Bat and Bird Report

Bath Abbey, Bath City Centre

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NICHOLAS PEARSON ASSOCIATES

ENVIRONMENTAL DESIGN | LANDSCAPE ARCHITECTURE | ECOLOGY | VISUALISATION

npaconsult.co.uk npavisuals.co.uk +44 (0)1225 876990 The Farm House, Church Farm Business Park, Corston, Bath BA2 9AP

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	Name	Signature	Position	Date
Prepared by:	C Collier	CC	Graduate Ecologist	18/02/2025
Approved by:	D Harvey	DH	Associate Director	31/03/2025

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npaconsult.co.uk npavisuals.co.uk +44 (0)1225 876990

The Farm House, Church Farm Business Park, Corston, Bath BA2 9AP

Nicholas Pearson Associates Ltd. Registered Office: as above. Company Reg. No: 02715105. VAT Reg. No: 398 1148 22

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1.0 Introduction

1.1 This document has been prepared by Nicholas Pearson Associates (NPA) on behalf of Bath Abbey in relation to proposed works to the bell tower of Bath Abbey, Bath, BA1 1LT (OS Grid Reference: ST 75113 64773), hereafter referred to as the 'Site'.

1.2 Bath Abbey is located between Cheap Street (to the north) and York Street (to the south) in Bath city centre and covers a footprint of approximately 0.2 hectares (demarcated in red in Image 1 below). The Site comprises the footprint (Approx. 110m^2) of the bell tower (demarcated in blue in Image 1 below). The Site is set within an urban area, surrounding by commercial development interspersed with scattered greenspace. The River Avon is present approximately 135m to the east.

Image 1: Building subject to survey

1.3 Bath Abbey are proposing to remove and replace the existing lead roof covering of the bell tower with a new timber decking and EPDM (Rubber) membrane. The proposals also include the installation of new balustrade guarding, a new circular bench and a new raised walkway as shown on the Proposed Roof Plan (St Ann's Gate Architects Drawing no. 1280-07-350).

1.4 To inform the planning application, the bell tower was subject to a Preliminary Roost Assessment (PRA). This survey was extended to include a search for evidence of nesting birds. This report sets out the results of these surveys.

2.0 Methods

Preliminary Roost Assessment

2.1 An internal and external inspection of the bell tower was undertaken on the 21 January 2025 by a licenced bat ecologist and two assistants in accordance with Good Practice Guidelines[1].

2.2 The survey comprised a detailed external inspection of the bell tower roof and a detailed internal inspection of the belfry chamber to search for features suitable for roosting bats, potential exit/entry points and sign of bats (e.g. droppings, feeding remains). Any potential bat droppings collected during the inspection were later sent off for DNA analysis.

2.3 This part of the Abbey was then assigned a rating based on its potential to support roosting bats, as outlined below:

- Roost: Bats and/or evidence of bats recorded,
- High: one or more potential roosting sites that are obviously suitable for use by larger numbers of bats,
- Moderate: one or more potential roost sites, but unlikely to support a roost of high conservation status,
- Low: includes one or more potential roost sites that could be used opportunistically by individual bats,
- Negligible: no obvious habitat features on site likely to be used by roosting bats, but a small element of uncertainty remains, and
- None: complete absence of habitat features on site likely to be used by any roosting bats.

3.0 Legislation and Planning Policy

3.1 All species of British bat are fully protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) (W&CA 1981) and the Conservation of Habitat & Species Regulations 2017 (as amended), known as the Habitat Regulations.

[1] Collins, J (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines*. 4th Edition. London: The Bat Conservation Trust.

3.2 This legislation affords strict protection to bat roosts and makes it an offence to disturb bats in a way which would be likely to impair their ability to, survive, breed, reproduce, rear or nurture their young, hibernate, migrate; or affect significantly the local distribution or abundance of the species to which they belong.

3.3 Natural England are the government's advisors for the natural environment in England and are responsible for assessing and administering European Protected Species (EPS) mitigation licences under the Habitat Regulations, providing the three licensing tests, set out in this legislation, are met. These tests are:

- Regulation 53(2)(e) states: a licence can be granted for the purposes of "preserving 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(9)(a) states: the appropriate authority shall not grant a licence unless they are satisfied "that there is no satisfactory alternative".
- Regulation 53(9)(b) states: the appropriate authority shall not grant a licence unless they are satisfied "that 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."

3.4 All species of British bird, their nest and eggs are protected under the Wildlife and Countryside Act 1981 (as amended), making it an offence to intentionally kill, injure, or take any wild bird; take, damage or destroy the nest of any wild bird whilst it is in use or being built; or take or destroy an egg of any wild bird.

3.5 Species listen in Schedule 1 of this Act are afforded additional legal protection which makes it an offence to internationally or recklessly disturb wild birds whilst nesting, building a nest or in or near a nest that contains their young; or disturb their dependent young.

4.0 Results

Bats

Preliminary Roost Assessment

4.1 Table 4.1 below describes the features of the structure and any evidence of suitability for roosting bats.

Table 4.1: Assessment of Buildings Potential to Support Roosting Bats

Overview	
The bell tower has a footprint of approximately 110m^2 and is situated within a centralised position above the Abbey. The scope of the survey included the tower roof (Appendix 1; Photo 1) and the belfry chamber (Appendix 1; Photo 2). The belfry chamber is at least 35m above the ground and is subject to being lit by powerful uplighters. **Tower roof** 4 No. stone built decorative turrets at corners of tower. Roof accessed via a small (~150cm x 50cm) timber door on south-west turret. Tall decorative stone parapets with solar powered festoon lighting and wire mesh panels zip tied at lower levels. Floor constructed from lead with rubber matting above. Lead constructed 'weights cabinet' at side of north-east turret with timber panels on underside and small (~50cm^2) padlocked hatch at side. Flagpole in centralised position. **Belfry Chamber** Accessed via small timber door below south-west turret. Bells are typically switched on/the belfry is open to tour groups during the day. Ceiling – Timber constructed with horizontal beams, joists and panelling above and 3 No. larger, suspended timber beams approximately 50cm below wall plate. Windows – Traditional V-shaped windows with metal mesh and timber internal louvres at higher levels *i.e.* no glazing. Partly sealed with breeze blocks and timber boarding at lower levels. Floor – Timber panels with remnants of old fibreglass insulation. Timber bell supports and bell mechanism above. Lighting – Single roof-mounted hanging bulb and 6 No. wall-mounted floodlights.	
Element/elevation	**Description/evidence**
Tower roof	Gaps under lead flashing at edge of weight's cabinet. Potential access into belfry via small gap in timber hatch of the weight's cabinet (Appendix 1; Photo 3). Potential access into south-west turret via linear gaps at side of small roof access door (Appendix 1; Photo 4).
Belfry	Access into belfry via small gaps in metal mesh (Appendix 1; Photo 5) and below timber louvres (Appendix 1; Photo 6) on windows. Splits/cracks suitable for crevice dwelling species in timber ceiling beams below wall plate and in bell supports (Appendix 1; Photo 7). Small cavities/cut outs in stone wall. Gaps in timber floor panelling with access into intermediate chamber. A single potential bat dropping was collected from on top of one of the bell supports. Extent of potential cavities between the belfry ceiling and tower roof floor unknown but may be sufficient to support multiple roosting bats.

4.2 Whilst the proposed area of works is at a significant height and subject to high illumination and noise levels, based on the potential roosting features identified above, the tower roof and belfry chamber are considered to have the potential support a 'Moderate' status bat roost.

4.3 The dropping collected from the belfry could not be attributed to a particular species due to either the quality or quantity of the sample. Based on the characteristics of the dropping it was considered unlikely to have been a bat dropping *i.e.* it was sent for DNA analysis on a precautionary basis.

Birds

4.4 No signs/evidence of nesting birds were recorded and there are no entry points large enough for birds to gain access to the belfry chamber. The tower roof is considered unsuitable for nesting birds due to the high level of disturbance caused by the bells and tour groups.

5.0 Recommendations

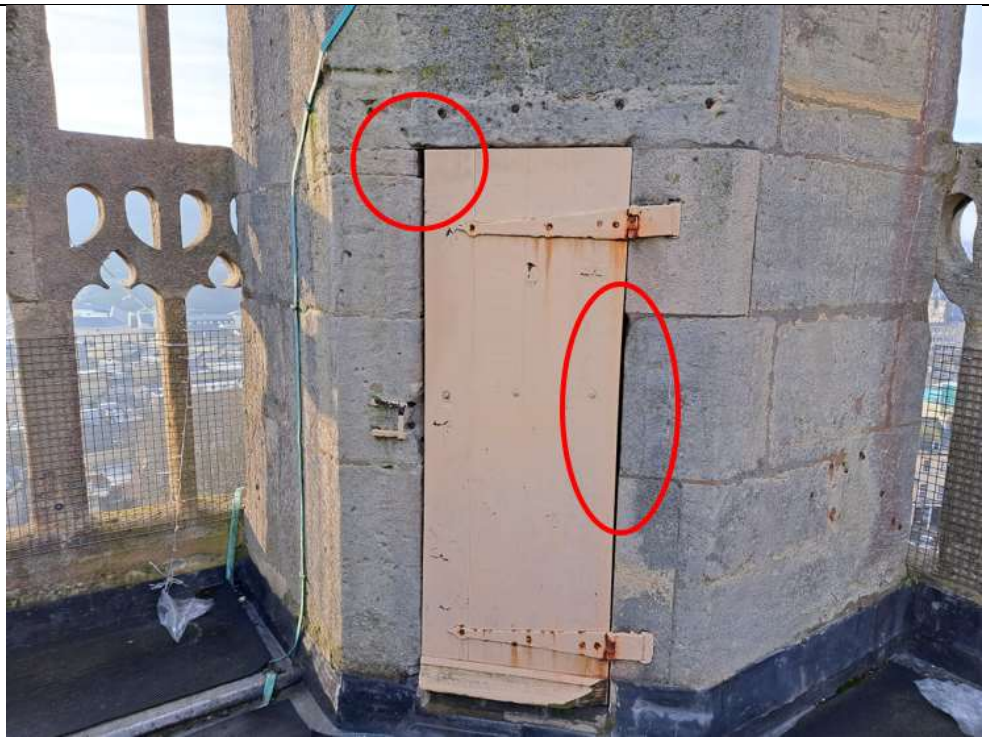
5.1 Whilst no definitive evidence of roosting bats was recorded, the tower roof and belfry chamber are considered to have the potential support a 'Moderate' status bat roost. In accordance with Good Practice Guidelines[1], 2 No. dusk emergence/re-entry surveys are recommended to determine their actual presence/absence ahead of the works. Such surveys are seasonally restricted to May – August/September.

5.2 If roosting bats are present, a licence would be gained to undertake the works and works would be undertaken utilising sensitive working measures, including:

- works that could disturb roosting bats avoiding the hibernation period, and potentially be restricted to the "shoulder months" dependant on the status of the roost,
- licensed bat worker overseeing potentially disturbing works, and
- bat roosting features replaced on a like for like basis to maintain the favourable conservation status.

Appendix 1: Photographs

Photo no.	
1.	 View of bell tower roof from south-east corner
2.	 Internal view of belfry

3.	 Access gap at side of timber hatch (leads to belfry)
4.	 Access gaps at side of roof access door (leads to stairwell/lower chambers)

5.	 Access into belfry through gap in metal mesh
6.	 Access into belfry through gap below timber louvre

7.	 Split/crevice in ceiling beam in belfry

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