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Bat Survey Report (preliminary day-time survey):

**Stone animal sheds,
Simonstone Road,
Sabden,
BB7 9HA.**

OS grid reference:

SD 7800 3685

Commissioned-by:

Gordon Higham

Survey Date: 29/6/18

Report Date: 8/7/18

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1. Summary.

(This summary should be read in conjunction with the conclusions and recommendations.)

These single-storey, stone, agricultural buildings are sunk into a hillside in an area of prime bat feeding habitat.

No evidence of roosting was found inside the buildings though there are gaps available into walls within the larger structure.

Externally, the nature of the buildings means the likelihood of use by a maternity colony in summer is quite low, but Individual bats can enter the fabric of the walls to roost and potentially hibernate at any time of year, including winter. Given the favourable location of the site, the like of some roosting taking place is moderate.

I understand the development may not take place for a number of years.

A baseline bat emergence survey in 2018 would flag up any obvious roosting at the time but the survey work will need up-dating, with a second internal inspection and two bat activity surveys (dusk emergence or return-to-roost-at-dawn), over the summer immediately-prior-to the development taking place.

The finding of a roost would require the roost to be maintained if at all possible. Otherwise an appropriate licence would be needed from Natural England to cover its destruction.

As bats could hibernate unseen in winter, some bat roosting potential needs to be retained in any case and a Bat Method Statement should be written to ensure the needs of bats are taken into account appropriately.

2. Introduction

I was asked to assess the importance of these purpose-built animal sheds to bats as part of the planning process, prior to their conversion as holiday let. I understand the development is unlikely to take place in the near future.

Incidentally I comment on any issues discovered with respect to other protected/invasive species and species of conservation concern.

These are two single-storey, stone buildings constructed into the hillside. They have been used for keeping pigs and poultry. There is a small, separate wood-store which is not affected by the proposal. Birds have been known to use this for nesting.

The buildings are of stone with pre-fabricated roofs, partially colonised by vegetation, and have glazed windows. They are shown below:



Front and rear elevations

The site is in a rural location adjacent to a small reservoir and on the edge of a wooded clough. Sabden Brook is about 500m to the north:



Location of buildings indicated by red circle

The pipistrelle bat (2 species: *Pipistrellus pipistrellus* - the common pipistrelle, and *Pipistrellus pygmaeus* - the soprano pipistrelle) is common and widespread in the area.

Roosts of these species can occur in any building that provides suitable roosting crevices, with the risk of bat presence increased by close proximity to good bat feeding habitat and commuting routes; for example tree-lines, hedges, woodland, scrub and water courses and bodies. The bats use different roosts at different times of year, sometimes singly and sometimes in large groups of females with dependent young. They can move

frequently and unpredictably between the roost sites known to them. The majority of house-holders with a roost of this species are unaware of it.

In summer females gather together each with their single off-spring in, sometimes large, maternity colony groups. Disturbance can cause the abandonment of babies (pups). In autumn when the young are independent, females visit males to mate. In winter the bats hibernate and rousing from hibernation - a slow process - can result in a depletion of fat reserves that may compromise the bats' ability to survive the winter. Females become pregnant in spring when their food (insects) becomes available again.

Other species likely to occur within 2 kilometres are the brown long-eared (*Plecotus auritus*) - the species most likely to leave evidence of roosting within barns and lofts, the whiskered (*Myotis mystacinus*)/Brandt's (*Myotis brandtii*), which are hard to separate without dna analysis, Daubenton's (*Myotis daubentonii*), noctule (*Nyctalus noctula*) and Natterer's (*Myotis nattereri*) possible.

Breeding birds.

Buildings generally can be used by birds of conservation concern (1), such as the house sparrow (*Passer domesticus*), house martin (*Delichon urbicum*), swift (*Apus apus*) and starling (*Sturnus vulgaris*). The house sparrow and starling are both listed in Section 41 of the Natural Environment and Rural Communities Act (NERC) as species "of principal importance for the purpose of conserving biodiversity".

Farm buildings in particular are often used by swallows (*Hirundo rustica*) for nesting and can be used by barn owls (*Tyto alba*). The barn owl has special protection as a "Schedule 1" species. These buildings can be used by other birds of conservation concern such as stock doves (*Columba oenas*) and kestrels (*Falco tinnunculus*) as well as more common species species such as the pied wagtail (*Motacilla alba*) jackdaw (*Corvus monedula*), wren (*Troglodytes troglodytes*), blue tit (*Cyanistes caeruleus*), great it (*Parus major*), robin (*Erithacus rubecula*) and blackbird (*Turdus merula*).

3. Bats and the Law

All British bats and their roosts are legally protected under the Wildlife and Countryside Act of 1981 (as amended) and the EC Habitats Directive of 1994 as implemented by the Conservation of Habitats and Species Regulations 2017.

Where a development will destroy a bat roost, a Low Impact Class Licence or a European Protected Species Licence (Mitigation Licence) is required before the roost can be interfered with in any way. The former applies in cases where only small numbers of common species of bat are using the building within certain parameters. It usually takes approximately 2 weeks for these licences to be issued, whereas the turn-around time for a full European Protected Species Licence is approximately 7 weeks once the application has been submitted. Any licence issued is a legally binding document.

Licences can only be issued providing planning permission has been granted, where applicable.

When a roost is found, both the bat consultant and the planners have to apply the "three tests" required by Natural England before issuing planning consent. Essentially these are:

- That the development is necessary for the purpose 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 consequence of primary importance for the environment";
- 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 in their natural range".

N.b. The way in which the necessity is assessed includes whether the client has an alternative that it would be reasonable to expect them to adopt.

Necessary mitigation and compensation measures to ensure the favourable conservation status of bats will be maintained, would include appropriate timing and methodology for the work, including details of how the bats will be provided-for in the long term.

Planners are required by the Government to satisfy themselves before granting planning consent that it would be possible for a licence to be obtained if necessary. Accordingly they are obliged to apply the three tests before issuing consent. For this reason enough survey work has to have been undertaken that the planning authority can evaluate whether or not the three tests can be satisfied and what degree of compensation/enhancement is necessary. To avoid delays in obtaining consent it is in the client's best interest to find out sooner rather than later whether any bat roosting issues need to be addressed.

Natural England, the Government body responsible for administering the law relating to bats, have issued guidelines to planners on how to proceed with respect to bats

Outside the planning system, the onus is on developers/members of the public, to have sufficient investigations undertaken to satisfy themselves (and the authorities in the event of a subsequent investigation), that their actions are unlikely to be in contravention of bat legislation.

***N.b.* It should always be remembered that bats often roost in places not anticipated by a lay person, such as modern buildings, trees with cavities, and bridges. Some leave no signs in lofts, as they roost underneath external features such as roof slates, ridges, weather-boarding and cladding.**

In the case of a building, tree or other feature not already known to be a bat roost, if bats are found during the course of work, contractors are legally obliged to stop work and seek advice. This should be from an appropriately experienced and licenced bat ecologist.

Breeding birds.

The Wildlife and Countryside Act of 1981 gives protection to the nests of all wild birds whilst being built or in use, including by newly fledged birds that have not left the immediate vicinity of the nest. The bird nesting season is generally considered to be 1st March to 31st July for most species but can extend a number of weeks either side of this depending on the species concerned and weather conditions in that particular year.

Additional Relevant Legislation and Policy.

Between 1995 and 2010 certain more vulnerable habitats and species were the subject of National or Local Biodiversity Action Plans. This strategy for the protection of

biodiversity has been superseded by UK post-2010 Biodiversity Framework, which is largely now implemented at county level. Internationally The Convention on Biodiversity produced a Strategic Plan for Biodiversity 2011-2020. Further to this the EU Biodiversity Strategy was launched in 2011.

Section 41 of the Natural Environment and Rural Communities Act 2006 lists species "of principal importance for the purpose of conserving biodiversity". The list was up-dated in 2014 and includes the brown long-eared bat (*Plecotus auritus*), noctule (*Nyctalus noctula*) soprano pipistrelle (*Pipistrellus pygmaeus*) and 4 other bat species.

The National Planning Policy Framework of 2012 states that "the planning system should contribute to and enhance the natural and local environment" by a number of means, including "minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks... "

4. Survey

I made a daytime visit on **29/6/18** to undertake a preliminary survey of the building, assess its likely importance to bats and advise whether or not a precautionary approach or further survey work is needed.

Having been involved with bat survey work for 30 years and consultancy work for 20years, it is always my objective to carry-out my work in a manner consistent with accepted Good Practice Guidelines (2) and consistent with the code of practice of the CIEEM. I hold Natural England Class Licences CL21, 18 and 16. Amongst other things these cover me to apply for Low Impact Licences for clients and undertake bat survey work. I have a supplementary licence to photograph bats in roosts and a CL29 Barn Owl Class Licence. My credentials are expanded-upon in Appendix 1.

As far as possible, I surveyed the building inside and out with the aid of surveyor's ladders, 2 million candle-power torch, camera with 6x optical zoom and binoculars (8x42). Head-torch, 10x 50 binoculars, fibrescope (6 and 13mm heads, extendable to 2m), camera with 18x zoom and mirrors were also available if needed.

I was looking for access to potential roosting places and evidence of their use such as droppings, urine spots, staining and scratch marks around entrances, feeding remains and bats - alive or dead.

I also take into consideration the surrounding habitat and the range of bat species it appears likely to support, along with the quality of the habitat linkages with the wider area.

The survey was conducted with the needs of different species of bat over the seasons in mind.

Incidentally I comment on any relevant issues discovered with respect to bat feeding habitat and commuting routes, possibly including likely roosting sites nearby, as well as any relevant findings with respect to other protected/invasive species and species of conservation concern.

5. Limitations of the survey

This was a preliminary survey to discover whether there are obvious signs of use by bats and to assess potential for use. If potential exists, usually follow-up work is required at dusk or dawn, possibly at a more appropriate time of year. See Appendix 3.

It should be noted that droppings are the sign most frequently found, but they are often deposited in areas that cannot be easily visualised, if at all, and they can turn to powder quite quickly. They are usually soon washed and blown away from exposed external surfaces so evidence of use often doesn't last long and pipistrelle bats in particular can change roosts frequently. However an assessment has been made of potential bat roosting places associated with the exterior of the building.

As bats often roost in crevices and cavities in winter, and can be particularly hard to locate when hibernating, the report highlights the areas that could be used by bats in winter without their presence necessarily being obvious. A fibrescope can be used to discover roosting bats in these situations, but may miss bats deeper inside more complex crevice networks.

6. Findings

The larger of the two structures is essentially two buildings, with a large doorway between the two:



There are gaps into the internal stonework in places.

The other building is smaller and lacks gaps into stonework:



There was no evidence in either building to suggest bats had been present.

There are some gaps into stonework and to wall-heads externally:



Otherwise the buildings have relatively little bat roosting potential.

The location however, essentially in a woodland-clearing next to a large, well-vegetated pond, means at least 3 or 4 bat species are likely to frequent the vicinity of the buildings. The high quality bat feeding habitat is shown below:



7. Conclusions/Discussion

Appendix 2 gives an outline of the criteria used in assessing the level of risk of use by bats.

These buildings are in a high risk location for use by bats, increasing the likelihood of any roosting potential being made use of at times.

There was no evidence to suggest bats had been present inside the buildings, and the interior of the smaller is relatively unsuitable for roosting.

The side and rear walls are low in height due to the building being constructed into the hillside. These provide little bat roosting potential.

However, there are gaps into external stone-work and to the wall heads at the front of the larger building in particular.

I've assessed the risk of some roosting by bats as moderate, largely due to the excellent bat feeding habitat immediately available. This could include hibernation by individuals within walls in winter.

There should be no reason why gaps into the external structure can't be retained, including any found from further survey work, to be used by bats in the warmer months. Due to the hibernation risk some appropriate bat roosting potential needs to be retained at the time of the development.

With respect to bat activity in the warmer months, Good Practice Guidelines suggest even low risk buildings should have a bat activity survey (emergence at dusk or to return-to-roost at dawn) when the findings of the initial survey were negative. Buildings at moderate risk should have two. See Appendix 3.

These surveys should be well-spaced over the season to accord with good practice.

A survey in 2018 would provide a useful baseline but as the development is not imminent, the survey-work would need up-dating with the two recommended surveys being done over the summer immediately-prior to the development commencing. The internal inspection should also be up-dated.

Even if bats are found, it should be possible to avoid destroying the roost by leaving open the appropriate gap/s. If this was not possible, a licence from Natural England would be needed to cover destruction of the roost. The licencing system requires roosts not to be destroyed if there is a reasonable alternative however.

As bats could hibernate here unseen in winter, a Bat Method Statement should be written to ensure the needs of bats are given due consideration.

8. Recommendations

These recommendations should be read in conjunction with the conclusions above.

Consider having a bat emergence survey before the end of August 2018 as a baseline assessment of bat activity and to discover whether any roosting is taking place at the time.

In the summer prior to the proposed commencement date of the work, have the internal inspection up-dated and have the two recommended bat activity surveys (dusk emergence or return-to-roost-at-dawn) undertaken, spaced as well as possible over the season to accord with good practice.

Irrespective of the outcome, have a Bat Method Statement written to ensure the fact bats could hibernate unseen within walls in winter is taken into account.

9. References

1. Eaton, M. A. et al (2015). Birds of Conservation Concern 4: the population status of birds in the UK, Channel Islands and Isle of Man. British Birds 108: 708-746.
2. Ed. by Collins, J. (2016). Bat Surveys for Professional Ecologists: Good Practice Guidelines - Third Edition. Bat Conservation Trust.

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Appendix 1 - Angela Graham's Experience.

- I hold Natural England Class Licences CL21 - Registered Consultant 163 - CL18 and CL16. CL21 covers me to apply for Low Impact Class Licences for clients - a more stream-lined system for quickly obtaining a licence from Natural England when a roost of a small number of common bat species will be impacted-upon by the development. CL18 covers me for survey/consultancy/scientific work. CL16 allows me to do voluntary work with house-holders at domestic properties in certain circumstances, on behalf of Natural England, and to train new volunteers. I have a supplementary licence to use flash photography in bat roosts (2014/SC1/0160), possess up to 10 live/dead bat specimens (20123429). I have a CL29 licence to disturb barn owls.
- I'm a member of The Chartered Institute of Ecology and Environmental Management.
- I undertake my work in accordance with the principles outlined in the Bat Conservation Trust's "Good Practice Guidelines".
- I have been involved in bat conservation for 30 years, initially as a member of the South Lancashire Bat Group from its inception in 1987 and as a volunteer with the Nature Conservancy Council (NCC) - first licenced in 1989. Later, and for many years, I was Co-ordinator/Chair and Trainer for the South Lancashire Bat Group. I trained the people who currently run the group, one of whom is a Trustee for the Bat Conservation Trust. I was a founder member of the Greater Manchester Bat Group in 2002 and ran the group for 4 years.
- Over the last 23 years I have done increasing numbers of bat surveys on a consultancy basis, firstly part-time, then full time from December 2003.
- My experience at applying-for European Protected Species Licences with respect to bats spans approximately 20 years.
- From 2003 to 2008 I represented the bat groups of the north-west region at national bat worker meetings, hosted by the Bat Conservation Trust.
- I regularly communicate with the Ecologists who advise local authority planners, especially the Greater Manchester Ecology Unit and West Yorkshire Ecology raising concerns about practice and protocols.

Other experience includes:

- Attending bat-worker conferences every year since 1988 (mainly England, some in Wales) plus additional symposia on specific topics such as mitigation and woodland bats.
- Helping with winter surveys of underground hibernation sites in Clwyd and north Lancashire..
- Participating in "Bat Detector Workshops" during the 1990s in different areas of the country, concerned with locating bat roosts and feeding sites/commuting routes.
- Sitting on local council "Wildlife Advisory Groups" (WAGs) in the Greater Manchester area from the early 1990s until around 2005.
- Helping local authorities and the Greater Manchester Ecology Unit formulate their Biodiversity Action Plans for bats.
- Administering the bat casework for English Nature (now Natural England) in the South Lancashire and Greater Manchester areas over 1998-2000.
- Assisting with research involving mist netting, harp trapping and radio-tracking.

- Continuing to attend courses run by recognised experts to ensure I stay up-to date both with respect to bat survey-work and conservation, and issues such as health and safety.
- Re-passing the Construction Site (CITB) Operatives test in June 2017 and last updating my confined spaces training in 2006.
- Contributing to the Bat Conservation Trust's survey standards guidelines.

Other ecological experience includes:

- Bird watching for fun since 1982 with a general interest in wildlife, ecology and conservation for a similar period.
- Attending short courses and field training with respect to grasses, flowering plants, British mammals including water voles, reptiles and amphibians, non-native invasive plant species, Extended Phase 1 Habitat Surveying, National Vegetation Classification, Environmental Impact Assessment and use of GIS.
- Taking part in British Trust for Ornithology breeding bird and associated butterfly surveys annually.
- A year-long sandwich placement assisting with badger research, including radio-tracking.
- Short periods of voluntary work with the Lancashire Wildlife Trust and Royal Society for Protection of Birds.

Appendix 2 - Personally-devised criteria used in assessing risk of roosting (in the absence of obvious evidence at the preliminary survey).

Risk of roosting	Definition	Suggested Action
Nil	Whole of structure/tree can be seen well enough to be sure there are no roosting opportunities.	No need to consider bats further unless development is delayed and potential roosting places might develop in time.
Minimal/negligible	All or most of structure/tree can be seen well enough to suggest there are few, if any, places suitable for roosting and the location does not provide easy access to potential feeding grounds.	Although roosting is thought to be unlikely and therefore the development is unlikely to impact on the favourable conservation status of bats, a precautionary approach should be taken in relevant areas at the time of the work. Further survey work needed only if development delayed.
Low	Whole of structure/tree can be seen well enough to know there are no more than a few openings that could be used by an individual bat or two and/or these provide access to the sorts of features that are likely to be suboptimal due to materials and/or conditions within (eg unstable temperature); and/or the location provides limited access to potential feeding grounds.	Although regular roosting is thought to be relatively unlikely and the development is unlikely to impact on the favourable conservation status of bats, a single survey at dusk or dawn in favourable weather conditions would be appropriate to accord with good practice. This would reduce the extent to which the judgement is based on speculation. If the findings were ambiguous e.g. possible bat emergence and/or considerable bat activity around the building, the survey would need repeating.
Moderate/medium	A small number of openings are present in an area of reasonable habitat, and at least some seem likely to provide access to good conditions for roosting bats, and/or a loft/hay-loft is present that appears to have good qualities for roosting but there were limitations to access or no evidence of bats was found at the time. Cellars may be assessed as potentially being suitable for hibernation in winter,	Further work is needed to better assess the abundance of bat activity in the vicinity and whether or not bats seem to make use of the roosting potential available. To accord with good practice a dusk emergence survey and a dawn return-to-roost survey will be necessary. A second inspection of the interior may also be necessary - if the survey was undertaken in winter for example. As the absence of bats on two occasions wouldn't guarantee absence at other

	but the conditions and/or location aren't optimal.	times, possibly including winter, some precautions would be needed at the time of the work and some roosting potential should be retained/re-created. In the case of cellars and equivalent, inspection in winter is necessary. Some work, for example pointing old stone walls, should be avoided in winter.
High	There is at least one feature that is typical of those favoured by bats for regular roosting and it/they provide access to abundant insect food on-site and/or via good links with the wider natural environment. The feature/s could be suitable for use by a maternity colony, either as a main or satellite roost, or by a territorial male in autumn in the case of pipistrelles, or by individuals or small numbers of bats at any time of year, including winter when hibernating.	The extent to which bats of different species make use of the potential available needs to be investigated by carrying-out at least 3 surveys at dusk and/or dawn spaced over the months of May to September inclusive, possibly extending into April or October if weather conditions are favourable. (Air temperature above 8°C and not more than light rain and/or gentle breeze. I generally plan to do surveys only when the forecast is for 10°C or above.) Maternity colonies have largely disbanded by September, but territorial male pipistrelles may be missed without a survey in September and a lot of smaller roosts are discovered at this time of year. As bats could hibernate unseen in winter and/or roost at other times not covered by the survey work, appropriate precautions would be needed at the time of the work along with maintenance of appropriate potential roosting places.
High - hibernation only	Cave-like places with stable conditions and high humidity, such as cellars can be used for hibernation in winter.	High-risk potential hibernation sites need at least 3 inspections spaced over the winter months as bats will move between sites depending on the weather conditions.

Appendix 3 - Recommendations for further survey work when the findings of the preliminary survey were negative.

Bat Conservation Trust

Table 7.3 Recommended minimum number of survey visits for presence/absence surveys to give confidence in a negative result for structures (also recommended for trees but unlikely to give confidence in a negative result).

Low roost suitability	Moderate roost suitability	High roost suitability
One survey visit. One dusk emergence or dawn re-entry survey* (structures). No further surveys required (trees).	Two separate survey visits. One dusk emergence and a separate dawn re-entry survey.*	Three separate survey visits. At least one dusk emergence and a separate dawn re-entry survey. The third visit could be either dusk or dawn. ^a

^a Structures that have been categorised as low potential can be problematic and the number of surveys required should be judged on a case-by-case basis (see Section 5.2.9). If there is a possibility that quiet ealling, late-emerging species are present then a dawn survey may be more appropriate, providing weather conditions are suitable. In some cases, more than one survey may be needed, particularly where there are several buildings in the category.

* Multiple survey visits should be spread out to sample as much of the recommended survey period (see Table 7.1) as possible; it is recommended that surveys are spaced at least two weeks apart, preferably more. A dawn survey immediately after a dusk one is considered only one visit.

Taken from "Bat Surveys for Professional Ecologists: Good Practice Guidelines", 3rd Edition (2)

Table 7.1 Recommended timings for presence/absence surveys to give confidence in a negative result for structures (also recommended for trees but unlikely to give confidence in a negative result).

Low roost suitability	Moderate roost suitability	High roost suitability
May to August (structures) No further surveys required (trees)	May to September ^a with at least one of surveys between May and August ^b	May to September ^a with at least two of surveys between May and August ^b

^a September surveys are both weather- and location-dependent. Conditions may become more unsuitable in these months, particularly in more northerly latitudes, which may reduce the length of the survey season.

^b Multiple survey visits should be spread out to sample as much of the recommended survey period as possible; it is recommended that surveys are spaced at least two weeks apart, preferably more, unless there are specific ecological reasons for the surveys to be closer together (for example, a more accurate count of a maternity colony is required but it is likely that the colony will soon disperse). If there is potential for a maternity colony then consideration should be given to detectability. A survey on 31 August followed by a mid-September survey is unlikely to pick up a maternity colony. An ecologist should use their professional judgement to design the most appropriate survey regime.

Taken from "Bat Surveys for Professional Ecologists: Good Practice Guidelines", 3rd Edition (2)