Blenheim Estates

37-41 BRIGHTON ROAD, SHOREHAM-BY-SEA

Bat Survey Report

UK-70118838-002
MAY 2025

PUBLIC

Blenheim Estates

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Bat Survey Report

DRAFT (V1.0) PUBLIC

PROJECT NO. UK-70118838

OUR REF. NO. UK-70118838-002

DATE: MAY 2025

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QUALITY CONTROL

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	Draft for client review			
Date	May 2025			
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Signature	David.Blahout@wsp.com Digitally signed by David.Blahout@wsp.com DN: cn=David.Blahout@wsp.com Reason: I am the author of this document Date: 2025.05.16 14:57:18 +01'00'			
Checked by	Joel Rowlands			
Signature	Digitally signed by Rowlands, Joel (UKJER600) DN: cn=Rowlands, Joel (UKJER600), ou=Active, email=Joel.Rowlands@wsp.com Reason: Signed on behalf of Kate Taylor Date: 2025.05.16 15:02:40 +01'00'			
Authorised by	Verity Dickie			
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Project number	UK-70118838			
Report number	002			
File reference	\\uk.wspgroup.com\central data\Projects\70118xxx\70118838 - Kwik-Fit, Brighton Road, Shoreham\03 WIP\Ecology\Bat Survey\Report			

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EXECUTIVE SUMMARY

WSP UK Limited was commissioned by Blenheim Estates (the 'Client') to undertake a dusk emergence survey 37-41 Brighton Road, a car servicing and repair garage located in Shoreham-by-Sea ('B1'). The current plans include demolition of B1 within the Site. A Preliminary Ecological Appraisal (PEA) was completed by WSP in August 2024 which comprised a desk study, habitat walkover and a preliminary bat roost assessment (PBRA) of the Site. The PBRA identified nine potential roosting features (PRFs) within B1, which was assessed as having low overall suitability to support roosting bats in the active season.

To confirm roosting bat presence or likely absence within structure B1, WSP completed a dusk emergence survey of the building on 6 May 2025. No signs of bat activity or roosing bats were recorded during the survey. Therefore, roosting bats are likely absent from B1. Given the survey results, the low suitability of B1 for roosting bats and the unsuitable nature of the surrounding habitat, it is considered that the presence of roosting, foraging and/or commuting bats within the Site is unlikely. Timing of works should adhere to good practice guidelines and avoid the bat hibernation period (November – March inclusive). Otherwise, ecological supervision of works by a suitably experienced ecologist, including demolition of B1, may be required for the Proposed Development to proceed. No further mitigation or enhancement measures have been recommended for the Proposed Development.

1 INTRODUCTION

1.1 PROJECT BACKGROUND

1.1.1. WSP was commissioned by Blenheim Estates (the 'Client') to undertake a dusk emergence bat survey of 37-41 Brighton Road, a car servicing and repair garage located in Shoreham-by-Sea (Central OS Grid Reference TQ 22212 05113) (hereafter referred to as the 'Site'). An indicative Site boundary is shown in **Figure 1**. The 'Proposed Development' would involve the demolition of the existing commercial unit on Site and the construction of a new residential block with approximately 50 units within the established Free Wharf masterplan area.

1.1.2. The Site falls under 'Policy 8: Shoreham Harbour Regeneration Area' of the Adur Local Plan 2017. It is understood that this report will inform a future outline planning application of the Proposed Development.

1.2 ECOLOGICAL BACKGROUND

1.2.1. To inform the planning application, WSP undertook a Preliminary Ecological Appraisal (PEA) including a Preliminary Bat Roost Assessment (PBRA) survey in August 2024 (WSP, 2024). The PBRA survey comprised a ground level inspection of the existing structure to be demolished (B1) and identified any potential roosting features (PRFs) with suitability to support roosting bats (**Figure 2**).

DESK STUDY

1.2.2. As part of the PEA the desk study was undertaken to review existing ecological baseline information. In addition, freely available aerial photography was consulted to show Site habitats and the local context. The scope of the data collection was proportionate to the potential impacts of the Proposed Development.

1.2.3. No records of bat roosts within 2km of the Site were returned during the desk study, however, six foraging bat records were identified for common pipistrelle *Pipistrellus pipistrellus*, serotine *Eptesicus serotinus* and bats only identified to order level *Chiroptera*. No records of European Protected Species (EPS) licences for bats were found within 2km of the Site within the last 10 years.

HABITAT SURVEY AND PBRA

1.2.4. The Site does not provide suitable foraging habitat for bats due to its urban nature and limited vegetation. The building within the site (B1) has potential to support roosting bats and was assessed for its bat roost suitability during a ground-level external PBRA. Two buildings outside of the Site boundary but within the Survey Area were not able to be assessed due to lack of access. During the ground level inspection, B1 was found to contain nine PRFs in total (see **Figure 2**). The complete results of the PBRA with details of the individual PRF are summarised in the PEA (WSP, 2024).

1.2.5. Overall, the PBRA classified B1 to have low transitional roost suitability, negligible maternity roost suitability and low hibernation roost suitability.

1.2.6. In accordance with good practice guidance (Collins, J. (ed.), 2023), a single further survey visit during the active season (May to August) was recommended to confirm the presence or likely absence of roosting bats from B1 and the Site.

1.3 BRIEF AND OBJECTIVES

1.3.1. The Client commissioned WSP to complete bat dusk emergence surveys of the Site. The brief was to:

- undertake dusk emergence surveys on the building previously identified during the PBRA as having low suitability to support roosting bats, to establish the presence or likely absence of bat roosts on Site; and
- make recommendations as to how to account for roosting bats with respect to legislation and biodiversity policy, where appropriate.

1.3.2. This document provides the results of the dusk emergence surveys which were completed to establish the presence or likely absence of bat roosts on Site.

2 METHODS

2.1 OVERVIEW

2.1.1. The building on Site (B1) that is to be demolished was assessed to have a low suitability to support roosting bats during the active season. In line with best practice guidance (Collins, J. (ed.), 2023) (see **Tables 2-1**), buildings with 'low' roost suitability require surveying once between May and August.

Table 2-1 – Recommended minimum number of survey visits for presence/absence surveys to give confidence in a negative result for structures (as per Collins (ed.) (2023))

Low Roost Suitability	Moderate Roost Suitability	High Roost Suitability
One survey visit. One dusk emergence survey [A].	Two separate dusk emergence survey visits.	Three separate dusk emergence survey visits [B].

A. Structures that have been categorised as low potential can be problematic, and the number of surveys required should be judged on a case-by-case basis. In some cases, more than one survey may be needed, particularly where there are several buildings in this category.

B. Multiple survey visits should be spread out to sample as much of the recommended survey period as possible; it is recommended that surveys are spaced at least three weeks apart, preferably more.

Table 2-2 – Recommended timings for presence/absence surveys to give confidence in negative results for structures (as per Collins (ed.) (2023))

Low Roost Suitability	Moderate Roost Suitability	High Roost Suitability
May to August	May to September [A], with at least one survey between May and August [B].	May to September [A], with at least two surveys between May and August [B].

A. September surveys are both weather and location dependent. Conditions may become more unsuitable in these months, which may reduce the length of the survey season. September surveys are likely to miss maternity roosts due to dispersal before this time but may pick up mating roosts.

B. Multiple survey visits should be spread out to sample as much of the recommended survey period as possible; it is recommended that surveys are spaced at least three weeks apart, preferably more.

2.2 BAT DUSK EMERGENCE SURVEY

2.2.1. B1 was subject to a dusk emergence survey to watch and listen for bats emerging from the roost, if present. Surveyor locations were utilised to fully cover the potential roosting features present. The surveyor locations are shown in **Figure 3** with photographs in **Appendix A**.

2.2.2. The surveyors used Elekon Batlogger type M and type M2 bat detectors to listen to and record echolocation calls of bats observed. Infra-red (IR) cameras (Canon XA11 HD Camcorders with two IR illuminating lights) were also used to record the features during the survey to ensure bats were not missed during times of low light (Bat Conservation Trust, 2022). The cameras were positioned

adjacent to the building and IR illuminators placed on each camera and its respective stand to provide direct lighting to ensure appropriate illumination of PRFs during the survey after the sunset.

2.2.3. During the survey, surveyors mapped the flight-lines used by any bats observed emerging from the building(s) and noted any features used by the bats to exit the buildings. Incidental records of bat activity in the vicinity of the surveyor locations were also collected.

2.2.4. The level of survey effort employed was proportional to the level of potential for a bat roost to be present, with the number and timing of survey visits shown in **Table 2-1** and **Table 2-2** respectively. The dusk emergence surveys began 15 minutes before sunset and continued until 90 minutes after sunset.

2.3 DATES OF SURVEY AND PERSONNEL

2.3.1. The dusk emergence surveys were undertaken by experienced bat surveyors including lead surveyors with a minimum of four years' experience of ecological survey including extensive bat survey experience. Each of the surveyors has experience in undertaking bat emergence surveys with using IR cameras as night vision aids.

2.3.2. Survey site visit details for B1 are outlined in **Table 2-3** with meteorological data shown in **Table 2-4** below.

Table 2-3 – Dusk emergence survey dates

Building Reference	Bat Roosting Suitability	No. Survey Visits Required	Survey Details		
			Visit No.	Dates	No. of Surveyor Locations
B1	Low	1	1	06/05/2025	4

Table 2-4 – Survey visit meteorological data

Survey Date	Survey Times	Temperature (ºC)	Cloud Cover (Oktas)	Wind Speed (Beaufort scale)	Rainfall	Humidity %[1]
06.05.2025	Start - 20:15	13	6	3 (NE)	0	46

[1] Temperature and humidity readings were taken from Batlogger M2 detectors that surveyors used during the surveys.

Survey Date	Survey Times	Temperature (ºC)	Cloud Cover (Oktas)	Wind Speed (Beaufort scale)	Rainfall	Humidity %[1]
	End - 22:00	11	6	3 (NE)	0	58

2.4 NOTES AND LIMITATIONS

2.4.1. Best practice indicates that survey data is generally considered valid for up to 18 months (CIEEM, 2019). The data presented in this report enables an evaluation of bat activity within the Site at the time of survey.

2.4.2. The survey visit was completed outside of the bat hibernation period (November to March inclusive) when bats are active. The survey results therefore cannot inform on the likely absence of hibernating bats. However, this is not considered to be a limitation to recommendation of mitigation measures. In accordance with current good practice guidance (Collins, J. (ed), 2023), low suitability structures do not require an additional hibernation survey. Precautionary mitigation measures have been recommended in section 4.1 to account for potential presence of hibernating bats within B1.

3 RESULTS

3.1.1. No sign of bat activity or use of B1 by roosting bats was recorded during the dusk emergence survey from 6 May 2025. It is, therefore, concluded that transitional roosting bats are likely absent from B1.

4 IMPLICATIONS FOR DEVELOPMENT

4.1 OVERVIEW

4.1.1. The Proposed Development is unlikely to contravene relevant legislation and national and local planning policy due to the likely absence of roosting bats and the absence of bat activity within the Site and immediate surrounds. The legislation and policy summary below are provided for information purposes only.

4.1.2. In accordance with the good practice guidelines (Collins, J. (ed), 2023), it is recommended that demolition works of B1 are completed outside of the bat hibernation period (November to March inclusive). If the Proposed Development needs to be completed during the bat hibernation period, works are required to be undertaken under supervision of a suitably experienced ecologists. Soft-stripping parts of the building under ecological supervision may be required where a potential feature cannot be safely inspected prior to demolition.

4.1.3. If a bat is encountered, works must immediately pause and the bat must be protected and left in situ. A licence will likely be required by Natural England before the works can proceed and will require a detailed method statement.

4.1.4. No further mitigation or enhancement measures are currently required.

4.2 LEGISLATION

4.2.1. Bats and their roosts are afforded a high level of protection under the Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations'). The legislation 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.*

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

4.2.3. Due to the high level of protection afforded to bats and their habitat, mitigation for this species is governed by a strict licensing procedure administered by Natural England (normally, planning permission must be obtained before a licence can be sought). Licencing is subject to three tests, as defined under the Habitats Regulations. For a licence to be granted, the following criteria must be satisfied:

- The proposal is necessary '*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*';

- '*There is no satisfactory alternative'*; and
- The proposals '*will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range*'.

4.2.4. Certain species of bats recorded during the emergence surveys are also listed as a Species of Principal Importance (SPI) for the Conservation of Biodiversity in England under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. Under Section 40 of the NERC Act (2006) public bodies (including local planning authorities) have a duty to have regard for the conservation of SPI when carrying out their functions, including determining planning applications.

4.3 PLANNING POLICY

4.3.1. At the national level, the National Planning Policy Framework (NPPF) (2024) forms the basis for planning system decisions with respect to conserving and enhancing the natural environment, including bats. The ODPM circular 06/2005 also provides supplementary guidance, including confirmation that '*the presence of a protected species is a material consideration when a planning authority is considering a development proposal*'.

4.3.2. The NPPF (2024) made clear the expectations for development to achieve biodiversity net gain, including references to net gains in biodiversity in the following sections:

- *'Planning policies and decisions should contribute to and enhance the natural and local environment by…(d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures'* (paragraph 187);
- *'To protect and enhance biodiversity and geodiversity, plans should…(b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity'* (paragraph 192); and
- *'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.'* (paragraph 183).

4.3.3. At a local level, Policy 31 from the Adur Local Plan 2017 (Adur District Council, 2017) states that:

- *All development should ensure the protection, conservation, and where possible, enhancement of biodiversity, including nationally and locally designated sites, Biodiversity Opportunity Areas (BOAs), marine habitats and other Biodiversity Action Plan (BAP) habitat areas, wildlife corridors, and protected and priority species. If significant harm cannot be avoided (by locating development on an alternative site with less harmful impacts), then such harm should be adequately mitigated. Where it cannot be adequately mitigated then such harm must be compensated for. Where it cannot be compensated for, then planning permission should be refused.*
- *Nationally designated sites: Proposed developments which would adversely affect a Site of Special Scientific Interest (SSSIs) (individually or cumulatively) will not normally be permitted. Exceptions will only be made where the benefits of the development on the particular site clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts.*

- *Local Designations: Proposals for development in, or likely to have an adverse effect (directly or indirectly) on a Local Nature Reserve, Local Wildlife Sites (including ancient woodlands or wildlife corridors) or Regionally Important Geological/Geomorphological Site will not be permitted unless it can be demonstrated that reasons for the proposal outweigh the need to safeguard the nature conservation value of the site/feature.*
- *Where appropriate, the Authority will use planning conditions or obligations to provide appropriate enhancement and site management measures, and where impacts are unavoidable, mitigation or compensatory measures.*
- *Where relevant, new development adjacent to the Adur Estuary or the coast will have to demonstrate how it is addressing the issue of coastal squeeze.*

4.3.4. Furthermore, Policy 8 of the Adur Local Plan (Adur District Council, 2017) requires developments to *'protect and enhance the areas important environmental assets and wildlife habitats, and in particular minimise impacts to the Adur Estuary SSSI'*

4.3.5. Policy SH7 of the Shoreham Harbour Joint Area Action Plan (JAAP) (2019)[2] requires that all developments are required to include schemes to conserve, protect and enhance existing biodiversity such as the provision of bird nesting and bat roosting boxes.

[2] The JAAP forms part of the development plan for both Adur and Brighton & Hove and should be read in conjunction with the Adur Local Plan 2017, the Brighton & Hove City Plan Part 1 (2016) and the Brighton & Hove City Plan Part 2 (2022) Full details can be found at: https://www.adur-worthing.gov.uk/shoreham-harbour-regeneration/joint-area-action-plan/

5 CONCLUSION AND RECOMMENDATIONS

5.1.1. A survey of B1 was completed in line with best practice guidelines (Collins, J. (ed.), 2023). The results indicate the likely absence of roosting bats within the Site as well as commuting and foraging bats in its immediate surroundings.

5.1.2. Furthermore, the habitat surrounding the Site is considered to be of poor quality and is highly disturbed through artificial lighting and nearby road noise, making it unsuitable for transitional roosting, commuting and/or foraging bats.

5.1.3. Given the survey results and the highly disturbed nature of the Site, the overall presence of bats on Site is unlikely, therefore no further mitigation is required for the Proposed Development.

5.1.4. All works, including the demolition of B1, should be completed outside of the bat hibernation period (November to March inclusive). Otherwise, works may proceed under ecological supervision by a suitably qualified ecologist.

5.1.5. In the unlikely event where a bat is encountered during the Proposed Development, the works must be stopped immediately, and further steps are to be consulted with a suitably experienced ecologist before work may be resumed. A licence by Natural England with a detailed method statement may be required before the works can proceed.

5.1.6. No further mitigation has been recommended for the Proposed Development.

5.1.7. Additionally, no enhancement measures are recommended for the Proposed Development due to the likely absence of bats within the Site and the disturbed nature of the Site's habitat and its surrounding areas.

6 REFERENCES

- Adur District Council (2017). Adur Local Plan 2017
- Adur District Council (2019). Shoreham Harbour Joint Area Action Plan (JAAP), 2019
- Bat Conservation Trust (2022) Interim Guidance Note: Use of night vision aids for bat emergence surveys and further comment on dawn survey.
- CIEEM (2019) Advice note on the lifespan of Ecological Reports and Surveys. CIEEM, Winchester.
- Collins, J. (ed.) (2023). Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.
- HMSO (1981). Wildlife and Countryside Act (as amended by the Environment Act 2021).
- HMSO (2005). Biodiversity and Geological Conservation – Statutory Obligations and Their Impact Within the Planning System. Office of the Deputy Prime Minister (ODPM) Circular 06/2005 HMSO, Norwich.
- HMSO (2006). Natural Environment and Rural Communities Act.
- HMSO (2017). The Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitat Regulations).
- Ministry of Housing, Communities and Local Government (2024) National Planning Policy Framework (NPPF). (as amended 2025).
- WSP (2024) 37-41 Brighton Road, Shoreham-by-Sea, Preliminary Ecological Appraisal.

7 FIGURES

Figure 1- Site Location Plan

Figure 2 - Preliminary Bat Roost Assessment Results

Figure 3 - Surveyor Locations and Survey Results

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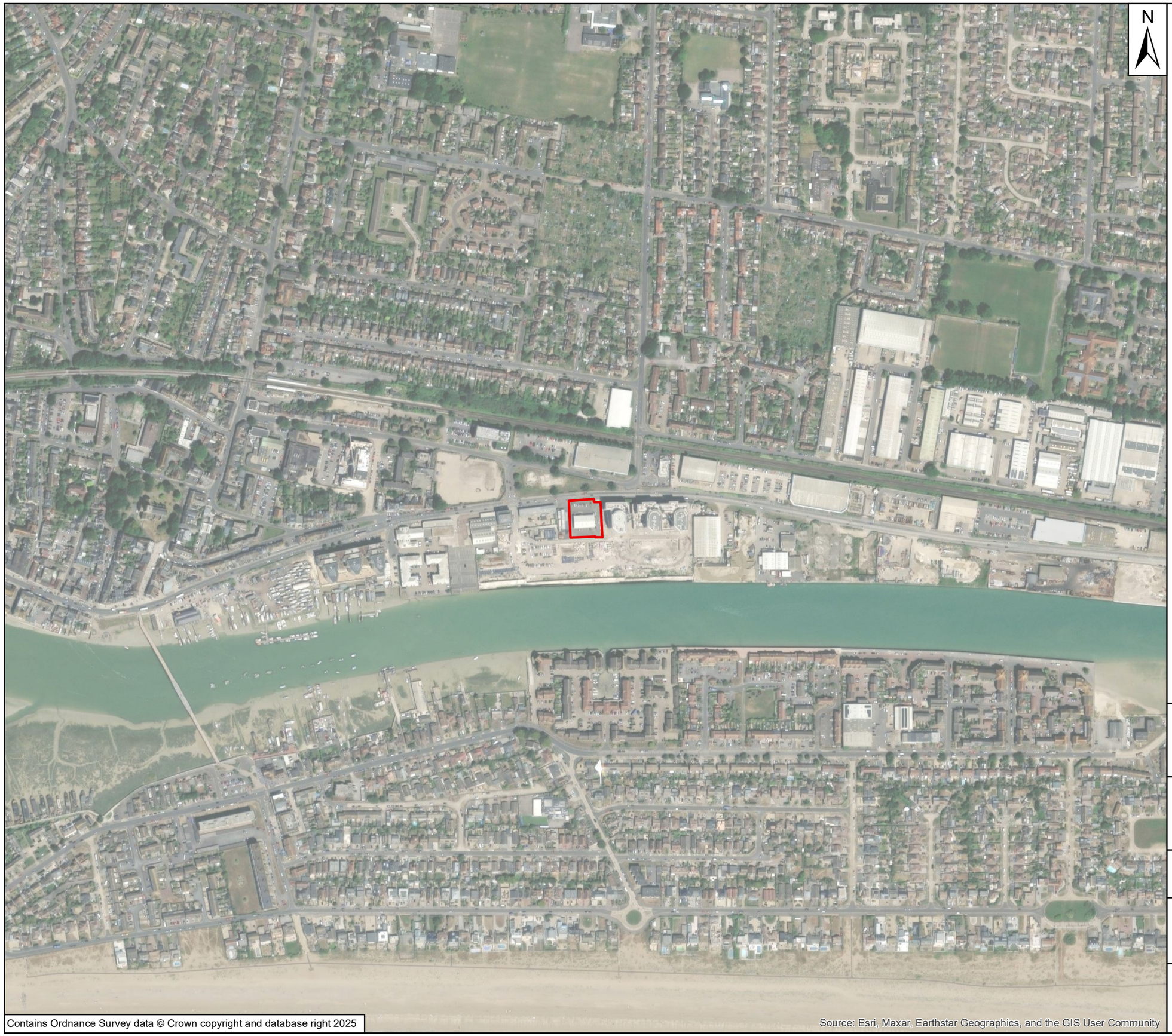

N

Key

Indicative Site Boundary

0 100 200

Metres

wsp

Client:

Blenheim Estates

Project:

37-41 Brighton Road, Shoreham-by-Sea

Title

Site Location Plan

Drawing No: Figure 1

Date: April 2025

Scale: 5,000 @ A3

Drawn: DB

Checked: CH

Approved: KT

Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

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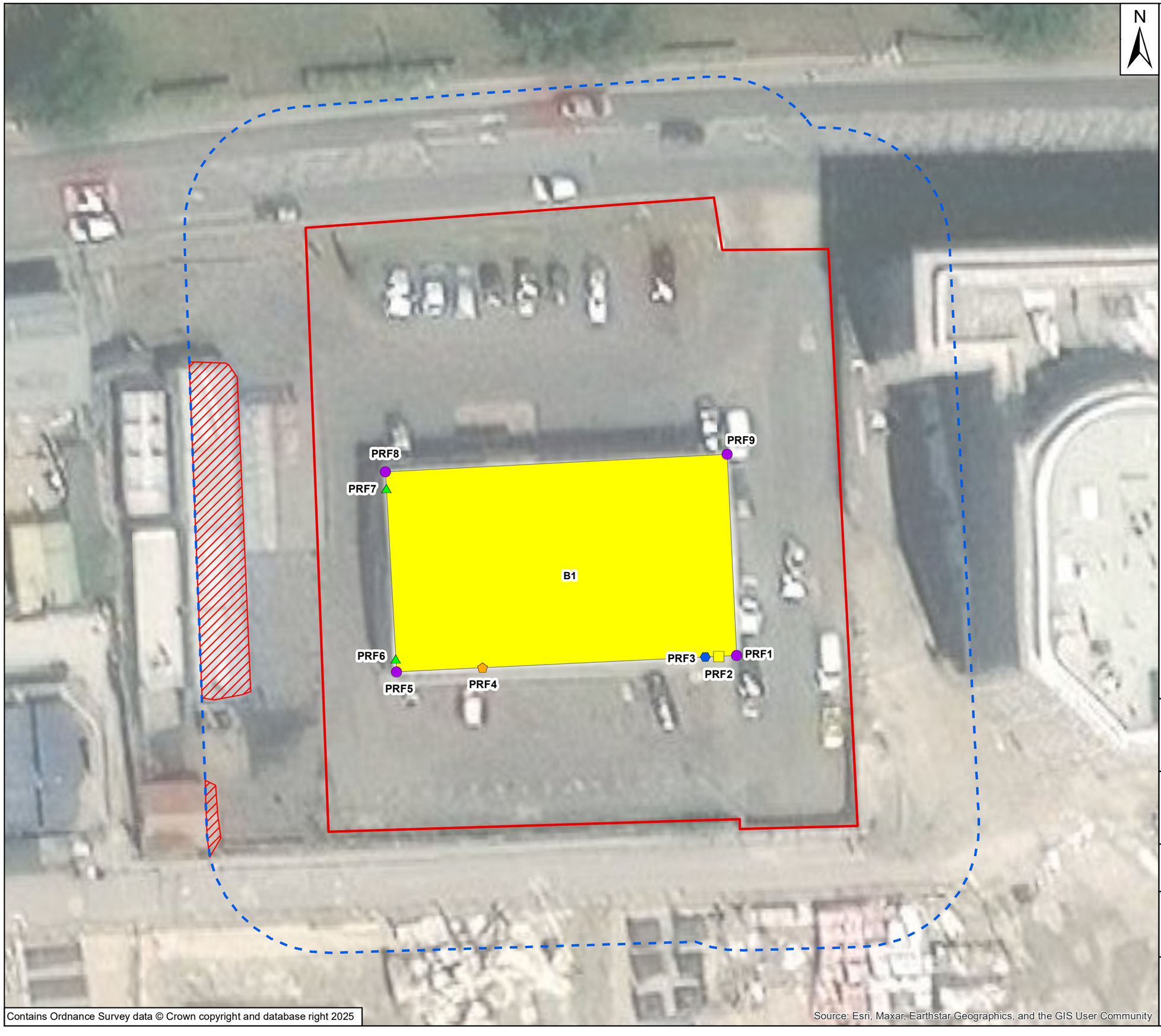

Key

- Indicative Site Boundary
- 10m Buffer

Bat Roosting Suitability

- Low
- No access

Potential Roosting Features

- A gap in metal cladding on corner of building
- A hole around a pipe
- A large gap within soffit
- An exposed grate
- Missing/damaged soffit

0 5 10
Meters

wsp

Client: Blenheim Estates

Project: 37-41 Brighton Road, Shoreham-by-Sea

Title: Preliminary Bat Roost Assessment Results

Drawing No:	Figure 2	Drawn:	JP
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Scale:	300 @ A3	Approved:	KT

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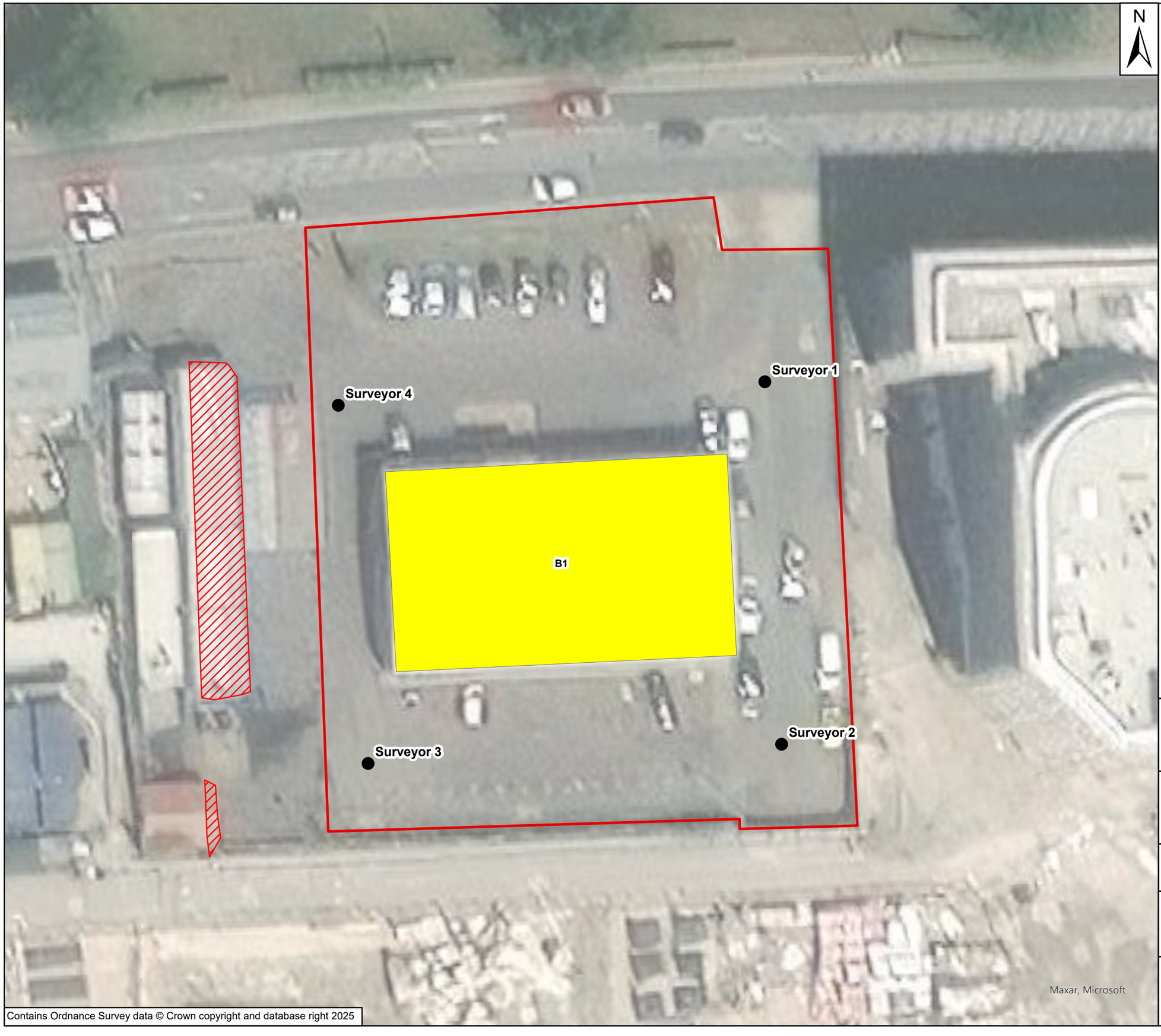

N

Key

Indicative Site Boundary

Bat Roosting Suitability

Low

No access

Surveyor Locations

0 5 10

Meters

wsp

Client:

Blenheim Estates

Project:

37-41 Brighton Road, Shoreham-by-Sea

Title

Surveyor Locations and Survey Results

Drawing No: Figure 3
Date: May 2025
Scale: 300 @ A3

Drawn: DB
Checked: JR
Approved: VD

8 APPENDICIES

Appendix A - Photographs

Appendix A

PHOTOGRAPHS

Table B-1 – Photographs of B1 and screenshots from the IR cameras

Building no.	Surveyor Location	Photograph
B1	1	
	2	
	3	

Building no.	Surveyor Location	Photograph
	4	

2 London Square
Cross Lanes
Guildford, Surrey
GU1 1UN

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