Maria Fidelis Old School Building

Precautionary Method of Works

Document No. 1CP01-MDS_ARP-EV-REP-SS08_SL20-990054
Work Package No.

Revision	Author	Checked by	Approved by	Accepted by (Not HS2)	Date approved	Revision Details
P01	Phoebe Cox (SDSC)	Charlotte Hewitt (SDSC)	Emma Hatchett (SDSC)	Alex Rose (MDJV)	06/11/2023	Issued for Planning

STAKEHOLDER REVIEW REQUIRED (SRR)	PURPOSE OF SRR
☒COUNTY/DISTRICT/LONDON BOROUGH COUNCIL ☐LOV ☐LUL ☐NRL ☐TFL ☐UTILTIES COMPANY ☐OTHER ……	☐ACCEPTANCE ☒APPROVAL ☐NO OBJECTION ☐CONSENT

Disclaimer:

This report takes into account the particular instructions and requirements of the Project as defined in SDSC Contract for the provision of design services Euston dated 13 February 2018 including any amendments to it.
It is not intended for and shall not be relied upon by any third party and SDSC shall have no responsibility or liability to any third party. Provided always that nothing in this disclaimer alters our SDSC's rights, obligations and liabilities under our Contract for the Project.

Contents

List of figures

List of tables

1 Introduction

1.1 Overview

1.1.1 This Bat Precautionary Method of Works (PMoW) was commissioned by Mace Dragados Joint Venture (MDjv) under the Station Design Services Contract (SDSC), for the redevelopment of the former Maria Fidelis school site to include a change of use of the former school building to office use with associated external alterations and multi-use community facilities; erection of a two storey Construction Skills Centre and provision of public open space together with alterations to existing access arrangements, all as meanwhile uses for a period of 10 years (LBC planning application reference 2019/3091/P, as amended by 2023/4110/P). The Construction Skills Centre element of the Proposed Development has been superseded by a separate application under planning application ref. 2021/3796/P.

1.1.2 The Proposed Development is required to facilitate the construction of HS2 Euston Station by providing site accommodation and welfare facilities.

1.1.3 Full planning permission was granted for the Proposed Development on 15th October 2021 (LBC application reference 2019/3091/P, as amended by 2023/4110/P), subject to completion of a Section 106 legal agreement and various planning conditions. Condition 20 of the planning permission states:

'*Prior to commencement of the relevant part of the works a method statement for a precautionary working approach to demolition and construction should be submitted to the Local Authority and approved in writing. This shall include approaches to mitigate the impact on amphibians and bats, including impact of lighting during works. All site operatives must be made aware of the possible presence of protected species during works. If any protected species or signs of protected species are found, works should stop immediately and an ecologist should be contacted. The applicant may need to apply for a protected species licence from Natural England, evidence of which should be submitted to the Local Authority*'.

1.1.4 This PMoW has been prepared to discharge condition 20 of the planning permission.

1.2 Project Background

1.2.1 The Proposed Development will include change of use of the former Maria Fidelis school building to office use with associated external alterations and multi-use community facilities. This is required as part of the HS2 railway project and will facilitate the construction of HS2 Euston Station.

1.2.2 The Proposed Development is required for a temporary period of 10 years, commencing from 1st November 2021, following which the land and building will then be returned to the previous land use class (former land use class D1 non-residential).

1.3 Site Description

1.3.1 The land within the Proposed Development (hereafter referred to as the 'Site') was formally known as the Maria Fidelis School Site and is located within the London

Borough of Camden (approximate grid reference: TQ29288263). The majority of the Site currently consists of the existing Maria Fidelis school buildings and associated hardstanding. Immediately north of the Site is the newly constructed Construction Skills Centre (CSC) and site accommodation building (planning application ref. 2021/3796/P) and the active HS2 Euston site. Within the wider area are residential buildings, roads, Euston station and small residential gardens. Regent's Park Site of Metropolitan Importance (SMI) is approximately 570m west of the Site.

1.3.2 The Site boundary is presented in Appendix 1, Figure 1.

1.4 Previous Survey Results

Preliminary Bat Roost Appraisal

1.4.1 An ecological assessment of the Site was carried out by ASW Ecology in December 2018 (ref: ASW/MELS/093/22/2018), which included a Preliminary Bat Roost Appraisal (PBRA). This assessment found that the main school building and the smaller connecting building (gymnasium and extension) had suitability to support roosting bats, but only within the external features, such as under slates and within damaged soffit boxes.

1.4.2 An updated PBRA of the Site was carried out in November 2021 by SDSC (ref: 1CP01-MDS_ARP-EV-REP-SS08_SL20-990019) which found the main school building to have moderate suitability for bats and the gymnasium and its smaller connecting building (changing room / gas room) to have low suitability for bats.

Bat Internal and External Inspection

1.4.3 A bat internal and external inspection was carried out for the Site on 31st August 2023. This included the main school building and its connecting annex building, and the gymnasium and its connecting changing rooms and gas room. This inspection found all internal areas (that were accessible[1]) within the main school building to be negligible for bats.

1.4.4 The external inspection of the school building found features suitable for bats, including vents within the roof area, holes in brickwork and damage to wooden soffits on the annex building connected to the school building. Overall, no direct evidence of bats was recorded and given that the Site is within a highly urbanised environment and is directly adjacent to the HS2 Euston active construction site, the main school building and its connecting annex building was assessed to have low suitability for bats.

1.4.5 The internal inspection of the gymnasium found negligible suitability for bats, however the external inspection identified suitable features, such as lifted metal cladding and cracks in the brick work. No evidence of bats was recorded and overall, the gymnasium was assessed to have low suitability for bats. The connecting changing rooms / gas room to the gymnasium (known as the 'SEN Block') was assessed to have negligible suitability for bats.

[1] Internal areas where asbestos was present were not surveyed.

Bat Emergence Surveys

1.4.6 Three bat emergence surveys were carried out by SDSC during August and September 2023. The dates and results of all three surveys are summarised below in Table 1.

Table 1: Results of bat emergence surveys carried out by Arup in August and September 2023.

Bat Survey	Date	Results	Species Present
Bat Emergence Survey 1[1]	21/08/2023	No emergences	One Common Pipistrelle bat recorded commuting and foraging.
Bat Emergence Survey 2	13/09/2023	One confirmed emergence	Common Pipistrelle recorded emerging, commuting and foraging.
Bat Emergence Survey 3	28/09/2023	One possible emergence	One pipistrelle bat recorded flying above building at the northern elevation.

[1] The northern elevation was an active construction site at the time of the survey and consequently could not be accessed due to health and safety reasons. Furthermore, access to the roof was not permitted at the time of the first bat emergence survey.

1.4.7 One common pipistrelle bat was recorded emerging from the northern elevation of the main school building during the dusk emergence survey on 13th September 2023 at 19:38 hours. The exact location of where the bat emerged could not be determined however the bat emergence point was localised to the 3rd floor windows on the western side of the northern elevation (see Photograph 1 in Table 4; Appendix A). It is likely the bat emerged from one of the holes in the brickwork, present within this area.

1.4.8 During the final dusk emergence survey on 28th September 2023, a common pipistrelle was recorded at 19:15 hours, 30 minutes after sunset, flying above the building and then flew in front of the northern façade to the east and then away to the west. This bat was not recorded emerging when analysing the IR camera footage, however it is possible this bat emerged from the roof vents which were not surveyed during this visit (see Photograph 2 in Table 4; Appendix A).

1.4.9 Based on the evidence collected, the roost recorded on 13th of September 2023 and the possible roost recorded on 28th September 2023, have been characterised as day roosts. Day roosts are defined as a place where individual bats, or small groups of males, rest or shelter in the day but are rarely found by night in the summer (Natural England, 2023 [2]).

2 Relevant Legislation

2.1 Legislation

2.1.1 Bats and their roosts are afforded a high level of protection under the Conservation of Habitats and Species Regulations 2017 (as amended) (HMSO, 2017 [3]), amended by Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (HMSO, 2019 [4]). This means that it is an offence to:

- Deliberately capture, injure or kill a wild bat;
- Deliberately disturb wild bats; '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.' and
- Damage or destroy a breeding site or resting place used by this species.

2.1.2 Protection is also afforded under the Wildlife and Countryside Act 1981 (as amended) (HMSO, 1981 [5]) with respect to disturbance of animals when using places of shelter, and obstruction of access to places of shelter.

2.1.3 Certain species of bats including noctule bat *Nyctalus noctule*, brown long-eared bat *Plecotus auratus* and soprano pipistrelle bat *Pipistrellus pygmaeus* are also listed as a Species of Principal Importance (SPI) for the Conservation of Biodiversity in accordance with Section 41 of the NERC Act 2006 (England [6]). Section 40 (1) of the NERC Act 2006 (which was amended within the Environment Act 2021 [7]) asks public bodies (including local planning authorities) to "*consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective*".

3 Licensable Activities

3.1 HS2 Bat Mitigation Class Licence WML-CL39

3.1.1 An application for a HS2 Bat Mitigation Class Licence WML-CL39 (hereafter referred to as the 'HS2 Bat Licence') was granted by Natural England on 26 October 2023 for the construction activities that will impact the northern elevation and the roof of the main school building. Table 2 below details the works to be covered under the licence, date of activity and how each works will be completed in accordance with the licence.

Table 2. Construction activities to be covered under the HS2 Bat Mitigation Class Licence WML-CL39

Construction Activity	Date of Activity	Description of Works	Instructions to Complete the Works according to the Licence
Hazmat (including Asbestos) removal works	November to December 2023	Asbestos building within the basement, Ground Floor including the sports Hall, 1st floor, 2nd floor and Water Tank on the roof.	Asbestos removal for the Water Tank on the roof will have to be completed according to the HS2 Bat Licence. During asbestos removal, access to the air vents by roosting bats should be retained at all times. If this is not possible or the air vents will be damaged or disturbed as a result of asbestos removal, an endoscope survey will be carried out by a licenced bat ecologist prior to works. The bat licenced ecologist can access the roof by the access stairs and so scaffolding will not be required. If a roosting bat is found, then a suitable buffer (determined by the bat licenced ecologist) will be placed around the air vent, within which no works must take place. A repeat endoscope survey will then be carried out each day to check if the roosting bat is still present and works can only proceed if roosting bats are confirmed absent from the air vents. If no roosting bats are found, then a temporary exclusion should be put in place, following best practice detailed within the Bat Mitigation Guidelines [8] and Bat Workers Manual [9] and works can proceed.
Structural Alterations	January to May 2024	Removal of structural slabs in order to build riser within the building. The slabs to be removed are on the 1st floor, 2nd floor and the roof. Removal of structural wall on the Ground Floor to extend classroom size. Removal of structural walls for lift entrances on north elevations. Removal of Structural wall in Sports Hall Ground Floor into North Gower street. Structural alterations to the main building will be performed via use of various	Any structural works that involve the northern elevation or the roof and any structural works that can cause vibrations to the external or structural walls on the northern elevation or to the roof, will have to be completed according to the HS2 Bat Licence. Prior to works on the northern elevation, an endoscope survey will be carried out by a licenced bat ecologist. This endoscope survey will be carried out on all holes within the northern elevation that are to be impacted by the structural works (the holes to be impacted by the structural alterations will be determined by the bat licenced ecologist). A mobile scaffold tower, MEWP or similar equipment will be used to safely access the holes. If a roosting bat is found, then a suitable buffer (determined by the bat licenced ecologist) will be placed around the hole, within which no works must take place. A repeat endoscope survey will then be carried out each day to check if the roosting bat is still present and works can only proceed if roosting bats are confirmed absent from the holes. If no bat is found, then a permanent exclusion will be put in place, following best practice detailed within the Bat Mitigation Guidelines and Bat Workers Manual and works can proceed.

Construction Activity	Date of Activity	Description of Works	Instructions to Complete the Works according to the Licence
		hand power tools and mechanical means.	Prior to works on the roof, an endoscope survey will be carried out by a licenced bat ecologist prior to works. The bat licenced ecologist can access the roof by the access stairs and so scaffolding will not be required. If a roosting bat is found, then a suitable buffer (determined by the bat licenced ecologist) will be placed around the air vent, within which no works must take place. A repeat endoscope survey will then be carried out each day to check if the roosting bat is still present and works can only proceed if roosting bats are confirmed absent from the air vents. If no roosting bats are found, then a temporary exclusion should be put in place, following best practice detailed within the Bat Mitigation Guidelines and Bat Workers Manual and works can proceed.
Waterproofing replacement	January to February 2024	Removal of existing roof waterproofing asphalt and screed on roof slab and replace with up to 300mm of insulation and a liquid membrane. This will involve extensive breaking.	Waterproofing of the roof will have to be covered under the HS2 Bat Licence, due to the breaking required. Prior to works on the roof, an endoscope survey will be carried out by a licenced bat ecologist prior to works. The bat licenced ecologist can access the roof by the access stairs and so scaffolding will not be required. If a roosting bat is found, then a suitable buffer (determined by the bat licenced ecologist) will be placed around the air vent, within which no works must take place. A repeat endoscope survey will then be carried out each day to check if the roosting bat is still present and works can only proceed if roosting bats are confirmed absent from the air vents. If no roosting bats are found, then a temporary exclusion should be put in place, following best practice detailed within the Bat Mitigation Guidelines and Bat Workers Manual and works can proceed.
Roof Strengthening	February to March 2024	Northeast elevation of the building needs strengthening to allow for MEP Installation. This involves fixing into the roof structure and breaking into some of the parapets	Strengthening of the northeast roof elevation will have to be covered under the HS2 Bat Licence, due to the breaking required. Prior to works on the roof, an endoscope survey will be carried out by a licenced bat ecologist prior to works. The bat licenced ecologist can access the roof by the access stairs and so scaffolding will not be required. If a roosting bat is found, then a suitable buffer (determined by the bat licenced ecologist) will be placed around the air vent, within which no works must take place. A repeat endoscope survey will then be carried out each day to check if the roosting bat is still present and works can only

Construction Activity	Date of Activity	Description of Works	Instructions to Complete the Works according to the Licence
			proceed if roosting bats are confirmed absent from the air vents. If no roosting bats are found, then a temporary exclusion should be put in place, following best practice detailed within the Bat Mitigation Guidelines and Bat Workers Manual and works can proceed.
Window replacement	January to April 2024	2 Scenarios; 1. Replacement of Ground Floor only all around the building. This will require minor scaffold which will not be attached to the building. 2. Replacement of all Windows with scaffold tying into the building. Window installation would start from the Ground Floor and works its way up to the top of the second floor windows and then be removed.	Window installation on the northern elevation, including any attached or unattached scaffolding, will have to be completed according to the HS2 Bat Licence, as this has the potential to block a roosting feature. Prior to works on the northern elevation, an endoscope survey will be carried out by a licenced bat ecologist. This endoscope survey will be carried out on all holes within the northern elevation that are to be impacted by the window installation (the holes to be impacted by the window installation will be determined by the bat licenced ecologist). A mobile scaffold tower, MEWP or similar equipment will be used to safely access the holes. If a roosting bat is found, then a suitable buffer (determined by the bat licenced ecologist) will be placed around the hole, within which no works must take place. A repeat endoscope survey will then be carried out each day to check if the roosting bat is still present and works can only proceed if roosting bats are confirmed absent from the holes. If no bat is found, then a temporary exclusion will be put in place, following best practice detailed within the Bat Mitigation Guidelines and Bat Workers Manual and works can proceed.
Mechanical Electrical and Plumbing (MEP) and testing & commissioning	January to May 2024	MEP installation through the whole of the building including the Ground Floor. All plant for the MEP will be installed onto the roof and then cabling all through the riser throughout all floors.	Any MEP installation that directly impacts or causes vibrations to the external or structural walls on the northern elevation or to the roof, will have to be completed according to the HS2 Bat Licence. Prior to works on the northern elevation, an endoscope survey will be carried out by a licenced bat ecologist. This endoscope survey will be carried out on all holes within the northern elevation that are to be impacted by the MEP installation (the holes to be impacted by the MEP installation will be determined by the bat licenced ecologist). A mobile scaffold tower, MEWP or similar equipment will be used to safely access the holes. If a roosting bat is found, then a suitable buffer (determined by the bat licenced ecologist) will be placed around the hole, within which no works must take

Construction Activity	Date of Activity	Description of Works	Instructions to Complete the Works according to the Licence
			place. A repeat endoscope survey will then be carried out each day to check if the roosting bat is still present and works can only proceed if roosting bats are confirmed absent from the holes. If no bat is found, then a temporary exclusion will be put in place, following best practice detailed within the Bat Mitigation Guidelines and Bat Workers Manual and works can proceed. Prior to works on the roof, an endoscope survey will be carried out by a licenced bat ecologist prior to works. The bat licenced ecologist can access the roof by the access stairs and so scaffolding will not be required. If a roosting bat is found, then a suitable buffer (determined by the bat licenced ecologist) will be placed around the air vent, within which no works must take place. A repeat endoscope survey will then be carried out each day to check if the roosting bat is still present and works can only proceed if roosting bats are confirmed absent from the air vents. If no roosting bats are found, then a temporary exclusion should be put in place, following best practice detailed within the Bat Mitigation Guidelines and Bat Workers Manual and works can proceed.
Fit out	March to June 2024	Fit out of all new partition walls and new fixtures and fittings on the Ground Floor. This includes the installation of new sliding doors in the opening along North Gower St. Fitout will require utilisation of handheld power tools.	Any fit out works that directly impacts or can cause vibrations to the external or structural walls on the northern elevation, will have to be completed according to the HS2 Bat Licence. Prior to works on the northern elevation, an endoscope survey will be carried out by a licenced bat ecologist. This endoscope survey will be carried out on all holes within the northern elevation that are to be impacted by the fit out (the holes to be impacted by the fit out will be determined by the bat licenced ecologist). A mobile scaffold tower, MEWP or similar equipment will be used to safely access the holes. If a roosting bat is found, then a suitable buffer (determined by the bat licenced ecologist) will be placed around the hole, within which no works must take place. A repeat endoscope survey will then be carried out each day to check if the roosting bat is still present and works can only proceed if roosting bats are confirmed absent from the holes. If no roosting bats are found, then a temporary exclusion will be put in place, following best practice detailed within the Bat Mitigation Guidelines and Bat Workers Manual and works can proceed.

Construction Activity	Date of Activity	Description of Works	Instructions to Complete the Works according to the Licence
Lift Install and Bridge Connection	TBC	Installation of new lift on the north of the building. Construction of new lift at the north side of the building will be done manually using powered hand tools because of space constraint in the area for a plant. Concrete works for the lift will require use of a mobile concrete pump which can be placed to the front of the school within the boundaries of the school away from public interface.	All construction activities associated with the installation of the lift on the northern elevation will have to be completed according to the HS2 Bat Licence. Prior to works on the northern elevation, an endoscope survey will be carried out by a licenced bat ecologist. This endoscope survey will be carried out on all holes within the northern elevation that are to be impacted by the lift installation (the holes to be impacted by the lift installation will be determined by the bat licenced ecologist). A mobile scaffold tower, MEWP or similar equipment will be used to safely access the holes. If a roosting bat is found, then a suitable buffer (determined by the bat licenced ecologist) will be placed around the hole, within which no works must take place. A repeat endoscope survey will then be carried out each day to check if the roosting bat is still present and works can only proceed if roosting bats are confirmed absent from the holes. If no bat is found, then a permanent exclusion will be put in place, following best practice detailed within the Bat Mitigation Guidelines and Bat Workers Manual and works can proceed.

4 Non-Licensable Activities

4.1.1 Table 3 below details the non-licensable construction activities that can proceed under a Precautionary Method of Works (PMoW) protocol.

Table 3. Non-licensable construction activities that can proceed under a Precautionary Method of Works protocol.

Construction Activity	Date of Activity	Description of Works	Works to be completed under a Precautionary Method of Works protocol
Hazmat (incl Asbestos) removal works	November to December 2023	Asbestos building within the basement, Ground Floor including the sports Hall, 1st floor, 2nd floor and Water Tank on the roof.	Asbestos removal for the basement, Ground Floor including the Sports Hall, 1st floor, and 2nd floor can proceed under the PMoW protocol as detailed in Section 5 of this method statement. All asbestos removal should be carried out by hand to avoid disturbance to roosting bats by vibration.
Soft Strip	November to December 2023	Removal of all fixtures and fittings within the internal space of the building, including partition wall removal throughout. This is within the basement, GF, 1st Floor and 2nd Floor. All materials will be removed via chutes on the southern elevation of the building into skips and removed off site. Soft stripping of the main building including existing heating system will be conducted using powered hand tools.	Soft strip activities of internal areas, with all materials removed via chutes on the southern elevation, can proceed under the PMoW protocol as detailed in Section 5 of this method statement.
Structural Alterations	January to May 2024	Removal of structural slabs in order to build riser within the building. The slabs to be removed are on the 1st floor, 2nd floor and the roof. Removal of structural wall on the Ground Floor to extend classroom size. Removal of structural walls for Lift entrances on north elevations. Removal of Structural wall in sports Hall Ground Floor into North Gower Street. Structural alterations to the main building will be performed via use of various hand power tools and mechanical means.	Main School Building - Any structural works that does not directly impact or cause vibrations to the external or structural walls on the northern elevation or to the roof area can proceed under the PMoW protocol as detailed in Section 5 of this method statement. Sports Hall – all structural alterations can proceed under the PMoW protocol as detailed in Section 5 of this method statement.

Construction Activity	Date of Activity	Description of Works	Works to be completed under a Precautionary Method of Works protocol
Demolition	January 2024	Demolition of the former Maria Fidelis School “SEN Block” (small annex building on the west which is attached to the Sports Hall) that sits within the development footprint – the demolition will be completed through a combination of soft strip and hand demolition activities (using powered hand tools) and structural demolition using an excavator and hydraulic processing attachment.	The former Maria Fidelis School “SEN Block” was found to have negligible suitability for bats and so demolition of this small annex building can proceed under the PMoW protocol as detailed in Section 5 of this method statement.
Window replacement	January to April 2024	2 Scenarios; 1. Replacement of Ground Floor only all around the building. This will require minor scaffold which will not be attached to the building. 2. Replacement of all Windows with scaffold tying into the building. Window installation would start from the Ground Floor and works its way up to the top of the second floor windows and then be removed.	Window installation on the southern, eastern and western elevation can proceed under the PMoW protocol as detailed in Section 5 of this method statement.
Mechanical Electrical and Plumbing (MEP) and testing & commissioning	November to March 2024	MEP installation through the whole of the building including the Ground Floor. All plant for the MEP will be installed onto the roof and then cabling all through the riser throughout all floors.	Any MEP installation that does not directly impact or cause vibrations to the external or structural walls on northern elevation or to the roof, can proceed under the PMoW protocol as detailed in Section 5 of this method statement.

Construction Activity	Date of Activity	Description of Works	Works to be completed under a Precautionary Method of Works protocol
Fit out	March to June 2024	Fit out of all new partition walls and new fixtures and fittings on the Ground Floor. This includes the installation of new sliding doors in the opening along North Gower St. Fitout will require utilisation of handheld power tools.	Any fit out work that does not directly impact or cause vibrations to the external or structural walls on northern elevation or to the roof, can proceed under the PMoW protocol as detailed in Section 5 of this method statement.

5 Precautionary Method of Works Protocol

5.1 Overview

5.1.1 This PMoW requires mandatory conditions/controls to be implemented:

1. Timing of Proposed Works;
2. Artificial Lighting; and
3. Briefings and toolbox talks;

5.2 Timing of Proposed Works

5.2.1 No evidence of breeding bats was observed, and external features are unsuitable to support hibernating bats due to the lack of a cavity wall or space that could maintain suitable air temperature for bats. Therefore, maternity and hibernation roost types have been ruled out, and thus works are not constrained by any time frame and can be undertaken at any time of the year.

5.3 Artificial Lighting

5.3.1 The standard working hours for the Site are as follows:

- 8.00am to 6pm on Monday to Friday;
- 8.00am to 4.00pm on Saturdays and Sundays.

5.3.2 Artificial lighting could have a negative effect upon bat activity and disturb roosting bats, therefore, methods to avoid this impact will be implemented by:

- Ensuring there is no direct illumination of the main school building exterior, including the air vents on the roof and the northern elevation;
- Using low-level lighting rather than taller, spotlights where possible;
- Using the minimum light levels necessary for the relevant task / function; this may equate to reducing light intensity, and/or using the minimum number or light sources or minimum column height; and
- Using hoods, shields and filters to avoid light spill onto the main school building.

5.4 Briefing and Toolbox Talks

5.4.1 All licensable activities (as detailed in Table 2) will be supervised by a licenced bat ecologist acting as an Ecological Clerk of Works (ECoW). The ECoW will brief and deliver toolbox talks to all staff on Site explaining the ecological constraints present (including location of known and possible bat roost locations), methods of working, relevant legislation, bat roosting ecology and how these may impact the Proposed Works. A record of briefings will be maintained by MDjv (Appendix B provides a model briefing record which may be used).

5.4.2 For all non-licensable activities (as detailed in Table 3) that will be unsupervised by a ECoW, all staff should be informed on the ecological constraints present (including location of known and possible bat roost locations), methods of working, and a precautionary approach (see Section 5.5 of this method statement) to be adopted in the unlikely event that bats are encountered. Staff should be informed by including these details (as presented in Appendix B) in the Site induction or during toolbox talks.

5.5 Unexpected Discoveries

5.5.1 If at any stage Site personnel encounter a bat, they must stop works immediately. Workers must not handle the bat but must vacate the area and seek advice from the Appointed licenced bat ecologist.

5.5.2 Contact Details for Appointed licenced bat ecologist:

- **Charlotte Hewitt**

6 References

[1] SDSC, “Maria Fidelis School – Bat Survey Report 2023.,” HS2 Ltd, 2023.

[2] N. England, “Bat Mitigation Class Licence WML-CL39 – Roosts in buildings. HS2 Phase 1 (London to West Midlands) and 2a (West Midlands to Crewe).,” 2023.

[3] HMSO, “The Conservation of Habitats and Species Regulations 2017 (the Habitat Regulations).,” 2017.

[4] HMSO, “The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.,” 2019.

[5] HMSO, “ Wildlife and Countryside Act (as amended by the Countryside and Rights of Way Act 2000).,” 1981.

[6] HMSO, “Natural Environment and Rural Communities Act 2006,” 2006.

[7] HMSO, “Environment Act 2021,” 2021. [Online]. Available: https://www.legislation.gov.uk/ukpga/2006/16/section/41. [Accessed October 2023].

[8] N. England, “Natural England Bat Mitigation Guidelines.,” 2023. [Online]. Available: https://www.gov.uk/guidance/bats-advice-for-making-planning-decisions. [Accessed October 2023].

[9] JNCC, “Bat Workers' Manual (3rd edition).,” 2004. [Online]. Available: https://hub.jncc.gov.uk/assets/e5888ae1-3306-4f17-9441-51a5f4dc416a. [Accessed October 2023].

Appendix A Site Location

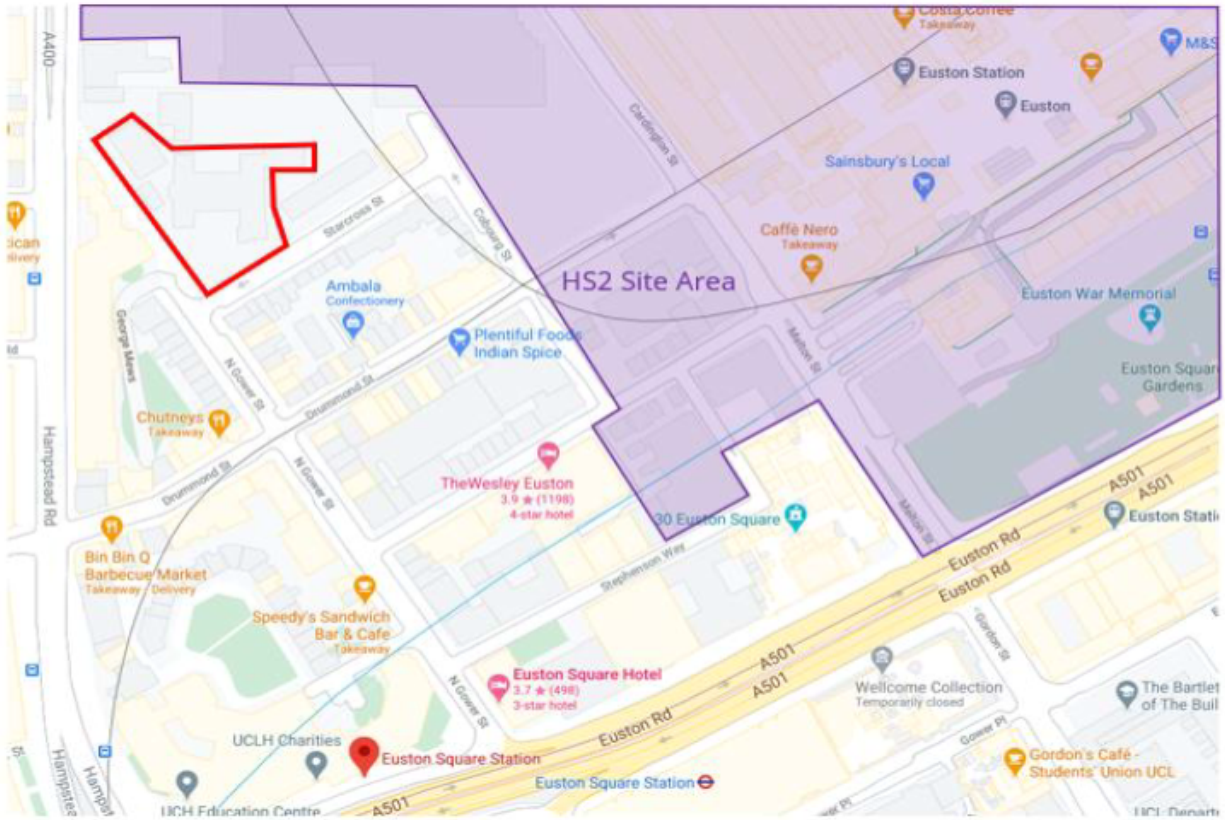

Figure 1. Site Boundary and Location

Table 4. Photographs

Photographs	
	
Photograph 1 – External brickwork cavities, including the confirmed roost locality (blue circle) and possible additional roosting features (orange circles).	Photograph 2 – 3 of the total 17 roof vents present throughout the roof top. All roof vents are recorded as possible roosting features.

Appendix B Protected Species Toolbox Talk: Bats

B.1 Appearance

Bats are nocturnal flying mammals. There are 18 species in Britain and all are small, ranging in size from 4.8cm to 8.2cm. Our smallest bat, which is the Pipistrelle, weighs less than a 2p piece and can fit into a matchbox. Bats have brown/dark fur, prominent ears and dark skinned wings.

B.2 Activity

Bats are active from late April until October (weather dependant), with young likely to emerge in May and June. Bats hibernate during winter months.

B.3 Suitable Habitat

Bats can often be found around woodland and water, but also use linear features such as hedgerows, rivers, streams and lines of trees for feeding and commuting.

Bats live in roosts during the spring and summer which can be located in trees, buildings, bridges, dry-stone walls and rock crevices. In winter, roosts may be found in buildings, underground structures such as caves, culverts, underpasses and disused mines, or inside the hollows of large old trees.

Bats are known to roost within the main school building during their active period. Therefore, all licensable activities can only take place according to the HS2 Bat Licence and all non-licensable activities can only proceed under the Precautionary Method of Works (PMOW) protocol.

B.4 Legal Protection

All bats are protected under both The Wildlife and Countryside Act 1981 (as amended) and Conservation of Habitats and Species Regulations 2010.

It is an offence to:

- Deliberately capture, injure or kill a bat
- Intentionally or recklessly disturb in a way that would affect their local distribution or abundance, or affect their ability to survive, breed or rear young
- Damage or destroy a roost or recklessly obstruct access to a breeding or resting place used by a bat (even if bats are not present at the time)
- Keep, control, transport, sell or exchange or offer for sale/exchange live or dead bat or any part of a bat.

Any activity that would result in a contravention of the above legislation would likely require an EPS licence from Natural England.

B.5 On finding a bat/bat roost on-Site:

- Stop works as soon as it is safe to do so and inform the Site Ecologist;
- Leave the animal as undisturbed as possible;
- Do **NOT** handle;
- Vacate the area.

B.6 Good Practice Measures on Site

- Where possible, ensure there is no direct illumination of the main school building;
- Where possible, works should be undertaken during daylight hours only;
- If in any doubt check with the Site Ecologist.

B.7 Signature Sheet

6.1.1 By signing this form the contractor representative certifies that he / she has read and understood the prescribed methods required for Site works detailed in the PMoW and will adhere to the contents of this document at all times during the works.

Name	Company	Date	Signature

Name	Company	Date	Signature