



*Wyndrush Wild*

## **BAT ACTIVITY SURVEY**

Roch Gate (Former Motel), Roch, Haverfordwest, Pembrokeshire

**Client – Mr N. Neumann**

**Survey Date – 2<sup>nd</sup> June and 17<sup>th</sup> July 2023**

**Report Reference – WW/Bats/170723**

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Survey report and data valid for two years, unless otherwise specified by Local Authority Planning Department.

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## EXECUTIVE SUMMARY

An earlier survey in 2017 by Kite Ecology found no evidence of roosting bats at the site proposed for demolition at Roch Gate, Roch. Since 2017, the buildings have fallen further into a state of disrepair and were deemed no longer safe to access internally. The Preliminary Bat Roost Assessment by Wyndrush Wild in June 2023 found no evidence externally of roosting bats. However, there were a number of potential access points. The structure was assessed to have ‘moderate’ potential for bats and as such a single emergence survey and a single roost return survey were required.

The subsequent dusk emergence survey and dawn roost return survey were undertaken on 2<sup>nd</sup> June and 17<sup>th</sup> July 2023 respectively to investigate the use of the target buildings by roosting bats.

Commuting activity over the northern and western sections of the site by Common Pipistrelle (*Pipistrellus pipistrellus*) and Soprano Pipistrelle (*Pipistrellus pipistrellus*) were incidentally recorded during the emergence survey. These species were again recorded during the dawn roost return survey, along with a single Greater Horseshoe (*Rhinolophus ferrumequinum*) commuting along the western edge of the site.

Neither the daytime or activity surveys identified any evidence to suggest that the buildings at Roch Gate are used as a bat roost.

Future proposals for the site involve demolishing the buildings and undertaking a new tourism development.

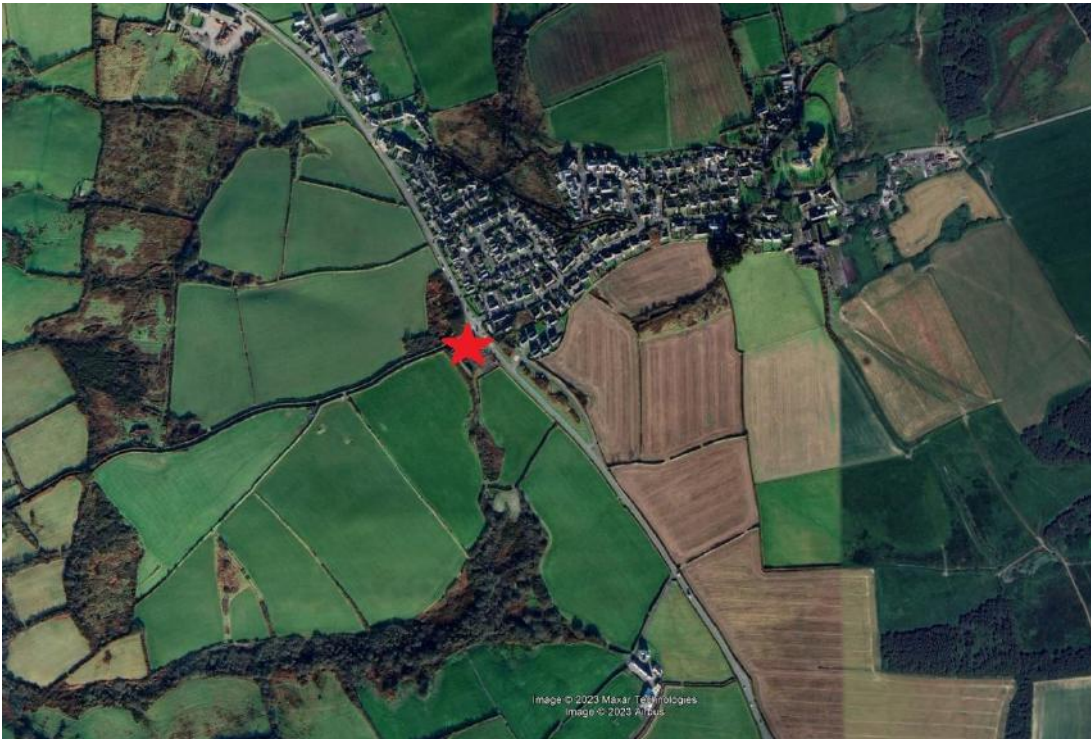
Bats do not appear to form a constraint to development of the site. In the unlikely event that bats are discovered, works should cease and further ecological advice should be sought.

## 1 INTRODUCTION

### 1.1 Site Description

Wyndrush Wild were commissioned by the client to undertake bat surveys targeting the buildings on the property known as Roch Gate (Figure 1). The National Grid Reference is centred on SM87422089. An earlier survey by Kite Ecology (2017) and an external Preliminary Bat Roost Assessment by Wyndrush Wild found no evidence of roosting bats at the site proposed for development; however, locations were identified for opportunistic roosting.

The site is located in a rural setting on the south-western edge of the settlement of Roch in a rural setting. It is surrounded by farmland, a network of hedgerows and scrub and tree-lined watercourses.



*Figure 1. Site Location*

### 1.2 Proposed Works

The client intends to demolish the existing buildings and undertake a new tourism development.

### **1.3 Aims of Survey**

The aims of the survey were to:

- establish whether the buildings are being used by bats;
- assess the potential impacts on bats of the proposed works.

## **2. METHODS**

### **2.1 Summary of survey methods**

The study methodology follows the guidelines set out in the Bat Conservation Trust document, 'Bat Surveys for Professional Ecologists, Good Practice Guidelines, 3<sup>rd</sup> Edition', 2016.

The buildings at Roch Gate were subject to a daytime inspection on 2<sup>nd</sup> June 2023. During the inspection, an external search of the buildings for evidence of current or past bat roosts, in the form of bats, droppings, staining, feeding signs and/or remains of bats was undertaken. The external façade was examined carefully from multiple angles with binoculars (Leica Ultravid 10x32).

One dusk emergence survey was undertaken on 2<sup>nd</sup> June 2023 and one dawn roost return survey was undertaken on 17<sup>th</sup> July 2023. The surveys followed good practice guidelines, with the dusk survey starting approximately half an hour before sunset, and the dawn survey starting approximately one and a half hours before sunrise. A range of detectors were used including Anabat Express (frequency division) detectors, Anabat Scout (full spectrum) and Echo Meter Pro 2 (full spectrum). All bat calls recorded were analysed using Anabat Insight software, Analook software or Kaleidoscope software. An infrared camera was also used to assist the surveyor on the south-western corner.

### **2.2 Pre-survey data search**

A specific data search using West Wales Biodiversity Information Centre (WWBIC) was not commissioned. However, an internet-based search was undertaken to investigate the status of bats in the wider area.

## **2.3 Surveyor information**

Vicky Swann and Matt Sutton, partners in Wyndrush Wild, are experienced bat surveyors. They have completed numerous scoping reports, activity surveys and accompanying reports for a variety of schemes. Vicky holds a NRW bat licence.

Fran Evans and Olly Craigan are experienced bat surveyors and have assisted on numerous surveys.

## **3. RESULTS**

### **3.1 Landscape setting**

Roch Gate is located within an area of optimal foraging opportunities for bats with the site's close proximity to hedgerows, tree lines, agricultural pasture and watercourses. These hedgerows and tree lines connect to areas of tree lined watercourses in the wider landscape (Figure 1).

### **3.2 Pre-survey data search**

Common and widely distributed bat species including Common Pipistrelle, Soprano Pipistrelle and Brown Long-eared (*Plecotus auritus*) would be expected to occur in habitat associated with the site, in addition to strong fliers such as Noctule (*Nyctalus noctula*).

No protected sites, notified for bats, are located within 10km of the site.

### **3.3 Field surveys**

#### **3.3.1 Daytime Inspection**

The buildings are in a very poor state of disrepair due to being unused for a number of years. Both buildings have painted smooth render; the paint is peeling in places but the render mainly remains intact. The western building has many window panes missing on the western elevation and the northern



section of this building no longer has a roof, therefore much of this structure is open to the elements. The southern section has many ceilings missing, resulting in open access to the roof space.

The eastern building has boarded up windows and doors due to vandalism in the past. Access via soffit squeeze gaps is apparent. The northern section of this building has a flat roof and no roof void. The roofs are mainly intact.



*External photographs of eastern building (Clockwise from top left): Southern elevation with boarded up windows and doors, and mainly intact roof; western elevation with flat roof; potential squeeze gaps behind boarding and at corner of soffits; eastern elevation.*





*External photographs of western building: Eastern elevation (left) and (right) southern elevation with boarded up windows.*

Internally, there was no access to either building due to health and safety concerns. However, the internal spaces of the western building could be viewed through broken windows. No cracks or crevices within the internal walls were apparent. Access was possible to the roof space via missing ceiling plasterboard and in some places whole sections of ceiling were missing, leaving joists exposed.



*Internal photographs of western building: Missing ceiling plasterboard (left) and (right) exposed joists and broken window.*

No bat droppings, either fresh or old, were found externally. No staining on walls was apparent. No feeding signs were found and no bats were visible.

The inspection found the buildings to have potential access points for bats. No cavities or cracks are apparent in external walls.

Following the building inspection and with the knowledge that there are a high number of bats within the local area, the site was assessed to have ‘moderate’ potential suitability for bats with the structure having ‘one or more potential roost sites but which are unlikely to support a roost of high conservation status. Sites with ‘moderate’ potential are required to have two separate survey visits.

### 3.3.2 Dusk activity survey – 2<sup>nd</sup> June 2023

Sunset was expected at 2128hrs. The weather conditions during the dusk roost emergence survey were considered suitable for bat activity: no cloud, dry, little to no wind and with a temperature of 12.3 °C.

No bats were observed emerging from the target buildings.

Incidental recordings were made of a small number of Common Pipistrelle and Soprano Pipistrelle commuting over the site along the western and northern boundaries.

### 3.3.3 Dawn activity survey – 17<sup>th</sup> July 2023

Sunrise was expected at 0519hrs. The weather conditions during the dawn roost return survey were considered suitable for bat activity: cloudy, dry, light wind and with a temperature of 13.7 °C.

No bats were observed entering the target buildings.

Incidental recordings were again made of a small number of Common Pipistrelle and Soprano Pipistrelle commuting; this time along the western edge of the site. A single Greater Horseshoe bat was also recorded commuting along the western edge.

## **4 ASSESSMENT**

### **4.1 Constraints on survey information**

None

### **4.2 Constraints on equipment used**

None

### **4.3 Potential impacts of development**

The daytime inspection of the buildings at Roch Gate identified a number of features where roosting bats could not be entirely discounted. Based on the good practice guidelines of BCT, the building was assessed as of moderate roost potential (i.e. a structure with one or more potential roost sites but which are unlikely to support a roost of high conservation status).

The emergence survey and re-entry survey recommended for structures with moderate roost potential were undertaken and no evidence of roosting bats was found.

Given the low number of potential roost features and complete absence of evidence, bats do not appear to form a constraint to development of the site. In the unlikely event that bats are discovered, works should cease and further ecological advice should be sought.

### **4.4 Legislation and policy guidance**

#### The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

All British bat species are protected under Annex IV of the European Communities Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora ('The Habitats Directive'), as amended, which requires the United Kingdom government to provide bats with strict protection. This is transcribed into England and Wales law by The Conservation of Habitats and Species Regulations 2019.

The key part of this legislation in relation to bats and the proposed works is Regulation 41, copied below:

*“41.—(1) A person who—*

- (a) deliberately captures, injures or kills any wild animal of a European protected species,*
- (b) deliberately disturbs wild animals of any such species,*
- (c) deliberately takes or destroys the eggs of such an animal, or*
- (d) damages or destroys a breeding site or resting place of such an animal, is guilty of an offence.*

*(2) For the purposes of paragraph (1)(b), disturbance of animals includes in particular any disturbance which is likely—*

- (a) 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*
- (b) to affect significantly the local distribution or abundance of the species to which they belong.”*

It is possible to obtain a derogation licence from Natural Resources Wales (NRW) to permit activities which would otherwise contravene Regulation 41, above. Licences may only be issued if certain conditions are met, and in relation to the proposed works these will be as follows:

- The purpose of the work is to preserve public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment (Regulation 53(2)(e))
- There is no satisfactory alternative (Regulation 53(9)(a))
- The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range (Regulation 53(9)(a))

Failure to satisfy the Regulations and obtain a licence where required could result in prosecution and lead to fines of up to £5,000 per bat and possible imprisonment.

### Wildlife and Countryside Act 1981

An addition to the Regulations, above, the Wildlife and Countryside Act 1981, as amended, provides additional protection for British bats.

The key parts of this legislation in relation to bats and the works proposed are in Section 9, copied below:

“9 Protection of certain wild animals

...

(4) *Subject to the provisions of this Part, a person is guilty of an offence if intentionally or recklessly—*

...

(b) he disturbs any such animal while it is occupying a structure or place which it uses for shelter or protection; or

(c) he obstructs access to any structure or place which any such animal uses for shelter or protection.”

Although there is no provision within the Act for a derogation licence to be issued for the proposed works, provided a licence is obtained under the Regulations (above) the defence under Wildlife and Countryside Act 1981 Section 10 Part (3) © should apply. That is, the works are: *“the incidental result of a lawful operation and could not reasonably have been avoided.”*

#### Environment (Wales) Act 2016

Section 6 of the Environment (Wales) Act places the following duty on public bodies such as Pembrokeshire County Council:

“6 Biodiversity and resilience of ecosystems duty

(1) A public authority must seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions.”

As part of this duty, statutory undertakers must have regard to the list of organisms that are *“of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales”* (the ‘Section 7 list’). This list of species includes eight bat species, of which both common pipistrelle and soprano pipistrelle are listed.

## **5. RECOMMENDATIONS**

Enhancement opportunities exist to provide biodiversity gain by incorporating purpose-designed bat boxes within the development. Boxes are now widely available and can be sourced from a variety of internet-based suppliers. If such artificial roosts are proposed, they should be incorporated into the proposed development at height, in a sheltered sunny position away from windows and lighting. Further information is also provided by publications including RIBAs “Designing for Biodiversity”.

Adoption of a sympathetic lighting regime to avoid light spill could also be encouraged. In particular, any security lighting should be directional and fitted with sensors and timers to ensure light is only created when required and is of limited extent and duration.

## **6. SUMMARY**

A dusk emergence survey and dawn re-entry survey were undertaken at Roch Gate, Roch during periods of warm, settled weather in June and July 2023.

A daytime inspection was undertaken on 2<sup>nd</sup> June 2023 to survey for signs of roosting bats. The external inspection found no evidence of bats within the site.

The activity surveys undertaken in June and July have demonstrated the absence of a bat roost within the roof space or walls of the target buildings.

## 7. REFERENCES

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