BAT SURVEY REPORT

TYLER GRANGE

247 TOTTENHAM COURT ROAD

JULY 2020

Prudential UK Real Estate Nominee 1
Limited and Prudential Real Estate Nominee
2 Limited

JULY 2020

Bat Survey Report

247 Tottenham Court Road and Morwell Street Properties

29th July 2020

Tyler Grange

Report No:	Date	Revision	Author	Checked
13175_R02e	29/07/2020	e	Rebekah Baker MSc	Aaron Grainger BSc MSC MCIEEM

Contents

Appendices

Plans

Summary

S.1. This bat survey report has been prepared by Tyler Grange Group Ltd on behalf of Prudential UK Real Estate Nominee 1 Limited and Prudential UK Real Estate Nominee 2 Limited. It sets out the findings of a bat emergence survey at a parcel of land that comprises the following five buildings (OS Grid Reference TQ 29736 81583), hereinafter referred to as the "site":

1. 247 Tottenham Court Road, London, W1T 7HH;
2. 3 Bayley Street, London, WC1B 3HA;
3. 1 Morwell Street, London, WC1B 3AR;
4. 2-3 Morwell Street, London, WC1B 3AR; and
5. 4 Morwell Street, London, W1T 7QT.

S.2. The proposals are for the demolition of 247 Tottenham Court Road, 3 Bayley Street, 1 Morwell Street, 2-3 Morwell Street and 4 Morwell Street and the erection of a mixed use office led development comprising ground plus five storey building for office (Class B1) use, flexible uses at ground and basement (Class A1/A2/A3/B1/D1/D2), residential (Class C3) use, basement excavation, provision of roof terraces, roof level plant equipment and enclosures, cycle parking, public realm and other associated works.

S.3. During the Preliminary Bat Roost Assessment (PBRA) undertaken by Tyler Grange, buildings B2 and B4 out of the five existing buildings were found to have a low potential for roosting bats. In line with best practice guidance it was recommended that one emergence/re-entry survey be undertaken to determine the presence/ likely absence of bat roosts in these two buildings.

S.4. As part of this application, an emergence survey was undertaken on two of the existing residential buildings which were considered to have a low potential for roosting bats. No evidence of bat roosts being present in either of the two buildings was found during the survey visit.

S.5. As no emergences were observed during the survey undertaken on the 30th June 2020, buildings B2 and B4 are not subject to legal protection with respect to bats and as such no mitigation is required for their removal. It is therefore considered that the demolition of the five onsite buildings will not have any impact on any local roosting bat populations

S.6. The development offers the opportunity to enhance the site, through the establishment of native green wall or roof planting and the inclusion of bat boxes within the scheme design. These enhancements could increase foraging and roosting opportunities for bats that are present in the wider landscape.

S.7. Overall, there will be no ecological issues that would affect proposal for the redevelopment at the site, and enhancement measures are provided to increase the value of the site for bats.

Section 1: Introduction

Introduction

1.1. This bat survey report has been prepared by Tyler Grange Group Ltd on behalf of Prudential UK Real Estate Nominee 1 Limited and Prudential UK Real Estate Nominee 2 Limited. It sets out the findings of a bat emergence survey at a parcel of land that comprises the following five buildings (OS Grid Reference TQ 29736 81583), hereinafter referred to as the "site":

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1.2. The proposals are for the demolition of 247 Tottenham Court Road, 3 Bayley Street, 1 Morwell Street, 2-3 Morwell Street and 4 Morwell Street and the erection of a mixed use office led development comprising ground plus five storey building for office (Class B1) use, flexible uses at ground and basement (Class A1/A2/A3/B1/D1/D2), residential (Class C3) use, basement excavation, provision of roof terraces, roof level plant equipment and enclosures, cycle parking, public realm and other associated works.

Context

1.3. The site is 0.19ha in size and currently comprises five buildings which are mixture of residential, educational, and commercial units. The southern boundary is directly adjacent to the neighbouring buildings, Tottenham Court road runs along the western site boundary, Bayley street along the northern boundary, and Morwell Street on the eastern boundary. The surrounding area is built up and urban, with a mixture of residential and commercial units and a private garden to the far east of the site boundary.

1.4. The proposals are for the demolition of 247 Tottenham Court Road, 3 Bayley Street, 1 Morwell Street, 2-3 Morwell Street and 4 Morwell Street and the erection of a mixed use office led development comprising ground plus five storey building for office (Class B1) use, flexible uses at ground and basement (Class A1/A2/A3/B1/D1/D2), residential (Class C3) use, basement excavation, provision of roof terraces, roof level plant equipment and enclosures, cycle parking, public realm and other associated works.

1.5. During the Preliminary Bat Roost Assessment (PBRA) conducted by Tyler Grange (**13175/R01c**) in May 2020, the five onsite buildings were assessed for their potential to support roosting bats and both buildings B2 (2 Morwell Street) and B4 (3 Bayley Street) were found to support potential bat roost features.

1.6. Building B2 supports a mortar gap and a gap underneath lead roof sheeting on the southern aspect and gaps between a brick ledge and sheeting on the eastern aspect. Building B4 supports two holes and a gap around an extraction fan in the concrete wall of the eastern aspect of the building and a missing outdoor spot light at the building entrance which provides an entrance into a small void where the light fitting is absent. The features found on buildings B2 and B4 could provide roosting space for common and widespread crevice dwelling bat species. Considering the built-up urban environment, well-lit conditions and limited foraging habitat in the surrounding landscape, buildings B2 and B4 were considered to have **low potential for roosting bats**.

1.7. The remaining buildings, B1, B3 and B5 were all considered to have negligible potential for roosting bats due to a clear lack of potential bat roost features and therefore require no further survey work.

1.8. One emergence/re-entry survey was therefore recommended for buildings B2 and B4 to confirm the presence or likely absence of bat roosts.

Purpose

1.9. The purpose of this report is to describe the results of the dusk emergence survey, in order to assess the potential impact of the scheme on bats and provide recommendations for appropriate mitigation and enhancement measures, where necessary.

Legislation and Conservation Status

1.10. As European protected species, all UK bats receive legal protection in England under the Conservation of Habitats and Species Regulations (CoHSR) 2017 (as amended) and the Wildlife and Countryside Act (WCA) 1981 (as amended).

1.11. All British species of bat are listed on Schedule 2 of the CoHSR 2017 as European Protected Species (EPS). Regulation 41 (1) makes it an offence to:

- Deliberately capture or injure a EPS;
- Deliberately disturb a EPS;
- Deliberately take or destroy the eggs of a EPS; and/or
- Damage or destroy a breeding site or resti0ng place of a EPS.

1.12. All British bats are listed in Schedule 5 of the WCA. Section 9 of the WCA affords protection to Schedule 5 animals against:

- Intentional killing, injuring or taking;
- Possessing (including parts or derivatives);
- Intentional or reckless damage, destruction, or obstruction of any structure or place used for shelter, or protection; and/or
- Selling, offering or exposing for sale (alive or dead, including parts or derivatives).

1.13. All British bats are also listed at Schedule 6 of the WCA, and as such under Section 11 (1) of the WCA cannot be killed or taken by certain methods, such as traps and nets, poisons, automatic weapons, electrical devices, smoke / gases etc.

1.14. Several British bat species are listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, which states that decision-makers such as Local Planning Authorities must have regard to Species of Principal Importance (SoPI) in all their activities, including when making decisions on planning applications.

1.15. The following bat species are SoPIs: barbastelle *Barbastella barbastellus*, Bechstein's *Myotis bechsteinii*, brown long-eared *Plecotus auritus,* greater horseshoe *Rhinolophus ferrumequinum*, lesser horseshoe *R. hipposideros*, noctule *Nyctalus noctula,* and soprano pipistrelle *Pipistrellus pygmaeus*. These are the species found in England which were identified as requiring action under the UK Biodiversity Action Plan (UKBAP) and which continue to be regarded as conservation priorities under the UK Post-2010 Biodiversity Framework.

1.16. The local plan for London and Camden, namely London Plan Policy 7.19, draft London Plan Policy G6 and Camden Policy A3, states that development within the area should not adversely affect local biodiversity.

Section 2: Methodology

2.1. The surveys followed standard methodologies set out in the Bat Mitigation Guidelines (Mitchel-Jones, A. J., 2004), the Bat Workers Manual (Mitchell- Jones, A.J. and McLeish, A.P., 2004) and Bat Surveys – Good Practice Guidelines 3rd Edition (Collins, 2016). The methods broadly comprise the following:

- Desk Study - acquiring records of bats and/or bat roosts within the local area; and
- One emergence survey conducted on building B2 and B4, both of which possess potential bat roost features that are to be affected by development proposals, to assess whether roosting bats are present.

2.2. Records of bats within 2km of the site were requested and received from the Green Space Information for Greater London (GIGL) on the 28th April 2020.

2.3. Buildings B2 and B4 were considered to have a low potential for roosting bats and so in line with best practice guidelines (Colins, 2016), were subject to one emergence survey on the 30th June 2020.

2.4. Surveyors were positioned strategically to ensure that the potential bat roost features were covered adequately for both buildings (see **13175/P02b**). Surveyors remained in these positions, observing the buildings from 15 minutes before sunset, through until 1.5 hours after sunset. **Table 2.1** shows the metadata for this emergence survey.

2.5. Surveyors used a combination of visual observations and echolocation detection to identify any bats emerging from the buildings. The type of detector used is detailed within the raw data in **Appendix 1**.

Date	**30/06/20**	
Sunset:	**21:21**	
Buildings surveyed	**B2 and B4**	
Weather at:	**Start time: 21:06**	**End time: 22:51**
Cloud Cover (%):	100	100
Wind (Beaufort Scale):	2	1
Precipitation:	Sporadic very light drizzle for first 30 minutes	0
Temperature (°C):	18	17

Table 2.1: Date and weather conditions during the emergence survey.

Limitations

2.6. Bats use a variety of roosts, ranging from maternity, mating or swarming and hibernation roosts containing a large number of individuals, to mating or night-time feeding roosts containing low numbers or individual bats. Bats also tend to be nomadic (although are faithful to certain favoured roosting sites), spending variable lengths of time in a variety of roosts. As a result, even after considerable survey effort it is possible that small transient roosts of bats may have been missed, although these tend to be less important to bats and so should not affect the evaluation and recommendations made.

2.7. Bat surveys are subject to numerous variables. The echolocation calls of species such as brown long-eared bats are of low amplitude and may not always be picked up on bat detectors. Survey results represent a sample of bat activity for the duration of the survey.

2.8. Bat calls cannot always be identified to species level, either due to distant contacts or the similarity between some types of bats. Where this occurs, it is recorded as 'unidentified bat species' (Unid) or will show which genus the bat species is likely to belong to (e.g. Pipistrelle sp. / Myotis sp.).

2.9. A small section of the buildings was not accessible to survey during the Phase 1 habitat survey (see TN1 on the Habitat Features Plan 13175/P01a). As much of the area was surveyed as possible from the limited view available. Additionally, due to current Covid-19 guidance, an internal inspection of the buildings was not undertaken. However, considering the built-up urban landscape and the fact that the majority of the roof space found on all five buildings contains no roof voids, based on professional judgement, it is considered that these factors did not present a significant limitation on the survey.

2.10. Although there was some sporadic and very light drizzle during the first thirty minutes of the survey, it was not considered significant enough to abort the survey. Furthermore, there was no rain during the key time of the survey, which was thirty minutes after sunset for emerging common and soprano pipistrelles, which considering the context of the site, where considered to be the most likely species present. Excluding the sporadic drizzle at the start of the survey, the weather conditions were optimal during the survey visit and therefore do not pose any limitation to the interpretation of the survey results.

Quality Control

2.11. All ecologists at Tyler Grange Ltd are members of CIEEM and abide by the Institute's Code of Professional Conduct

Section 3: Results

Desk Study

3.1. The data search returned records of three species of bat within the past 10 years. This included, Nathusius's Pipistrelle Pipistrellus, common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus* and six records of unknown bat species. A summary of the bat records returned by the data search is presented in **Table 3.1**.

Species	Number of Records	Approximate Distance and Direction of Nearest Record	Date of Most Recent Record
Nathusius's pipistrelle	1	0.7km north	2011
Common pipistrelle	15	0.2km north west	2018
Soprano pipistrelle	4	0.4km south east	2013
Unknown bat species	6	0.4km east	2016

Table 3.1: List of bat records returned by the data search within the past 10 years.

3.2. Three European Protected Species Licenses (EPSL) have been granted for bats within a 2km radius and are listed in **Table 3.2.**

Case reference of licence	Species to which the licence relates	Start and end date	Notes or description of licence
2014-6253-EPS-MIT	Common pipistrelle	19/02/2015-31/03/2020	License allows destruction of a roosting place.
2014-6253-EPS-MIT-1	Common pipistrelle	11/09/2015-01/03/2020	License allows destruction of a roosting place.
2017-30911-EPS-MIT	Soprano pipistrelle	11/09/2017-04/09/2022	License allows destruction of a roosting place

Table 3.2: List of EPSL granted within a 2km radius of the site

3.3. The license referenced 2014-6253-EPS-MIT was granted approximately 0.47km north from site and ran from 2015 to 2020.

Detailed Roost Survey

3.4. One emergence survey was undertaken on buildings B2 and B4 by Rebekah Baker and Daniel Lock, experienced ecologists and qualifying members of CIEEM and Abigail Long and Aaron Dore.

3.5. There was no evidence of bats using either building B2 or B4 for roosting during the dusk survey and no emergences were recorded.

3.6. One commuting common pipistrelle was recorded during the survey. This bat was not observed and was only heard using a bat detector.

3.7. It should be noted that the missing light fitting at the entrance to building B4 has now been replaced and no longer presents a suitable potential roost feature.

Section 4: Discussion and Recommendations

Site Proposals

4.1 The proposals are for the demolition of 247 Tottenham Court Road, 3 Bayley Street, 1 Morwell Street, 2-3 Morwell Street and 4 Morwell Street and the erection of a mixed use office led development comprising ground plus five storey building for office (Class B1) use, flexible uses at ground and basement (Class A1/A2/A3/B1/D1/D2), residential (Class C3) use, basement excavation, provision of roof terraces, roof level plant equipment and enclosures, cycle parking, public realm and other associated works .

4.2 The potential impacts of the development on bats are described below alongside relevant recommendations for mitigation and ecological enhancements.

Potential Impacts

4.3 As no emergences were observed during the survey on the 30th June 2020, buildings B2 and B4 are not subject to legal protection with respect to bats and as such no mitigation is required for their removal. It is considered that the demolition of the five onsite buildings will not have any impact on any local roosting bat populations.

4.4 Furthermore, the site currently offers no valuable foraging habitat for bats and as such it is considered that the demolition of the building will not have any impact on foraging bats that may exist in the vicinity of the site or within the wider landscape.

4.5 The site is situated in an already well-lit location in central London and the baseline light conditions surrounding the site are high, As such, it is not considered that the proposals will have any measurable impact on the lighting conditions around the site.

4.6 Overall, it is considered that the proposals will have no impacts on the local bat population.

Mitigation

4.7 No mitigation is necessary to facilitate the demolition of the five on site buildings. If the demolition/refurbishment of the buildings occurs more than 12months following the completion of the survey, repeat surveys will potentially be required before any works can take place to ensure that no protective legislation is triggered if bats are found to be later using the building.

4.8 Although there will be no requirement to apply for an EPSL to enable the development to proceed, in the unlikely event that bats are discovered during any aspect of the demolition process, then works must cease immediately and advice must be sought from a licensed bat ecologist.

Enhancements

4.9 The proposals offer the opportunity to enhance the site for bats post-development.

4.10 Roosting opportunities could be provided at the site through installing either exterior bat boxes at the site post-development, such as the Schwegler 1FF bat box, or by incorporating internal bat boxes within the scheme design, such as the Ibstock Enclosed bat box “C”. Any bat boxes integrated into the site design should be installed in suitable locations on proposed buildings (See **Appendix 2** for more details on bat box specification).

4.11 The development of the site could also provide foraging opportunities for bats through the incorporation of green roofs or walls, which where possible should support native planting. As well as increasing the amount of insect forage available for bats, green roof and wall planting is in line with the London plan Policies 5.10 and 5.11 and the draft London plan Policies G1 and G5.

4.12 These enhancements could be integrated into the scheme design and would be in line with the London plan Policy 7.19, draft London plan Policy G6 and the Camden Local Plan Policy A3, which state that proposals should create enhancements for biodiversity. Furthermore, enhancements for bats will be in line with both the London Biodiversity Action Plan (BAP), Camden BAP and the Camden Planning Guidance on Biodiversity which recommends the incorporation of green walls and bat boxes into scheme designs.

Section 5: Conclusion

5.1 The results of the emergence survey on buildings B2 and B4 indicate that it is unlikely that bats are using these buildings as roosting sites. As such, these two buildings (along with all buildings on-site) can be demolished without obtaining an EPSL. In the event that demolition is delayed, and the works do not take place within a 12-month time frame from the completion of the emergence survey, an update survey is potentially required.

5.2 In the unlikely event that a bat roost is discovered during demolition the works should cease and liaison with Natural England should be made in order to plan the appropriate plan of action.

5.3 It is considered that there are no ecological issues that would affect the proposed development at the site. If the suggested enhancement measures are followed, the development should comply with relevant legislation, the NPPF and local planning policy, namely the London plan Policy 7.19, draft London plan Policy G6 and the Camden Local Plan Policy A3, which seek to protect and enhance ecological features.

5.4 In addition, it is considered that the development proposals offer the opportunity to enhance this currently innocuous site for bats by creating new habitats through ecologically minded soft landscaping and through the incorporation of bat boxes to provide an increase in foraging and roosting opportunities.

References

Chartered Institute of Ecology and Environmental Management (2018). *Guidelines for Ecological Impact Assessment in the UK and Ireland, 2nd Edition*. http://www.cieem.net/ecia-guidelines-terrestrial-. Chartered Institute of Ecology and Environmental Management, Winchester.

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

Joint Nature Conservation Committee (2010). *Handbook for Phase 1 habitat survey - a technique for environmental audit*. JNCC, Peterborough.

Jones, J. (2000) *Impact of Lighting on Bats*. Bat Conservation Trust, London.

Appendix 1: Raw Bat Survey Data

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A1.1 See **13175/P02b** for bat surveyor locations.

Emergence Survey 30th June 2020

Surveyors: Rebekah Baker and Daniel Lock		
Date: 30/01/20		
Survey: Dusk		
Building: B2 and B4		
Surveyor Location: SL1		
Equipment used: Bat Box Duet with a Zoom recorder		
Sunset time: 20:21	Start time: 21:06	End Time: 22:51
Weather	At Start	At End
Cloud Cover (%):	100	100
Wind (Beaufort Scale):	2	1
Precipitation	Sporadic and very light drizzle for first 30 minutes	0
Temperature (C°)	18	17
Notes: One common pipistrelle pass was heard at 22:18. No emergences were observed, and no foraging bats were observed.		

Surveyors: Abigail Long and Aaron Dore		
Date: 30/01/20		
Survey: Dusk		
Building: B2		
Surveyor Location: SL2		
Equipment used: Bat Box Duet with an Ediroll recorder and Anabat Express		
Sunset time: 20:20	Start time:	End Time:
Weather	At Start	At End
Cloud Cover (%):	100	100
Wind (Beaufort Scale):	2	1
Precipitation	Sporadic and very light drizzle for first 30 minutes	0
Temperature (C°)	18	17
Notes: No emergences were recorded, and no bats were recorded throughout the survey.		

Appendix 2: Bat Box Specifications

Appendix 2: Bat Box Specifications

A2.1 External bat boxes (such as the Schweglar 1FF bat box) could be installed onto the walls of the site post-development or internal bat boxes (such as the Ibstock Enclosed bat box “C”) could be integrated into the scheme design. These boxes offer suitable roosting conditions for crevice dwelling species such as common and soprano pipistrelle.

Figure A2.1: Schweglar 1FF bat boxes (image from: http://nhbs.com/)

Figure A2.2 Ibstock Enclosed bat box “C” (image from: http://nhbs.com/)

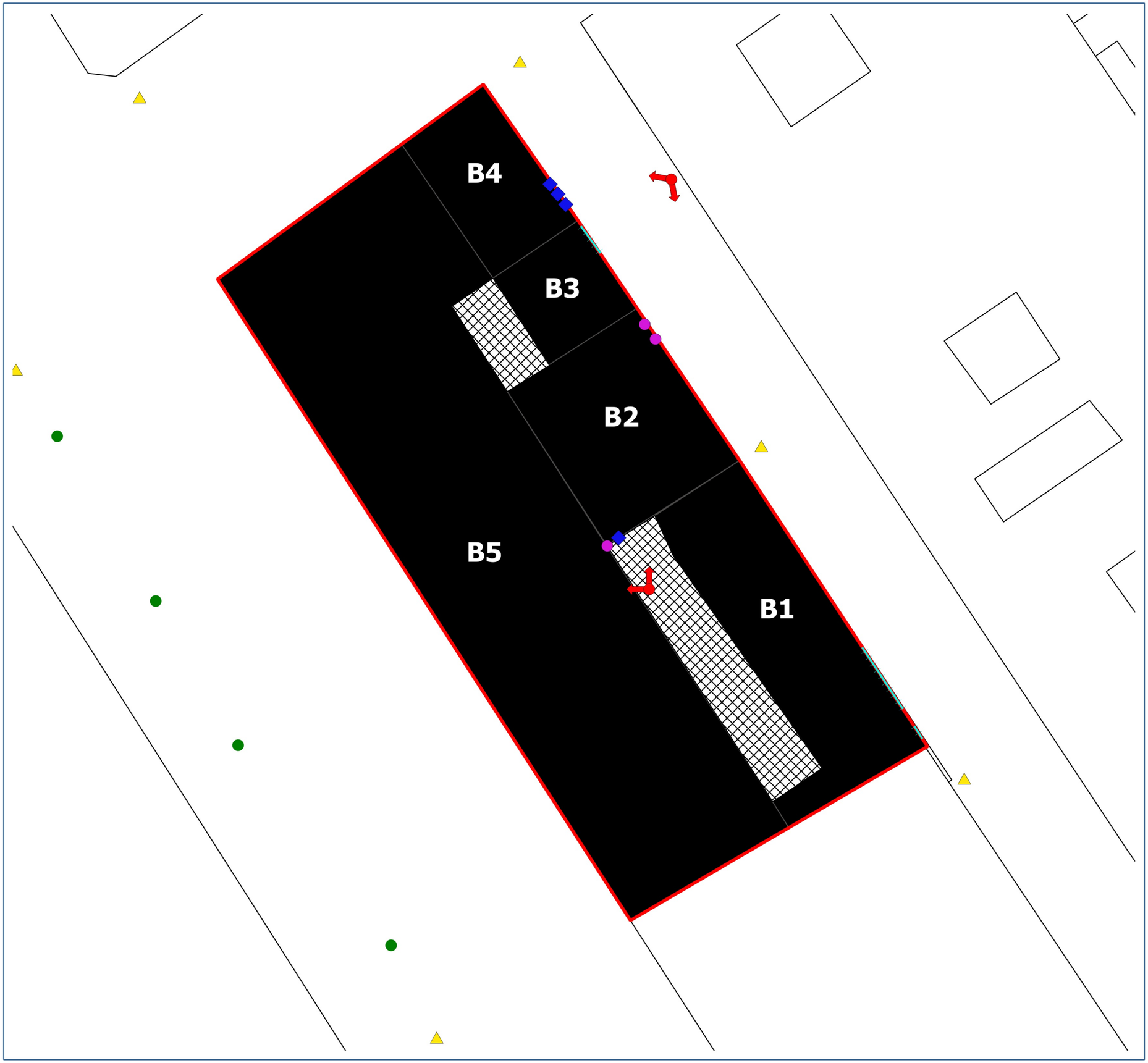
A2.2 The bat boxes should be installed at least 4m off the ground and positioned with an unobstructed approach. If possible, they should be placed where there will be no lighting directed towards them.

A2.3 As temperature is known to be an important factor influencing the success of artificial roost boxes (BCT, 2016 the boxes are to be sited on the south, west and east aspects of trees or buildings to receive maximum amounts of sunlight and warmth.

Plans

Plan 1: Habitat Features and Potential Bat Roost Features Plan – 13175/P01a

Plan 2: Bat Survey Locations Plan – 13175/P02



- Red Line Boundary
- Building
- Gate
- Hardstanding
- London Plane

Bat Features

- Gap under Roof Sheeting
- Motar Gap
- Street Lamp
- Bat Surveyor Location

N

0 10 m

Project	247 Tottenham Court Road and Morwell Street Properties
Drawing Title	**Bat Surveyor Location Plan**
Scale	As Shown (Approximate)
Drawing No.	13175/P02a
Date	July 2020
Checked	RB

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