Castle Hills House, St Neots

Precautionary Working Method Statement: Bats

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1. Background Information

Background

1.1. Elton Ecology Ltd was commissioned by Mr M Hicks to produce a Precautionary Working Method Statement: Bats in support of a planning application for the erection of an orangery at Castle Hills House, St Neots; hereafter referred to as the 'Site'.

1.2. This PWMS follows the Preliminary Ecological Appraisal (PEA) for the site completed by Elton Ecology in 2024 (report reference P2565_01) and the Decision Notice from Huntingdonshire District Council (Application Reference: 24/00228/HHFUL).

1.3. The provision of this PWMS is to address Condition 7 of the Decision Notice, which states:

'No development above slab level shall take place until a Precautionary Working Methods Statement for Bats has been carried out has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the conservation and enhancement of on-site biodiversity in accordance with Policy LP30 of the Huntingdonshire Local Plan to 2036.'

Site details

1.4. The site comprises modified grassland, scattered trees, scattered scrub, and developed land sealed surface. The site is located Castle Hills House, School Lane, Eaton Socon, St. Neots, Huntingdonshire, Cambridgeshire, PE19 8GW (Figure 1: Site Location Plan) (central OS grid reference: TL 17264 58818).

Rationale for PMWS

1.5. Potential roosting features associated with B1 were limited to features in the roof structures and loft voids. A single storey extension is proposed to the building only. No evidence of bats was recorded during the PRA (Elton Ecology Ltd, 2024)

1.6. When considering the above factors, against the prospective project delays and costs associated with nocturnal surveys (plus the subsequent document and planning delay); the provision of a PMWS to inform a precautionary approach to works is considered proportionate and an effective solution to manage risk to roosting bats on-Site.

1.7. This PMWS is therefore provided in the interest of mitigating the risk of the proposal on roosting bats for which there is a very low risk of impacts occurring. This PMWS seeks to manage the following risks/offences through mitigation measures:

- Potential roost destruction;
- Disturbance; and,
- Killing and injury.

1.8. Whilst not a primary consideration of this PMW, mitigation will also be provided in respect of nesting birds.

The Proposal

1.9. As detailed within the officer report, the proposed orangery will be sited to the rear of the host dwelling replacing the existing colonnade and would extend beyond the rear elevation of existing lounge and garden rooms by 5m, and extend 4.2m from the side elevation of the existing swimming pool room. The proposal would have a flat roof with a lantern roof light, the eaves would have a height of 2.925m and the latern roof light would have a height of 3.444m.

2. Relevant Legislation

Bats

2.1. British bats are fully protected within UK Law under Wildlife and Countryside Act 1981 (as amended) through their inclusion in Schedule 5. Under the Act, they are protected from:

- Intentional or reckless killing, injury, taking;
- Damage to or destruction of or, obstruction of access to any place of shelter, breeding or rest;
- Disturbance of an animal occupying a structure or place;
- Possession or control (live or dead animals);
- Selling, bartering or exchange of these species, or parts of.

2.2. This law is reinforced by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. These Regulations also prohibit:

- the deliberate killing, injuring or taking of bats;
- the deliberate disturbance of any bat species in such a way as to be significantly likely to affect:
    - their ability to survive, hibernate, migrate, breed, or rear or nurture their young; or
    - the local distribution or abundance of that species.
- damage or destruction of a breeding site or resting place;
- the possession or transport of bats or any other part of.

2.3. The Wild Mammals Act 1996 (as amended) also affords protections to wild mammals from cruel acts such as crushing or asphyxiation.

2.4. In addition, seven British bat species are listed as Species of Principal Importance (SPI) under the Natural Environment and Rural Communities (NERC) Act, 2006. These are barbastelle (*Barbastellus barbastellus*), Bechstein's (*Myotis bechsteinii*), noctule (*Nyctalus noctula*), soprano pipistrelle (*Pipistrellus pygmaeus*), brown long-eared (*Plecotus auritus*), greater horseshoe (*Rhinolophus ferrumequinum*) and lesser horseshoe (*Rhinolophus hipposideros*).

Birds

2.5. The Wildlife and Countryside Act 1981 (as amended) is the principal legislation affording protection to UK wild birds. Under this legislation all birds, their nests and eggs are protected by law and it is an offence, with certain exceptions, to recklessly or intentionally:

- Kill, injure or take any wild bird;
- Take, damage or destroy the nest of any wild bird while it is in use or being built;
- Take or destroy the egg of any wild bird.

2.6. For birds listed on Schedule 1 of the Act, it is an offence to disturb any bird while it is building a nest, is at or near a nest with young; or disturb the dependant young of such a bird.

2.7. Species listed in Annex 1 of the EU Birds Directive 1994 are required to have special conservation measures taken to preserve their habitats and sites to be classified as Special Protection Areas (SPAs) where appropriate.

3. Precautionary Working Methods

3.1. This document should be printed and located in a prominent place within the works area to allow all contractors the ability to review and read the contents as necessary.

Suitably Qualified Ecologist

3.2. A Suitably Qualified Ecologist (SQE) will be appointed to oversee the works, holding a Natural England personal bat licence.

Timing of Works

3.3. Due to the size/type of roosting features found and the materials associated with them the following roosts are extremely unlikely to be present in B1:

- Hibernation; and
- Maternal roosts.

As such, works can be timed to any time of the year.

Pre-Works

Toolbox Talk

3.4. Prior to Works commencing a toolbox talk is required for all contractors (including any scaffold installers) from the SQE which will cover the contents of this document. The relevant parts will be delivered to the contractors prior to works starting. Once the toolbox talk is complete all attendees will sign to say they have received and understand the brief and are committed to the mitigation measures outlined throughout; see appendix 1 for register of attendance.

3.5. Where new attendees arrive at Site, the works covered by the PMW are not yet complete and the SQE is not present, it will be the Site Supervisors responsibility to induct staff and review the relevant content in this PMW as well as getting those individuals to sign the register of attendance at the end of this document.

Bat Box installation

3.6. A single bat box will be installed on-Site mounted on a mature tree that is proposed for retention. This feature will be located 3-4m high in a south-eastern or south-western orientation. A box such as the Harlech Woodstone Bat Box (see figure below) should be utilised. This can be purchased at the following location:

https://www.wildcare.co.uk/harlech-woodstone-bat-box-11266.html

Figure 3-1: Harlech Woodstone Bat Box



3.7. This bat box is installed for emergency purposes only and if a bat is found the aim should be to leave the individual(s) in situ and the area reinstated (including the associated ingress/egress point) to avoid risk of wildlife offences being committed. Further details on this are provided later in this section.

Scaffold Installation

3.8. Following completion of the toolbox talk the SQE should inform the installation of scaffold (*if proposed for use*). The installation should avoid blocking potential roosting features or the drop zone below such features. Installation of scaffold should be completed sensitively to the risk of disturbing roosting bats and should therefore include only the use of hand tools by contractors to facilitate its installation; taking care not to damage the building as they install; as is standard practice.

3.9. If scaffolding is required and the design specification requires tie-in with the brickwork each location should be approved prior to tie-in by the SQE; and inspected by the SQE as necessary. If locations are not suitable; an alternative solution should be engineered.

3.10. Where scaffold is not required/preferred, a Mobile Elevated Working Platforms (MEWP) may be utilised to support with soft stripping of potential roosting features covered by this PMW. However, this will require a MEWP which can reach the entire ridge line of the roof and have space for an operative and SQE within the basket.

Nesting Bird Check

3.11. Birds such as pigeons can nest all year round and will routinely occupy structures even being known to nest in the chimneys or valleys of a roof. As such immediately prior to scaffold installation (or prior to works starting if no scaffolding is proposed) and then works commencing the SQE will complete a short nesting bird check (which may involve a component of this assessment from within the loft space). Active nests found at any time will remain unaffected until all chicks have fledged.

Mid-Works

3.12. Once work at height plant/equipment is in place, an emergency bat box has been installed on-Site and likely absence of nesting bird has been confirmed, the SQE will complete a visual assessment of the potential roosting features on the building. This will be progressed as follows:

- An initial loft inspection will be complete to check for roosting bats or evidence of roosting bats using torch light and an endoscope camera as required;
- Following loft inspection, the SQE will begin external aerial assessment. The SQE will check such features from MEWP/scaffold if possible via endoscope camera and torchlight to determine if roosting bats (or evidence of roosting bats is present). If no such evidence is found and the SQE is confident the any features at the location of works has been comprehensively inspected they will allow removal/destruction of the respective feature by Site operatives; or,
- Where endoscopy leaves some uncertainty about presence of roosting bats at a feature on the building requiring works the SQE will advise the supporting Site operative on how to soft strip the feature and the surrounding area until they are confident roosting bats (or evidence of) are not present. This process will be repeated until bat roosts are considered likely absent from the areas of structure subject to works. At which point mechanical demolition will be approved to proceed and the SQE will no longer be required.

3.13. If at any point a bat or evidence of bats is found, under the SQE's guidance the roost will need to be reinstated and any bat or evidence left in situ. The SQE will ensure reinstatement work provides like for like ingress/egress feature for bat access and all works will need to be stood down until a bat mitigation licence is obtained from Natural England to proceed lawfully.

3.14. Where soft stripped material cannot be reinstated, and the bat must be taken by hand for emergency purposes only, the SQE will decide on the appropriate course of action. This will be one of the following:

- If the works take place in the active season for bats (March/April-October; depending on the weather) the individual will be placed in the emergency bat box on-Site.
- In the extremely unlikely event the bat is captured and works take place in the winter months November- February the SQE will take the bat into care and release the individual(s) in the active season (at the Site) as this will be in the best interest of the animal(s) as rousing over winter when food resources are scarce is extremely likely to result in mortality for bats.
- If a bat is injured in the course of demolition activities the SQE will take the bat into care; again releasing the bat in the active season at the Site.
- Where a bat is taken, immediate contact with Natural England will be made by the SQE and an emergency mitigation licence will be sought.

3.15. If bats or evidence are not found, and the SQE is satisfied the works will not present a risk to bats, bat roost(s), or nesting birds, the demolition works will proceed with no further input from the SQE.

3.16. Use of hand tools where possible is recommended to reduce risk of disturbing any bats with all work covered by this PMWS. If tools creating excess dust or excess vibration/noise are required, these must be first agreed with the SQE and their utilisation needs to be short frequency with regular breaks and monitoring intervals for the SQE to determine risk of disturbance to bats as a result of their use.

3.17. Once demolition is complete the SQE can return to Site to remove the emergency bat box, or it can be left in situ as a biodiversity enhancement for the Site. If removal is sought and bats are found in the box (or were moved there during demolition), further surveys and an application to Natural England would likely be required to legitimise its removal.

Emergency Procedure

3.18. If in the extremely unlikely event a bat/nesting bird is found or seen flying away from the building by Site operatives at any stage, works should stop immediately and the SQE should be contacted immediately for further advice.

3.19. UK Bats should not be handled as they are known to carry European bat Lyssavirus (rabies) which can cause mortality to humans. Contractors should complete work using safety gloves to mitigate the extremely low risk of encountering bats.

3. References

Bat Conservation Trust (BCT) & Institution of Lighting Professionals (ILP), (2018). Bats and artificial lighting in the UK. Bats and the Built Environment series. Guidance Note 08/18.

Elton Ecology Ltd (2024) Castle Hills House, St Neots. Preliminary Ecological Appraisal Report. P2565_01.

Legislation.gov.uk for: Wildlife and Countryside Act 1981 (as amended) & Conservation of Habitats and Species Regulations 2019. Accessed February 2023.

Ministry of Housing, Commutnities and Local Government (2021) National Planning Policy Framework. Found at https://www.gov.uk/government/publications/national-planning-policy-framework--2.

The Conservation of Habitats and Species Regulations 2017 (as amended). Found at https://www.legislation.gov.uk/uksi/2017/1012/introduction

4. Figures

Figure 1: Site Location Plan (Overleaf)



Legend

- Red Line Boundary
- Survey Area

Project:

Castle Hills House, Eaton Socon, St Neots. PE19 8HN

Drawing:

Figure 1: Site Location Plan

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5. Appendix 1: Toolbox Talk Register of Attendance

5.1. Table below provides a register of attendance following completion of the toolbox talk with the SQE. If you have received and understand the brief and are willing to commit to working practices, please sign below. If however, you have any further questions in advance of signing please speak to the SQE.

Name	Job Role	Date	Signature