

Land off St Columba's Close, Gravesend

Bat Survey Report

24/06/2022

Gravesend Borough Council

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1 Introduction

1.1 Background

For information relating to the site description and previous ecological survey work conducted for the site, refer to the GreenLink Ecology Ltd. Preliminary Ecological Appraisal (PEA) ref: 21_1655_Report_MF_PB, dated 14th April 2022.

In summary, the PEA report concluded that although there was no evidence of bats recorded during the survey, 'low' bat roost potential was identified in relation to the 2 no. buildings at 28–34 and 36–42. To inform the need for mitigation measures in relation to bats and establish the need for a mitigation licence application, further survey work was therefore recommended.

1.2 Planning Status

The proposed works are the subject of a planning application to Gravesham Borough Council, the Local Planning Authority (LPA), for the demolition of 4 no. blocks of flats, including 1–12, 36–41, 28–34 and 36–42 (to the west, north-east and north of the site, respectively), and subsequent construction of 50 affordable homes, along with new parking areas and improved amenity space.

1.3 Aims of Study

To address the recommendation in the PEA report and to inform the planning application, GreenLink Ecology Ltd. has been commissioned to conduct detailed survey work for bats, in accordance with the 2016 Bat Conservation Trust's (BCT) published guidance¹.

The aims of this report are to present the results of the survey work, assess the potential for the proposed works to impact bats, establish whether mitigation measures are required to comply with the legislation and evaluate the need for a protected species mitigation licence to be applied for.

¹ Collins, J. (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines*, Bat Conservation Trust (3rd Edition)

2 Legislation

All species of bat and their habitats are fully protected under the Wildlife and Countryside Act 1981 (as amended by the CRoW Act 2000) and by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

The legislation makes it illegal under the Wildlife and Countryside Act 1981 (as amended) to:

- Intentionally or recklessly kill, injure or take a wild bat;
- Be in possession or control of any live or dead wild bat, or any part of, or anything derived from a wild bat;
- Intentionally or recklessly damage, destroy or obstruct access to any place that a wild bat uses for shelter or protection; and
- Intentionally or recklessly disturb any wild bat while it is occupying a structure or place that it uses for shelter or protection.

The legislation makes it illegal under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 to:

- Deliberately capture, injure or kill any wild animal of a European Protected Species;
- Deliberately disturb wild animals of any such species. 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, to hibernate or migrate; or
 - to affect significantly the local distribution or abundance of the species to which they belong;
- Deliberately take or destroy the eggs of such an animal; or
- Deliberately damage or destroy a breeding site or resting place of such an animal.

3 Methodology

Since 'low' bat roost potential had been identified during the PEA survey, a single dusk emergence survey visit was undertaken, which is the minimum survey effort required to have confidence in a negative result, according to the 2016 BCT published guidance (Table 7.3 on page 52, summarised in Table 1 below).

Table 1: Recommended minimum number of survey visits

Low potential	Moderate potential	Confirmed/high potential
<u>One survey visit. One dusk emergence or pre-dawn re-entry survey</u>	Two survey visits. One dusk emergence and a separate pre-dawn re-entry survey	Three survey visits. At least one dusk emergence and a separate pre-dawn re-entry survey. The third visit could be either dusk or pre-dawn

In accordance with the 2016 BCT published guidance, survey work was conducted during the optimal seasonal period in June 2022 by experienced Natural England bat licence holders Marcus Fry MCIEEM² (licence no. 2015-10955-CLS), Rachel Hedley (licence no. 2015-05522-CLS) GradCIEEM³ and Leon Brown (licence no. 2015-13716-CLS), assisted by Katherine Bright.

During the survey visits, the surveyors observed opposite aspects of the buildings and used Echo Meter Touch 2 Pro bat detectors, to enable any bats emerging to be recorded. All bat ultrasonic echolocation calls that were made within range of the bat detectors were recorded and analysed, to determine which species of bat made them.

The dusk survey visit began approximately half an hour before sunset and continued until approximately two hours after sunset.

² Member of the Chartered Institute of Ecology and Environmental Management (Full)

³ Member of the Chartered Institute of Ecology and Environmental Management (Graduate)

4 Results

In summary, there were no bats recorded emerging from the buildings during the dusk survey visit and although relatively low numbers of noctule (*Nyctalus noctula*) bat calls were recorded, these related to bats that were foraging high above the site, which were not directly associated with the buildings or garden areas.

It is therefore considered that this proves that bats do not roost within the building and as a result, should not be affected by the proposals.

Table 2: Details of the bat survey

Date	Climatic conditions	Sunset	Species of bat emerging (no. of individuals)	Bat activity (calls, not individuals)
21/06/22	Scattered cloud, 20°C	21:19	None	Noctule (37)

5 Assessment

5.1 Constraints

The survey work was undertaken by experienced and licensed consultant ecologists using appropriate survey techniques and equipment, during the optimal seasonal period and in accordance with the published guidelines. It is therefore considered that there were no significant constraints to the bat survey.

5.2 Potential Impacts

Since the detailed survey work has determined that bats do not roost within the buildings and overall the extent of bat activity associated with the local area appears to be relatively low, it is considered that there is no significant risk of direct or indirect impacts to bats as a result of the proposed works.

6 Recommendations

6.1 Mitigation Measures

Since there is no significant risk of impacts to bats associated with the proposals, mitigation measures are not considered necessary for bats.

However, if at any time it becomes apparent that bats are actually present and at risk of impacts, works will need to temporarily cease whilst advice is obtained from a Natural England bat licence holder, about how to progress further without the risk of an offence being committed.

As recommended in Section 5.3 of the PEA report (in addition to the measures recommended for habitats and birds) and in accordance with the principles of the National Planning Policy Framework (NPPF), the following enhancement measures should be implemented for bats: *The new buildings should incorporate at least 5 no. wall-integrated bat boxes (<http://www.birdbrickhouses.co.uk/brick-nesting-boxes/bat-box/>), which should ideally be installed at least four metres from ground level on the gable ends and not illuminated by artificial lighting.*

7 Conclusions

To inform the planning application and to address the recommendation made in the PEA report, GreenLink Ecology Ltd. was commissioned to undertake a detailed bat survey for the site, which has been completed without significant constraint.

The results of the bat survey indicate that bats do not use the buildings in which to roost and since there is no significant risk of bats being impacted on by the proposed works, mitigation measures have not been recommended for bats, although enhancement measures have been recommended, in accordance with the principles of the NPPF, which should be made a condition of planning permission.

8 Disclaimer

This report is issued to the client for their sole use and for the intended purpose as stated in the agreement between the client and GreenLink Ecology Ltd. under which this work was completed, or else as set out within this report.

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