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BAT PRESENCE/ABSENCE SURVEYS OF:

THE WENDY HOUSE
McFARLANDS DOWN
ST MARY'S
ISLES OF SCILLY
TR21 0NS

Client: Clive Sibley

Our reference: BS3-2018PAS

Report date: 3rd September 2018

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Report peer reviewed: Darren Hart;

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REPORT ISSUED IN ELECTRONIC FORMAT ONLY

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Non-Technical Summary

- On the 15th August 2018, The Isles of Scilly Wildlife Trust (IoSWT) conducted a Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) of The Wendy House, McFarlands Down, St Mary's, Isles of Scilly (BS3-2018), which is proposed for a rear and front single-storey extension, a change of roof style to the garage and a proposed dormer window extension to the 1st floor (north elevation). A subsequent dusk emergence and an immediate dawn re-entry survey (PAS) were carried out on the 30th and 31st August 2018 respectively to support the findings of the PRA. This report outlines the findings of the presence/absence surveys and provides advice based upon all the surveys' conclusions.
- Both the PEA/PRA and PAS reports should be considered together to provide a comprehensive assessment of nature conservation issues at the site.
- During the PRA an external/internal inspection of the building was undertaken (where accessible). Due to the very narrow access down the sides of the property the inspection of the main north and south roofs were restricted to inspection by binoculars from approximately 30m away.
- Evidence of bats was found during the PRA and the characteristics of the building suggested a low roost potential. Evidence of bats, the presence of suitable roosting features and the proximity to suitable bat habitat (as outlined in the PEA) necessitated a PAS in order to assess impacts of the proposed development with respect to roosting bats.
- The dusk emergence and dawn re-entry survey found no evidence of roosting bats within the building however the timing between sunset and the first bat contact suggest that there may be Common pipistrelle roost(s) local to the Wendy House. The main activity around the proposed development was considered to be low, consisting primarily of commuting and foraging behavior, with signs of social interaction occurring nearby (from analysis of sonograms).
- The recommendations of the PRA and this report suggest no further surveys and no requirement to obtain an EPS license. This report recommends that it does not see any constraint to the planning proposal if the following details are adhered to which include; avoidance measures during demolition and construction phase, mitigation in the form of exterior lighting requirements and enhancement in the form of provision of new potential roost sites.

1.0 Introduction

1.1 Background

The Isles of Scilly Wildlife Trust (IoSWT) was commissioned by Clive Sibley to undertake a Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) to inform the proposal for a rear and front single-storey extension, a change of roof style to the garage and a proposed dormer window extension to the 1st floor (north elevation), of The Wendy House, McFarlands Down, St Mary's, Isles of Scilly.

This Bat Presence/Absence survey report builds upon the information gathered from the PEA and PRA carried out on the 15th August 2018.

1.2 Survey Objectives

The objectives of this Presence and Absence Survey (PAS) report, is to provide further ecological information to support the planning proposal by:

- Ascertaining if roosting bats are present at the application site
- To identify the location of these bat roosts (including exit/entry points)
- Subjecting this information (and the information from the PEA and PRA) to evaluation and impact assessment
- To provide advice on the potential for contravention of legislation/policy
- To provide recommendations on any further actions needed (i.e. further surveys, licensing, mitigation or enhancement)

1.3 Surveyor details

The surveys were undertaken by Darren Mason BSc and Darren Hart BSc of the Isles of Scilly Wildlife Trust. Both staff members have undertaken professional Bat Licence Training to permit them to undertake professional surveys. They are both currently gathering sufficient 'working hours' to achieve a Natural England Class Level 1 licence.

2.0 Methodology

2.1 Bat Dusk emergence and dawn re-entry surveys

The objective of the dusk emergence survey was to detect active bat use of the site and identify any exit locations being used around the building. Survey effort was concentrated on areas of the site where suitable features or bat field signs were noted from the PRA. The survey involved;

- Starting the survey 15 minutes before sunset and continuing for approximately 1.5-2 hours after¹;
- Identification of bat species primarily through the use of ultrasound characteristics. To aid identification flight and habitat characteristics were also noted (where possible) in order to determine the species;
- Identifying exit locations of bats by standing at different vantage points around the building that offered visual contact with any potential exit point previously recorded. Surveyors stood no more than 50m apart, or away from the building (see Fig 1 for location of surveyors).

The objective of the dawn re-entry survey was to detect bats returning to possible roost sites. As bats tend to swarm around a roost entrance for a period of time before entering dawn, these surveys are more effective at identifying species and numbers of bats that may have emerged later, when no visual contact was possible to identify an exit location or, when the roosts are only small. The survey involved;

- Starting the survey 1.5 – 2 hours before sunrise and continuing until 15 minutes after¹;
- Identification of bat species primarily through the use of ultrasound characteristics (as above)
- Identifying entry/exit locations of bat roosts by visual methods described above

2.2 Equipment

The following equipment was used for both the dusk and dawn emergence surveys at the site:

- Anabat Express (Frequency Division) static bat recorder
- Elekon Batscanner Stereo Heterodyne
- Batbox III D Heterodyne
- Binatone Action 1100 two-way radios

Sound recordings were analysed using Analook W 4.3x software to confirm surveyors' identification of species.

2.3 Survey Limitations

Surveys carried out during a specific season can only provide information on bat presence at that particular time, as bats are highly mobile in nature and may only use buildings at certain times of the year that favour a particular part of their roosting, maternity and hibernating requirements.

3. Results

3.1 Weather conditions, temperatures and timings

Survey Information:	Start and End Times:	Conditions (Start):	Conditions (End):
Dusk emergence: 30/8/18	Start: 19:58 Sunset: 20:13 End: 21:30	Temp: 17.5 ⁰ C Humidity: 66% Wind speed: 5mph - S Cloud cover: 80% Rain: none	Temp: 15 ⁰ C Humidity: 75.5% Wind speed: 6mph - S Cloud cover: 100% Rain: none
	Surveyors		
	1. Darren Mason 2. Darren Hart	Notes: Light rain shower at 20:30 Light level at Lux 2: 20:40	

Table 1. Site conditions for Dusk emergence survey

Survey Information:	Start and End Times:	Conditions (Start):	Conditions (End):
Dawn Re-entry: 31/8/18	Start: 04:39 Sunrise: 06:39 End: 06:40	Temp: 15 ⁰ C Humidity: 78% Wind speed: 12mph - S Cloud cover: 100% Rain: none	Temp: 17 ⁰ C Humidity: 68% Wind speed: 14mph - S Cloud cover: 95% Rain: none
	Surveyors		
	3. Darren Mason 4. Darren Hart	Notes:	

Table 2. Site conditions for Dawn re-entry survey

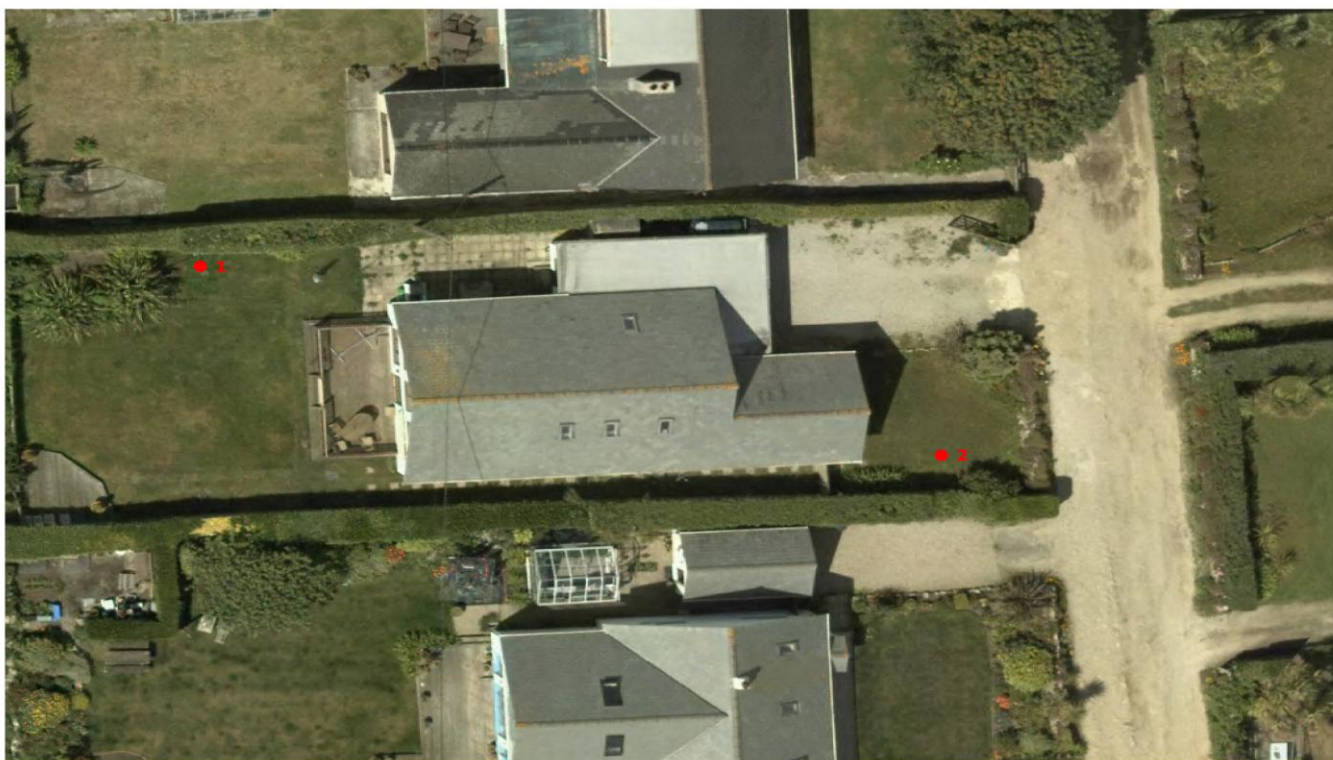


Figure 1. Location of surveyors during the dusk emergence and dawn re-entry survey

3.2 Dusk emergence and dawn re-entry roost survey results

Species recorded active onsite during the dusk emergence survey included Common pipistrelle (*Pipistrellus pipistrellus*) (see Appendix B for sample sonogram examples). Activity was deemed low, with most activity related to commuting from north to south, recorded by both surveyor 1 and 2 (see Appendix A for recorded bat contacts). The first bat contact came at 34 minutes after sunset at 20:46 (surveyor 2), immediately recorded by surveyor 1 at 20:47, with the bat passing very close from south to north from the rear gardens to the south of the Wendy House. It has been shown that *pipistrellus* sp. typically emerge 30 minutes after sunset to avoid predation.^{5,6} The proximity of the first contact to this time after sunset may indicate a roost(s) of this species nearby. Commuting activity and some foraging behaviour (as seen from the sonograms) continued throughout the survey period. In total 7 bat contacts were recorded, the last at 21:16. Bat activity further away was recorded by surveyor 2 on heterodyne. During the survey period no bats were seen to emerge from the building.

The results from the dawn re-entry survey recorded 4 bat contacts (see Appendix A) comprised of commuting activity and some social interaction (as seen from sonogram results). The first contact came at 05:24, with the last recorded at 05:41. During the survey period no bats were seen to swarm and enter the building.

4. Evaluation of Results

To identify which ecological features are important and which could potentially be affected by the proposed project, an evaluation of their importance for example; in a geographical context, degree of scarcity or level of protected status needs to be undertaken². The table below outlines those features identified as important, the nature conservation legislation relevant to those features and an assessment of the level of impact from the proposed development on those features.

Ecological Feature	Relevant Legislation	Evaluation (of importance)	Mitigation Hierarchy	Impact Level
Habitats:				
Building (roost sites)	CHSR, W&CA	Local	A, M, E	Low
Impacts: Demolition/construction: – None predicted as long as Reasonable Avoidance Measures (RAM) are followed (see section 5). Positive impact may result through enhancement by creating/incorporating new roosts in the building ⁷ Operational impact: – None predicted, however please note a summary of criminal offences with respect to bats and their roosts. This can be found at: http://www.bats.org.uk/pages/bats_and_the_law.html				
Species:				
Bats	CHSR, W&CA	International	A, M, E	Low
Impacts: Construction/post-construction – None predicted as long as Reasonable Avoidance Measures (RAM) are followed (see section 5). Positive impact may result through enhancement by increased roost availability ⁷ Operational impact: – None predicted, however please note a summary of criminal offences with respect to bats and roosts. This can be found at: http://www.bats.org.uk/pages/bats_and_the_law.html				
Key to Legislation and Mitigation Hierarchy				
CHSR – Conservation of Habitats and Species Regulations 2017 ³ - http://www.legislation.gov.uk/ukxi/2017/1012/made W&CA – Wildlife & Countryside Act 1981 (as amended) ⁴ - http://www.legislation.gov.uk/ukpga/1981/69/contents A – Avoid, M – Mitigate, C – Compensate, E - Enhancement				

5. Recommendations and Mitigation

The recommendations in this section are provided as information only and are the professional opinions of the author. Note; if building works are delayed for more than one year, then re-assessment may be required.

5.1 Further survey requirements

In the professional opinion of the author **no further surveys are required**. BCT guidance suggests that for buildings with low roost potential, a single dusk emergence survey should be carried out to provide sufficient evidence to support the PRA that bat roosts are likely absent. However, as bat droppings were found it was felt that an immediate dawn re-entry survey was required to reinforce the likely absence. However, it must be noted that a dusk survey immediately followed by a dawn survey is not sufficient time for the roosting behaviour of bats to have changed significantly. Therefore, the two surveys should only be considered as one visit¹. The survey carried out to date follows this guidance, is proportionate to the scale of the development and the information provided is believed to be sufficient to inform the planning decision.

5.2 EPS Licence requirement

For any development that is likely to commit an offence (or offences) in respect to a European Protected Species (EPS) i.e. bat, or their habitat, a licence will be required. In this instance based on sufficient survey work **no EPS licence is required**. If in the unlikely event a bat were found during the demolition phase of the project, Reasonable Avoidance Measures (RAM) must be followed and will determine any further action, such as licensing.

5.3 Mitigation – Further Action

As there is a low risk that bats may roost within the building, prior to construction, precautions should be taken to reduce the probability of committing an offence. If affected RAM should include:

Avoidance - Bats

- i. Work should avoid the main breeding and mating season of Common pipistrelle bats. Construction, particularly of the 1st floor dormer extension and the installation of the rectangular windows on the southern elevation should be carried out from the 1st November through to the 1st May, inclusive.
- ii. Ensure all workers on site (including sub-contractors) are made familiar with bat legislation and agree to work in accordance with and fully follow best practice measures

- iii. Carry out careful checks of any cracks/crevices and cavities in or on the building prior to demolition. Signs of usage include; bat droppings, dis-colouration or polishing of access points where bats rub against them, urine stains and a lack of cobwebs, particularly if other crevices around them have plenty.
- iv. Individual bats may be found in/under; cladding, between timber boards, between corrugated sheeting, in soffit boxes, behind lead flashing and sometimes just clinging to timber beams around joins as well as others areas. When any of these are removed, please do so carefully, lifting outwardly, and checking for bats continually. If in doubt, consult a licensed bat worker.
- v. In the unlikely event that a bat is found please see below:

- 1. At no point should a worker handle a bat. Untrained handling may cause undue stress and injury to the bat, and if bitten may expose the worker to rabies-related European Bat Lyssavirus
 - 2. Where possible replace any covering without damaging the bat, then halt works and contact **Natural England** (Tel: 0845 601 4523), or the **Bat Conservation Trust Helpline** (0845 1300 228), or **IoSWT** (01720 422153) for advice.
 - 3. Any bats that go to ground should be covered with a box and left alone until a licensed bat worker arrives to assess the condition of the bat
 - 4. If the bat attempts to fly at any point allow it to do so. Preventing natural behavior will cause unnecessary stress and may cause injury. Attempt to see where bat goes. If the bat returns to the building, halt works and report the escaped bat to the local bat worker
- vi. Try to minimise any dust generated from demolition works from entering off-site buildings and gardens

Mitigation – Bats

- i. If the final building works includes exterior lighting, the location and direction will need to be considered. An increase in lighting, or focused lighting on potential roosts need to be avoided. In this instance lights that have features such as cowls, hoods etc that direct light towards the ground are preferred. Ideally, using motion-sensor security lighting and timing that avoids the 1st hour after dusk and 1 hour before dawn are also recommended⁸.

Enhancement – Bats

The Isles of Scilly have the most southern population of Common Pipistrelle (*Pipistrellus pipistrellus*) bats in the United Kingdom. Any loss of roosting, commuting or foraging sites could have a detrimental effect on this species distribution as a whole and cause a net loss in biodiversity on the islands.

As the results of this survey have shown that there is a likelihood of a roost nearby, there is an opportunity for this development to provide additional roosting habitat and an opportunity to strengthen the population of this locally important species.

Each local planning authority in England and Wales has a statutory obligation under Part 3 Section 40 of the Natural Environment & Rural Communities Act 2006¹⁰ (NERC 2006) to have due regard for biodiversity when carrying out their functions and must pursue sustainable development and a net gain in biodiversity set out under the guidelines in the National Planning Policy Framework 2018⁹. Therefore, this planning application should be permitted with the following being undertaken:

- i. Roosting provision in the new ground floor rear extension to be provided as long term replacement for the loss of (potential) roosts for crevice dwelling species. This should be in the form of leaving a 20mm gap (using spacers), along the full length of the base of each of the top 3 cedar cladding boards to create artificial crevices that narrow from the base to the apex of each board. This should be carried out on each of the north, south and western aspects of the extension.
- ii. Erect two free-standing bat boxes developed for crevice-dwelling species (see figure 4 for examples and Appendix D for supplier details) on the east and west gable ends of the 1st floor.
- iii. Retain all vents and existing gaps in soffit boards (see preliminary roost assessment BS3-2018) as potential roost sites.



Figure 4. free-standing bat box examples

https://www.nhbs.com/browse/search?q=bat%20boxes&hPP=30&idx=titles&p=0&is_v=1&qview=158636

<https://www.nhbs.com/browse/search?q=bat+boxes&qview=176916>

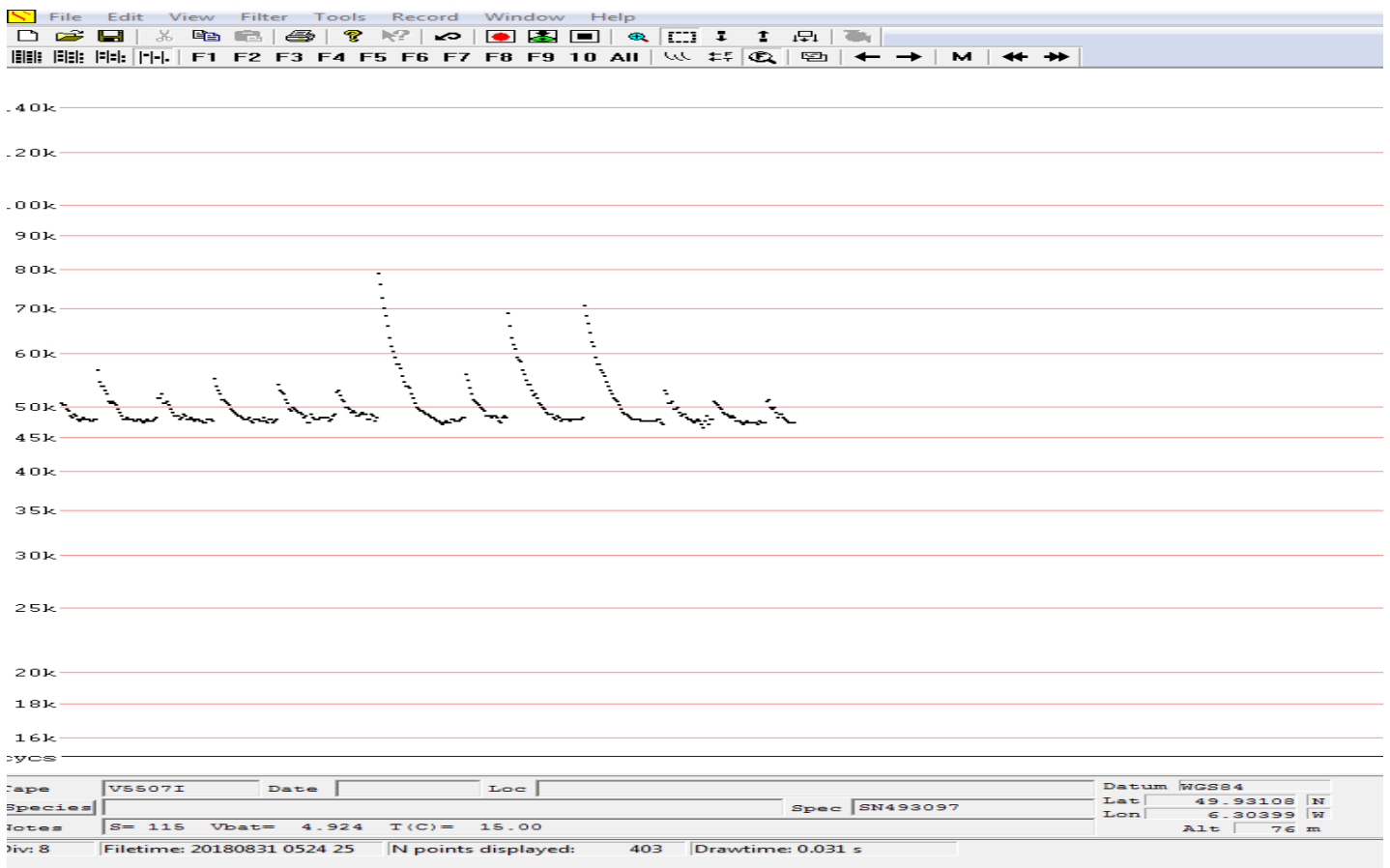
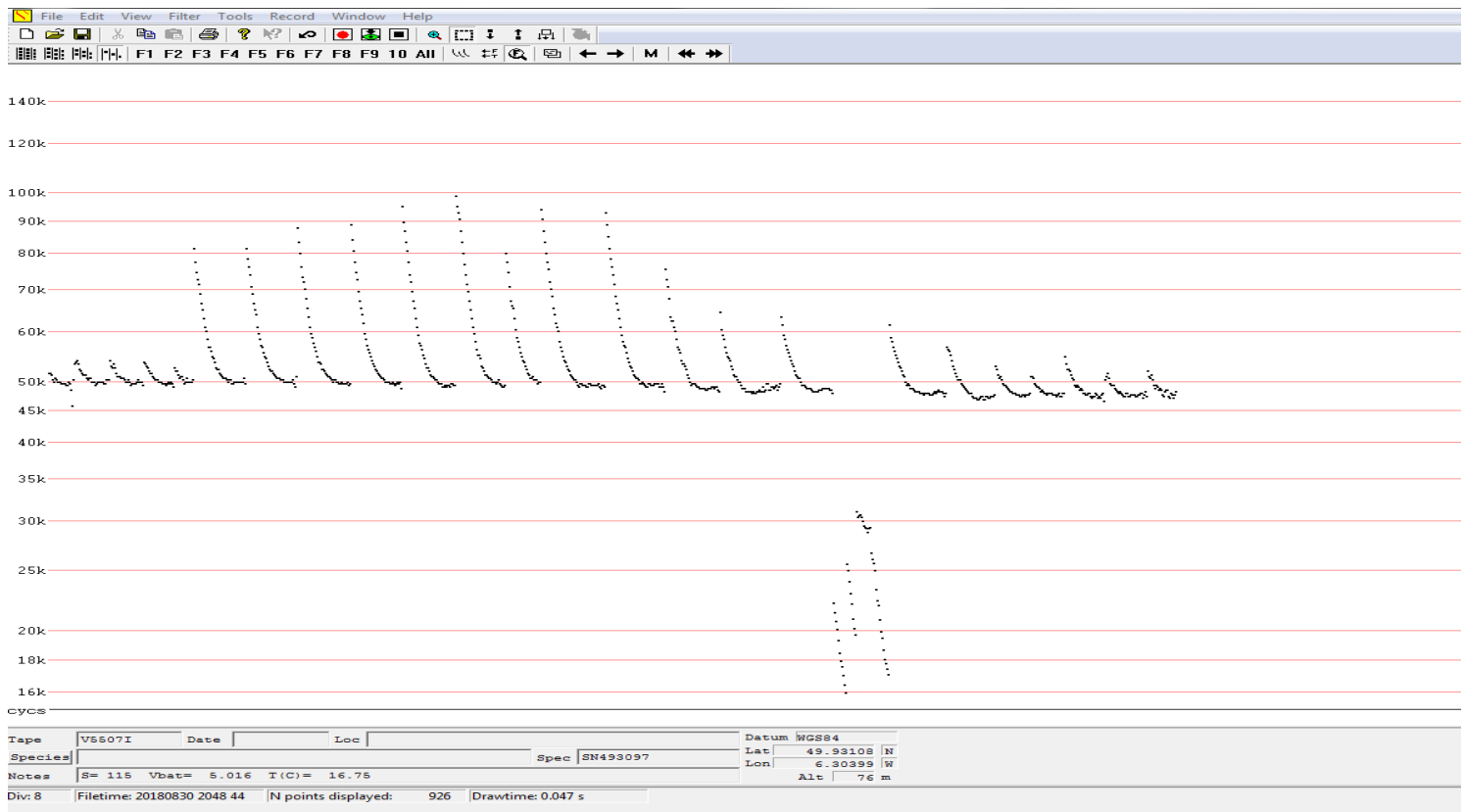
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8. Bat Conservation Trust. (2009). *Bats and Lighting in the UK*. Bats and the Built Environment Series
9. Ministry of Housing, Communities & Local Government. (2018). *National Planning Policy Framework*. OGL
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APPENDIX A – BAT CONTACTS SURVEY TABLE

Date:	30/8/18	12/9/18
Survey Type:	Dusk emergence	Dawn re-entry
Location:	Commuting NW to SE Commuting N to S Foraging behaviour – no visual Foraging further afield – no visual	Commuting and social calls – no visual
Exit/Entry point:	n/a	n/a
Time(s):	20:46 (surveyor 2 then 1), 20:48, 20:49 (surveyor 2 then 1), 20:51, 21:04, 21:04, 21:16, 21:29 A further 22 bat contacts more distant to captured by surveyor 2 on heterodyne only	05:24, 05:31, 05:37 (surveyor 2 then 1), 05:41 (surveyor 2 only)
Species of bat:	Common pipistrelle	Common pipistrelle
Roost present:	None recorded	None recorded

APPENDIX B – SAMPLE SONOGRAMS



APPENDIX C – LEGISLATION AND LICENSING

a) Legislation

All species of bats receive special protection under UK law making it a criminal offence under Schedule 5 section 9 (4) (b) and (c) of the Wildlife and Countryside Act 1981 (as amended) to *"intentionally or recklessly disturb a bat at a roost"* or *"intentionally or recklessly obstruct access to a roost"* and under Regulations 43 (1) and (2) of the Conservation of Habitats and Species Regulations 2017 (The Habitat Regulations) to *"deliberately disturb a bat in a way that would affect its ability to survive, breed or rear young or, affect the local distribution or abundance of the species; or to "damage or destroy a roost"* without first having obtained the relevant licence for derogation from The Habitat Regulations from the Statutory Nature Conservation Organisation (the SNCO – Natural England in England).

The word 'roost' is not used in the legislation, but is used here for simplicity. The actual wording in law is 'any structure or place which any wild animal...uses for shelter or protection' or 'breeding site or resting place'. Because bats tend to re-use the same roosts after periods of vacancy, legal opinion is that the roost is protected whether or not the bats are present at the time.

Penalties on conviction of a bat-related crime - the maximum fine is £5,000 per incident or per bat, up to six months in prison, and forfeiture of items used to commit the offence, e.g. vehicles, plant, machinery.

b) Licensing

In order to obtain such a licence (as set out above) the SNCO must apply the requirements of the Regulations and, in particular, the three tests set out in sub-paragraphs 55(2)(e), (9)(a) and (9)(b). These are as follows:

(1) Regulation 55 (2)(e) states that a licence can be granted for the purposes of *"preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment"*.

(2) Regulation 55 (9)(a) states that the appropriate authority (the SNCO) shall not grant a licence unless they are satisfied *"that there is no satisfactory alternative"*.

(3) Regulation 55 (9)(b) states that the appropriate authority (the SNCO) shall not grant a licence unless they are satisfied " *that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.*"

The licence would permit an otherwise unlawful activity to take place, and it requires of the licensee measures to ensure that negative impacts are prevented, reduced or offset, and that the favourable conservation status of the bats is maintained. **Once a licence is granted, failure to comply with its contents, including its attached Method Statement is a Criminal Offence with fines of a maximum of £5,000 per infringement.** A licensed bat consultant must be appointed to assist in the preparation and the delivery of the mitigation proposals that ensure the species protection requirements (Favourable Conservation Status 'FCS' test) can be met.

Additional information on the tests is available from the Natural England website.

<http://publications.naturalengland.org.uk/publication/4727870517673984?category=12002>

The ecologist is responsible for providing evidence to meet Test 3. The evidence to satisfy tests 2 and 3 is submitted on a part of the license application called the Reasoned Statement. The Reasoned Statement must be filled in by the client or their agent. Applicants often approach planning consultants, architects or similar for advice regarding completion of the Reasoned Statement.

- **Permissions**

The development must have **full permission** before the licence application will be registered including any ecology-related conditions or reserved matters that can be discharged before the date of application.

- **Further bat surveys**

If a full active bat season is going to pass between the granting of planning permission and the licence application period, Natural England will require **update survey(s)** (March-Aug) prior to application submission. The number of surveys required will vary by site depending on the size and complexity of the site as well as the species and roost types present.

- **Land ownership**

If mitigation, compensation or monitoring is anticipated to be on land not owned by the applicant, then written consent from the landowner will be required by Natural England. Responsibility for management and maintenance must also be agreed.

- **Commitments**

Applications should not give any commitments to undertake licensed works (or actions relating to the licence) that cannot be delivered.

- **Multi-phased projects**

If a plan is phased, Natural England will require a Master Plan with all mitigation and timetables included on it.

c) Licence timescales:

- **Licensing decision**

The licence application pack can take anywhere from **2 to 3 weeks** to produce and Natural England allow themselves **30 working days** from the date of receipt to respond to applications, a window which can be extended if further information is requested by themselves. It is important that clients, developers, contractors, agents, etc. keep this in mind when designing work timetables. Occasionally, further information will be requested by NE, which can result in additional delays; therefore application as soon as possible is advised.

- **Timing of works**

In most cases, the works most likely to affect bats (bat exclusion work, soft strip, re-roofing, ecologist-advised timber treatment, etc.) will normally be timed to avoid the hibernation and maternity periods. Thus, these works tend to be timed for either the **September-October period** or the **March-April period**. This means licence application is normally completed 3 months prior to these periods, and cannot be submitted any earlier.

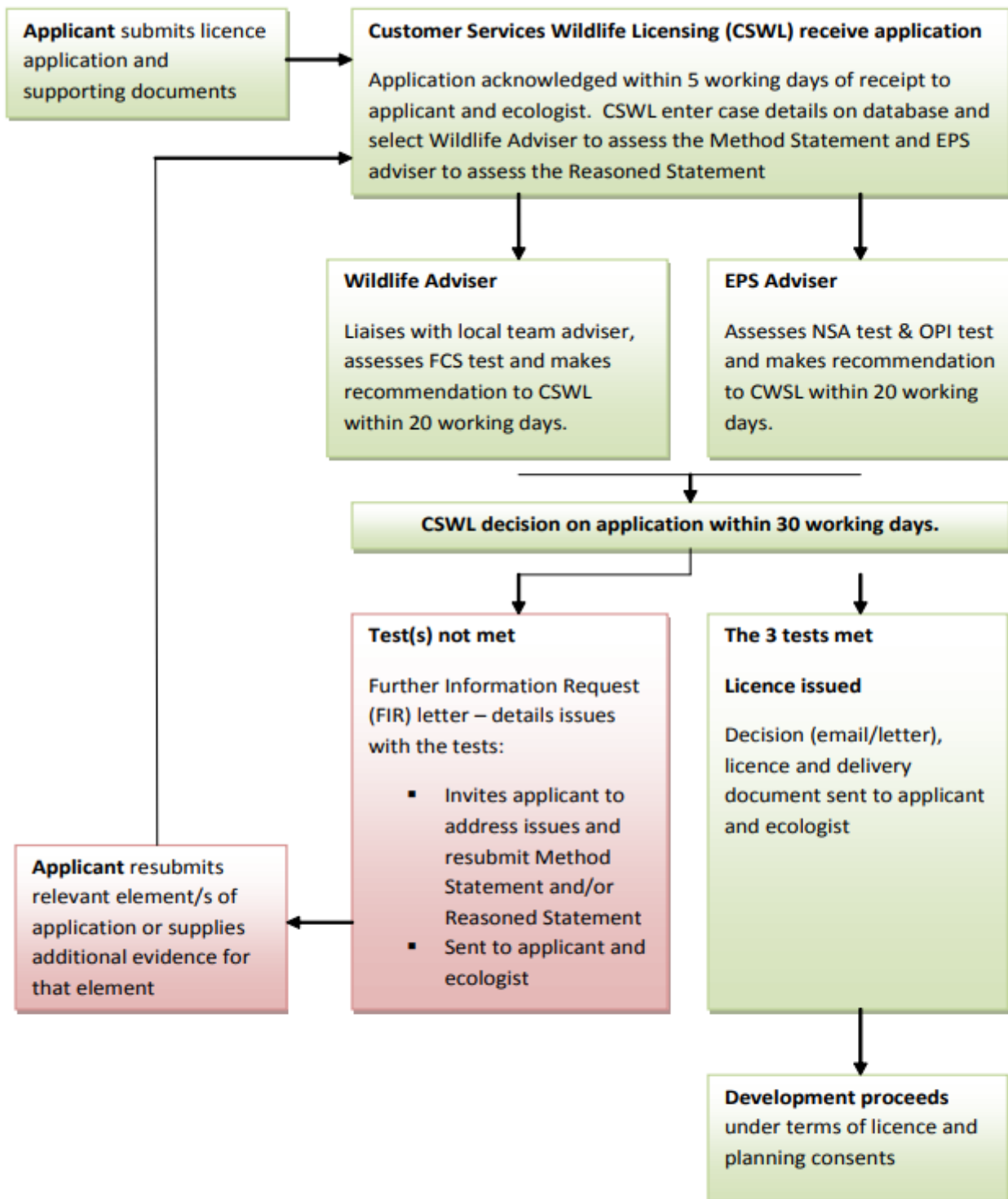
- **Other Timing**

All timescales are weather-dependent (e.g. 5 days post-exclusion period extended due to inclement weather) and also may be impacted by other aspects of the project not related to ecology. In some situations license periods can be extended, but this involves more work and is not guaranteed as they must ensure that Test 3 is still met.

d) Scale of work involved:

- **Mitigation** Production and submission of the license application pack as well as the completion of the licensed works themselves are time intensive and involve inspections, exclusions, site induction and other works requiring onsite supervision such as bat roost creation, soft strip and other necessary checks under the terms of the license. Costs for materials and equipment including bat boxes, exclusion materials, lifts/scaffolding to carry out soft strips, roost construction materials, etc. needs to be considered. Costs can vary considerably by project, but the applicant should ensure provision for all aspects of the licensed works is well-budgeted.
- **Monitoring** Most mitigation schemes require some sort of post-development monitoring, the type and extent of which would be confirmed in the license method statement. A contract with the ecologist for all survey, mitigation and post-development monitoring surveys needs to be agreed for this at the application stage.

EPS Process



EPS application procedure flowchart (updated December 2011). Taken from WML-G12-EPS Mitigation Licensing – How to get a licence
Version December 2013

APPENDIX D – SUPPLIERS

1. Natural History Book Service
1-6 The Stables
Ford Road
Totnes
Devon
TQ9 5LE
Tel: 01803 865913
Email: customer.services@nhbs.com
Website: <https://www.nhbs.com/>

2. Wildlife & Countryside Services
Covert Cottage
Pentre Lane
Rhuddlan
North Wales
LL18 6LA
Tel: 0333 9000927
Email: support@wildlifeservices.co.uk
Website: www.wildlifeservices.co.uk

3. Wildcare
Eastgate House
Moreton Road
Longborough
Gloucestershire
GL56 0QJ
Tel: 01451 833181
Email: sales@wildcare.co.uk
Website: www.wildcare.co.uk