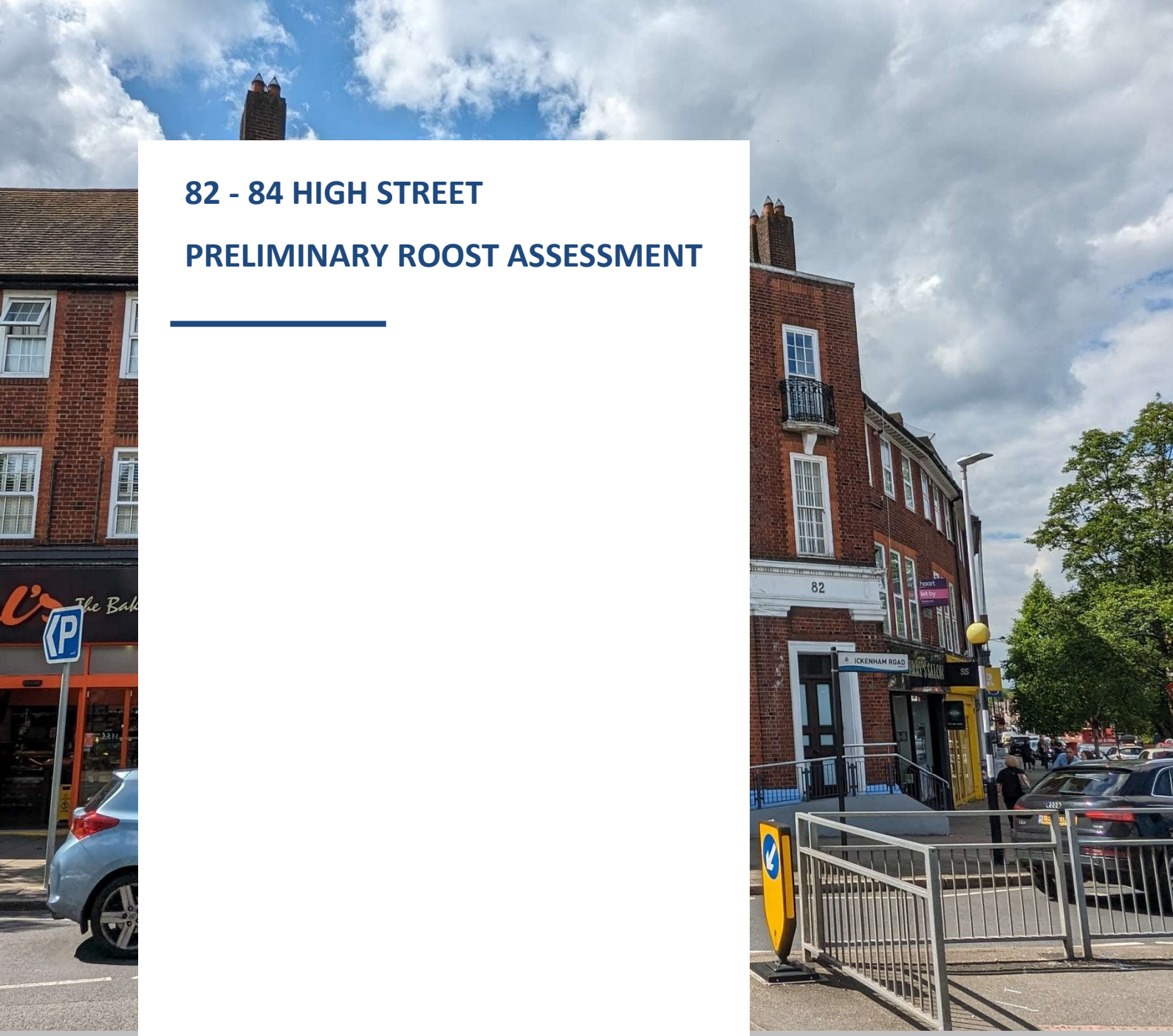

82 - 84 HIGH STREET

PRELIMINARY ROOST ASSESSMENT

JUNE 2024

GROVE ECOLOGY LTD

AUTHOR: C AYLWARD MCIEEM, MRSB, CBIOL

VERSION 1.0

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82 - 84 HIGH STREET
PRELIMINARY ROOST ASSESSMENT

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82 - 84 HIGH STREET
PRELIMINARY ROOST ASSESSMENT

1. EXECUTIVE SUMMARY

Site:	82-84 High Street, Ruislip, Greater London, HA4 7AB
Central OS Grid Reference:	TQ09218735
Report Commissioned by:	Bika Construction Ltd
Date of Appraisal:	5th June 2024

Survey Results	Preliminary Roost Assessment	Inspection of the building on site has found a small number of potential roost features within the front and rear elevations of the three-storey portion of the building, including brickwork and roof. The PRFs range from low to medium potential but the building as a whole has been downgraded to low potential due to the surrounding site context. There are no statutory or non-statutory designated for bats or citing bats as an interest feature within 2km of the proposed development.
Further Surveys	Bat Emergence Surveys	As per Bat Conservation Trust guidelines it is recommended that a single emergence survey be conducted (as a minimum) between May and August, to be reasonably certain of bat roost presence/likely absence prior to work commencing.
Mitigation	TBC	Bat mitigation requirements will be determined after further surveys are complete.
Enhancements	TBC	Bat enhancement measures will be determined after further surveys are complete.
Survey Validity	One Year	The survey data and conclusions of this report are valid until June 2025.

2. INTRODUCTION

PURPOSE OF REPORT

2.1 Grove Ecology Ltd has been commissioned to undertake a preliminary roost assessment (PRA) of 82 - 84 High Street, Ruislip to identify the potential for bats to roost within the property.

2.2 This report details the findings of the PRA, provides an evaluation of the results, and provides recommendations for further surveys needed to support a planning application if necessary.

DEVELOPMENT PROPOSAL

2.3 It is proposed that the former bank be converted into residential units via a change of use. This is likely to include conversion of the existing roof space into a residential unit and repairs to the brick work on all elevations.

SITE AND SETTING

2.4 The site is approximately 266 square meters of land centrally located on the high street of Ruislip, Greater London. The entire site is developed, covered by a continuous building of variable height, ranging from single to three storeys. (Appendix A – Landscape and Site Photographs).

2.5 The site has limited and fragmented connectivity to the wider rural landscape via approximately 500m of residential gardens to the west. Highly developed commercial and residential flats border the site to the north and south, whilst a carpark borders the west of site. The east elevation of the site faces onto the junction of Ickenham Road (B466) and the High Street (A4180). Other nearby features of note include St Martin's Church and graveyard approximately 100m to the northeast and Church Field Gardens located immediately to the east of the graveyard.

LEGISLATION AND POLICY

2.6 All UK species of bats and their roosts are strictly protected under UK legislation via the Conservation of Habitats and Species Regulations 2017 (as amended), and the Wildlife and Countryside Act 1981 (as amended). Four UK bat species are also listed under Annex II of the Habitats Directive. For full details of legislation pertaining to bats please see Appendix B for details.

2.7 The Local Planning Authority (LPA) take into account any material impacts resulting from proposed developments and ensure compliance with the requirements of the Natural Environment and Rural Communities (NERC) Act (2006) (Section 40) and the Government Circular: Biodiversity and Geological Conservation – Statutory obligations and their Impact within the Planning System (ODPM 06/2005, Defra 01/2005).

OBJECTIVES

2.8 The objectives of this PRA report are to:

- Identify potential bat roost features (PRFs) within the main building that may be potentially affected (if any);
- Assign an overall value of suitability for the building to potentially support roosting bats;
- Evaluate the potential impact of the proposed development in relation to any identified PRFs, and commuting and foraging bats;
- Provide recommendations for further surveys or actions if required.

3. METHODOLOGY

DESK STUDY

3.1 The Internet database MAGIC (Multi-Agency Geographic Information for the Countryside) was searched for statutory and non-statutory designated areas that include bats in their citation within a 2km radius of the site. MAGIC was also searched for bat mitigation licences that have recently been granted within 2km. Additional designated sites with larger consultation zones may also be highlighted where their consultation buffer zones are known to reach the proposed development site.

3.2 A 2km search radius was specified as it is an appropriate size for the scale of the proposed development and is also the minimum search radius specified by the Bat Conservation Trust (BCT) guidance *Bat Surveys for Professional Ecologists: Best Practice Guidelines* (Collins, 2023).

3.3 A data request for bat records within 2km of site was not made to London Bat Group as the size and scale of the development, and the likely impacts do not warrant it. The need for further surveys also influenced this decision (see recommendations).

PRELIMINARY ROOST ASSESSMENT SITE VISIT

3.4 The PRA was undertaken at ground level, and via the single storey floor flat roof at the rear of the property, with the aid of close focus binoculars and appropriate lighting where necessary. The exterior of the property was examined for field signs of bats such as scratch marks, fur oil stains, wear on tiles, droppings, feeding remains, and auditory squeaks.

3.5 The exterior of the property was also examined for potential roost features, such as raised or broken roof tiles, cracked masonry, open eaves and lifting lead flashing.

3.6 A speculative visual inspection of the loft space was attempted but could not be accessed due to health and safety concerns.

3.7 There are no trees or other structures on site to inspect.

3.8 Upon completion of the PRA the property is assigned a level of suitability for bats as outlined in Table 1 below.

Table 1: Classifying the bat roosting suitability of buildings and trees (Collins, 2023).

Evidence of bats found	Sufficient evidence of bats has been found to conclude that a roost is present.
High roosting suitability	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger number of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
Moderate roosting suitability	A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat, but unlikely to support a roost of high conservation status (with respect to roost type only).
Low roosting suitability	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions

	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 or hibernation). A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential.
Negligible roosting suitability	A structure or tree with few, if any features suitable for roosting.
None	A complete absence of any cracks, crevices or features that could be used by any number of bats at any time during the year.

SURVEYOR DETAILS

3.9 The PRA was undertaken by Grove Ecology Principal Ecologist Chris Aylward BSc, MSc, who has been working as an ecologist for 17 years. Chris is a full Member of the Chartered Institute of Ecology and Environmental Management (MCIEEM), and a Chartered Biologist (CBiol) of the Royal Society of Biology (MRSB) and a Level 1 Bat Survey licence holder.

SURVEY METHOD CONSTRAINTS

3.10 The survey was conducted at ground level with the aid of 9x 63 binoculars, a 22-66 x 100 telescope, and a high-power torch where necessary. It is possible that evidence or potential roost features only visible from a higher angle may have been missed, however, this is an accepted risk under the relevant survey guidelines used.

3.11 It is also possible to conduct a PRA and find no evidence of bats, but for bats to still be present. This situation occurs when either small numbers of bats are present, weather or human activity clears away evidence, reduced bat activity during the winter, and/or specific features of a roost hide evidence, such as droppings collecting within internal cavities used by bats rather than within a loft space.

3.12 As discussed in paragraph 3.5, it was not possible to inspect the loft space due to health and safety concerns, hence it is possible that evidence of bats may have been missed in this area. There was no specific way to mitigate this constraint at the time of the survey.

3.13 Lastly, the absence of biological / licensing records does not preclude the presence of a particular species, as record coverage is often patchy due to access restrictions placed on county surveyors by private property, trespass laws and privacy laws governing client data released by consultants.

4. RESULTS

DESK STUDY

Designated Nature Conservation Sites

4.1 Three statutory nature conservation sites were identified within 2km of the proposed development. None of the identified local or national statutory designated are designated specifically for bats.

4.2 There are approximately ten non-statutory Sites of Importance for Nature Conservation (SINC) have been identified within 2km of the proposed development. None of the identified SINCs list bats as an interest feature or reason for designation.

Granted Bat Licences

4.3 A 2km MAGIC search has revealed two bat mitigation licences have been granted, both are approximately 500m to the northwest and southeast respectively, covering a combined time period from 2010 to 2015. Each identified roost supported either common pipistrelle (*Pipistrellus pipistrellus*) or common pipistrelle and soprano pipistrelle (*P. pygmaeus*).

BUILDING EXTERIOR

4.4 The majority of the property is fitted with a flat roof providing no detectable roof void for bats to roost, the exception is a pitched roof partially covering the three-storey portion of the building on the northeast end (front) of the property. This roof has close fitting red clay tiles providing limited potential for bats to roost, although there is a single missing tile on the northeast elevation (front) that provide a potential roost feature for either single crevice dwelling bats or potentially greater roost potential if access between batons or into the roof void is possible.

4.5 Three areas of overhanging stone capping or lead flashing were noted to provide low potential roost features on the southwest elevation of the three-storey portion of the building (see Appendix A for details). These were around the central chimney stack an outer walls abutting adjacent properties.

4.6 Glass reinforced plastic (or similar) capping surrounds the two-storey portion of the property on the southwest end of site. This appeared to be in good condition and offered negligible potential roost features.

4.7 The brickwork on the southwest elevation (rear) of the three-storey portion of the property features three gaps within the brickwork where pipes or cables have been either placed or removed. These offer low to medium potential roost features depending upon whether a cavity wall is present.

4.8 A single gap in the brickwork is present on the northeast elevation of the property at approximately 3m high on a brick column. Again this offers a low to medium potential roost feature depending upon whether a cavity wall is present and has been breached.

4.9 No field signs of bats were detected during the survey of the building exterior.

HABITAT

4.10 The habitat within the proposed development site is entirely hard standing and building offering no foraging potential for bats.

4.11 Areas for potential foraging in the wider area includes the residential gardens to the west of site that are likely to provide low quality foraging habitat and are separated from the site by approximately 40m of carpark. The most viable area for foraging bats within the local area appears to be St Martin's Church and graveyard approximately 100m to the northeast and Church Field Gardens located immediately to the east of the graveyard.

5. EVALUATION

DESIGNATED SITES

5.1 There are no designated sites for bats, or that cite bats as an interest feature, within 2km of the proposed development, and no known consultation or buffer zones for designated sites further afield that cover the area. Based upon this information, no impact is predicted for bat related designated sites.

LOCAL BAT LICENCES

5.2 The bats from the identified roosts approximately 500m away are unlikely to regularly commute past the proposed development site as there are specific linear features nearby to each roost that are likely to support commuting and foraging and draw bat away from site rather than towards or past it. These features being the River Pinn to the northwest and the railway embankments passing through Ickenham, Ruislip and Ruislip Manor to the southeast. As such, no impact is predicted upon these roosts.

SUITABILITY FOR ROOSTING BATS

5.3 The property has a number of low to medium potential roost features within the older, three-storey portion of the building on both the northwest and southeast elevations.

5.4 Ordinarily this building would be assigned a moderate bat roost potential, however, the site has poor habitat connectivity and limited local foraging availability combined with likely significant amounts of light pollution. Therefore, when assessed within the context of the surrounding environment the building has been downgraded to low bat potential.

5.5 Without further surveys to determine presence/or likely absence and any necessary mitigation measures, there is a potential risk of destruction of bat roosts and harm to roosting bats.

Trees and Other Structures

5.6 No trees or other structures are present on site.

SUITABILITY FOR FORAGING AND COMMUTING BATS

5.7 There are negligible foraging opportunities on site due to its lack of vegetated habitat. Commuting could potentially occur past the building if light spill in the local area allows it,

but it is unlikely to be a significant commuting feature due to its urban location and poor connectivity to the wider landscape.

5.8 It is likely that only faster flying, more light tolerant bat species will be found in the area. Most likely these species will be pipistrelles, *Nyctalus* species and potentially serotine (*Eptesicus seretinus*).

POTENTIAL LIGHT IMPACTS

5.9 The lighting impact of the proposed development will be further assessed following an emergence survey.

6. RECOMMENDATIONS

FURTHER SURVEYS

6.1 As per the Bat Conservation Trust guidelines it is recommended that a minimum of one dusk emergence surveys be conducted for a building with low bat roost suitability. This survey is to determine a reasonable level of confidence in the presence / likely absence of bat roosts within the building.

6.2 Four bat surveyors should be sufficient to obtain a suitable level of coverage of the front and rear of the building. Two surveyors are required on either elevation due to the public facing survey positions required and the height differential between identified roost features. Where resourcing is an issue, it may be acceptable to split the buildings into survey zones and phase each survey over two nights, thereby utilising fewer bat workers. All surveyors should be suitably experienced ecologists/bat workers and will require night vision aids.

6.3 Surveys must be carried out between May to August inclusive, in suitable weather.

6.4 If bats are found to be present, then additional surveys may be required to quantify the roost and inform mitigation measures/licensing.

7. ENHANCEMENTS

7.1 Enhancements will be recommended following the bat emergence survey.

8. REFERENCES

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

Department of Communities and Local Government (March 2012) National Planning Policy Framework.

Institute of Environmental Assessment (1995) Guidelines for Baseline Ecological Assessment.

JNCC (2010) *Handbook for Phase 1 Habitat Survey: a technique for environmental audit.* JNCC, Peterborough.

MAGIC Site Check Report. Available: www.magic.gov.uk.

Mitchell-Jones, J. (2004) Bat Mitigation Guidelines. Natural England.

Mitchell-Jones, A.J. and Mc Leish, A.P. (2004). Bat Workers Manual. JNCC

9. Appendix A – Landscape and Site Photographs

Figure 1. Aerial Photograph of site outlined in red.

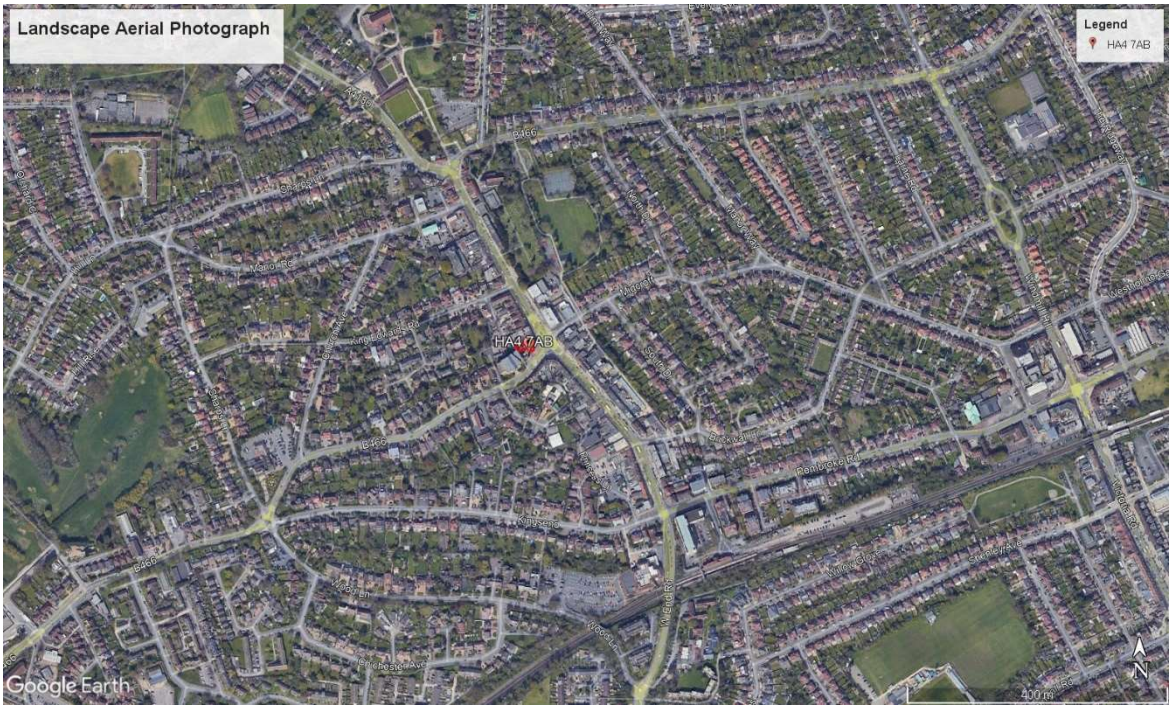

Figure 2. Landscape aerial photograph.

Photo 1. –View of the northeast elevation with PRFs highlighted.

Photo 2. – View of the northeast roof elevation and missing tile.

Photo 3. – The PRF within the brickwork on the northeast elevation.

Photo 4. – The southwest elevation and PRFs. Note that the chimney PRF cannot be seen from this angle.

	
Photo 5. – A closer view of the PRF on the southwest elevation.	**Photo 6**. – A closer view of the PRF on the southwest elevation chimney.
	
Photo 7. – A closer view of the PRF on the southwest elevation.	**Photo 8**. – A closer view of the PRF on the southwest elevation brickwork.
	
Photo 9. – A closer view of the PRF on the southwest elevation brickwork.	**Photo 10.** – A closer view of the PRF on the southwest elevation brickwork.

10. Appendix B – Legislation, Planning Policy & Conservation Status

DISCLAIMER: The details provided in this appendix are for general guidance only and should not be relied upon as a definitive statement of the law. For legal advice please consult an appropriate legal professional.

LOCAL STATUTORY DESIGNATIONS

Local authorities in consultation with the relevant nature conservation agency can declare ***Local Nature Reserves (LNRs)*** under the National Parks and Access to the Countryside Act 1949. LNRs are designated for flora, fauna or geological interest and are managed locally to retain these features and provide research, education and recreational opportunities.

NON- STATUTORY DESIGNATIONS

All non-statutorily designated sites are referred to as ***Local Wildlife Sites (LWS) or Sites of Interest for Nature Conservation (SINC)*** and can be designated by the local authority for supporting local conservation interest. Combined with statutory designation, these sites are considered within Local Development Frameworks under the Town and Country Planning system and are a material consideration during the determination of planning applications. The protection afforded to these sites varies depending on the local authority involved.

NATIONAL AND EUROPEAN LEGISLATION AFFORDED TO BATS

All 18 British bat species are listed in Schedule 5 of the *Wildlife and Countryside Act 1981* (as amended) and Schedule 2 of the *Conservation of Habitats and Species Regulations 2017* as European Protected Species. Furthermore, the *Countryside and Rights of Way Act 2000* (Schedule 12, Paragraph 5) has amended Section 9 of the 1981 Act. Bats are therefore, fully protected under Section 9 of the WCA 1981 and under Regulation 41 of the *Conservation of Habitats and Species Regulations 2017 (as amended),* which transposes the Habitats Directive into UK law.

All European bat species are listed as protected under Annex IV of Council Directive 92/43/EEC 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora, commonly referred to as the EC or EU Habitats Directive. In addition, four UK bat species are listed in Annex II of the EC Directive; the conservation of which requires the designation of Special Areas of Conservation under certain criteria. These four species are the greater horseshoe bat *Rhinolophus ferrumequinum*, the lesser horseshoe bat *Rhinolophus hipposideros*, Bechstein's bat *Myotis bechsteinii* and the barbastelle *Barbastella barbastellus*.

In England (and Wales) the EC Habitats Directive is transposed into national law by means of the *Conservation of Habitats and Species Regulations 2017 (as amended)*. The commonly used collective term for this above legislation is the 'Habitats Regulations' and all bats are European Protected Species (EPS).

Ultimately, the above EU and UK legislation makes it an offence to, or to attempt to do, any of the following:

- Deliberately capture, injure or kill a bat;

- Deliberately disturb a bat, including in particular any disturbance which is likely to impair a bats ability to survive; breed or reproduce; or rear or nurture their young;
- In the case of hibernating or migratory species, to impair their ability to hibernate or migrate;
- Affect significantly the local distribution or abundance of the species to which they belong;
- Damage, destroy or obstruct a breeding site or resting place of a bat whether intentionally or recklessly; and / or,
- Possess, control, transport, exchange or sell a bat or parts of a bat, alive or dead.

Furthermore, where development will result in damage to, or obstruct access to, any bat roost (whether occupied or not) or risks harming or significantly disturbing bats an EPS licence is required from Natural England, the regulatory body responsible for protected species in England, to allow the development to proceed.
The legal interpretation of "development" in the context of EPS is not restricted to works requiring planning permission from LPAs but includes permitted development and can encompass works that do not require any formal permission.
Bats are also afforded more general protection in England (and Wales) within the *Natural Environment and Rural Communities Act, 2006*. This imposes a duty on all public bodies, including local authorities and statutory bodies, in exercising their functions, “to have due regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity” [Section 40 (1)]. It notes that “conserving biodiversity includes restoring or enhancing a population or habitat” [Section 40 (3)]. Consequently, attention should be given to dealing with the modification or development of an area if aspects of it are deemed important to bats, such as roosts, flight corridors and foraging areas.
Species of Principal Importance in England (SPIE) – formerly UK Biodiversity Action Plan Priority (BAP) include the barbastelle, brown long-eared bat, soprano pipistrelle *Pipistrellus pygmaeus*, noctule *Nyctalus noctula*, greater horseshoe, lesser horseshoe and Bechstein's bat.

PLANNING POLICY

Fifty-six habitats and 943 species of principal importance are included on the S41 list. These are all the habitats and species in England that were identified as requiring action in the UK Biodiversity Action Plan and continue to be regarded as conservation priorities in the subsequent UK Post-2010 Biodiversity Framework.

The S41 list is used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 40 of the Natural Environment and Rural Communities Act 2006, to have regard to the conservation of biodiversity in England, when carrying out their normal functions (e.g. consideration of Planning Applications).

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