

Dusk Survey Results

June 2025

St Agnes Parish Church

82. Hey Road

Huyton

Liverpool

L36 5SR

National Grid Reference: SJ 4479 9056



St Agnes Parish Church, 82 Hey Road, Huyton, Liverpool, L36 5SR
Dusk Survey Results in Relation to Bats

Document Title	Dusk Survey Results
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Executive Summary

As part of a proposed planning application with Knowsley Metropolitan Borough Council regarding a clubhouse building at St Agnes Parish Church in Huyton (termed 'the site'), Tyrer Ecological Consultants carried out an Inspection & Assessment in Relation to Bats & Breeding Birds in September 2021.

Included within the Inspection & Assessment in Relation to Bats & Breeding Birds was a Preliminary Roost Assessment (PRA) of any built structures and trees on site in relation to bats. Based on the findings of the PRA, the clubhouse building was duly categorised as pertaining to '**Moderate**' bat roost suitability.

As such, Tyrer Ecological Consultants were re-commissioned to undertake the two recommended dusk emergence surveys in May 2022. These surveys concluded that emergence was absent from the clubhouse building, with activity limited to foraging and commuting by up to two common pipistrelle (*Pipistrellus pipistrellus*) bats.

However, following the 2022 surveys, the proposed development did not proceed, with the building remaining in place. As such, Tyrer were recommissioned in 2025 to undertake updated dusk emergence surveys; the two dusk emergence surveys were carried out in May & June 2025

Bats

Based on the results gathered during the 2025 dusk surveys, the building is ascertained to be host to a day roost for a single soprano pipistrelle bat.

A European Protected Species Mitigation Licence (EPSML) will be required from Natural England for the proposed development to legally proceed.

*A Mitigation Scheme to inform the EPSML application, and to demonstrate to the Local Authority that the favourable conservation status of the species identified can be maintained, has been provided in **Section 6.0** of this report.*

Survey Validity

Bat emergence/re-entry surveys are typically **valid for a period of 12 – 18 months**; Ideally, the survey data should be from the most recent optimal survey season before a planning or licence application is submitted, however this is at the discretion of the Local Planning Authority and/or Natural England. Should your planning application not achieve consent, or a licence application (where required) not be applied for within this time period, updated surveys may be required.

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Appendix II: *St Agnes Club – Dusk Survey Results* (Tyrer Ecological Consultants Ltd, June 2022)

1.0 Background & Introduction

- 1.1 As part of a proposed planning application with Knowsley Metropolitan Borough Council regarding a clubhouse building at St Agnes Parish Church in Huyton (termed 'the site'), Tyrer Ecological Consultants carried out an Inspection & Assessment in Relation to Bats & Breeding Birds in September 2021.
- 1.2 The survey was commissioned by Property Surv; proposals are understood to involve the demolition of the club building. See **Figure 1.1** for a site location plan.



Figure 1.1 – Existing site location plan with red line boundary (adapted © Ordnance Survey)

- 1.3 Included within the Inspection & Assessment in Relation to Bats & Breeding Birds was a Preliminary Roost Assessment (PRA) of any built structures and trees on site in relation to bats. Based on the findings of the PRA, the clubhouse building was duly categorised as pertaining to '**Moderate**' bat roost suitability, in accordance with the then relevant Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd ed. (2016). (see **Figure 1.2** overleaf for a BCT guidance extract)

Table 7.3 Recommended minimum number of survey visits for presence/absence surveys to give confidence in a negative result for structures (also recommended for trees but unlikely to give confidence in a negative result).		
Low roost suitability	Moderate roost suitability	High roost suitability
One survey visit. One dusk emergence or dawn re-entry survey ^a (structures). No further surveys required (trees).	Two separate survey visits. One dusk emergence and a separate dawn re-entry survey. ^b	Three separate survey visits. At least one dusk emergence and a separate dawn re-entry survey. The third visit could be either dusk or dawn. ^b

Figure 1.2 – 2023 BCT extract on 'Moderate' suitability survey implications

- 1.4 As such, Tyrer Ecological Consultants were re-commissioned to undertake the two recommended dusk emergence surveys in May 2022. These surveys concluded that emergence was absent from the clubhouse building, with activity limited to foraging and commuting by up to two common pipistrelle (*Pipistrellus pipistrellus*) bats.
- 1.5 However, following the 2022 surveys, the proposed development did not proceed, with the building remaining in place. As such, Tyrer were recommissioned in May 2025 to undertake updated dusk emergence surveys; the two dusk emergence surveys were carried out in May & June 2025, in accordance with the now relevant Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023) (see. **Figure 1.3**).

Table 7.2. Recommended minimum number of survey visits for presence/absence surveys to give confidence in a negative result for structures (also recommended for trees but unlikely to give confidence in a negative result).		
Low roost suitability or PRF-I	Moderate roost suitability	High roost suitability or PRF-M
One survey visit. One dusk emergence survey* (structures). No further surveys required (trees).	Two separate dusk emergence survey visits ^b .	Three separate dusk emergence survey visits ^b .

Figure 1.3 – 2023 BCT extract on 'Moderate' suitability survey implications

- 1.6 The surveys aimed to update the findings of the 2022 survey effort, to identify the presence or reasonably conclude the absence of bats within the building. The results, conclusions and recommendations following the survey, including any indicative mitigation to inform an application to Natural England for a European Protected Species Mitigation Licence (EPSML), where necessary, will be supplied within this report.
- 1.7 This report should be read, understood and presented to the local authority as an additional document to **Appendix I** (see Contents page).

2.0 Bats – Legislation & Policy

- 2.1 All British bats and their **roosts are afforded full protection under the Wildlife & Countryside Act (1981) (as amended) and are listed in Schedule 2 of the Conservation of Habitats and Species Regulations (2019) (EU Exit). When dealing with cases where an EPS (all UK bats) may be affected, a planning authority is a competent authority within the meaning of Regulation 7 of the Regulations, and therefore has a statutory duty, as the local authority, to have due regard to the provisions of the Regulations in the exercise of its functions.

2.2 Uses of Buildings by Bats

- a) Summer breeding roost, and day/occasional roost (May – August)
- b) Hibernation roost (October – March)
- c) Transitional or temporary roost (other months)

- 2.3 Roost selection is often closely correlated to suitable foraging habitat within a reasonable commuting distance from the roost and different sites are used depending upon insect densities and abundance; climatic conditions can also affect their ability to successfully forage. All British bats are insectivorous.

*** The term roost is generically referred to as a place that bat/s use for the any of the above reasons, however it should be noted that under the Conservation of Habitats and Species Regulations (2019) (EU Exit) (Regulation 43 (d) the term roost is not used but refers to “a breeding site or resting place of such an animal” and is afforded legal protection. The roost, breeding site or resting place of bats, which ever terminology is used is legally protected whether or not bats are in occupation.*

- 2.4 Up to ten bat species have been regularly recorded within Merseyside to date, many of which use built structures, notably occupied residential buildings, for roosting. The most frequently encountered bat species is the common pipistrelle (*Pipistrellus pipistrellus*) and its abundant status in Merseyside is reflected throughout the UK.

Policy

- 2.5 Guidance for Local Authorities: Extract from Office of the Deputy Prime Minister – Circular 06/2005:

“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision”.

- 2.6 Paragraph 193 of the National Policy Planning Framework (as revised in December 2024) states:

“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 reasons¹ and a suitable compensation strategy exists; and

d) 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.”

- 2.7 The Knowsley Local Plan Core Strategy, which was adopted in January 2016, and echoes this national focus on biodiversity within Policy CS8, titled ‘Green Infrastructure’, stating:

“1) Knowsley's existing Green Infrastructure and its beneficial functions will be protected, managed and/or enhanced, primarily to:

..

b) Sustain and promote biodiversity (including designated sites, priority habitats and protected and endangered species) in accordance with importance and contribution to ecological networks”

¹ 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

3.0 Survey Methods

- 3.1 Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023) edition states:

“The guidelines do not aim to either override or replace knowledge and experience. It is accepted that departures from the guidelines (e.g. either decreasing or increasing the number of surveys carried out or using alternative methods) are often appropriate. The guidance should be interpreted and adapted on a case-by-case basis according to site-specific factors and the professional judgement of an experienced ecologist. Where examples are used in the guidelines, they are descriptive rather than prescriptive.”

- 3.2 Relative to the above the survey protocol has been determined using the collective and long standing experience of Tyrer Ecological Consultants Ltd and knowledge of the specific nature of the site.

Survey Protocol

- 3.3 The timing of the surveys took place in May & June 2025, thus within the time period when bats are within their active and breeding season, when bats are within a highly active and social stage, maternity colonies of pregnant females have formed at established breeding sites, and when certain species are starting to give birth to pups.

- 3.4 In accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023), it is specified that:

“The bat active period is generally considered to be between April and October inclusive”, though the period of **May – August** is the optimal most productive period that Natural England accept bat surveys and grant EPSMLs in relation to bats.

- 3.5 Typically only surveys within this period are accepted by licensing authorities, as the results of these surveys are used to inform an EPS licence application or a non-licensable Precautionary Working Method Statement (PWMS).

- 3.6 Where bats are roosting, they are likely to be detected by the ecologists who are trained in the use of bat detector hardware and call analysis software, and specifically how to detect bats and to correctly identify / disseminate bat calls.

- 3.7 When considering survey protocol, the decisions about whether dusk or dawn surveys are selected are based on the extensive experience of Tyrer Ecological Consultants Ltd, the nature of the building and species that can be anticipated as being present either at the property or in the locality as well as any visual limitations at the survey site.

- 3.8 Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023), it is specified that:

“Roost re-entry visits prior to dawn are no longer routinely recommended for presence/absence surveys due to the risk of bats returning early and being missed ... As return times appear to be far more variable (Andrews & Pearson, 2022).”

- 3.9 In this case, the bat roost potential that exists at St Agnes presents no problems for dusk observations; if a building is complex, or observations were restricted, or species that are difficult to detect at dusk are suspected then dawn surveys would be conducted where appropriate. At the site there are no visual constraints and to date there is no evidence to suggest the presence of such species.

- 3.10 Survey protocol should not be determined by parties who are 1) not familiar with the site 2) do not have a sufficient level or experience in relation to the undertaking of dusk / dawn bat surveys.
- 3.11 The number of surveys and surveyors was adequate relative to the roost potential that was identified on attendance of the site, i.e. **'Moderate'**, and requiring four surveyors to accurately monitor potential roost features (PRFs) across the structure. Surveyor credentials are provided in **Table 3.1** below:

Table 3.1 – Surveyor credentials

Surveyor(s)	Experience	Surveyor Credentials
Dr. R. King MCIEEM	15+ years	Highly experienced seasonal consultant with extensive experience of undertaking professional bat surveys.
Mr. M. Ashton	10+ years	An experienced seasonal consultant with extensive experience of undertaking professional bat surveys.
Mrs. H. Taylor-Boyd	8 years	An experienced seasonal consultant with extensive experience of undertaking professional bat surveys.
Mr. D. Boyd	8 years	An experienced seasonal consultant with extensive experience of undertaking professional bat surveys.
Mr. M. Smith	7 years	An experienced seasonal consultant with experience of undertaking professional bat surveys.
Mr. N. McMahon	1 year	A seasonal consultant with experience of undertaking professional bat surveys.

- 3.12 Surveyors were strategically positioned so that all elevations with bat roost potential could be observed without limitation. The surveyors were aided by full spectrum electronic bat detectors including the Anabat Scout, Elekon Batlogger M & M2, Echometer EM2 Pro, Peersonic RPA3, or equivalent detectors which enable the locating and recording of the high frequency calls that are emitted by bats; echolocation calls were analysed the next day using, Anabat Insight, Kaleidoscope, BatExplorer, Sonobat or equivalent computer software to verify field observations.
- 3.13 Elevations were also surveyed via the use of a Night Vision Aid (NVA) Camera (Panasonic HC-VXF990, Canon XA35 or Canon XA70) or Nightfox Whisker Night Vision Binoculars with additional illumination provided by infra-red (IR) lighting (for example Nightfox Arc, Nightfox XB5, or additional IR floodlights) where deemed necessary by the attending ecologist(s) – recordings would be subject to review the following day to identify emergences / flight lines and species / abundance.

Survey Limitations

- 3.14 Following the completion of the further surveys, having carefully considered the results and conclusions derived from all surveys to date, no significant constraints were experienced that might hinder the gathering of ecological data on which to base sound conclusions and recommendations.

4.0 Results

- 4.1 Two dusk emergence surveys were undertaken at the site, during May & June 2025 by four surveyors at any one time. **Table 4.1** shows survey timings and weather conditions, whilst **Tables 4.2 – 4.3** alongside **Figures 4.1 – 4.4** document the results of the dusk surveys.

Table 4.1 – Survey date, times and weather conditions

Times of Survey	Date	Weather Conditions
Dusk survey 1 2043 – 2233	14/05/2025	Sunset: 2103: Dry, Calm (0/12 Beaufort), 0% cloud cover Start temp: 18°C End temp: 16°C
Dusk survey 2 2113 – 2303	05/06/2025	Sunset: 2133: Dry, Light air (1/12 Beaufort), 100% cloud cover Start temp: 13°C End temp: 11°C

Table 4.2 – Dusk survey results

Survey Dates	Time	Activity
14/05/2025	2043 – 2233	Summary: No emergence of any bat species from target building 2142 – 2153 hrs: Occasional commuting passes along eastern elevation of building by one soprano pipistrelle (SP) General activity comprised of sporadic commuting by a single soprano pipistrelle bat.
05/06/2025	2113 – 2303	Summary: Emergence of a single soprano pipistrelle bat from beneath tongue-and-groove cladding on eastern elevation EP1 2205 hrs: Emergence of a soprano pipistrelle from beneath timber tongue-and-groove cladding on eastern elevation, commuting east. General activity comprised of a single emergence and commuting pass off-site by a soprano pipistrelle bat.



Dusk Survey 1 – 14/05/2025

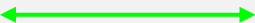
Key			
	Surveyed structure		Foraging activity
	Surveyor positions		Commuting activity
	Directional compass		

Figure 4.1 – Visual Aid – Dusk survey results with Key



Dusk Survey 2 – 05/06/2025

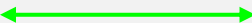
Key			
	Surveyed structure		Foraging activity
	Surveyor positions		Commuting activity
	Directional compass		Emergence point

Figure 4.2 – Visual Aid – Dusk survey results with Key



Figure 4.3 – Location of emergence point © Google Earth Pro 2025

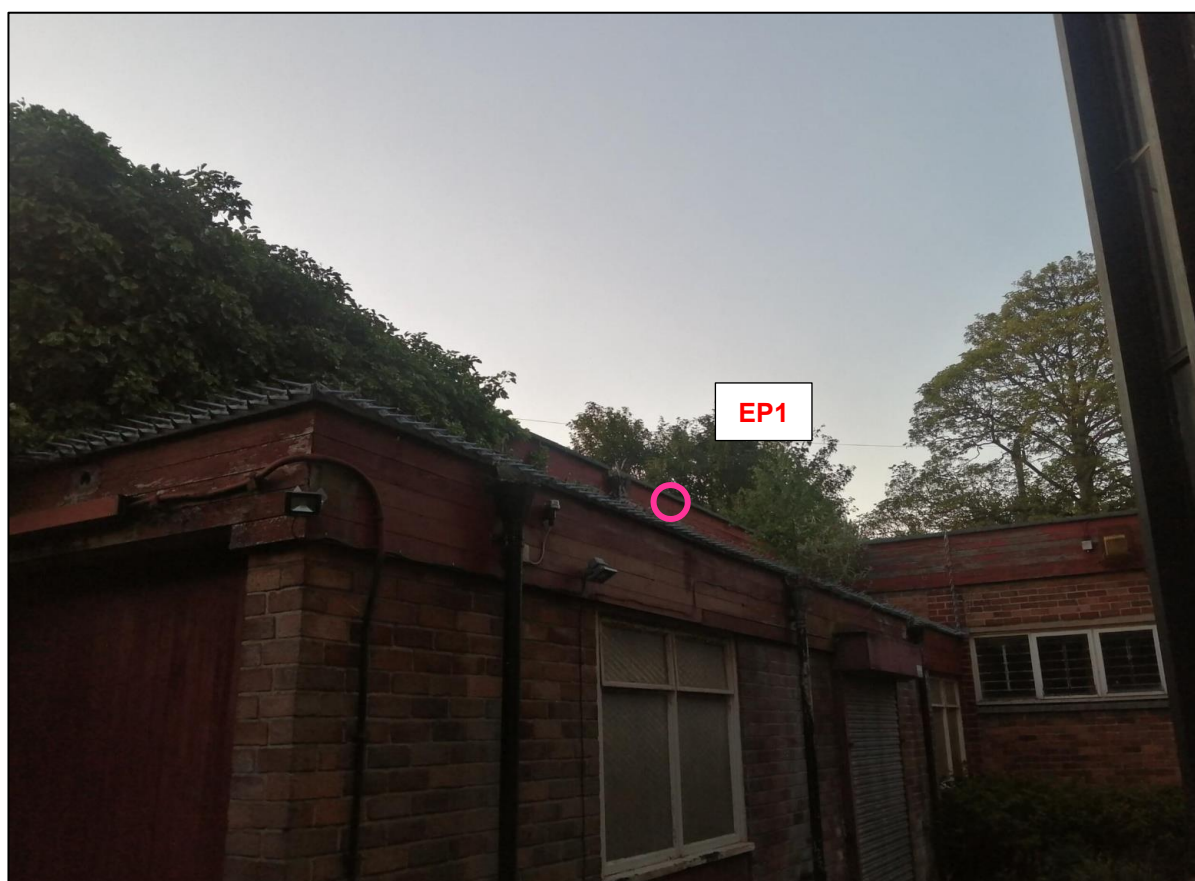


Figure 4.4 – Location of Emergence Point 1 beneath cladding on eastern elevation (EP1)

5.0 Conclusions & Recommendations

5.1 Based on the results gathered during the dusk surveys, the building is ascertained to be host to a day roost for a single soprano pipistrelle bat.

5.2 Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023) describes a day roost as the following:

Day roost: *“A place where individual bats, or small groups, rest or shelter in the day during the summer.”*

5.3 For clarity, the roost categorisation, location and access point has been provided in **Table 5.1** below, alongside the site status assessment and the conservation significance² of the roost:

Table 5.1 – Roost locations and access points at St Agnes Church

Structure Reference	Species	Count	Roost Location	Access Points	Site Status Assessment	Conservation Significance
St Agnes Parish Church Clubhouse	Soprano pipistrelle	1	Crevice beneath cladding on eastern aspect	EP1 – crevice beneath cladding	Day	Site

5.4 Proposals are understood to involve the demolition of the existing building, with no replacement structure proposed.

5.5 Based on the above, impacts to a protected species will need to be addressed from both a conservation and legal perspective, along with the application of appropriate mitigation before any works can take place. A European Protected Species Mitigation Licence (EPSML) will be required to legally impact upon places that are actively used for breeding, rest or shelter (roost) by bats, **however, before a licence can be applied for all planning issues need to be resolved.**

5.6 In order that the LPA can implement its obligations under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), appropriate and proportionate mitigation will need to accompany the planning application which will demonstrate that the “*favourable conservation*” of the species concerned can be maintained.

5.7 Additionally, it should be noted that installation of new lighting as part of a development scheme that exceeds current levels may have a negative impact upon foraging / commuting bats confirmed as present in the vicinity, particularly if increased light spillage occurs in areas currently valued and relatively free from illumination. There are several measures that can be used to offset impacts upon bats, where lighting is unavoidable; these include, however are not limited to: the light source used and luminaire design, and accessories to direct light at its intended target. Numerous software programmes are currently available which can be used inform lighting plans, demonstrating how lighting decisions will illuminate a site. the reader is referred to the Bat Conservation Trust's 'Bats and Artificial Lighting at Night' guidelines (August 2023) for further information.

² As extracted from **Reason, P.F. & Wray, S.** 2023. UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Chartered Institute of Ecology and Environmental Management, Ampfield

6.0 Mitigation

- 6.1 From the evidence gained during the surveys, the use of the site is considered to be of ‘**Site**’ level significance relatable to soprano pipistrelle bats and their current conservation status (as according to current EPS mitigation licencing applications); the proposed mitigation is proportionate to that use. However, if at any time that assessment is revised to a higher level, then the mitigation will also be accordingly revised.
- 6.2 The following procedures and mitigation recommendations are designed to allow the Local Planning Authority (LPA), in association with their ecological advisors, to determine a Planning Application where a European Protected Species has been identified and will be affected by the work for which the Planning Application seeks consent.
- 6.3 In addition, Local Planning Authorities, in accordance with the obligations placed upon them by way of their duties under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), have to take into consideration the presence of a European Protected species (EPS) before determination of an application where it / they have been identified.
- 6.4 The LPA will consider the mitigation in relation to the potential success of a Natural England licence application and if, in their opinion, the mitigation is considered as being appropriate, or if it is over and above what is required; if they determine that the mitigation is appropriate, then **a Planning Condition should be attached**, requiring the roost provision to be implemented. If the LPA consider that the mitigation is over what is necessary but require “enhancement” as part of their Local Biodiversity / Net Gain Planning Policies, this should be included in the terms of Consent. The acting bat ecologist, in this case, deems the proposed new roost creation as appropriate and not over and above what is required.
- 6.5 Notwithstanding that Planning Consent is granted, or equally if the work is undertaken outside of the planning system, whereby projects that do not require planning consent may affect bats or their roost (including disturbance), it does not absolve the applicant, site owner, developer or any other party involved with the work from ensuring that an application is made for a European Protected Species Licence to legally undertake work that will affect bat(s) or their roost(s). If work is undertaken without a licence and bat(s) or their roost(s) is/are affected, then a breach of current wildlife legislation will occur, for which penalties are severe.
- 6.6 Under Regulation 53(1) and 56(3)(a) of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), a licence is required prior to disturbing bats or destroying / damaging or obstructing any place that is used by bats as a resting place or breeding site. The licence is issued by the EPS Licensing Team of Natural England.

Summary of Mitigation

- 6.7 With the clubhouse on site set to be demolished, it is acknowledged that the presence of a roosting bat needs to be addressed from both a legal and conservation perspective. For the purposes of this report, **it is considered that the roost will be subject to destruction**; as such, there is a necessity to pursue an alternative solution.
- 6.8 The mitigation proposals outlined in this report are seen to form the most productive way forward that will retain long term roosting opportunities for bats and minimise disturbance whilst also enabling the client to undertake the proposed works.
- 6.9 The darkened corridor to the east of the clubhouse between the structure and the church provides a commuting resource, evidenced by the occasional passes by a single soprano pipistrelle bat. It is likely that the development will lose this darkened corridor. Whilst the site

itself is of relatively low value for bats, the loss of this corridor could impact upon commuting bats in the landscape indirectly via increased levels of lighting.

- 6.10 It is therefore recommended that a bat-friendly lighting plan is produced for the site, which should include measures to avoid illumination of this commuting route between the clubhouse and church. In addition, no lighting should be directed at roost provision as specified below.
- 6.11 This lighting plan should be produced by a suitably qualified lighting specialist and should be checked by a licenced bat ecologist against this dusk report to ensure that roost provision and key commuting / foraging areas are not subject to intense lighting.
- 6.12 To ensure that bats are not left without a roost while works take place that could displace bats from their roost at the building, a tree-mounted receptor roost will need to be installed at the site. The tree-mounted box should be a Schwegler 2F³ (or suitable equivalent – to be agreed with the express consent of the ecologist). Receptor roosts serve as a receiver unit for if bats must be captured and translocated to it by the licenced ecologist during the works schedule. The receptor roost should be installed and be in place prior to any deconstruction works and be within a reasonable distance and line of sight of the existing roost(s). The bat box will be retained post works to serve as a permanent roost provision following the works (see **Figure 6.1** overleaf).

Works to be undertaken by the Ecologist

- 6.13 **Licence Application:** A protected species licence from Natural England (NE) will be applied for by a suitably qualified Ecologist, subsequently the 'Named Ecologist', in conjunction with the applicant, which will provide details of the measures undertaken to maintain the favourable conservation status of the bats present on site. This could take the form of either an A13 bat mitigation licence or could utilise the Earned Recognition (ER) scheme to streamline the process and improve the outcome for both bats and the client.
- 6.14 **Toolbox Talk:** Once a protected species licence is in place, at the pre-commencement stage the Named Ecologist (or accredited agent) is to undertake a site induction 'Toolbox talk' to the Licensee and all contractors on possible bat presence and discuss document features taken from the license, i.e. license, method statement, mitigation figures and work schedule to be kept on site for the duration of the work.
- 6.15 **Pre-commencement Check:** Prior to any work being undertaken the presence / absence of bats, as far as is possible, will be established by the Named Ecologist (or accredited agent) undertaking a thorough investigation of the areas at which bats have been observed using the site. This will involve a thorough inspection of these areas during dismantling using endoscopes and / or narrow-beam torch, as necessary, and will involve a soft strip at the local areas of interest, as necessary, which involves the careful lifting, inspecting and removal of components.
- 6.16 **Timing Implications:** No timing implications are necessary in relation to the day roost on site.
- 6.17 **Ecological Clerk of Works:** The Named Ecologist (or their accredited agent) will supervise careful dismantling of all places of bat roost interest. In addition, at the Named Ecologist's discretion, wherever opportunities for bats exist in other areas of the building, supervised dismantling / inspections will extend to these areas with strategies for safely removing bat(s) applied. All dismantling of potential roost features will be undertaken during favourable weather conditions (above 9°C, low wind).
- 6.18 **Exclusion:** Where crevices are extensive, or where it cannot be conclusively ascertained that bats are absent from a crevice, exclusion devices may be fitted for a period of 3 days and 3

³ See: <https://www.nhbs.com/2f-schwegler-bat-box-general-purpose>

nights, or longer, at the Named Ecologist's discretion – this is where material is placed over the entrance area(s) of a roost allowing bats a means of escape whilst preventing them from re-accessing. This method will only be adopted if necessary, and exclusion fitted cavities will only be filled in following this process.

- 6.19 **Capture:** Any bats located by the Named Ecologist (or accredited agent) will be removed, placed in a secure box with soft tissue and transferred into the receptor roosts that will have been previously erected as indicated below. If bats are in ill-health they will be taken into care by a previously nominated bat carer. **Only once it has been conclusively established by the Named Ecologist that bat(s) are absent can works continue to completion.** In the unlikely event that bats are found outside of supervision time, then as legal requirement and conditions of the licence, work will immediately cease, and the named Ecologist will be contacted for further advice; contractors must not touch, handle or in any way cause bats to move without ecological supervision.

Works undertaken by the contractor

- 6.20 A single day roost with one identified access point was identified on site, which will be destroyed during the proposed works. As the existing building which is host to the roost must be demolished to facilitate the proposed development, retention or modification of the identified roost is not possible.
- 6.21 As such, it is considered that the most feasible and productive approach in terms of maintaining the favourable conservation status of the identified species roosting on site is to include novel roosting provision within the site. Given that no replacement structure is proposed, it is considered that the only viable option within the proposals is to include an additional tree-mounted bat box within the site. A second Schwegler 2F bat box (or suitable alternative) should be mounted on a tree within the site boundary to act as a mitigation provision, separate to the previously detailed receptor roost as per Section 6.12. See **Figure 6.1** overleaf for the location of the proposed measures on the site.

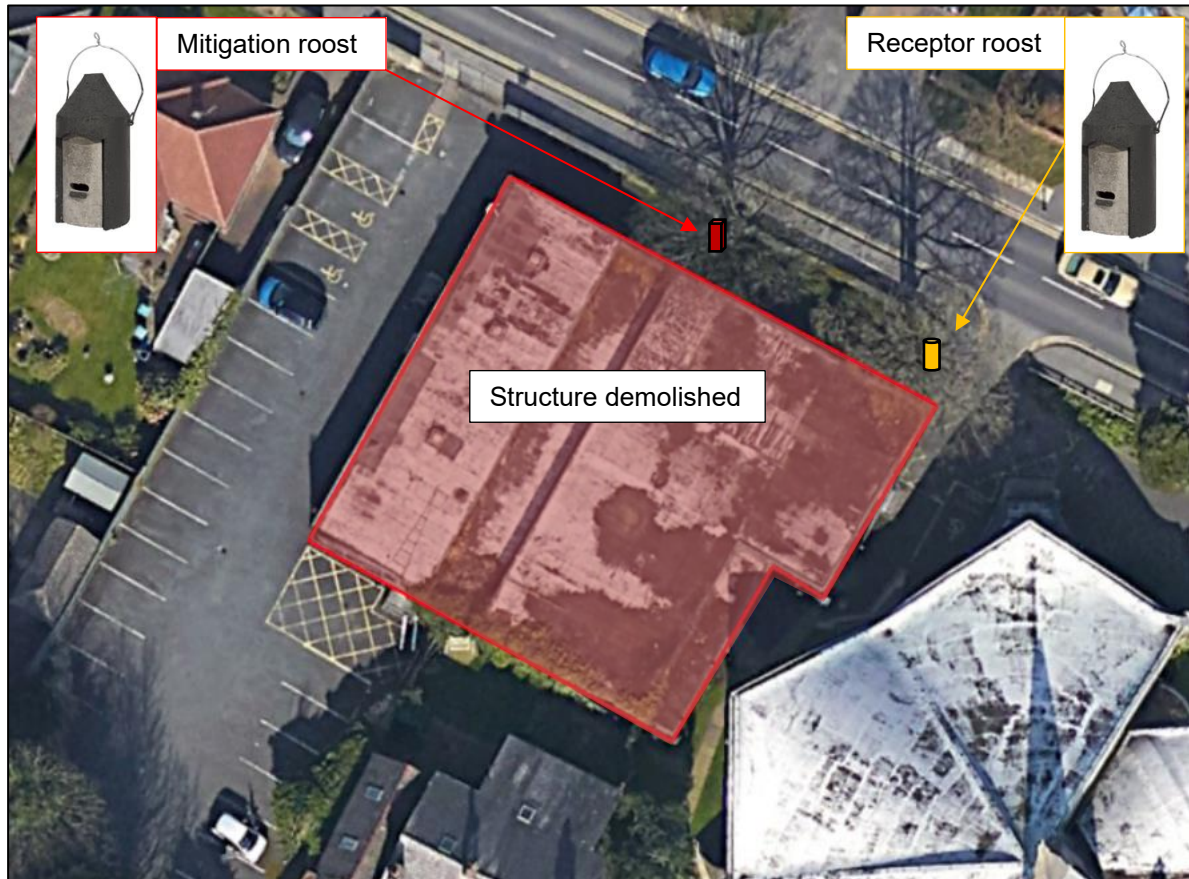


Figure 6.1 – Proposed location of receptor roost and mitigation roost over satellite imagery © Google Earth Pro 2025

- 6.22 This mitigation proposed is subject to the approval of the Natural England EPS team who may influence the terms of this mitigation; all proposed roost provisions outlined hereafter will be dedicated for bats and permanent.
- 6.23 No post-development monitoring is required for the roost given that it is a 'Day roost' of 'Low' significance, as stated following current guidance (Bat Mitigation Guidelines) concerning Day roosts / low significance roosts.
- 6.24 Lighting must not be directed at or close to the roost areas nor will it affect nearby foraging places or flight lines. The lighting plan recommended above should take into account the proposed roosting mitigation, and all flight lines to and from these features should be unilluminated at key times.

7.0 References

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Appendix I: *St Agnes Club – Inspection & Assessment in Relation to Bats & Breeding Birds* (Tyrer Ecological Consultants Ltd, October 2021)

Appendix II: *St Agnes Club – Dusk Survey Results* (Tyrer Ecological Consultants Ltd, June 2022)