



BAT SURVEY REPORT

CUSTOM HOUSE

GRAVESEND

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1. INTRODUCTION

- 1.1 This report details presence/ likely absence survey work for bats undertaken in respect of proposed development at Custom House, The Terrace, Gravesend, DA12 2BL.
- 1.2 Figure 1, Section 2 provides a site location plan.

COMMISSION

- 1.3 Native Ecology was commissioned by Mile Property Group to undertake bat presence/likely absence survey for building (B2).

APPLICATION SITE

- 1.4 For site location plan and survey site details please refer to PEA (ref: 1149_R02_PEA)

PROPOSED WORKS

- 1.5 Proposals include the redevelopment of the application site including the demolition of the southern section of building B2, the conversion of the existing buildings and the construction of a new three storey building to provide 27no. residential units with associated landscaping and parking.

PURPOSE OF REPORT

- 1.6 The objectives of the report are to:
- To determine whether roosting bats are present; and
 - Establish whether the proposed development is likely to impact on roosting bats. The degree of impact is determined by a number of factors:
 - the species present;
 - number of bats present;
 - the type of roost present; and
 - location of roost and access points.

2. METHODOLOGY

PRESENCE/ABSENCE SURVEYS

- 2.1 One dusk emergence survey (detailed in Table 1) was undertaken in July 2023 in accordance with the Bat Conservation Trust Good Practice Guidelines (Collins, 2016).

Table 1. Survey details for the dusk emergence surveys

Survey location	Survey no.	Survey date	Surveyors	Sunrise/ sunset time	Time		Weather conditions			
							°C	Wind BF	Precipitation	Cloud cover %
B2	1	25/07/23	CT JF TO DS	20:58	Start	20:43	18	B3	None	30
					Finish	22:28	17	B3	None	30

- 2.2 The emergence survey commenced 15 minutes prior to sunset and continued for 1.5 hours after sunset.
- 2.3 Surveyors (listed in Table 2 below) were positioned around the building so that the features with suitability to support roosting bats were visible and any emerging or re-entering bats could be observed. A survey plan is available in Appendix 3.
- 2.4 Each surveyor used an EMT Pro and a Elekon Bat Scanner to identify and record bat activity within the Site. Data was recorded as to the species, number of bats, any emergence or re-entry locations, time and general activity.
- 2.5 On completion of the survey, the footage was reviewed using appropriate software and any emergence or re-entry activity recorded, including species (cross-referenced with the associated detector), emergence / re-entry location and behaviour. Any emergence / re-entry video clips were cut and saved for reference.

Table 2. Surveyor details

Surveyor name (initials)	Experience
Calista Tardivel (CT)	Class 1 bat licence: 2020-49197-CLS-CLS
Johnathan Fletcher (JF)	>2 years bat survey experience
Trevor O'Sullivan (TO)	>6 years bat survey experience
Dani Sheehan (DS)	>1 year bat survey experience

LIMITATIONS

- 2.7 In accordance with CIEEM guidance, consideration should be given to the validity of survey data after a period of 12 month from the date of the survey. This may require a site visit to assess whether ecological conditions within the site have changed and may require further ecological survey work due to the transient nature of roosting bats.

3. RESULTS AND ASSESSMENT

PRESENCE/ LIKELY ABSENCE SURVEYS

Dusk Emergence Survey - 25th July 2023

- 3.1 There were no bats recorded emerging or re entering the building during the survey.
- 3.2 Bat activity during the survey was very low.
- 3.3 The first bat recorded was a common pipistrelle, at 21:20 (22 minutes after sunset). This bat foraged around the car park for approximately 10 minutes.
- 3.4 A single common pipistrelle pass was also recorded at 22:15.

ASSESSMENT

- 3.5 Emergence surveys on B2 did not record any roosting bats. Therefore, roosting bats are considered to be likely absent from the building.
- 3.6 No further survey work or mitigation measures are recommended.

4. REFERENCES

- A. J. Mitchell-Jones (2004). Bat Mitigation Guidelines (Version. January 2004). English Nature 2004.
- CIEEM (2017a). Guidelines for Ecological Report Writing. Chartered Institute for Ecology and Environmental Management, Winchester.
- Collins, J. (ed.) (2016) Bat surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). The Bat Conservation Trust, London.
- Native Ecology (2023) Preliminary Ecological Appraisal. Report reference 1149_R01, dated 10th February

5. APPENDIX 1: SUMMARY OF PLANNING POLICY AND LEGISLATION

LEGAL PROTECTION FOR BATS

- 5.1 Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 are also known as European Protected Species. European Protected Species include all species of bat.
- 5.2 European Protected Species relate to those listed within the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 and are afforded the highest level of protection. These species are also protected under the Wildlife and Countryside Act 1981. Taken together this level of protection makes it an offence to:
- deliberately capture, injure or kill any wild animal of a European protected species,
 - deliberately disturb wild animals of any such species
 - damage or destroy a breeding site or resting place of such an animal
- 5.3 Disturbance of animals includes in particular any disturbance which is likely:
- to impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or
 - in the case of animals of a hibernating or migratory species, impair their ability to hibernate or migrate
 - to affect significantly the local distribution or abundance of the species to which they belong
- 5.4 The legislation requires that any derogation be dealt with by licencing through an appropriate licencing body (Natural England in England). In determining whether a licence can be granted the licencing body must apply the requirements of Regulation 53, and in particular, the three tests:
1. Regulation 55(2)(e) states: 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) states: The relevant licensing body must not grant a licence under this regulation unless it is satisfied—
 - (a) that there is no satisfactory alternative; and
 - (b) 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.



Legend

- Site boundary
- Buildings
- Bat surveyor position

 native ecology PROMOTING BIODIVERSITY INTEGRATION	
Bat Surveyor Location Plan	
Custom House, The Terrace Gravesend, Kent DA12 2BL	
Drawing ref:	1149_DR03
Revision:	-
Date:	02/08/2023
Scale:	1:500
Paper size:	A3