



Potential Bat Roost Assessment

V1

Ref: 1065	Clinton House, Pondfield Lane, Gravesend, DA12 3LD
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2 EXECUTIVE SUMMARY

ECOassistance were commissioned to carry out a Potential Bat Roost Assessment at Clinton House, Pondfield Lane, Gravesend, DA12 3LD.

No bat field signs were found internally of the main house during extensive searches by suitably qualified and experienced bat workers.

Due to the number of gaps within the fabric of the structures and the high value surrounding habitat, the main house has been deemed to have 'moderate' bat roost potential.

Buildings or structures with moderate bat roost potential require a minimum of two subsequent bat emergence surveys to demonstrate likely absence of bats for planning purposes. Should bats be found, additional emergence surveys may be required to properly characterise the roost(s) and a Natural England licence may also be required in order to lawfully impact them.

In the loft void of the garage a single brown long eared bat was directly observed. The garage is considered to be a 'confirmed roost' of brown long eared bat and further roost characterisation surveys will be required to inform both a planning application and a protected species licence application if required; as to prove that other roosting bats are likely absent. A minimum of two bat emergence surveys are recommended for the garage.

The areas surrounding the site are considered to provide high potential foraging and commuting habitats for bats. Bat sensitive lighting of potential commuting and foraging corridors in line with standing guidance will be required.

Disclaimer

This report considers the instructions and requirements of the client and is not intended for and should not be relied upon by any third party.
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The results contained within this report can be relied on for decision-making purposes without the need to be updated for twelve-to-eighteen months providing there is no significant change in land use or land management in that time.
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Interpretations and recommendations contained in this report represent the author's professional opinions. They are based on currently accepted industry practices and personal experience. This is a working document and must be updated if development proposals change, or new information become available.

3 INTRODUCTION

ECOassistance were commissioned by Randhir Sidhu (Hereafter referred to in this report as: the client) to undertake a Potential Bat Roost Assessment (PBRA) at Clinton House, Pondfield Lane, Gravesend, DA12 3LD (Hereafter referred to in this report as: the site). The grid reference for the approximate centre of the site is: TQ 69283 70138.

All native species of bat are protected by law; this is mainly under the Conservation of Habitats and Species Regulations 2017 and the 1981 Wildlife & Countryside Act as amended. More detailed information on the relevant legislation protecting bats is provided in the appendix.

A planning application is to be made at the site which has potential to disturb or harm bats and/or destroy or damage potential bat roosting spaces. A description of the application produced by the client is reproduced in full below:

The scheme will involve a two storey extension and alterations to the main dwellings roof and alterations to the garage

The key objectives of the PBRA survey undertaken was to:

- Assess the presence or likely absence of bat roosts at the site; and
- Characterise the roost size and type if bats are found to be present.

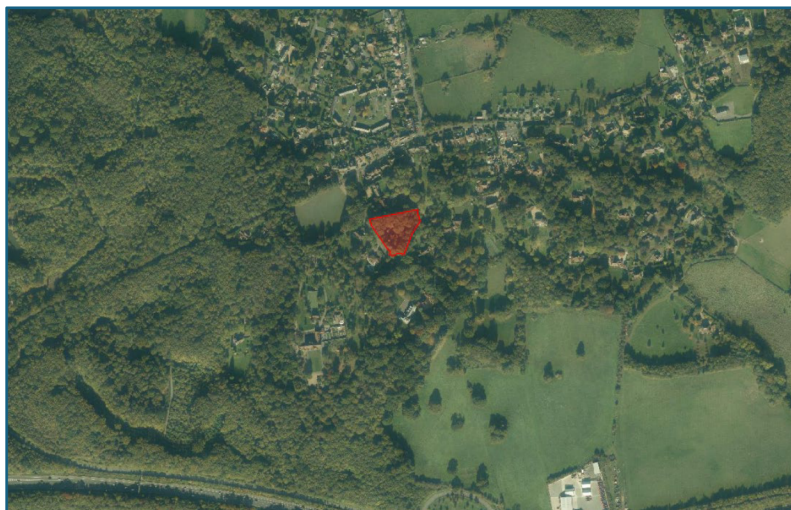
The report discusses the survey findings and makes recommendations on further courses of action to be taken in line with National good practice guidance publications.

3.1 THE SITE

The site comprises a relatively large, detached house and garage. It is accessed from Pondfield Lane through an entrance in the west of the site.

The site is situated within a rural setting, surrounded by woodland and other dwellings. The site boundaries and those of the surrounding houses are demarcated by lines of trees and hedges. An overhead satellite image with indicative red line boundary of the site and its habitats shown within the context of those in the wider area is provided in Figure 1 below.

Figure 1: satellite image of the site and surrounding area



3.2 SURVEY OBJECTIVES AND METHODOLOGY

3.2.1 PBRA Survey

All native species of bat are protected by law in England. The main legislation pertaining to the protection of bats falls under the Conservation of Habitats and Species Regulations 2017 and the 1981 Wildlife & Countryside Act (as amended).

In England it is unlawful to deliberately kill, capture, injure or possess a bat. It is unlawful to disturb bats anywhere (roosts, flight lines or foraging areas) in particular, if the level of disturbance can be shown to impair their ability to survive, to breed or reproduce, to rear or nurture their young, to hibernate or migrate or to affect significantly local abundance.

More detailed information on the relevant legislation protecting bats is provided in the appendix.

The planning application involves impact to the buildings within the site, which may contain bats. For reasons of expediency a PBRA survey was carried out at the same time as the PEA survey.

The key objectives of the PBRA survey are to:

- Identify and record any structures and trees that could be suitable for bats to roost in; and
- Identify any habitats that could be suitable for bats to commute, forage or swarm in/at.

The report discusses the survey findings and makes recommendations on further courses of action to be taken.

3.2.2 PBRA Desk Search

The Multi-Agency Geographic Information for the Countryside (MAGIC) governmental website which provides geographic information in map form was used to:

- Search for records of protected species within 2km of the site including any granted European Protected Species Licenses (EPSL) for bats; and
- Search for local statutory and non-statutory land-based designations relating to bats within 2km of the site.

An aerial map search using freely available resources was used to assess habitat connectivity of the site with the wider area and identify habitats of value near to the site.

3.2.3 PBRA Site Survey

The PBRA was conducted by ecologist Edward Clark and assisted by Charlie Birch. Edward has more than 13 years professional and voluntary ecological survey experience for bats and holds various Natural England and NPTC survey licenses including a level 2 bat science and conservation survey licence (Class licence number: 2018-33670-CLS-CLSCS38).

The surveys included internal and external searches of all parts of the survey building(s) and any trees which might be impacted. A search for bat field signs which might indicate the presence of a roost was undertaken on all aspects of the building.

The PBRA survey was undertaken on 26/03/24 during daylight hours in fair weather conditions.

Binoculars and Clulite CB2-L2 clubman torches were used to identify potential roosting features (PRF) and evidence of bat signs both internally and externally. Accessible cavities, crevices and recesses were surveyed with the torches and/or a Dewalt DCT410 endoscope including potential entry and exit points such as missing roof tiles and structural cracks. Thorough searches were made for evidence of urine staining, discolouration or scratch marks; bat droppings, feeding remains and dead or living bats.

Other survey equipment included an android tablet device for making notes and taking photos, survey mirrors, a magnification lens, survey sample tubes, a telescopic survey ladder and a 'Flir One pro' thermal imaging device.

The survey buildings were assessed for the perceived bat roosting potential (BRP) as well as if the presence of roosting bats could be confirmed. Surrounding habitats were assessed for their potential to be used by roosting, commuting and foraging bats.

The assessment takes into consideration the design and construction of the buildings, the size and location of potential features and access points, the position, aspect, geographical location, surrounding land use and adjacent landscape connectivity as well as if bat field signs are present. The assessment follows criterion set out in National guidance (Collins, 2023) published by the Bat Conservation Trust (BCT), as well as guidance published by English Nature and CIEEM.

Roosting, foraging and commuting habitats are given one of the following ratings:

- confirmed roost
- high potential
- moderate potential
- low potential

- negligible potential
- none

On and off site habitats are compared with the descriptions given in Table 1 below¹ in order to justify the rating.

Figure 3: Guidelines for assessing potential bat suitability

Table 4.1. Guidelines for assessing the potential suitability of proposed development sites for bats, based on the presence of habitat features within the landscape, to be applied using professional judgement.		
Potential suitability	Description	
	Roosting habitats in structures	Potential flight-paths and foraging habitats
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging bats).
Negligible ^a	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions ^b and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats ^c).	Habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions ^b and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions ^b and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.
^a Negligible is defined as 'so small or unimportant as to be not worth considering, insignificant'. This category may be used where there are places that a bat could roost or forage (due to one attribute) but it is unlikely that they actually would (due to another attribute). ^b For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance. ^c Evidence from the Netherlands shows mass swarming events of common pipistrelle bats in the autumn followed by mass hibernation in a diverse range of building types in urban environments (Korsten <i>et al.</i>, 2016 and Jansen <i>et al.</i>, 2022). Common pipistrelle swarming has been observed in the UK (Bell, 2022 and Tomlinson, 2020) and winter hibernation of numbers of this species has been detected at Seaton Delaval Hall in Northumberland (National Trust, 2018). This phenomenon requires some research in the UK, but ecologists should be aware of the potential for larger numbers of this species to be present during the autumn and winter in prominent buildings in the landscape, urban or otherwise.		

¹ Screenshot of Table 4.1 taken from Good Practice Guidelines, Collins, 2023.

4 CONSTRAINTS AND LIMITATIONS

The desk study is not comprehensive because species and habitat types especially ephemeral or migratory species may be present but under recorded or have been missed entirely. A data search from the Local Ecological Records Centre (LERC) was not commissioned and is not likely to be required at this stage of the application; but will be required to support a EPSL application should one be needed at a later date.

Measurements taken from online mapping tools may not be exactly accurate, but this is the most proficient method available to the desktop surveyor. Measurements have been rounded up or down to the nearest whole number for reporting.

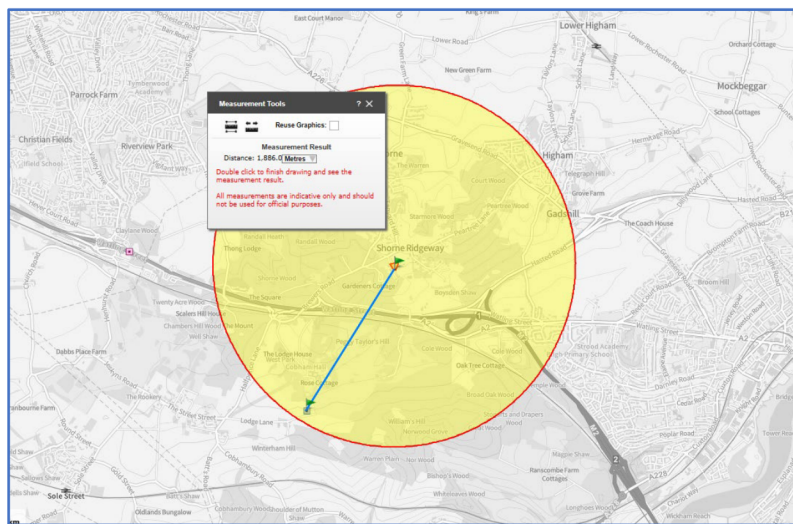
Records of protected species are often submitted with six figure grid reference co-ordinates which is only accurate to within 100m.

5 RESULTS

5.1 DESK SEARCH

There has been one European protected species licence (EPSL) application for bats granted within 2km of the site. The application is located c.1886m southwest of the site and is for the destruction of a resting place for long eared *Plecotus auritus* and whiskered bat *Myotis mystacinus*. The location of this record relative to the site is shown in Figure 4 below.

Figure 4: Distance to nearest record of EPSL granted for bats



5.2 SURROUNDING HABITATS

The habitats surrounding the site contain a large amount of linear landscape features including tree lines and ornamental hedges which are well connected to one another, forming a lattice of potential commuting and foraging corridors as well as potential roosting places. Adjacent to the site is a corridor of deciduous woodland. Further ancient woodland (AW) is then located c.48m west of the site. These woodland habitats have high potential to be used by bats.

The site is within the Kent Downs Area Of Natural Beauty (AONB).

6 SITE SURVEY

6.1 THE MAIN HOUSE

The main house is brick built with a clay tiled roof. This comprises multiple sections including hipped roofs, a catslide and outshot dormer roof as well as a lean-to flat roof extension.

There is a single chimney stack in the centre of the main roof which is lined with stepped flashing. There are some low suitability PRFs between the gaps in the flashing and these have potential to lead to further cavities behind. The house has timber soffit and fascia boxing where roofs terminate.

From the ground, multiple PRF are visible beneath slipped, broken and/or raised tiles in the roof covering. There is one hipped dormer on the western facing elevation where PRF are visible in the gap between the tiles and the fascia. The location of these PRF are indicated with red circles in Figure 5 below.

Figure 5: PRFs visible on the western facing elevation



During an extensive search of all external elevations a single bat dropping was found on the windowsill (indicated with a red arrow in figure 5 above) of the western facing elevation. This dropping was consistent in shape and size with those of smaller bats such as the pipistrelle genus *Pipistrellus* spp.

Internal inspections of the loft void in the main roof found it to be lined with bitumen 1F roofing felt. The large brick-built chimney through the centre is exposed. The internal loft floor is insulated with mineral wool quilt and not boarded over. Numerous rat *Ratus norvegicus* droppings and mouse *Mus musculus* droppings (c.250-300 in total) were observed throughout the loft void on top of the rock wool insulation. The loft contained relatively large amounts of spider cobwebs, as shown in figure 6 below, which suggests bats do not fly around the internal loft space.

Figure 6: Internal loft area of the main house



No bat field signs such as feeding remains, bat droppings and/or urine staining were found in the loft void. There is no evidence that high or low conservation status roosts are present. The absence of field signs within the loft void suggests that open roosting species are likely absent.

The presence of an internal lining confirms there PRF are available between the internal lining and the tiles on the outside which with the relatively high number of PRF identified during the external search means that there are likely to be a moderate number of roosting spaces suitable to crevice dwelling species.

There are mature trees near to the western elevation and in the garden and so PRF in the house have good connectivity with woodland habitats in the wider area..

The main house is deemed to have at least moderate BRP. A minimum of two emergence surveys will be required to determine likely absence of bats to the level required by the LPA prior to determination.

6.2 THE GARAGE

The detached garage is a hipped roof building. It comprises a clay tiled roof serviced by plastic guttering, solid brick walls, soffit and fascia boxing where roofs terminate, sliding reticulated timber garage doors, a

single timber side door and glazed crittles casement windows. Attached to the south eastern facing elevation of the garage is a timber shed with a bitumen mono-pitched roof.

The hip tiles on the garage roof provide a limited number of PRF at the ends which might provide potential access points for bats to the internal fabric of the roof or loft void. Other PRF are visible on the garage beneath a limited number of loose tiles but these are by no means numerous. These are indicated with red circles in Figure 7 below.

Figure 7: PRF visible on the south eastern facing elevation of the garage



The garage is currently used for both car parking and storage. A close inspection of all stored items, including the car, which provided ideal surfaces upon which to search for bat field signs found no evidence of bat use or visitation including bat droppings, urine staining and/or feeding remains. Figure 8 below shows the relative tidiness of the internal space which provided optimal conditions to search for bat field signs.

Figure 8: Internal garage area with stored items

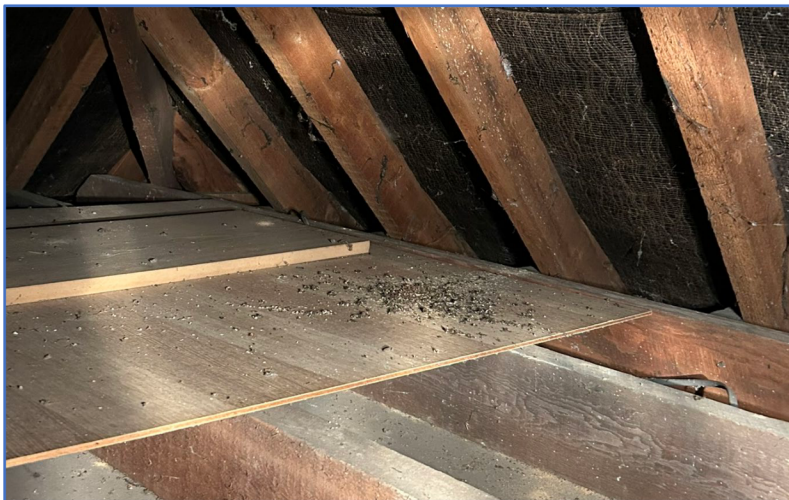


Internally the garage has a ceiling and loft hatch.

Internal inspection of the enclosed loft void in the garage found the roof to be internally lined with bitumen 1F roofing felt and there is no insulation between the rafters. The loft space was empty of any stored items.

Inside the loft surveyors found c.300-350 bat droppings of varying ages. The bat droppings were consistent in shape and size with those of long eared bats *Plecotus spp.* A photo of the largest accumulation of old and new droppings is shown in figure 9 below.

Figure 9: Bat droppings found within the garage loft void



Inside the loft void a single bat was directly observed by the surveyors. It was openly roosting between a roof timber and the underside of the felt near to the ridge. The singleton bat was identified from a distance of

around two metres as likely to be a long eared bat – almost certainly brown long eared bat *Plecotus auritus* due to the known distributions of this and other *plecotus* species.

In line with current guidance the garage is considered to be a ‘confirmed roost’ with ‘moderate potential’ for further roosts of crevice dwelling species to be present.

6.3 ASSESSMENT: TREES

Mature trees nearest to the house include two large conifers with no PRF visible from the ground.

In the garden area surrounding the house and garage there are a relatively high number of mixed broadleaf standard trees but these are not large or veteran and do not have suitable PRF for bats such as rot holes or cavities. This is up until the site margins where boundary trees appear older and some have damage which could provide PRF for bats.

The trees with PRF in the site margins are a significant distance from the proposed development and screened from it by other trees. At this distance there is likely to be negligible impact from lighting, noise and vibration associated with the application.

The boundary trees are likely to be used by the roosting bat identified within the garage for commuting to the nearby wooded habitats and these must be protected from direct impacts including artificial light spill.

7 CONCLUSION AND RECOMMENDATIONS

In general it is not possible to check all PRF during internal and external inspections and there are likely to be many crevices present within the fabric of structures which have potential to contain crevice dwelling species that have not been searched.

7.1 MAIN HOUSE

A moderate number of potential access points or PRF have been identified within the fabric of the main house including beneath tiles and lead flashing and in gaps around structural features. These PRF are surrounding by high potential foraging habitats and potential commuting corridors in the wider area and so have potential to contain roosting bats. No bat field signs were found during the internal inspection and the loft void appears to be currently unsuitable to support open roosting species. There was no evidence to suggest that a high conservation roost or high numbers of bats might be present. For these reasons the main house was assessed as having moderate BRP.

Standing guidance dictates that at least two further bat emergence surveys are required to establish likely absence of crevice dwelling species from the main house. If roosting bats are found during the surveys an additional survey or surveys could be required to properly characterize the roost to the level required by the licensing body Natural England (NE) should a licence be required to allow works to go ahead lawfully.

BES should be carried out prior to the determination of a planning application where the schedule of works has the potential to impact bats and/or their roosts. BES can only be carried out in the main bat activity season and must be spaced at least three weeks apart to be compliant with current guidance. The bat activity season runs from mid-May to mid-September inclusive.

7.2 GARAGE

The garage is considered to be a 'confirmed roost' (of BLE) with 'moderate potential' for further roosts of crevice dwelling species to be present.

In line with guidance, a minimum of two BERS are required to establish presence or likely absence from all parts of the structure and to further characterise the usage by brown long eared bats. In line with guidance, a minimum of two BERS are required to establish presence or likely absence from all parts of the structure and to further characterise the usage by bats.

If the loft of the garage is to be impacted then a licence with appropriate mitigation to ensure there is no harm to the bat and no net loss of roosting provision will be required.

BES should be carried out prior to the determination of a planning application where the schedule of works has the potential to impact bats and/or their roosts. BES can only be carried out in the main bat activity season and must be spaced at least three weeks apart to be compliant with current guidance. The bat activity season runs from mid-May to mid-September inclusive.

7.3 SURROUNDING HABITAT

The surrounding habitats are deemed highly likely to be used by foraging and commuting bats. Any adverse impacts from artificial light spill into the nearby trees and hedgerow boundary features associated with the proposed development should be mitigated in accordance with ILP 2018 guidance as follows:

1. The boundary vegetation should not be illuminated so that dark flight corridors for bats are retained.
2. Directional lighting should be used to avoid unwanted spill into surrounding habitats.
3. Any external lighting should be operated with motion sensors wherever possible.
4. Metal halide and fluorescent sources should not be used.
5. A warm white spectrum of lamp should be used. Blue light should not be used.
6. Internal luminaires that are in close proximity to windows should be recessed, where possible, to reduce external glare and light spill and/or low emissivity glass should be used in the windows if possible.

7.4 ENHANCEMENTS

Full details of appropriate enhancements for bats will be given in any subsequent BES report in order to take into account the species recorded and any recommendations therein should supersede those given here. Additional bat boxes for mitigation may also be required.

It is recommended that some simple enhancements could provide new roosting and foraging habitats for local bat species and improve the site for bats in line with National Planning Policy.

1 x multi-purpose bat box to be affixed to a mature tree or an elevation of the new garage facing the garden post construction at approximately 3m height after completion of the works.

Bat boxes should be of the woodcrete type to ensure longevity and erected in a sheltered location².

A log and brash habitat pile for invertebrates can be created in the northwestern corner away from likely disturbance to improve foraging opportunities.

Please note that bat boxes and any other enhancements are in addition to any mitigation requirements should a licence be needed in order to complete the proposed schedule of works.

² For all types of boxes, Collins et al. (2020) found that the box height most frequently occupied was 4m (2020). A height of at least 3 metres is recommended.

8 REFERENCES

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<https://magic.defra.gov.uk/MagicMap.aspx>

<https://records.nbnatlas.org/>

9 APPENDIX 1

Review of Protected Species UK Legislation and Policy

The level of protection afforded to protected species varies dependent on the associated legislation. A full list of protected species and their specific legal protection is provided within the Schedules and/or Sections of the associated legislation. Case law may further clarify the nature of the legal protection afforded to species.

The legal protection afforded to protected species overrides all planning decisions. European Protected Species (EPS) - and the Conservation of Habitats and Species Regulations 2010 (as amended)

European Protected Species (EPS) are afforded the highest level of protection through the Conservation of Habitats and Species Regulations 2017. EPS are also afforded legal protection by parts of the Wildlife and Countryside Act 1981 (as amended).

In general, any person and/or activity that:

- Damages or destroys a breeding or resting place of an EPS. (This is sometimes referred to as the strict liability or absolute offence);

Deliberately captures, injures or kills an EPS (including their eggs);

Deliberately disturbs an EPS, and in particular disturbance likely to impair animals' ability to survive, breed or nurture young, their ability to hibernate and migrate and disturbance likely to have a significant effect on local distribution and abundance;

intentionally or recklessly disturbs an EPS while occupying a structure or place used for shelter and/or protection (Wildlife and Countryside Act 1981) (as amended); and

Intentionally or recklessly obstructs access to any structure or place that an EPS uses for shelter or protection (Wildlife and Countryside Act 1981) (as amended). may be guilty of an offence.

The legislation applies to bat roosts even when they are not occupied.

Actions affecting multiple animals can be construed as separate offences and therefore penalties can be applied per animal impacted.

Under certain circumstances licences can be granted by the Statutory Nature Conservation Organisation (Natural England in England) to permit actions that would otherwise be unlawful.

There are some very specific defences associated with the Conservation of Habitats and Species Regulations 2017. However, these are unlikely to apply to construction related projects. The Sections of the Regulations provide further details of these defences.

The Wildlife and Countryside Act (1981) includes defence for those aspects of the legislation that apply to an EPS. These defences are unlikely to apply to construction related projects and do not apply to those acts

included in the Conservation of Habitats and Species Regulations 2017 (as amended). The Schedules of the Act provide further details of defences.

Local authorities have obligations under sections 40 and 41 of the Natural Environment and Rural Communities Act (NERC) 2006 to have regard to the purpose of conserving biodiversity in carrying out their duties. The majority of EPS are listed on Section 41 the NERC Act.

The Natural Environment and Rural Communities Act 2006 (as amended)

Section 41 (S41) of the Natural Environment and Rural Communities (NERC) Act (2006) requires the Secretary of State to publish a list of habitats and species which are of principal importance for the conservation of biodiversity in England. The S41 list is used to guide decision-makers, including local and regional authorities, in implementing their duty under Section 40 of the act to have regard to the conservation of biodiversity in England when carrying out their normal functions. S41 lists 56 habitats and 943 species of principal importance. Section 42 of the NERC Act relates to Wales.

Wildlife and Countryside Act 1981 (as amended)

The level of protection afforded to species listed on the Wildlife and Countryside Act 1981 (as amended) varies considerably.

‘Fully protected species’, such as bats, are afforded the highest level of protection. Any person who intentionally kills, injures, or takes ‘fully protected species’, or who intentionally or recklessly damages or destroys a structure or place used for shelter and/or protection, disturbs the animal whilst occupying a structure and/or place used for shelter and protection, or obstructs access to any structure and/or place used for shelter or protection is likely to have committed an offence.

The National Planning Policy Framework

Planning policy requires new developments to take into consideration our local and national wildlife. With the objective to maintain or increase the viability of the site for wildlife. The existing proposals are considered to determine whether Habitat enhancements are offered and whether they are adequate to meet the policy requirements. Again, national, regional, county and borough policies are considered.

The National Planning Policy Framework states that the planning system should contribute to and enhance the natural and local environment by minimizing impacts on biodiversity and delivering net gains in biodiversity where possible.

Ecological habitat enhancements measures need to be over and above any mitigation measures.

10 APPENDIX 2: BAT AND BIRD BOX DESIGN AND SITE PHOTOS

