PRECAUTIONARY WORKING METHOD STATEMENT FOR BATS

Client: Mr. R. Russell

Site: Stables at Glebe Meadow, Church Lane, Ashurst, West Sussex

12.06.2024

Version 001



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Life Span of Survey Data and Report	
Report	This report remains valid for 12 to 18 months from date of issue. The report, conclusions and recommendations are valid for current development plans only. Should this change, the report should be reviewed and, if necessary, further survey work and desk study review undertaken.
Survey Data	Survey data are valid for 12 to 18 months from the date the survey was undertaken.

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The information which we have prepared and provided is true and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct.

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1. Introduction

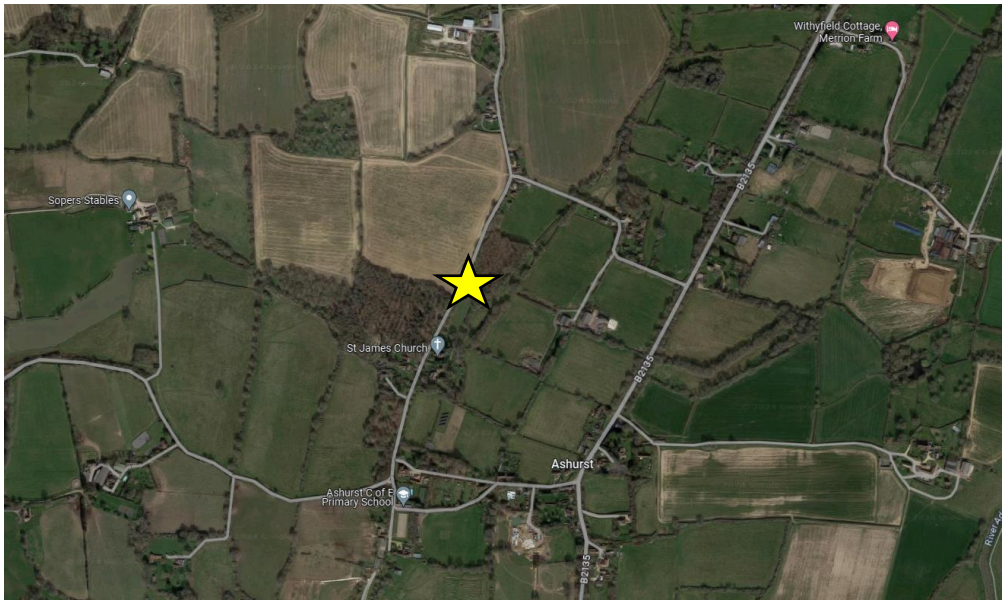
1.1 Site Details

Table 1 provides details on the site, intended as a summary of key features. Information provided in Tables 1 and 2 have been derived from www.magic.gov.uk and aLyne Ecology Ltd.'s Preliminary Roost Assessment and Barn Owl Scoping Survey Report (report reference: aLyne Ecology Ltd (2024). *Preliminary Roost Assessment and Barn Owl Scoping Survey. Church Lane, Ashurst.* Version 004. 5th March 2024).

Table 1. Site Details

Site Name	Stables at Glebe Meadow, Church Lane, Ashurst, West Sussex
Site Address	The Stables, Church Lane, Ashurst, Steyning, West Sussex, BN44 3AR
OS Grid Reference	TQ 1771 1651
Approximate Total Area (Ground Floor Footprint of the Stables)	71 m^2
Landowner and Local Authority	Mr. R Russell, Horsham District Council
Geology and Soils	Slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils
Hydrology	Impeded drainage
Nature Conservation Designations	None on site
Other Designations	None on site
The Woodland Trust Ancient and Notable Tree Inventory	None on site
Biodiversity Opportunity Area	None on site
National Habitat Network	None on site
Primary Habitats	Developed land; sealed surface and buildings
Protected Species	Potential for nesting birds and roosting bats (low suitability)
Current Land Use	Equestrian

An aerial plan showing the location of the site is provided below.



Source: Google Earth Pro (accessed 10th June 2024)

1.2 Site Context

Table 2 provides details on the context of the site in terms of habitats, land use and connectivity to the wider landscape.

Table 2. Site Context

Surrounding Habitats and Land Use	Rural location, with deciduous woodland immediately adjacent to the north, with tall rural, scrub and grassland on the other aspects. The wider landscape is characterised by open grazed pasture, arable and parcels of deciduous woodland
Urban Context / Locality	The site is located north of Ashurst, west of Henfield and north of Steyning
Connectivity to Wider Landscape	Via deciduous woodland to areas of key roosting/foraging/commuting habitat for bats and barn owls located in the wider landscape
Priority Habitats within 1 km	• Deciduous woodlands • Traditional orchards • Rivers/streams • Ponds
Ancient Woodland within 1 km	None
Non-Statutory Designated Sites within 1 km	Not known
Statutory Designated Sites within 1 km	None
European Designated Sites within 5 km	None
(European Protected Species Licences) EPSLs within 2 km	None

1.3 Preliminary Roost Assessment

The stables were surveyed both externally and internally for evidence of (and suitability for) bats. The survey was undertaken by Martin Roche BSc (Hons) (Accredited Agent under Bat Class Licence WML-CL17, Class Registration Number: 2017-32546-CLS-CLS on 27th September 2023.

The stables are single storey and L-shaped, comprising a red brick plinth and timber clad walls. The roof has two hipped ends and comprises clay tiles. The southern elevation is open, and the west-facing elevation has a door and two glass windows. There are no enclosed roof voids present.

The stables were assessed as having low suitability for roosting bats owing to the presence of external potential roosting features in the form of lifted profile tiles. There are also potential internal roosting features in the form of crevices in the timber framework; however, the stables are open sided and open to the eaves (lacks an enclosed roof void), meaning the stables are unlikely to offer suitable internal conditions for roosting bats. Therefore, it has been assessed that the only suitable potential roosting features present are external, namely the roof tiles.

1.4 Development Proposals

Planning reference: DC/23/1979. The development proposals are for the conversion of the stables into a holiday let, with the introduction of glazing on the open elevation and new windows to the rear. All other work will be related to internal fit-out. The roof and the tiles will be untouched, and no alterations are required for the internal timber structure.

1.5 Brief and Objectives

The purpose of this Precautionary Working Method Statement for Bats is to:

- Provide Reasonable Avoidance Measures and Mitigation so that committing an offence under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act, 1981 (as amended) (see Section 2) will be avoided during the proposed works to the stables.

2. Relevant Legislation

All UK bat species and their roosts are fully protected under Schedule 5 of the Wildlife & Countryside Act 1981 (as amended). All bats are also included in Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended), which defines "European protected species of animals" and are afforded further protection through the Countryside and Rights of Way (CRoW) Act, 2000.

The combined legislation makes it illegal to:

- Intentionally kill, injure, or capture bats.
- Deliberately disturb bats (whether in a roost or not).
- Damage, destroy or obstruct access to bat roosts.
- Possess or transport a bat or any part of a bat, unless acquired legally.
- Sell, barter or exchange bats, or parts of bats.

The Wildlife and Countryside Act 1981 (as amended) adds further protection by making it an offence to intentionally or recklessly disturb a bat while it is occupying a structure or place which it uses for shelter or protection, or to obstruct access to any structure or place the species uses for shelter or protection.

As a signatory to the Bonn Convention (Agreement of Bats in Europe), the UK is also required to protect their habitats, requiring the identification and protection from damage or disturbance of important feeding areas.

In this interpretation, a bat roost is "*any structure or place which any bat uses for shelter or protection*". Because bats tend to reuse the same roosts, legal opinion is that the protection of bat roosts are considered to apply regardless of whether bats are present or not. There is currently no guidance on when a roost ceases to be protected if it is not used by bats.

Under S.9(4)(b) of the Wildlife and Countryside Act 1981 (as amended) it is an offence to intentionally or recklessly disturb a bat '*while it is occupying a structure or place which it uses for shelter or protection*'. However, R.39(1)(b) of the Habitats Regulations states: '*A person commits an offence if they - (b) deliberately disturb animals of any such species* (including bats*) in such a way as to be likely significantly to affect — (i) the ability of any significant group of animals of that species to survive, breed, or rear or nurture their young, or (ii) the local distribution or abundance of that species'*. The loss or damage of habitats, which are important for foraging and commuting bats, could result in roosts being abandoned and bats not being able to forage. Therefore, it can be concluded that the Habitat Regulations affords protection to bat foraging and commuting habitats.

If planned works would constitute an offence, they may only be carried out under licence from Natural England. Works or mitigation activities involving interference with bats or bat shelters must be carried out by a licensed bat worker (with a Natural England Bat Licence).

The Natural Environment and Rural Communities Act (NERC Act) 2006, requires due consideration be given to biodiversity and its potential enhancement when considering proposed developments. Several bat species are listed as species of principal importance.

3. Precautionary Working Method Statement

The following Reasonable Avoidance Measures and Mitigation must be adhered to, to ensure bats and their roosts are safeguarded and committing an offence under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act, 1981 (as amended) is avoided.

3.1 Timing of Works

The installation of the glazing on the open elevation and new windows to the rear, and all works related to internal fit-out could potentially cause disturbance to roosting bats under the roof tiles, particularly during their most vulnerable periods, including during the maternity period (May to June, inclusive) and hibernation period (November to March, inclusive). The roof tiles are unlikely to support a maternity roost or hibernation roost for bats; however, in the absence of dusk emergence survey data, as a precautionary measure, the works should be carried out outside the maternity period (May to June, inclusive) and the hibernation period (December to February, inclusive).

3.2 Pre-Works Inspection

The licensed ecologist will visit the site prior to works commencing and will carry out an inspection externally and internally, using a torch and an endoscope, to determine whether bats or nesting birds are present. Providing bats and nesting birds are confirmed to be absent (as far as is possible), works to install glazing on the open elevation and new windows to the rear, and all works related to internal fit-out can commence. If bats are found to be present, works will be postponed and a licence will need to be obtained from Natural England, which must be informed by three dusk emergence surveys, during May to August/September inclusive and spaced at least three weeks apart, in accordance with guidelines set out by the Bat Conservation Trust (Collins, 2023). If nesting birds are found, works to that feature should be delayed until the nest site becomes inactive (species specific, but approximately 4-6 weeks maximum).

3.3 Toolbox Talk

A toolbox talk will be given by the licensed ecologist to all contractors working on site, following the pre-works inspection. A paper copy of the toolbox talk and this Precautionary Working Method Statement will be provided to contractors and kept on site for the duration of the works. All contractors will sign the toolbox register to confirm they have read and understand the toolbox talk.

Any contractors not present at the toolbox talk will need to sign the toolbox register, to confirm they have read and understand the toolbox talk and Precautionary Working Method Statement.

The toolbox talk and register are provided in Appendix 1.

3.4 Method of Works

All works will be carried out in the knowledge that individual bats could be present under the roof tiles, and, therefore, works will be carried out as quietly and as quickly as possible. Installation of the glazing on the open elevation and new windows to the rear, and all works related to internal fit-out will be carried out using non-mechanised hand tools and as quickly as possible.

3.5 Retention of Roosting Features and Access/Egress Points

The proposals are for the installation of glazing on the open elevation and new windows to the rear, and for internal fit-out. The roof tiles could potentially support roosting bats, as detailed in Figure 1. The

roof and the tiles will be untouched, and no alterations are required for the internal timber structure. Therefore, all roosting features for bats associated with the roof will be retained.

3.6 Post-Development Inspection and Report

Following completion of the works, the licensed ecologist will re-visit site to confirm that all potential roosting features for bats under the roof tiles have been retained and untouched. The licensed ecologist will prepare a brief report, confirming the works have been carried out in accordance with this Precautionary Working Method Statement for Bats.

3.7 Persons Responsible

Persons responsible and contact details are provided in Table 3.

Table 3. Persons Responsible

Name	Role	Mobile Number	Email Address
Robert Russell	Client & Contractor Site Manager	07748 261207	r.a.russell@outlook.com & conservation.craftsmen@gmail.com
Hannah McLaughlin	Architect	07789 720784	hannah.mclaughlin@dhaplanning.co.uk
Sarah Lyne	Licensed Ecologist	07443 652988	sarahlyne@alyneecology.co.uk
Martin Roche	Licensed Ecologist	07864 056178	martinroche@alyneecology.co.uk

3.8 External Lighting

Recommendations to minimise the potential impacts of artificial external lighting on bat activity, are provided below (Bat Conservation Trust, 2023):

- Avoid prolonged use of outside lighting during the period dusk to dawn, particularly during the bat active season (April to October).
- Security lighting should be on a motion sensor and short duration timer (1 minute).
- Lighting that is required for security or safety reasons, should use a lamp of no greater than 2000 lumens (150 Watts) and should comprise sensor activated lamps.
- Red light bulbs should be used, where possible.
- LED luminaires with a warm white spectrum (<2700 Kelvin) are the preferred option and should be used where possible. Luminaires should feature peak wavelengths higher than 550 nm to minimise disturbance to bats. All luminaires should lack UV elements, metal halide and fluorescent sources should not be used.
- Lighting should be directed to where it is needed with minimal light spillage. This can be achieved by limiting the height of the lighting columns and by using as steep a downward angle as possible and/or a specialist bollard that directs the light below the horizontal plane (<90º).

- Internal luminaires should be recessed where installed in proximity to windows to reduce glare and light spill.
- Waymarking inground markers with a low output and with cowls should be used to delineate path edges.
- Artificial lighting should not directly illuminate any potential bat roosting features or habitats of value to foraging bats, i.e., hedgerows, line of trees, and woodland.

4. References

aLyne Ecology Ltd (2024). *Preliminary Roost Assessment and Barn Owl Scoping Survey. Church Lane, Ashurst.* Version 004. 5th March 2024.

Bat Conservation Trust. (2018). *Bats and Artificial Lighting in the UK, Guidance Note 08/18*. Institution of Lighting Professionals.

Collins, J. (2023). *Bat Surveys for Professional Ecologists. Good Practice Guidelines (4th Edition).* Bat Conservation Trust, London.

HM Government (2023). *National Planning Policy Framework*. Department for Communities and Local Government. HMSO.

HM Government (2005). *ODPM Circular 06/05 Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System.* HMSO.

HM Government (1981). *Wildlife and Countryside Act, as amended.* HMSO.

HM Government (2017). *Conservation of Habitats and Species Regulations 2017 (as amended)*. HMSO.

Middleton, N. (2019). *Assessing Sites for Hibernation Potential. A Practical Approach, including a Proposed Method & Supporting Notes. Version: Draft/V2.2019*. BatAbility.

Mitchell-Jones, A. J. (2004). *Bat Mitigation Guidelines*. English Nature (now Natural England), Peterborough.

5. Figure 1 – Results of Preliminary Roost Assessment



Building B1 — External Inspection, Southern Elevation





Key:

Lifted Tiles

aLyne ecology
London & South East
Tel: 01372 602372
Mob: 07443 652988

Client: Mr. Robert Russell

Project Title: Stables at Glebe Meadow, Church Lane, Ashurst, West Sussex

Figure Number, Version: Figure 1b, 001

Date: 26.10.2023

Figure Title: Results of Preliminary Roost Assessment

Habitat locations and extent are approximate. Not to scale.
Photographs taken on 27.09.2023

Building B1 — External Inspection, Northern Elevation



Key:

Lifted Tiles

aLyne ecology
London & South East
Tel: 01372 602372
Mob: 07443 652988

Client: Mr. Robert Russell

Project Title: Stables at Glebe Meadow, Church Lane, Ashurst, West Sussex

Figure Number, Version: Figure 1c, 001

Date: 26.10.2023

Figure Title: Results of Preliminary Roost Assessment

Habitat locations and extent are approximate. Not to scale.
Photographs taken on 27.09.2023

Building B1 — External Inspection, Western Elevation





Key:

Lifted Tiles

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Mob: 07443 652988

Client: Mr. Robert Russell

Project Title: Stables at Glebe Meadow, Church Lane, Ashurst, West Sussex

Figure Number, Version: Figure 1d, 001

Date: 26.10.2023

Figure Title: Results of Preliminary Roost Assessment

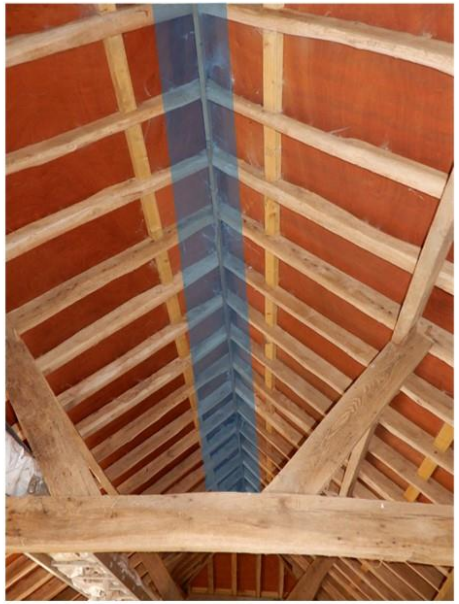
Habitat locations and extent are approximate. Not to scale.
Photographs taken on 27.09.2023

Building B1 — Internal Inspection









Key:

Crevices in Timber Framework

aLyne ecology
London & South East
Tel: 01372 602372
Mob: 07443 652988

Client: Mr. Robert Russell

Project Title: Stables at Glebe Meadow, Church Lane, Ashurst, West Sussex

Figure Number, Version: Figure 1e, 001

Date: 26.10.2023

Figure Title: Results of Preliminary Roost Assessment

Habitat locations and extent are approximate. Not to scale.
Photographs taken on 27.09.2023

6. Appendix 1 – Toolbox Talk

6.1 Site Details and Brief

Why do I need to read this? As you are working within a potential bat roost, you need to be aware of your legal obligation concerning bats and know what to do if bats are found. The stables comprise gaps under roof tiles, which could potentially support roosting bats.

In order to safeguard bats on site and to prevent an offence being committed, this Precautionary Working Method Statement for Bats must be adhered to.

6.2 Protection of Bats

All UK bat species and their roosts are fully protected under Schedule 5 of the Wildlife & Countryside Act 1981 (as amended). All bats are also included in Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended), which defines "European protected species of animals" and are afforded further protection through the Countryside and Rights of Way (CRoW) Act, 2000.

The combined legislation makes it illegal to:

- Intentionally kill, injure, or capture bats.
- Deliberately disturb bats (whether in a roost or not).
- Damage, destroy or obstruct access to bat roosts.
- Possess or transport a bat or any part of a bat, unless acquired legally.
- Sell, barter or exchange bats, or parts of bats.

The Wildlife and Countryside Act 1981 (as amended) adds further protection by making it an offence to intentionally or recklessly disturb a bat while it is occupying a structure or place which it uses for shelter or protection, or to obstruct access to any structure or place the species uses for shelter or protection.

6.3 Bat Identification and Ecology

In Britain there are 18 species of bats (17 of which breed within the UK), all of which feed on insects and are the only flying mammals in the UK. Most species weigh less than a pound coin and can fit into a space the size of a match box.

All the UK bat species have been known to use buildings and walls, but some species are more building reliant than others. Different bat species select different types of roosts in buildings since they look for sites comparable to those chosen in natural habitats.

The diagram below gives a rough guideline to what bats are doing at what time of year. It is important to note that there are species differences and depending on environmental conditions such as weather, bats can change their behaviour. For example, on mild winter days bats may wake to feed. The diagram below is taken from Collins, 2016.



In buildings and walls, a range of possible roosting opportunities exist that mimic those found in the natural environment. Crevice-like or tree cavity type spaces include those found in both modern and traditional houses such as behind fascia and barge boarding, spaces beneath roof tiles, wall coatings, hollow mortice joints, rain gutters and chimneys. Cave-like spaces include attics and cellars that are dark, exhibiting stable temperatures and humidity. These spaces may be found in a range of buildings including barns and other farm buildings, historic buildings, castles, churches, and terraced houses.



Here are some ways of recognising a bat:

- Small, normally as wide, or as long as your thumb.
- Bats in flight look bigger. Their wingspan can be up to 40cm.
- Brown or grey fur.
- Wings are leathery/skin like. Wings are folded close to body when bats are roosting.
- Bat droppings are small (0.5cm) and either black or brown. Bat droppings are similar in size and shape to mouse or rat droppings. The droppings consist of insect remains and crumble if crushed. Mouse and rat droppings do NOT crumble when crushed.



Brown long-eared bat (left) and common pipistrelle bat (right) (photographs taken by aLyne Ecology).

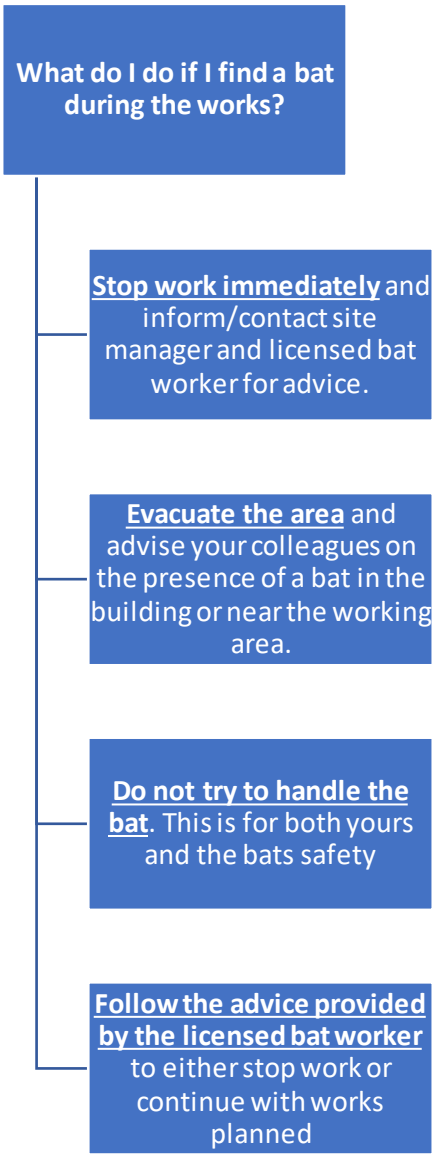
6.4 Bats and Rabies

Do not handle bats!

There have been cases of bats in Europe carrying a rabies virus called European Bat Lyssavirus (EBLV). In the UK this is very rare, following a study which tested 5000 dead bats, only four were found to have the virus.

Rabies is passed onto a human from a bite or scratch from an infected animal, or from its saliva coming into contact with your mucous membranes, such as your eyes, mouth and nose. With this in mind it is imperative that bats are not handled. If you are scratched or bitten by a bat wash the wound immediately using an alcohol-based disinfectant and seek advice from your doctor about post rabies treatment.

6.5 Finding Bats during Works



6.6 Contact Details

Licensed Bat Workers:

Sarah Lyne
aLyne Ecology Ltd
Managing Director and Principal Ecologist
T: 07443 652988
E: sarahlyne@alyneecology.co.uk

Martin Roche
aLyne Ecology Ltd
Senior Ecologist
T: 07864 056178
E: martinroche@alyneecology.co.uk

6.7 Toolbox Talk Register

I have read and understood the toolbox talk for bats.

Name and Role	Signature	Date