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BAT SURVEY REPORT

8 Markham Avenue, Whitburn



DATE:	August 2026
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ENVIRONMENTAL RECORDS DATA

Unless requested otherwise, the information below may be sent to, stored and used by the Local Environmental Records Centre or local bat group where relevant.

Species	Recorder	Date	Location	Abundance	Comment
Common Pipistrelle	E3 Ecology	08/07/26	NZ 41051 61694	3-4	Commuting & Foraging
Soprano Pipistrelle	E3 Ecology	08/07/26	NZ 41051 61694	1-2	Foraging

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A. SUMMARY

E3 Ecology Ltd was commissioned to undertake a single presence/absence bat survey of 8 Markham Ave, Whitburn where the replacement of the current roof and the creation of a two-storey flat roofed extension is proposed. A desk study was completed, including consultation with DEFRA's MAGIC website and the Environmental Records Information Centre North East (ERIC NE). One dusk presence/absence survey was undertaken on the 8th of July 2026. A preliminary roost assessment had been undertaken by Arbtech in September 2025.

The results of the desk study indicate that there are no internationally or nationally statutorily designated sites for bats within 2km. The site does not lie within a Site of Special Scientific Interest (SSSI) Impact Risk Zone (IRZ) for this type of development. There are two records of granted European Protected Species (EPS) mitigation licences affecting bats within 2km, both over 1km to the west of site. The Northumberland Marine Special Protected Area (SPA) and the Northumbria Coast SPA are both located approximately 0.067 km to the east of the site. No direct development impacts are envisaged on these or any other nearby protected sites.

The site itself consists of buildings and hardstanding with small amounts of ornamental planting and amenity grassland lawns. The general land use in the surrounding area is predominantly urban housing to the north-west of the site. Additionally, the area to the south-east of the site is comprised of fields that separate the residential area from the maritime cliffs, slopes and beach habitats.

Overall, the habitats in the local area are of low to moderate suitability for use by foraging/commuting bats.

The site comprises a 1.5 storey dwelling with a pantile roof, which was assessed by Arbtech as being of low suitability for roosting bats.

In accordance with Bat Conservation Trust (BCT) guidelines, one dusk presence/absence survey has been undertaken.

During the survey conducted on 8th July, no roosts were recorded. A single common pipistrelle commuted along the eastern edge of the site towards the south, and a small number of common pipistrelle and soprano pipistrelle were foraging along the eastern edge of the site and in both the garden on-site and the adjacent garden to the south.

The following potential impacts have been identified:

- Low residual risk of disturbing bats and loss of roosts in the unlikely event that roosts are present within the building.
- Increased lighting which could impact on bat foraging and commuting habitat within the adjacent area.

A detailed avoidance, mitigation and compensation strategy is provided within this report. Key measures include:

- External lighting that may reduce bat use of new potential roost sites will be avoided. High intensity security lights will be avoided as far as practical, and any lighting in areas identified as being important for bats will be low level (2m) and low lumen. Light spillage to areas used by foraging or commuting bats should be less than 2 lux. Where security lights are required, these will be of minimum practicable brightness, be set on a short timer and will be motion sensitive only to larger objects.
- No timing restrictions are considered necessary.

- As good practice, works will be completed in accordance with a precautionary working method statement.
- In the unlikely event that bats are found during works, works will stop in that area and the ecological consultant will be contacted immediately. If it is necessary to move the bats for their safety, this will be undertaken by a licensed bat handler.
- Timber treatments that are toxic to mammals will be avoided. If required, timber treatment will be carried out in the spring or autumn. Both pre-treated timbers and timber treatments will use chemicals classed as safe for use where bats may be present (see <https://data.jncc.gov.uk/data/e5888ae1-3306-4f17-9441-51a5f4dc416a/Batwork-manual-3rd-edn.pdf> - Chapter 10).

The following additional enhancement measures are recommended in order to further enhance the site for biodiversity:

- Provision of integrated bird nesting and bat roosting features in the re-roofed building and/or new extension on site. To include one nest box for birds and two bat boxes.

The Local Planning Authority is likely to require the means of delivery of the mitigation to be identified. It is recommended that mitigation and enhancement proposals are incorporated into the master-planning documents.

Provided that the recommendations in this report are implemented, it is anticipated that proposals may proceed while minimising the risk of significant impacts to bats. The proposals provide an opportunity for ecological benefit through bat and bird nest box provision, contributing to local and national conservation targets.

B. INTRODUCTION

E3 Ecology Ltd was commissioned by Dawn & Gert Reed-Buur to undertake a bat survey of a proposed development site at 8 Markham Avenue, Whitburn. The survey comprised a desk study and a single dusk presence/absence survey. A daytime risk assessment had been completed by another company.

B.1 AUTHOR, SURVEYORS & QUALIFICATIONS

The author's professional qualifications and survey licences are detailed in the table below, as well as those of additional lead surveyors who completed survey work at the proposed development site:

TABLE 1: LEAD SURVEYORS			
Name	Position	Professional Qualifications	Natural England Survey Licence Numbers
Rachel Adams	Graduate Ecologist	BSc	2025-85750-CL18-BAT (accredited)
Daniel Hawes	Graduate Ecologist	BSc	2025-85750-CL18-BAT (accredited)

Further details of experience and qualifications are available at www.e3ecology.co.uk.

All surveyors have the knowledge, skills and experience identified within the relevant CIEEM Competencies for Species Survey guidance, or were under the supervision of a surveyor with the required competencies.

B.2 OBJECTIVES

The objectives of the assessment are to:

- Undertake a presence/absence survey in line with survey guidelines to assess bat use of the site.
- Provide recommendations for further survey work, where required.
- If sufficient survey assessment has been possible, to set out the mitigation, compensation and enhancement measures required to ensure compliance with nature conservation legislation and to address any potentially significant ecological effects
- Identify how these measures could be secured
- Identify any requirements for post-construction monitoring of the site

B.3 PROPOSED DEVELOPMENT SITE

The site is located in Whitburn, at an approximate central grid reference of NZ 41051 61694.

The figures below illustrate firstly the site boundary and secondly the broad habitats present on site and within an approximate 500m buffer zone.

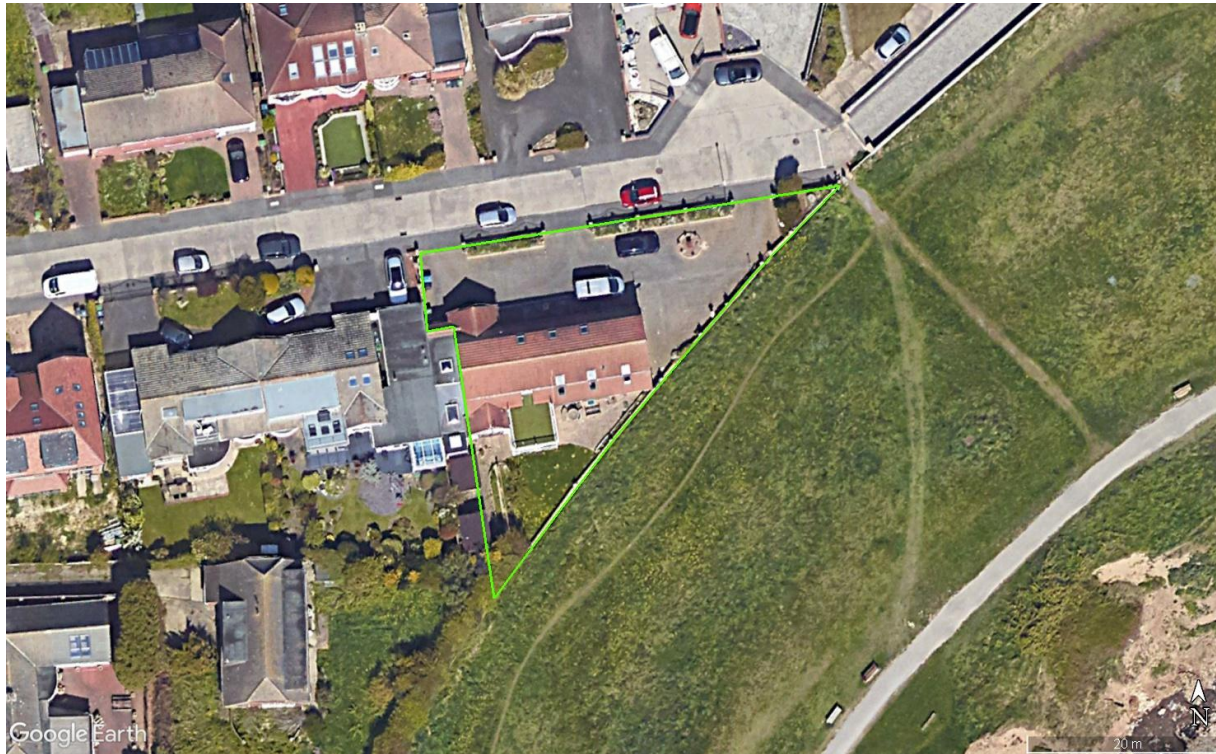


FIGURE 1: SITE BOUNDARY
(Reproduced under licence from Google Earth Pro.)



FIGURE 2: SITE AND SETTING
(Reproduced under licence from Google Earth Pro.)

B.4 DEVELOPMENT PROPOSALS

It is proposed to replace the existing roof and create a flat roof two storey extension.

C. METHODOLOGY

C.1 SCOPE OF STUDY

A presence/absence survey only was undertaken, following a preliminary roost assessment by Arbtech in September 2025.

The level of survey effort employed at the site has taken account of the recommendations within the BCT Good Practice Survey Guidelines¹.

C.2 DESK STUDY

Initially, the site was assessed from aerial photographs and 1:25,000 Ordnance Survey maps.

Following this, a data search was submitted to the local records centre in July 2026, requesting data relating to bats within 2km of site. In addition, a search was made of the MAGIC website² for any granted bat licences within 2km.

C.3 FIELD SURVEY

C.3.1 BAT PRESENCE/ABSENCE SURVEY

C.3.1.1 SURVEY EFFORT

The level of survey effort employed has taken account of the guidance provided by the BCT³ and summarised within the table below.

TABLE 2: RECOMMENDED NUMBER AND TIMING OF PRESENCE/ABSENCE SURVEY VISITS REQUIRED TO PROVIDE CONFIDENCE IN NEGATIVE PRELIMINARY ROOST ASSESSMENT RESULTS (FROM TABLE 7.1 AND TABLE 7.2 BCT GUIDELINES)			
	Low Roost Suitability* or PRF-I	Moderate Roost Suitability	High Roost Suitability or PRF-M
Recommended minimum number of survey visits for presence/absence survey to give confidence in a negative result	One survey visit. One dusk emergence survey (structures). For trees with PRF-I suitability, no further surveys required.	Two separate dusk emergence survey visits.	Three separate dusk emergence survey visits.
Recommended timings for presence/absence surveys	May to August (structures).	May to September with at least one of the surveys between May and August.	May to September with at least two of the surveys between May and August.
* If a structure is classified as having low suitability for bats an ecologist should make a professional judgement on how to proceed based on all of the evidence available. If sufficient areas of a structure have been inspected and no evidence found (and is unlikely to have been removed by weather or cleaning or be hidden), then further surveys may not be appropriate.			
Note: Where a roost is confirmed as being present, further surveys may be required to fully characterise the roost			

The recommendations provided above are guidelines and it is recognised by BCT that *'the number of visits could be adjusted (up or down) if necessary by the ecologist, bearing in mind the site-specific circumstances'*.

¹ Collins, J. (ed) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition). Bat Conservation Trust

² Multi Agency Geographic Information for the Countryside (www.magic.gov.uk)

³ Collins, J. (ed) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition). Bat Conservation Trust

Details of dates, timings, weather, and surveyor numbers and names are provided in the results section.

C.3.1.2 SURVEY METHODS

Activity surveys were undertaken in suitably mild conditions when bats are active. Surveyors were positioned to ensure coverage of all high-risk areas of the site, including any potential flight-lines from structures within the site to adjacent cover such as woodland blocks. If bats were recorded within the site before bats were seen in the wider area, or seen flying into the site, it is assumed that roosts are present within the site. All surveyors were equipped with bat detectors to listen for and record bats such that the resulting sonograms could then be viewed and analysed.

Timings for observations of key bat activity such as emergence, first records of each species and commuting routes were recorded. All data were recorded either using an Anabat Express or Scout for future reference and to allow confirmation of species identification through call analysis (using Anabat Insight software), and to capture brief echolocation calls that could not be reliably identified in the field⁴. Field survey recorded numbers of bats detected, feeding activity, flight paths, species (as far as is practicable), and social calls.

A total of 2 person-nights work was undertaken and direct observation was reinforced by remote recording of bat activity adding 2 monitoring points.

In addition, surveyor coverage of the site was supplemented with the use of night vision aids (which can comprise infra-red or thermal video cameras) to assist with observation of bat activity in lower light levels, which is particularly useful for later emerging species. Where infra-red cameras were used, these were supplemented with additional infra-red lighting. Night vision aids were not used in place of surveyors, but were used to supplement the survey coverage, including targeting areas of higher risk within the survey area. Recorded footage was then reviewed at varied speeds and analysed to inform the survey results.

Figures provided within the results section of this report illustrate the approximate location of each surveyor, monitoring point and camera.

C.3.1.3 SURVEY EQUIPMENT

- Anabat Scout bat detectors
- Light meter
- Infrared Video Camera
 - Canon XA15 Camcorder
- Infra-red torches and floodlights

C.3.2 DATA ANALYSIS

All bat calls were analysed using Anabat Insight with calls identified to species where possible, referencing call parameters as detailed within Russ (2012)⁵ and Middleton et al (2014)⁶.

If identification to species is not practicable, then where possible calls are identified to genus.

⁴ Reviewing data recorded by surveyors using Duet detectors and the Anabat data indicated that reliable *Myotis* records increased through Anabat use, particularly once conditions were too dark for visual cues to assist in identification, when there was a lot of bat activity, and with bats in clutter. It also reduces errors where pipistrelles in clutter can be mis-identified as *Myotis* bats.

⁵ Russ, J. (2012) British Bat Calls: A Guide to Species Identification. Pelagic Publishing

⁶ Middleton, N., Froud, A. and French, K. (2014) Social Calls of the Bats of Britain and Ireland. Pelagic Publishing

C.4 SURVEY CONSTRAINTS

The survey completed at the site will provide reasonably typical data for the season in which it was undertaken, and internal field signs are likely to reflect activity over the preceding active season. Assessment of the bat use of the site at other times of year and the potential impacts of the proposed development is based on professional judgement. This is an approach supported by the BCT Good Practice Guidelines⁷.

C.5 ASSESSMENT OF VALUE

The relative value of the ecological receptors (habitats, species and designated sites) was assessed using a geographical frame of reference. For designated sites this is generally a straightforward process with the assigned designation generally being indicative of a particular value, e.g. Sites of Special Scientific Interest are designated under national legislation and are therefore generally considered to be receptors of national value. The assignment of value to non-designated receptors is less straightforward and as recognised by the Guidelines for Ecological Impact Assessment⁸, is a complex and subjective process and requires the application of professional judgement.

When assessing the value of species and habitats, relevant documents and legislation are considered including the lists of species and habitat of principal importance annexed to the NERC Act (2006) and those provided within relevant local Biodiversity Action Plans. Data provided through consultation is also considered. These data sources can provide context at a local, regional and national scale.

The table below provides examples of receptors of value at different geographical scales.

TABLE 3: ECOLOGICAL RECEPTOR VALUATION	
Level of Value	Examples
International	An internationally designated site or candidate site.
	A site meeting criteria for international designation.
	The site is of functional importance* to a species population with internationally important numbers (i.e. >1% of the biogeographic population)
National	A nationally designated site.
	The site is of functional importance* to a species population with nationally important numbers (i.e. >1% of the national population)
Regional	The site is of functional importance* to a species population with regionally important numbers (i.e. >1% of the regional population)
County	A Local Wildlife Site (LWS) or equivalent, designated at a County level
	The site is of functional importance* to a species population of county value (i.e. >1% of the county population)
District	A Local Wildlife Site (LWS) or equivalent, designated at a District level
	The site is of functional importance* to a species population of district value (i.e. >1% of the district population)
Parish	A species population considered to appreciably enrich the nature conservation resource within the context of the parish.
	Local Nature Reserves
Local	A species population that contributes to local biodiversity but are not exceptional in the context of the parish.
Low	Habitats that are unexceptional and common to the local area.

⁷ Collins, J. (ed) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition). Bat Conservation Trust

⁸ Chartered Institute for Ecology and Environmental Management (2016) Guidelines for Ecological Impact Assessment in the UK and Ireland - Terrestrial, Freshwater and Coastal

TABLE 3: ECOLOGICAL RECEPTOR VALUATION	
Level of Value	Examples
* Functional importance defined as 'a feature which, based on professional judgement, is of importance to the day-to-day functioning of the population, the loss of which would have a detectable adverse effect on that population',	

The site lies within South Tyneside which covers approximately 6,690ha and is mainly comprised of urban and agricultural land. To the north of the site consists commercial and residential land, including the towns of South Shields, Tyne Dock and Jarrow with scattered greenspaces throughout. Agricultural land becomes more prevalent to the south of the site, and the River Tyne demarcates the northern boundary of the site.

D. RESULTS

D.1 DESKTOP STUDY

D.1.1 PRE-EXISTING INFORMATION

D.1.1.1 ORDNANCE SURVEY MAPPING AND AERIAL PHOTOGRAPHY

The most recent aerial photograph of the site (2023) indicates that habitats on site are dominated by the buildings, sealed surface and vegetated garden. Historic imagery suggests that the site has remained largely unchanged since at least 1985.

Aerial photography shows that the general land use in the surrounding area is predominantly urban housing to the north-west of the site. Additionally, the area to the south-east of the site is comprised of fields that separate the residential area from the maritime cliffs, slopes and beach habitats.

D.1.1.2 MAGIC WEBSITE⁹

PROTECTED SITES

There are no internationally or nationally statutorily designated sites for bats within 2km.

The site does not fall within a SSSI IRZ for this type of development.

The site lies within 400m of Durham Coast SAC. Direct development impacts are considered in a separate sHRA report.

SPECIES

There are no records of granted European Protected Species (EPS) mitigation licences for works affecting bats within 2km.

D.1.1.3 PREVIOUS SURVEY WORK

Arbtech Consulting Ltd. produced a preliminary ecological appraisal (PEA) and roost assessment (PRA) for the site in September 2025 (report ref: Arbtech: PEA-PRA - 8 Markham Avenue SR6 7DE - v1-43255025 - 09-09-25). The field assessment found the site and the surrounding area to be of low value for foraging and commuting bats due to the urban environment, along with the presence of more extensive areas of foraging and commuting habitat in the locality. The buildings on site were considered to be of overall low suitability for roosting bats due to the limited number of suboptimal roosting features observed during the survey. Additionally, no field signs were recorded during the internal investigation.

D.1.2 CONSULTATION

D.1.2.1 LOCAL RECORDS CENTRE

The local record centre provided the following notable records within 2km of site:

TABLE 4: CONSULTATION RECORDS			
Species	No. of Records	Closest distance (m – if sufficient record resolution provided)	Most recent date
Common Pipistrelle	12	100	01/07/2021

⁹ MAGIC Website: www.magic.gov.uk

Noctule	2	806	25/08/2023
Pipistrelle <i>Spp.</i>	6	N/A	29/04/2023

Full data sets are available on request.

D.2 PRESENCE/ABSENCE SURVEY

D.2.1 SURVEYORS, TIMINGS & CONDITIONS

Date	Start	End	Sunset / Sunrise	Start Temp (°C)	End Temp (°C)	Cloud (%)	Precipitation	Wind (Beaufort)
08/07/2026	21:29	23:15	21:44	20	16	0	Dry	2

Date	Lead Surveyor	Assistant surveyors
08/07/2026	DH	KM

D.2.2 08/07/2026 SURVEY RESULTS

The survey was undertaken in warm (20 °C), still and dry conditions. No roosts were identified during the survey, but a reasonable amount of activity was recorded on the eastern side of the site during the latter half of the survey. Only common pipistrelle and soprano pipistrelle were noted during the survey. The first common pipistrelle was recorded commuting south along the eastern boundary of the site at 22:19:40 (12.46 lux). The first soprano pipistrelle was foraging along the eastern boundary of the site at 22:43:03 (0 lux). A small number of bats were recorded throughout the survey, with 3-4 common pipistrelle and 1-2 soprano pipistrelle observed foraging along the eastern edge of the site and in both the garden on the site and the adjacent garden to the south of the site.

The figure below provides a summary of the results of dusk emergence survey. More detailed data is available on request.



FIGURE 3: SUMMARY OF 08/07/26 SURVEY RESULTS



FIGURE 4: NIGHT VISION AID STILL SHOTS

E. SITE ASSESSMENT

E.1 ASSESSMENT OF SURVEY FINDINGS

The building was considered to be of low suitability for roosting bats by Arbtech during their initial assessment.

No roosts were recorded during the dusk presence/absence survey.

The building does not support maternity roosts due to the results of the dusk presence/absence survey.

Hibernation use of the building is considered unlikely.

F. IMPACT ASSESSMENT

The likely effects of the proposed development, without appropriate targeted mitigation and/or compensation, are detailed below. Impacts have been considered in both the construction phase and operational phase of the development.

F.1 DIRECT DEVELOPMENT IMPACTS

- Low residual risk of disturbing bats and loss of roosts in the unlikely event that roosts are present within the building.

F.2 INDIRECT IMPACTS ON LOCAL POPULATIONS

- Increased lighting which could impact on bat foraging and commuting habitat within the adjacent area.

G. RECOMMENDATIONS

G.1 FURTHER SURVEY

If development does not happen within 12 months of the last survey, an updating survey will be required, ideally to be undertaken between May and August.

G.2 AVOIDANCE, MITIGATION AND COMPENSATION STRATEGY

The following strategy is proposed:

G.2.1 SITE DESIGN

- External lighting that may reduce bat use of new potential roost sites will be avoided. High intensity security lights will be avoided as far as practical, and any lighting in areas identified as being important for bats will be low level (2m) and low lumen. Light spillage to areas used by foraging or commuting bats should be less than 2 lux. Where security lights are required, these will be of minimum practicable brightness, be set on a short timer and will be motion sensitive only to larger objects.

G.2.2 TIMING OF WORKS

- No timing restrictions are considered necessary.

G.2.3 WORKING METHODS AND BEST PRACTICE

- As good practice, works will be completed in accordance with a precautionary working method statement which has been included in the appendix of this report.
- In the unlikely event that bats are found during works, works will stop in that area and the ecological consultant will be contacted immediately. If it is necessary to move the bats for their safety, this will be undertaken by a licensed bat handler.
- Timber treatments that are toxic to mammals will be avoided. If required, timber treatment will be carried out in the spring or autumn. Both pre-treated timbers and timber treatments will use chemicals classed as safe for use where bats may be present (see <https://data.jncc.gov.uk/data/e5888ae1-3306-4f17-9441-51a5f4dc416a/Batwork-manual-3rd-edn.pdf> - Chapter 10).

G.3 COMPENSATION STRATEGY

With the implementation of the above mitigation strategy, it is not anticipated that there will be any significant adverse residual effects from the proposed development. As such, a compensation strategy is not required.

G.4 MONITORING

Given the results of the survey, no monitoring is proposed.

G.5 ADDITIONAL ENHANCEMENT RECOMMENDATIONS

The following additional enhancement measures are recommended in order to further enhance the site for biodiversity:

- Provision of integrated bird nesting and bat roosting features in the re-roofed building and/or new extension on site. To include one nest box for birds and two bat boxes.

H. CONCLUSIONS

Provided that the recommendations in this report are implemented, it is anticipated that proposals may proceed while minimising the risk of significant impacts to bats. The proposals provide an opportunity for ecological benefit through bat and bird nest box provision, contributing to local and national conservation targets.

APPENDIX 1. LEGISLATION

NATIONAL PLANNING POLICY

The table below details the key paragraphs from the National Planning Policy Framework (NPPF)¹⁰ relating to the natural environment:

TABLE 5: NATIONAL PLANNING POLICY FRAMEWORK: CONSERVING AND ENHANCING THE NATURAL ENVIRONMENT	
Statement	Paragraph
Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate; d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs; e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and a) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.	187
Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework ¹¹ ; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries	188
Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads ¹² . The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas	189
When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development¹³ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and a) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.	190

¹⁰ National Planning Policy Framework (December 2024), Department for Communities and Local Government,

¹¹ Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.

¹² English National Parks and the Broads: UK Government Vision and Circular 2010 provides further guidance and information about their statutory purposes, management and other matter

¹³ For the purposes of paragraphs 182 and 183, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined

TABLE 5: NATIONAL PLANNING POLICY FRAMEWORK: CONSERVING AND ENHANCING THE NATURAL ENVIRONMENT	
Statement	Paragraph
Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 189), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.	191
To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity¹⁴; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation¹⁵; and a) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.	192
When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest; c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons¹⁶ and a suitable compensation strategy exists; and a) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.	193
The following should be given the same protection as habitats sites: a) potential Special Protection Areas and possible Special Areas of Conservation; b) listed or proposed Ramsar sites¹⁷; and a) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.	194
The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.	195

Section 40 of the Natural Environment and Rural Communities Act 2006, places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity.

¹⁴ Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

¹⁵ Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of development that may be suitable within them.

¹⁶ For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.

¹⁷ See Explanatory Note to the [Noise Policy Statement for England](#) (Department for Environment, Food & Rural Affairs, 2010).

Planning Practice Guidance¹⁸ states:

- Planning authorities need to consider the potential impacts of development on protected and priority species, and the scope to avoid or mitigate any impacts when considering site allocations or planning applications. (para. 016)
- Information on biodiversity and geodiversity impacts and opportunities needs to inform all stages of development (including site selection and design, pre-application consultation and the application itself). An ecological survey will be necessary in advance of a planning application if the type and location of development could have a significant impact on biodiversity and existing information is lacking or inadequate. (para. 018)
- Even where an Environmental Impact Assessment is not needed, it might still be appropriate to undertake an ecological survey, for example, where protected species may be present or where biodiverse habitats may be lost. (para. 018)
- As with other supporting information, local planning authorities should require ecological surveys only where clearly justified. Assessments should be proportionate to the nature and scale of development proposed and the likely impact on biodiversity. (para. 018)
- The National Planning Policy Framework encourages net gains for biodiversity to be sought through planning policies and decisions. Biodiversity net gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. Biodiversity net gain can be achieved on-site, off-site or through a combination of on-site and off-site measures. (para. 022)

RELEVANT LEGISLATION

Within England all bat species are specially protected under the Conservation of Habitats and Species Regulations 2017 (as amended).

As a result there is a requirement to consult with Natural England before undertaking any works that may disturb bats or their roost, and under the Conservation of Habitats and Species Regulations it is illegal to.

- Deliberately kill, injure or capture bats.
- Deliberately obstruct access to a bat roost.
- Damage or destroy a bat roost.
- Deliberately disturb bats; in particular any disturbance which is likely to impair their ability:
 - (i) to survive, to breed or reproduce, or to rear or nurture their young; or
 - (ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate; or
 - (iii) to affect significantly the local distribution or abundance of the species to which they belong.

Under the Wildlife and Countryside Act (1981) the above offence of disturbing bats includes low level disturbance and as such under this act it is also an offence to:

- Intentionally or recklessly disturb a bat while it is occupying a roost.
- Intentionally or recklessly obstruct access to a roost.

Under the above legal protection, only the offences under the Conservation of Habitats and Species Regulations 2017 (as amended) are strict liability offences; the remaining offences,

¹⁸ Planning Practice Guidance: Natural Environment (www.planningguidance.communities.gov) Updated July 2019
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under the Wildlife and Countryside Act (1981), are offences only where they are carried out "intentionally or recklessly".

Under the Countryside and Rights of Way Act 2000 (CROW Act) the offence in section 9(4) of the Wildlife and Countryside Act 1981 of disturbing bats is extended to cover reckless damage or disturbance.

The Hedgerow Regulations 1997 provide for the conservation of important hedgerows and their constituent trees. The presence of a protected species such as bats is a relevant consideration when assessing whether a hedgerow is important and may influence a local planning authority's decision on whether to approve removal of such hedges.

PRIORITY SPECIES

Although not afforded any legal protection, national priority species (species of principal importance, as listed in Section 41 of the NERC Act (2006)), and local and regional priority species, as detailed within the relevant biodiversity action plans, are material considerations in the planning process and as such have been assessed accordingly within this report.

The following bat species are listed as national priority species: Barbastelle bat, Bechstein's bat, noctule, soprano pipistrelle, brown long-eared bat, greater horseshoe bat and lesser horseshoe bat. 'Bats' as a species group is also listed on the relevant local biodiversity action plan for this site.

PROTECTED SPECIES METHOD STATEMENT FOR THE DEVELOPMENT OF 8 MARKHAM AVENUE

THIS METHOD STATEMENT MUST BE COPIED TO THE SITE OWNER, SITE MANAGER/LEAD CONTRACTOR AND TO THOSE CONTRACTORS WHOSE WORK MAY AFFECT PROTECTED SPECIES, INCLUDING THOSE INVOLVED IN ALL ELEMENTS OF THE WORK AT THE SITE. A SIGNED COPY SHOULD BE KEPT AT THE SITE OFFICE.

This method statement contains information regarding:

- Protected species' legal status
- Protected species' ecology
- Site working methods

	Print Name	Signature	Date
Site Manager/ Supervisor:			
Operative:			
Operative:			
Operative:			
Operative:			
Operative:			
Operative:			

We have read and fully understood this method statement and all key aspects have been explained to the site operatives.

Site details

Ecological survey work was undertaken of the site in July 2026.

Habitats on site are limited to the building itself.

The survey work identified the following ecological constraint that needs to be considered during the development, and which is the subject of this method statement:

- Bats

Specific details of these species in relation to the site is provided in the below table, as well as precautionary methods in relation to those species and general good working practices.

Additional requirements for other protected species and habitats may be included within the other ecological reports, though are not considered within this method statement. The site owner and site manager/lead contractor should familiarise themselves with those reports so that they are aware of any other such requirements.

General working methods (Please see specific species sections below for more targeted working methods)

- The site/project manager will maintain close contact with the project ecologist to review the nature and timings of works and the potential to affect wildlife and biodiversity.
- No work will be completed between dusk and dawn to minimise disturbance to nocturnal wildlife and no external lighting will be installed unless approved by the council and project ecologist.
- If species not detailed in this method statement are found on site (eg hedgehog or amphibians excluding great crested newt) during the clearance, they will be placed into a clean bucket with some wet grass or vegetation inside and moved to adjacent areas of suitable habitat such as boundaries that are not affected by the works.
- Any excavations left open overnight will have a means of escape for wildlife that may become trapped in the form of a ramp at least 300mm in width and angled no greater than 45°. If left overnight, excavations will be checked for amphibians (and any other wildlife) prior to infilling, with any amphibian/wildlife found to be carefully translocated to the boundaries as previously detailed.
- Any chemical storage or hazardous materials (e.g. barbed wire) will be stored in such a way that they cannot be accessed by wildlife (e.g. hedgehog or badger).
- Any pipes to be stored on site over 100mm diameter should be capped or stored in such a way that wildlife cannot shelter within.
- Materials should be stored on pallets where possible rather than directly on the ground, to reduce the risk of wildlife sheltering directly beneath materials and possibly being harmed when they are moved.
- If there is any doubt as to the appropriate action, the ecologist should be contacted for advice.

If works risk recklessly harming wildlife then the police can order all work on site to cease until the issue is properly addressed and may prosecute accordingly.

In case of any queries, please contact the project ecologist E3 Ecology Ltd on 01434 230982.

Bats - Buildings	
Legislation	All bat species are specially protected. The Wildlife and Countryside Act (1981) and the Conservation of Habitats and Species Regulations 2017 (as amended) make it an offence to: - intentionally kill, injure, or take any species of bat - intentionally or recklessly disturb bats - intentionally or recklessly damage destroy or obstruct access to bat roosts Fines (formerly of up to £5000 for each individual bat affected, fine limit now removed) and confiscation of vehicles/equipment used can be imposed for deliberate or reckless disturbance of bats or damage to a roost site. Under these regulations Natural England licenses are required for works that may adversely affect bats.
Ecology	Bat roost in buildings and stone structures can be difficult to locate. British bats vary in size, the smallest being the crevice roosting pipistrelle with a body the size of a matchbox. The small size of these animals means that they can roost within the smallest cracks or crevices. Common locations for crevice roosting bats within buildings include beneath slates or tiles, within mortise joints, rubble fill and cavity walls and between loose stones. It is possible that small colonies may be present within the fabric of a building, yet no external signs are visible. Therefore, care is needed when works affect such features.
Working Methods	- Roof tiles, ridge tiles, lead flashing and roof coverings will be removed by hand, being aware that bats may be present beneath slates or tiles, within mortise joints, cavity walls, between loose stones, between lintels and in gaps around window frames and in sash windows. - Ridge tiles should be lifted vertically, and then carefully checked beneath for bats prior to being removed from the roof. Removing ridge tiles also makes the roof draughty which, if the roof is not to be fully stripped at the same time, will help encourage bats to move away from the site. - Slates/pantiles/tiles should be lifted carefully and checked prior to being removed. - If bats are found during works, works should cease on that structure immediately and the ecological consultant contacted. - Remedial timber treatments that are toxic to mammals will be avoided. If required, timber treatment will be carried out in the spring or autumn. Both pre-treated timbers and timber treatments will use chemicals classed as safe for use where bats may be present (see http://www.jncc.gov.uk/pdf/batwork_manualpt4.pdf). If bats are found at any time during the development work, E3 Ecology Ltd (01434 230982) must be contacted immediately. If works risk recklessly harming bats then the police can order all construction/renovation work to cease until the issue is properly addressed. If police are called they will actively seek prosecution so full adherence to good working practises is essential
Provisions	The following mitigation/compensation/enhancements are to be provided: Provision of integrated bird nesting and bat roosting features in the new buildings on site. To include one nest box for birds and two bat boxes.



Missing stone mortar



Internal gaps near loft beam



Bat droppings under ridge tile