

Mr Derek Lewis
3 Woburn Close
Baxenden
Accrington
Lancashire
BB5 2TS

21st May 2021

Dear Mr Lewis

Re: Proposed development at 21 Knowsley Road, Wilpshire, BB1 9PX (central grid reference: SD 68607 31995)

Thank you for your request for a bat survey at the above site. I understand that the proposed development is for single and upper extensions to the existing dwelling house.

1.0 Background and Qualifications

The survey was carried out by Pat Waring and Janette Gazzard.

Pat Waring is a licensed great crested newt worker (Class 2 licence), a licensed bat worker (Class 2 licence), registered consultant of the Bat mitigation Class Licence, a Chartered Environmentalist and a full member of the Chartered Institute of Ecology and Environmental Management, with a Bachelor of Science degree in Biology.

Pat has been working as an ecological consultant for over twenty-three years, most recently as Director of Ecology Services UK Ltd. This work includes provision of expert advice and guidance to Statutory Nature Conservation Organisations, National Park Authorities and Lancashire Police Authority, as well as the delivery of professional training courses.

Pat has recognised and extensive experience and knowledge of ecological survey, monitoring, condition assessment and impact assessment techniques; these include impact assessment in relation to bats, great crested newts, nesting birds and changes to habitats, as well as ecological surveys and assessments.

Janette is a full member of Chartered Institute of Ecology and Environmental Management, with a Bachelor of Science degree in Environmental Management.

Janette has over seventeen years professional experience working in ecology and nature conservation, including roles as a Senior Ecologist for a large multidisciplinary company and as a lead adviser for Natural England throughout the North West of England. She has a range of demonstrable skills including habitat surveys, ecological appraisals, protected species surveys, conservation management advice and condition assessments.

Pat and Janette meet the requirements for knowledge, skills and practical experience as outlined in the CIEEM technical guidance series, Competencies for Species Surveys available at: <http://www.cieem.net/competencies-for-species-survey-css>

This advice letter complies with national best practice guidance as outlined in: *Chartered Institute of Ecology and Environmental Management (2017) Guidelines for Preliminary Ecological Appraisal. Second Edition.* CIEEM, Hampshire.

1.1 Advisory Note

The information in this letter represents the professional opinion of an ecological consultancy and does not constitute professional legal advice. You may wish to seek professional legal interpretation of the wildlife legislation associated with this area of work.

The information, opinion and advice that Ecology Services UK Ltd has prepared are true, and have been prepared in accordance with the CIEEM Code of Professional Conduct. Ecology Services UK Ltd confirms that the opinions expressed are our true professional bone fide opinions.

Ecology surveys are time-limited; as a rule survey findings can generally be relied on for the season in which surveys took place. However, mobile species such as bats and birds may increase or decrease in numbers and change behaviours over time. Statutory agencies will often accept survey results for 12-18 months, but this varies around the country.

Ecology Services UK Ltd personnel make a professional judgement as to how long the results of our surveys will remain current. Advice and recommendations as regards currency and its impacts on decision making are included in relevant sections below.

2.0 Methodology

In order to assess the likelihood of bats being present at the proposed development site, a visit was undertaken on the 18th May 2021. The proposed development site and close surroundings were searched and assessed.

Observations were made from ground level, as well as from telescopic ladders to examine potential bat roost features. An endoscope, although available, was not required on this occasion. A Coast HP 10R 1000 lumens torch and close-focussing Zeiss Victory FL 8x42 binoculars were also used as aids to visibility.

It is recognised that limiting the survey to a single visit in one month does not take account of bat activity on the site through the whole of the active season (April to October) or at other times of the year.

The survey was compliant with the current best practice guidance, as detailed in Collins, J. (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn)*. The Bat Conservation Trust, London.

3.0 Results of the Survey

21 Knowsley Road comprises an unoccupied, detached bungalow, constructed of brick walls and hipped slate roof, with a single storey flat roof extension to the west and in-built, lower ground garages on the north elevation. There is a single chimney with lead flashing and a small overhang feature to the main roof. All roof coverings and lead flashing are in good condition with only a very small number of gaps visible. All roof edges are sealed apart from the north elevation, where small and larger gaps are present. These roof edge features offer very limited shelter for use by bats but some of the larger gaps do provide high potential for use by nesting birds. In addition, there are 2 nest boxes, one attached to the external walls on the east elevation of the building and one attached to the garden railings in the rear garden. The nest box attached to the east elevation wall was occupied by nesting house sparrows during the survey. On the flat roof extension are plastic fascia boards. There are some gaps behind these fascias that offer some limited potential for use by roosting bats.

There is an accessible roof void above the main dwelling. The roof is underlined with modern roof membrane and part under boarded with laminated timber panels. The floor is part boarded and rock wool insulation is present. The roof void is open, uncluttered and heavily cobwebbed and extensive mouse and rat droppings were also found. A small amount of natural light spillage is present along the north elevation, consistent with gaps observed during the external inspection. No signs of use by bats or nesting birds were observed within the roof void.

The property lies within an established garden which has not been recently managed. There are numerous flowering plants and shrubs, including a number of plants listed on the Schedule 9 non-native species list. These include Montbretia, Rhododendron and Wall Cotoneaster amongst the garden planting. Himalayan balsam is also present within Showly Brook immediately adjacent to the proposed development site

21 Knowsley Road is situated within a residential area in the village of Wilpshire. There are other properties with gardens immediately adjacent and in close proximity. Showly Brook runs immediately adjacent to the east and there are open fields to the west. A

tree lined railway line, as well as other connecting trees and hedgerows, are also present within the close and wider surroundings. Levels of artificial lighting are expected to be at least moderate based on the density of the housing and presence of street lighting.

The immediate and close surroundings provide at least moderate potential shelter and foraging resources to local bats and high potential shelter and foraging resources to bird populations.

Bats

No bats were found during the site inspection.

Potential roosting features for bats are:

Night roosting

- Negligible potential – there are no suitable night roosting features

Day roosting

- Low potential – gaps associated with roof coverings, northern roof edge, and flat roof fascia boards
- Hibernation roosting - gaps associated with roof coverings and northern roof edge.

Low potential in the above examples reflects the condition of the features and their environment. It is our professional judgement that further surveys for bats at this time are not warranted.

Nesting birds

An active house sparrow nest was observed within a nest box, attached to the east elevation. Blue tit, great tit, wren, dunnock and robin were all observed singing and foraging within the garden during the survey.

There is high potential for nesting birds to be present within gaps associated with the building, bird boxes and garden vegetation during the nesting season (February to September).

Other species

An adult common frog was found within the garden pond.

4.0 Advice and Recommendations

4.1 Bats

Protected Species	Impacts /Predicted Impacts	Action Required
Bats	<p>It is advised that there is no evidence to suggest that bats pose a constraint to the proposed development.</p> <p>It is advised that there are potential roost features (gaps) suitable for bats associated with roof coverings, northern roof edges and flat roofed fascia boards. In this location and landscape setting, these features have low potential for bats to use throughout the year.</p> <p>All bat species are afforded full protection under The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019</p>	<p>Advice (mitigation): All personnel involved in proposed development works should be carefully advised about bats by a professional Ecologist, so that all works are undertaken with a clear understanding about legal aspects, precautions to be adopted and what to do if a bat is found. Prior to development.</p> <p>Advice (mitigation): As a precaution, it is advised that when removal or disturbance of potential roost features such roof coverings are to take place, this should be done carefully by hand. At all times.</p> <p>Advice (mitigation): If bats are found at any time during the development, work must stop until advice has been sought from an appropriately experienced Ecologist. If the development will affect bats, a licence may be required and suitable mitigation put in place. At all times.</p>

Table 1 Bats

4.2 Nesting birds

Protected species	Impacts /Predicted Impacts	Action Required
<p>Nesting birds</p> <p>House sparrows confirmed nesting</p>	<p>It is advised that there is high potential for birds to be nesting within the building, nest boxes and garden vegetation during the bird nesting season (February to September).</p> <p>Under the Wildlife and Countryside Act 1981 (as amended), wild birds are protected from being killed, injured or captured, while their nests and eggs are protected from being damaged, destroyed or taken.</p> <p>There is no provision under the Wildlife and Countryside Act 1981 (as amended) for licensing the disturbance of nesting birds or the destruction of nests which are in use, for the purpose of development.</p> <p>If enforcement action were taken the developer would need to rely on the 'incidental result of an otherwise lawful operation' defence if it were not possible to avoid an offence being committed. This defence can only be tested in court and it is therefore important to ensure all possible mechanisms for avoiding an offence are considered.</p>	<p>Advice (mitigation): It is advised that the most appropriate way to address the risk to nesting birds is: Avoid disturbance to the building, nest boxes and vegetation during the nesting season.</p> <p>Or</p> <p>If works cannot be delayed the proposed work area should be carefully checked, immediately prior to works commencing. Checks should be carried out by a suitably experienced ecologist. If the risk of nesting birds remains, then monitoring for nesting bird activity should continue for the duration of works. Prior to any work commencing (checks) and throughout works in nesting season (monitoring).</p> <p>Advice (mitigation): If works are to be undertaken during the nesting season, all people working at the proposed development site should attend a toolbox talk delivered by an appropriately experienced person, to be made aware of the likelihood of encountering nesting birds and how to identify them, the legal protection of nesting birds and their own responsibilities as regards implementation of precautionary measures. Prior to any work commencing.</p>

Protected species	Impacts /Predicted Impacts	Action Required
Nesting birds Continued		Advice (mitigation): If birds are found to be nesting within or in close proximity to the work area during proposed works, it will be necessary to stop and establish an exclusion area. The extent of the exclusion area, which should be determined by a suitably experienced ecologist, will depend on the bird species and the nature of the proposed works. At all times.

Table 2 Nesting Birds

4.3 Non-native invasive plant species

Non-native invasive plant species	Impacts /Predicted Impacts	Action Required
Cotoneaster, Montbretia and rhododendron species confirmed within the garden planting. Himalayn Balsam is present within Showley Brook	It is advised that the proposed development will have to take account of non-native invasive plant species. Proposed works to the building will involve an amount of disturbance which could result in the spread of non-native invasive plant species which are listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).	Advice (mitigation): All personnel involved in the proposed development works should be made aware of the presence of non-native plant species and how to identify them, so that all works are undertaken with a clear understanding about legal aspects and working methods and precautions to be adopted. Prior to any work. Advice (mitigation): Where possible, leave all boundary and border plants in situ and avoid all activities that have the potential to disturb the ground/plants resulting in the further spread, including the boundary adjacent to Showley Brook. If plants must be removed, they should be removed carefully by hand and all excavated material (soil and plants) should be removed from the site to a licensed landfill as controlled waste, or burnt on a bonfire where it will not cause nuisance to neighbours through excessive smoke or odour. Prior to and during any work.

Table 3– Non-native invasive plant species

4.4 Other species

Other species	Impacts /Predicted Impacts	Action Required
Common frog	<p>Proposed works will involve an amount of disturbance which could result in killing and/or harming of common frog.</p> <p>As a matter of good practice working methods and precautions should be adopted to avoid any harm to common frog.</p>	<p>Recommendation (mitigation): All personnel involved in the proposed development should be made aware of the likelihood of encountering common frog and how to identify these animals. Prior to the development.</p> <p>Recommendation (mitigation): In order to minimise impacts to common frog, potential sheltering features that are likely to be affected by the development, including areas of vegetation and stones, should be removed carefully by hand, avoiding where possible the hibernation period (October to March). During development.</p> <p>Recommendation (mitigation): Any common frogs encountered should be carefully moved to a safe area of suitable habitat, which should then remain undisturbed. At all times.</p>

Table 4 other species

Compliance with the actions outlined in Tables 1-3 above will help to avoid committing offences in relation to bats, nesting birds and non-native plant species.

Precautionary measures such as those listed above are generally regarded by Statutory Bodies, Local Planning Authorities and Professional Ecologists as being appropriate where there is a risk of protected species (i.e. bats and nesting birds) being present but further investigative surveys are not required prior to a planning application.

There are no constraints in relation to any other protected species.

If you require any further ecological advice or guidance in relation to the proposed works, please do not hesitate to contact me

Yours sincerely



Janette Gazzard MCIEEM
Senior Ecologist
Ecology Services UK Ltd
Tel: 07842 694 618



View of 21 Knowlsey Road showing front (south) elevation



View of rear (north) elevation. Red line indicates gaps present along roof edge



View of roof coverings and lead flashing on chimney, all good condition with few gaps visible.



Internal view of roof void showing brick chimney, modern roof liner and wood panel underboarding the roof structure



Nest box on east elevation, occupied by nesting house sparrows



Example of Montbretia present amongst garden planting



Example of Wall cotoneaster present amongst garden planting



Example of Rhododendron present amongst garden planting