

# **Preliminary Bat Roost Assessment**

39b Consort Road  
London  
SE15 2PR

23<sup>rd</sup> May 2017



PJC ref: 3512AO/17

This report has been prepared by

PJC Consultancy Ltd

on behalf of

Bluecroft Ltd

T: 01323 400311  
E: [contact@pjconsultancy.com](mailto:contact@pjconsultancy.com)



Chapter House, Priesthawes Farm  
Hailsham Road, Polegate,  
East Sussex BN26 6QU

## EXECUTIVE SUMMARY

PJC Consultancy Ltd were commissioned by Bluecroft Ltd to provide a preliminary bat roost assessment for 39b Consort Road, London. The purpose was to highlight the potential of the site to support protected species, namely bats and recommend suitable ecological enhancements and/or mitigation methods where appropriate. When implemented successfully, these recommendations will ensure that the development proceeds in line with all relevant laws pertaining protected species, as well as contributing to an increase in site biodiversity. This report has been produced in accordance with NPPF – more specifically *Chapter 11 ‘Conserving and Enhancing the Natural Environment’* as well as Strategic Policy 11 – Open Spaces and Wildlife of the London Borough of Southwark Core Strategy adopted 2011.

Based on current proposals, the results of the preliminary bat roost assessment can be summarised in the following table:

Protected Species/Habitats	Suitable Habitat Present	Recommended Further Surveys	Ecological Mitigation/Enhancements
Bats	Building found to have moderate potential to support roosting bats  Railway embankment to north provides suitable habitat for foraging/commuting bats	Four dusk emergence/activity surveys	Dependent on results of further surveys.

## **CONTENTS**

1 Introduction

2 Site Details and Observations

3 Survey Methodology

4 Results

5 Discussions and Recommendations

6 References

Appendix I – Results of Bat Roost Assessment

Appendix II – Legislation and Planning Policy

Appendix III – How Bats Use Buildings

Appendix IV – Photographs

## 1 INTRODUCTION

### Instruction

1.1 PJC Consultancy Ltd have been commissioned by Bluecroft Ltd to provide a preliminary bat roost assessment for 39b Consort Road, London.

### Documents and information provided

1.2 PJC Consultancy Ltd were provided with the following documents relating to the site:

- Drawing ref. S16/5621/02 Existing Floor Plans
- Drawing ref. S16/5621/03 Existing Elevations

### Survey Objectives

1.3 This report has been produced in accordance with BS 42020:2013 'Biodiversity. Code of practice for planning and development' and as such seeks to:

- Highlight the potential of the site to support bats protected under EU and domestic legislation.
- Provide recommendations for further survey, mitigation and enhancements measures to minimise impacts on biodiversity and provide net gains where possible, in line with Chapter 11 of the National Planning Policy Framework (NPPF).

### Scope of this report

1.4 This report is only concerned with the habitats within the property boundaries of the site, or in areas that have the potential to be affected by construction works.

### Proposal

1.5 A proposal has been outlined for the demolition of the existing buildings and construction of eight residential units.

## 2 SITE DETAILS AND OBSERVATIONS

### Site Address and OS Grid Reference

2.1 39b Consort Road, London SE15 2PR. Central national grid reference TQ 34625 76375.

### Site Description

2.2 The site is located to the east of Consort Road and west of Nazereth Close, more broadly to the southeast of Peckham. The location of the site within its environs can be seen in figure 1 below.

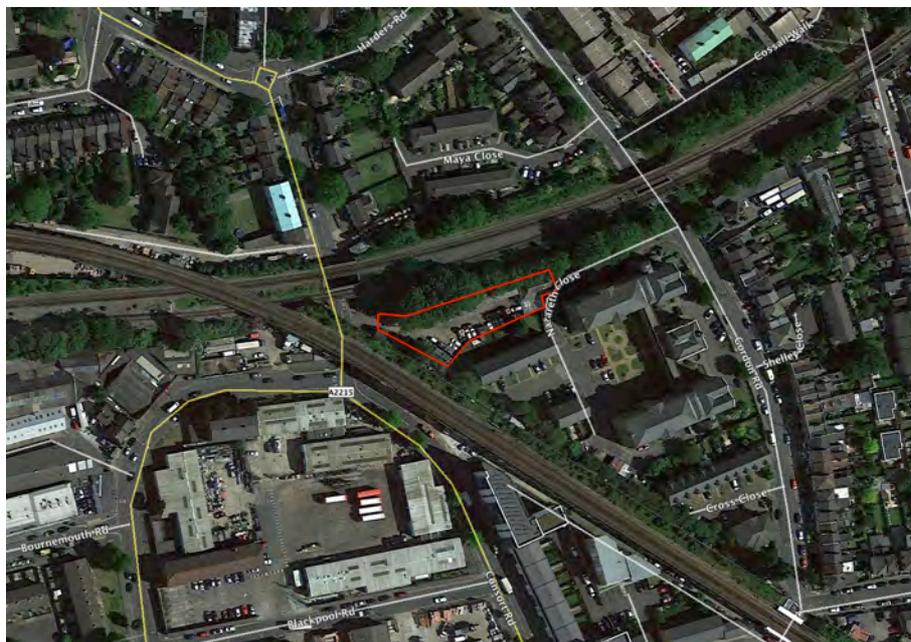


Figure 1: Location of Site and Environs

2.3 The site comprises a two-storey industrial building and associated hard standing. A linear group of mature trees are located immediately north of the site on a railway embankment. The embankment has been designated as a Site of Nature Conservation Importance.

### Limitations of the Survey

2.4 It should be noted that whilst every effort has been made to provide a comprehensive description of the site, no single investigation could ensure the complete characterisation and prediction of the natural environment.

2.5 The protected species assessment provides a preliminary view of the likelihood of protected species, namely bats, occurring on site, based on the suitability of the habitat and any direct evidence on site. It should not be taken as providing a full and definitive survey of any protected species group. Additional

surveys may be recommended if, on the basis of this assessment it is considered reasonably likely that protected species may be present.

2.6 The northern elevation of the building could not be thoroughly assessed due to the presence of dense vegetation and access restrictions. However, the canopy of the trees are in contact with the building which would discourage bat use through impeding their flight path.

### 3 SURVEY METHODOLOGY

#### Bat Roost Assessment

3.1 Adam Earl BSc(Hons) MCIEEM (NE licence number 2015-10845-CLS-CLS) undertook a bat roost assessment of the buildings on site on the 25<sup>th</sup> April 2017. An internal and external assessment was undertaken following good practice guidelines (BCT 2016). The surveyor assessed the internals of the building for evidence of bat presence including:

- Staining beneath or around a hole caused by natural oils in bat fur
- Bat droppings/feeding remains within the roof void
- Audible squeaking or chattering from live bats
- Insects (especially flies) around a hole/crevice
- Dead bats

3.2 The building was also assessed externally during daylight hours for potential crevice roosting opportunities/access points into the roof void. Such roosting features include:

- Missing/slipped/lifted roof or hanging tiles
- Lifted/warped weatherboarding
- Lifted lead flashing
- Lifted felt
- Missing mortar or joining material
- Gaps in soffits/wall plates

3.3 The building was assessed in accordance with the criteria listed above and assigned to one of five categories as listed in table 1 below. More detail on how bats use buildings can be found in Appendix III.

Table 1. Categorisation of bat roost potential

Level of evidence	Suitability
Evidence of use by bats including bats present.	Confirmed Roost
No evidence of bats. One or more suitable features that are obviously suitable for larger numbers of bats, on a more regular basis and for longer periods of time.	High
No evidence of bats observed, but includes a limited number of suitable features considered likely to support single bats but is unlikely to support a roost of high conservation status.	Moderate
No evidence, one or more potential roost sites that could be used by low numbers of bats opportunistically. However, potential sites are not suitable to be used by larger number of bats on regular basis.	Low
No evidence of roosting bats, no features with potential to support roosting bats.	Negligible

## 4 RESULTS

### Bat Roost Assessment

4.1 A description of the buildings and any potential roosting features (PRF) are detailed below:

<b>Buxted Reading Rooms</b>
<b>Description</b>
<p>The eastern extent of the building is a warehouse style building comprising brick walls and a pitched roof supporting slate-style tiles. The roof pitch runs east to west and culminates in two half hipped ends. The building is heavily glazed with roof lights and windows. Internally, the building is open plan with no roof void present. The building is greatly illuminated by natural light.</p> <p>The western extent of the building is a two storey brick built structure with a flat bitumen roof (not visible from ground level). The southern elevation is heavily glazed whilst no windows are present on the northern elevation. Internally, the building is divided into multiple rooms.</p>
<b>Evidence of Bats</b>
No evidence of bats was found during the assessment.
<b>Potential Roost Features</b>
A number of external roosting features were identified during the survey. The location and schedule of these features can be found in appendix I.
<b>Surrounding Habitat</b>
The site lies in an highly urbanised area. However, a linear tree group is situated on a railway embankment immediately north of the site. The embankment forms part of a wider green corridor which runs east to west across southeast London.
<b>Potential to Support Roosting Bats</b>
Moderate

## 5 DISCUSSION AND RECOMMENDATIONS

### Relevant Planning Policy and Legislation

5.1 A full list of the relevant planning policy and legislation can be found in Appendix II.

### Bats

5.2 Bats are legally protected under EU (Conservation of Habitats and Species Regulations 2010) and domestic legislation (Wildlife and Countryside Act 1981 (as amended)) which makes it an offence to disturb, injure or kill a bat or damage or destroy a bat roost (even if bats are absent).

5.3 No evidence of roosting bats was found during the bat roost assessment. However, the building was found to support a number of external features with potential to support roosting bats or features that provide access to the interior. The building was therefore classified as having moderate potential to support roosting bats and it is recommended that further surveys be conducted to ascertain the presence/likely absence of bats. These surveys will be undertaken in combination with the bat activity surveys described below. The surveys will inform the type and level of mitigation required.

5.4 The railway embankment which immediately borders the site to the north, forms part of a wider green corridor which runs east to west across southeast London. The green corridor provides a potential commuting and foraging route for bats, which could be of regional importance. Therefore, four bat activity surveys have been scheduled for June to August to ascertain the number and species of bat using the site for commuting/foraging purposes.

### Ecological Enhancements

5.5 In line with Chapter 11 of the NPPF and Strategic Policy 11 of the London Borough of Southwark Core Strategy, the following enhancements will help provide a net gain in biodiversity at the site:

- To enhance the site for bats, three woodcrete bat boxes shall be sited on the northern elevation of the proposed buildings at a minimum of three metres above the ground and where there is a clear flight path for bats entering and leaving.

## **6 REFERENCES**

Bat Conservation Trust (2009) Bats and Lighting in the UK: Bats and the Built Environment Series

British Standards Institution (2013). Biodiversity. Code of practice for planning and development: 42020. BSI, London.

Collins, J. (ed.) (2016). Bat Surveys for Professional Ecologists: Good Practice Guidelines. 3rd edition. The Bat Conservation Trust, London.

Department of Communities and Local Government (2012). National Planning Policy Framework. DCLG, London.

Natural England (2004) Bat Mitigation Guidelines

## Contact details

### Sussex Office

PJC Consultancy Ltd  
Chapter House  
Priesthawes Farm  
Hailsham Road  
Polegate  
East Sussex  
BN26 6QU

Tel: 01323 400311

### Kent Office

Unit 3, Park Grange  
Evegate Business Park  
Station Road  
Smeeth  
Nr Ashford  
Kent  
TN25 6SX

Tel: 01233 225365

E-mail: [adam@pjconsultancy.com](mailto:adam@pjconsultancy.com)



Author: Adam Earl

Date: 23<sup>rd</sup> May 2017

## **Appendix I**

### Results of Preliminary Bat Roost Assessment

## Schedule of Potential Roost Features

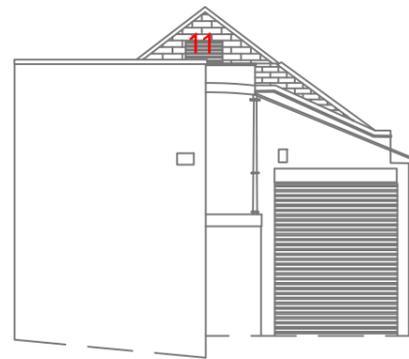
1. Gap between wall and flat roof
2. Lifted flashing on canopy
3. Gaps in canopy ceiling allowing access to cavity
4. Warped fascia board
5. Gap in between wall and pipe
6. Lifted lead flashing on parapet
7. Gap beneath wall and roof
8. Gap between soffit and wall
9. Lifted roof tiles
10. Fascia board missing allow access into cavity
11. Louvre vent potentially providing access to interior



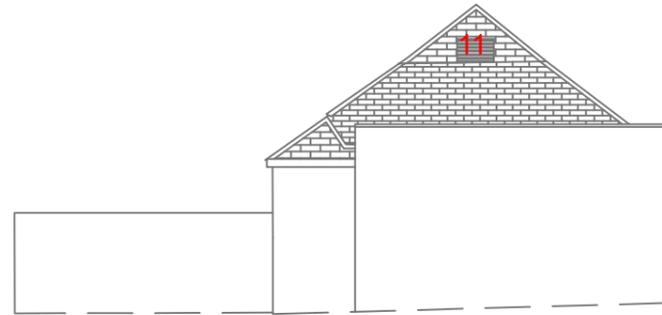
Front Elevation

Datum 5.000m

Datum 5.000m



Left hand elevation



Right hand elevation

Datum 5.000m

Datum 5.000m



Northern elevation could not be thoroughly inspected due to dense vegetation

Rear Elevation - No access

Datum 5.000m

Datum 5.000m

Drawing should be viewed in colour

All locations are indicative and have been plotted to best of surveyors ability using plans provided and aerial imaging



Drawing No.: PJC/3512AO/17 Rev: - Sheet number: 1 of 1

Client : Bluecroft Ltd

Project :  
39b Consort Road  
London  
SE15 2PR

Drawing title: Results of Preliminary Bat Roost Assessment

Date drawn: 23/05/17

Scale: NTS

Drawn by: AE

Checked by: TK



Sussex  
Chapter House, Priesthaves Farm, Hailsham Road, Polegate, East Sussex, BN26 6Q  
t: 01323 400311  
Kent  
Unit 3, Park Grange, Evegate Business Park, Smeeth, Nr Ashford, Kent, TN25 6SX.  
t: 01233 225365  
www.pjcconsultancy.com

## **Appendix II**

### Legislation and Planning Policy

## Legislation

### The Conservation of Habitats and Species Regulations 2010 (as amended)

The Conservation of Habitats and Species Regulations 2010 is the UK transposition of the European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, 1992, or the 'Habitats Directive'. The directive provides protection of key habitats and species of European importance. Those key habitats and species are listed in Annexes II and IV of the directive.

Those species protected under the regulations and most likely encountered during development include:

- All bat species
- Hazel dormouse
- Great crested newt
- Common otter

### The Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) is the primary legislation for the protection of wildlife in Great Britain. This legislation is the means by which the Convention on the Conservation of European Wildlife and Natural Habitats (the 'Bern Convention') and the European Union Directives on the Conservation of Wild Birds (79/409/EEC) and Natural Habitats and Wild Fauna and Flora (92/43/FFC) are implemented in Great Britain. All breeding birds, their nests, eggs and young are protected under the Act, which makes it illegal to knowingly destroy or disturb the nest site during nesting season. Schedules 1, 5 and 8 afford protection to individual birds, other animals and plants respectively. The Countryside and Rights of Way (CROW) Act 2000 makes it an offence to 'recklessly' disturb a protected animal whilst it is using a place of rest or shelter or breeding/nest site

Those species protected under the act and most likely encountered during development include:

- All bat species
- All nesting birds
- Hazel dormouse
- Great crested newt
- Common otter
- Water vole
- All native reptile species
- White-clawed crayfish

### The Natural Environment and Rural Communities Act (NERC) 2006

Section 40 of the Act requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the

'biodiversity duty'. Section 41 of the Act provides a list of habitats and species, which are of 'principal importance for the conservation of biodiversity.' This list aids decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications.

#### Hedgerows Regulations 1997

These regulations were produced to protect important countryside hedges from removal. The regulations only cover hedgerows that are at least 20m long or, if shorter, connected to other hedgerows at both ends or part of a longer hedgerow. They must be in or adjacent to common land, village greens, site of special scientific interest, local nature reserves, or land used for agriculture, forestry or breeding or keeping of horses, ponies or donkeys.

#### Wild Mammals (Protection) Act 1996

All wild mammals are protected against intentional acts of cruelty under the above legislation. This makes it an offence to mutilate, kick, beat, nail or otherwise impale, stab, burn, stone, crush, drown, drag or asphyxiate any wild mammal with intent to inflict unnecessary suffering.

This legislation is of relevance when undertaking works with potential to affect wild mammals e.g. works near burrows, warrens or dens, regardless of other legislative protection.

### **National Planning Policy**

#### National Planning Policy Framework (NPPF) 2012

Published in 2012 the NPPF sets out the Government's planning policies for England and how these are expected to be applied by local authorities. It replaces all the Planning Policy Statements and Guidance (PPSs and PPGs). The NPPF emphasises the need for sustainable development, whilst specifying the need for protection of designated sites and priority habitats and priority species (as listed in section 41 of NERC Act 2006). Paragraph 109 of The National Planning Policy Framework (NPPF) states:

*"The planning system should contribute to and enhance the natural and local environment by:*

- Protecting and enhancing valued landscapes, geological conservation interests and soils;*
- Recognising the wider benefits of ecosystem services;*
- Minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*

- *Preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and*
- *Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”*

Furthermore, paragraph 118 states that when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- If significant harm 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;
- Proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have 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;
- Development proposals where the primary objective is to conserve or enhance biodiversity should be permitted;
- Opportunities to incorporate biodiversity in and around developments should be encouraged;
- Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss; and
- The following wildlife sites should be given the same protection as European sites:
  - potential Special Protection Areas and possible Special Areas of Conservation;
  - listed or proposed Ramsar sites;<sup>26</sup> and
  - sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

## Local Planning Policy

London Borough of Southwark Core Strategy adopted 2007  
Strategic Policy SP11 – Open Spaces and Wildlife states:

*“Our approach is*

*We will improve, protect and maintain a network of open spaces and green corridors that will make places attractive and provide sport, leisure and food growing opportunities for a growing population. We will protect and improve habitats for a variety of wildlife.*

*We will do this by*

- 1. Continuing to protect important open spaces from inappropriate development. These will include parks, allotments, sports grounds, green chains, sites of importance for nature conservation (SINCs) and cemeteries. Large spaces of importance to all of London will be protected (Metropolitan Open Land) as well as smaller spaces of more borough-wide and local importance (Borough Open Land and Other Open Spaces).*
- 2. Protecting woodland and trees and improving the overall greenness of places, including through promoting green corridors, gardens and local food growing.*
- 3. Promoting and improving access to and links between open spaces, including green chains.*
- 4. Identifying and protecting open spaces that provide quiet areas and relative tranquillity.*
- 5. Requiring new development to help meet the needs of a growing population by providing space for children’s play, gardens and other green areas and helping to improve the quality of and access to open spaces and trees, particularly in areas deficient in open space.*
- 6. Requiring new development to avoid harming protected and priority plants and animals and help improve and create habitat.”*

## **Appendix III**

### How Bats Use Buildings



Image taken from 'Bats and Buildings' part of the 'Bats and the Built Environment series' produced by the Bat Conservation Trust 2012

## **Appendix IV**

### Photographs



Photograph 1: Lifted flashing around canopy and holes in canopy ceiling (see points 2 and 3, appendix I)



Photograph 2: Missing fascia board (see point 10, appendix I)