appendix 4: Legislation and Planning Policy Related to Bats

LEGAL PROTECTION

All species of bat are fully protected under ***The Conservation of Habitats and Species Regulations 2017*** (as amended) through their inclusion on Schedule 2.

Regulation 43: Protection of certain wild animals - offences

(1) A person is guilty of an offence if they:

(a) Deliberately captures, injures or kills any wild animal of a European protected species,

(b) Deliberately disturbs wild animals of any such species,

(c) Deliberately takes or destroys the eggs of such an animal, or

(d) Damages or destroys a breeding site or resting place of such an animal,

(2) For the purposes of paragraph (1) (b), disturbance of animals includes in particular any disturbance which is likely—

(a) To impair their ability:

(i) To survive, to breed or reproduce, or to rear or nurture their young; or

(ii) In the case of animals of a hibernating or migratory species, to hibernate or migrate; or

(b) To affect significantly the local distribution or abundance of the species to which they belong.

Bats are also protected under the ***Wildlife and Countryside Act 1981*** (as amended) through their inclusion on Schedule 5. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection
- Selling, offering or exposing for sale, possession or transporting for purpose of sale

NATIONAL PLANNING POLICY (ENGLAND)

National Planning Policy Framework 2021

The National Planning Policy Framework promotes sustainable development. The Framework specifies the need for protection of designated sites and priority habitats and species. An emphasis is also made on the need for ecological infrastructure through protection, restoration and re-creation. The protection and recovery of priority species (considered likely to be those listed as species of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006) is also listed as a requirement of planning policy.

In determining a planning application, planning authorities should aim to conserve and enhance biodiversity by ensuring that: designated sites are protected from harm; there is appropriate mitigation or compensation where significant harm cannot be avoided; measurable gains in biodiversity in and around developments are incorporated; and planning permission is refused for development resulting in the loss or deterioration of irreplaceable habitats including aged or veteran trees and also ancient woodland.

The Natural Environment and Rural Communities Act 2006 and the Biodiversity Duty

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'.

Section 41 of the Act requires the Secretary of State to publish a list of habitats and species which are of 'principal importance for the conservation of biodiversity'. This list is intended to assist decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications. A developer must show that their protection has been adequately addressed within a development proposal.

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A European Protected Species Licence (EPSL) issued by Natural England will be required for works likely to affect a bat roost or for operations likely to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g. survive, breed, rear young and hibernate). The licence is to allow derogation from the relevant legislation but also to enable appropriate mitigation measures to be put in place and their efficiency/success to be monitored. The legislation may also be interpreted such that, in certain circumstances, important foraging areas and/or commuting routes can be regarded as being afforded *de facto* protection, for example, where it can be proven that the continued usage of such areas is crucial to maintaining the integrity and long-term viability of a bat roost (Garland & Markham, 2008).

There are 17 species of bat breeding in England and Natural England issues licences under Regulation 55 of the Habitats Regulations to allow you to work within the law. Licences are issued for specific purposes stated in the Regulations, if the following three tests are met:

- The purpose of the work meets one of those listed in the Habitats Regulations (see below);
- That there is no satisfactory alternative;
- That the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range

The Habitats Regulations permits licences to be issued for a specific set of purposes including:

1. include preserving public health or public safety or other imperative reasons of over-riding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment;
2. scientific and educational purposes;
3. ringing or marking; and,

4. conserving wild animals.

Development works fall under the first purpose and Natural England issues bat mitigation licences for developments.

EUROPEAN PROTECTED SPECIES POLICIES

In December 2016 Natural England officially introduced the four licensing policies throughout England. The four policies seek to achieve better outcomes for European Protected Species (EPS) and reduce unnecessary costs, delays and uncertainty that can be inherent in the current standard EPS licensing system. The policies are summarised as follows:

- Policy 1; provides greater flexibility in exclusion and relocation activities, where there is investment in habitat provision;
- Policy 2; provides greater flexibility in the location of compensatory habitat;
- Policy 3; provides greater flexibility on exclusion measures where this will allow EPS to use temporary habitat; and,
- Policy 4; provides a reduced survey effort in circumstances where the impacts of development can be confidently predicted.

The four policies have been designed to have a net benefit for EPS by improving populations overall and not just protecting individuals within development sites. Most notably Natural England now recognises that the Habitats Regulations legal framework now applies to 'local populations' of EPS and not individuals/site populations.