St Paul's Church

Newport

Update Bat and Nesting Bird Survey

May 2022

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DOCUMENT CONTROL

St Paul's Church, Newport Update Bat Survey Report				
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Summary

Brief and Site Location	This report presents the findings of an update bat and nesting bird survey of St Paul's Church, 86 Commercial Road, Newport (Ordnance Survey Grid Reference: ST 3127 8760).
Proposed Works	Development proposals comprise the change of use of the church into residential apartments. The proposals are not anticipated to impact the external elevations of the building.
Survey Methodology	The survey comprised: • A daytime internal and external inspection of the church, searching for signs of bats and nesting birds. The inspection provides a preliminary assessment of the potential of the site to support roosting bats; and • A dusk emergence survey of the church.
Results of Preliminary Bat Roost Inspection	No signs of bats were found during the internal and external inspection of the church. The church is within a low-quality area for foraging and commuting bats.
Results of Dusk Emergence Survey	No bats were observed emerging from the church during the dusk emergence survey.
Evidence of Nesting Birds	Five dead pigeons were identified within the interior of the church, however, no evidence of past or current nesting by birds was noted either within or on the building's exterior.
Predicted Impacts of Development on Bats and Nesting Birds	Based on the conclusion that bats are unlikely to be using the church as a roost site, no negative impacts on bats are anticipated.
Mitigation and Compensation of Proposed Impacts	None required.
Licensing Requirements for Bats	None required.
Required Actions	Detailed recommendations are given in Section 6 of this report. These include precautionary methods and guidance for action to take if bats are found during the works.

1. Introduction

1.1. Brief and Site Location

This report presents the findings of an update bat and nesting bird survey of St Paul's Church, located at 86 Commercial Road, Newport (Ordnance Survey Grid Reference: ST 3127 8760). The church is within the boundary of Newport City Council.

1.2. Site Description

The church is situated within the centre of Newport. The immediate surroundings consist of residential and commercial properties. The wider environment consists of largely urban development, with small areas of woodland and parks.

1.3. Proposed Works

Development proposals comprise the change of use of the church into residential apartments. The proposals are not anticipated to impact the external elevations of the building. A planning application has been submitted under reference: FUL/00/0120[1].

1.4. Historical Works

Ethos Environmental Planning (Ethos) undertook a preliminary roost assessment and dusk emergence survey of St Paul's Church in 2019. They assessed the church as having low bat roosting suitability and no evidence of bats was found during the dusk emergence survey.

1.5. Legislation and Planning Policy

1.5.1. Bats

All UK bats are protected species. Their breeding sites or resting places[2] (roosts) are fully protected under the Wildlife and Countryside Act 1981[3] (as amended) and the Conservation of Habitats and Species Regulations 2017[4] which continues to apply in UK law through the Conservation of Habitats and Species (Amendment) (EU Exit) ['CHSAEU'] Regulations 2019[5]. Works affecting bats are subject to licensing procedures by Natural Resources Wales (NRW). The legal protection and licensing procedures are summarised in Appendix 1.

1.5.2. Nesting Birds

[1] 00/0120 | ERECTION OF 6 NO 1 BEDROOM & 2 BEDROOM FLATS (REVISION TO PREVIOUSLY APPROVED SCHEME) | St Pauls Church (Land Adj) Commercial Street Newport

[2] Resting places are defined as 'areas that are essential to sustain an animal or group of animals when they are not active' (Anon 2007).

[3] https://www.legislation.gov.uk/ukpga/1981/69

4 https://www.legislation.gov.uk/uksi/2017/1012/contents/made

[5] https://www.legislation.gov.uk/ukdsi/2019/9780111179512

All wild British birds (whilst building nests, nesting and sitting on eggs) and their nests and eggs, (with certain limited exceptions[6]) are protected by law under Section 1 of the Wildlife and Countryside Act 1981[7] (as amended) and the Countryside and Rights of Way Act 2000[8]. Some species, such as barn owls (*Tyto alba*), are listed in Schedule 1 and have additional protection from disturbance during the breeding season, as do their nests, eggs and dependent young.

1.6. Survey Scope

The survey comprised:

- A daytime internal and external inspection of the church, searching for signs of bats and nesting birds, and assessing the potential for bats to roost on site; and
- One dusk emergence survey.

1.7. Reporting

This report aims to:

- Outline the survey methodology used;
- Present the results of the survey;
- Provide an interpretation of the survey results;
- Determine the need for further targeted surveys; and
- Provide suitable recommendations in line with planning policy and wildlife law, including potential licencing requirements, mitigation, compensation and enhancement measures.

[6] Details of the exceptions are available at https://naturalresources.wales/permits-and-permissions/species-licensing/list-of-protected-species/bird-licensing/bird-licences/?lang=en

[7] https://www.legislation.gov.uk/ukpga/1981/69

[8] https://www.legislation.gov.uk/ukpga/2000/37

2. Methods

2.1. Desk Study

As the survey represents an update survey, no desk study was undertaken.

2.2. Field Study

2.2.1. Daytime Internal and External Inspection

A systematic search of the exterior and interior of the church was undertaken, looking for features that bats could use for entering/exiting and roosting[9]. In addition, a search was made for the presence of bats or evidence of bat use, such as droppings, feeding remains, urine staining, scratch marks and the remains of dead bats. The survey was undertaken on 24th May 2021 by Daisy Smith[10].

A high-powered torch (Clulite), an endoscope (Ridgid Micro CA-300), binoculars and a ladder were available for use, as appropriate during the survey.

2.2.2. Assessment of Bat Roost Suitability

The value of the site for bats (and any potential roost sites therein) was assessed, in accordance with Table 4.1 of the Bat Surveys for Professional Ecologists (Collins, 2016) (see Appendix 2). The assessment was based on the relative abundance and quality of potential roost sites, and the habitat features within both the site and the surrounding landscape suitable for roosting, foraging and commuting bats.

2.2.3. Dusk Emergence Survey

Four surveyors undertook the dusk emergence and dawn re-entry surveys: Daisy Smith, Emily Martin, Megan Parker and Richard Axenderrie. Surveyor details can be found in Appendix 5. The surveyors were both equipped with Elekon Batlogger M bat detectors, on both surveys.

Surveyors were positioned at viewpoints where they had good sight of all elevations of the venue, so that all potential roosting features could be observed to detect any bat emerging from, or re-entering the church. Bat activity near the church was also recorded to help ascertain flight lines.

In accordance with Section 2.6.1 of the Bat Conservation Trust's Bat Surveys for Professional Ecologists (Collins, 2016) surveys were undertaken during nights with temperatures above 10°C at sunset and during mornings where the previous sunset temperature was above 10°C. The surveys were also undertaken in the absence of rain and strong wind (5.4 m/s or greater, which is equivalent to 13 mph or Beaufort 4).

[9] Bats can utilise gaps approximately 8mmx17mm in size (The Bat Conservation Trust, Cluster-flies leaflet mentions 8mm by 20mm whilst the Bats and Buildings leaflet states 9mm by 17mm).

[10] Daisy graduated with a degree in Zoology from the University of Southampton. Daisy is currently in her first season of bat surveying, working as an Assistant Ecologist and receiving training from Acer Ecology. During her training she is undertaking numerous preliminary roost assessments on a range of different structures, under direct supervision. She is an accredited agent under Paul Hudson's bat licence (SO88190/8). Further details of her qualifications and experience can be found at https://www.linkedin.com/in/daisy-smith-0889561b3.

2.2.4. Survey for Nesting Birds

A visual search was undertaken for active bird nests, as well as any signs which might indicate either past or current nesting, such as guano, singing birds, birds carrying nesting material, food items, faecal sacs and calling chicks.

2.2.5. Constraints

Temporal Constraints

An ecological survey can only identify what is present on site at the time the survey is conducted. However, habitat usage by species can change over time.

Restricted Access Into The Voids

Not all parts of the voids could be inspected during the preliminary roost assessment. This is due to the height of the voids. In addition to this, as stated in the previous report by Ethos Environmental Planning the floorboards within the loft voids were unstable as a result of rot. Therefore, a visual inspection was undertaken using binoculars and torches to aid the assessment.

Data Search

A Local Records Centre (LRC) data search was not undertaken due to the low impact and small-scale nature of the development. Current proposals suggest no land will be lost or linear features severed. The overall impact on biodiversity is likely to be localised and of low significance. It is very unlikely that the development will have any impact outside the footprint of the works. The data search results are considered unlikely to impact the decision-making process, and there is limited potential for key information to have been missed.

This approach is consistent with CIEEM's Guidelines for Accessing and Using Biodiversity Data (2020), which states that in low impact/small-scale scenarios, such as the conversion of a building for residential use a LRC search may not be required.

3. Baseline Ecological Conditions

3.1. Field Study

3.1.1. Lighting and Ecological Context

Lighting

The site is within an E4: Urban lighting zone (Institute of Lighting Professionals, 2012), with extensive street lighting and a high level of artificial illumination.

Ecological Context

The habitats surrounding the site comprise residential streets and commercial buildings. The site itself is relatively ecologically isolated from the small areas of woodland within the wider landscape. Consequently, the site provides low-quality foraging and commuting bat habitat.

3.1.2. Building Description from the Perspective of Bat Habitat

The building has not changed significantly since the Ethos Ecology Bat Survey Report (2019).

Building Description St Paul's Church Extracted from *Ethos Ecology 2019 Bat Survey Report*

The structure is a large gothic three storey structure constructed of solid stone with sandstone surrounds around the openings and large stone quoins. The stonework is in good condition with the cement between the stonework being tight with no signs of damage or wear. The structure is complex in construction, with two transepts dissecting the main body of the structure, one located towards the western aspect of the structure and the other towards the east of the structure by the main entrance. A large hexagonal bell tower, with spire and similar construction to the main structure, is located on the eastern aspect of the structure. The bell tower is ornately decorated with carved stone and large archways upon the entrance. Large open windows are present on each aspect of the bell tower which provide internal access to the whole loft void within the structure. The roof is in good condition, comprising of a series of pitched roofs with slate tiles and lead flashing, all of which is in good condition. Five gables are present within the structure, four of which were present upon the end of the transepts whilst the fifth was located upon the western elevation of the structure.

Photo 1 – West and Southern Elevations

Photo 2 – Western Elevation

Photo 3 – Eastern Elevation with Bell Tower

Photo 4 – Northern Elevation

Photo 5 – Western Void

Photo 6 – Central Void

Photo 7 – Eastern Void

Photo 8 – Bell Tower

Potential Access Points for Bats in the Church

No potential access points for bats were recorded during the survey, as all windows and vents were covered with netting. The stone masonry of the church was also in good condition. This has resulted in there being no gaps of sufficient size to permit bats to access to potential roost sites.

Potential Roosting Features for Bats in the Church

One potential roosting feature was identified during the survey, this was the numerous raised roof tiles on the western elevation roof pitch.

3.1.3. Evidence of Bats

No bats or signs of bats were found anywhere in either the internal spaces or external parts of the church during the preliminary bat roost assessment.

3.1.4. Nesting Bird Survey

Five dead pigeons were identified within the interior of the church, however, no signs of recent nests or defunct nests were found within or on the exterior of the church.

3.1.5. Dusk Emergence and Dawn Re-entry Surveys

The results of the dusk emergence and dawn re-entry surveys are summarised below:

Table 1: Summary of Conditions During Dusk Emergence and Dawn Re-entry Surveys

	Survey 1 – Dusk Emergence
Date	25/05/22
Sunset/Sunrise Time	21:10
Start Time	20:40
Finish Time	22:40
Start Temperature (°C)	14
Rain	None
Wind (Beaufort scale)	4
Cloud Cover (Oktas)	3

Table 2: Summary of Dusk Emergence and Dawn Re-entry Surveys Results

	Survey 1: Dusk Emergence
Emergences/ Re-entries	No bats emerged from the building or interacting closely with the building.
Important Commuting/ Foraging Routes	One Common pipistrelle (*Pipistrellus pipistrellus*) were recorded foraging within the western front garden of the church.

Bat Activity[11]	Overall, low levels of bat activity were recorded.

[11] Activity thresholds have been quantified using personal judgement according to past experience of surveying similar sites.

4. Evaluation

4.1. Summary of Preliminary Roost Assessment

The survey found no evidence of bats roosting within or on the external parts of the church.

4.2. Birds – Interpretation of Nesting Bird Survey

No evidence of past or current nesting by birds was observed during the survey.

5. Impact Assessment

5.1. Potential Impacts of Development on Bats

Based on the conclusion that bats are unlikely to be roosting within the church, no negative direct or indirect impacts on bats are anticipated.

5.2. Potential Impacts of Development on Birds

Based on the conclusion that birds are unlikely to be nesting within the church, no negative direct or indirect impacts on birds are anticipated.

6. Required Actions

6.1. Further Work and Licensing Requirements for Bats

No further survey work is considered necessary. A bat development licence is not required as the survey indicates a likely absence of roosting bats in the church.

6.2. Precautionary Measures

No evidence of any use by roosting bats was recorded on site and it is therefore highly unlikely that bats or their roosts will be affected by the works. No precautionary timing conditions on works are required. However, it is not possible to rule out bat use entirely, and there is also a risk of an offence being committed if active birds' nests are present. The following recommendations are made to minimise risks to bats and birds:

- It will be clearly understood, and contractors made aware that in the event of any bats being found, the contractor must halt works (if bats are encountered, the bat will be carefully covered over again). Appropriate advice will be obtained from a suitably qualified bat consultant or Natural Resources Wales and, if necessary, a bat development licence obtained before work can resume;
- If any active bird nests are found these will be protected, along with an appropriate buffer zone of 5-10m, until the nesting is complete, and the young have fledged[1];
- Contractors will check for the possible presence of bats on the undersides of roofing tiles, fascias, soffits and bargeboards etc. as they are lifted off. This is especially important at the outset of the works, since once the works have started, the disturbance is likely to drive any bats which are present away voluntarily; and
- The services of an appropriately qualified and licensed ecological consultant will be available on an 'on-call' basis at all stages of the works to deal with any unexpected encounters with bats or nesting birds. Contact details of such will be held on site. Acer Ecology Ltd. could be retained to provide this support.

6.3. Longevity of Report

Survey data should ideally be from the last survey season before a planning or licence application is submitted, although the length of time that survey data remain valid should be decided on a case-by-case basis and is dependent upon several factors[12] (Collins, 2016). If development works do not begin within eighteen months to two years of the date of this report, an updated survey may be required in accordance

[12] The factors identified are as follows: Were the original surveys carried out according to good practice guidelines?; Were the original surveys constrained in any way?; Do the results of the original surveys support the original conclusions and are these still relevant?; Has the nature of the site or the surrounding area changed since the original surveys were undertaken; and are additional surveys likely to provide information that is material to a decision, the design of mitigation measures, or specific advice relating to a proposed activity.

with guidance in BS 42020:2013[13] and CIEEM (2019), to determine if conditions and bat usage has changed since described in the current report.

[13] As set out in Section 6.2.1, Point 7 which states that ecological information should not normally be more than two/three years old, or as stipulated in good practice guidance.

7. References

Anonymous (2007) *Guidance document on the strict protection of animal species of Community interest under the Habitats Directive 92/43/EEC*. Final version, February 2007.

BSI (2013) *BS 42020:2013 Biodiversity – Code of practice for planning and development.* British Standards Institution, London.

CIEEM (2019) *Advice Note on the Lifespan of Ecological Reports and Surveys* https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf

CIEEM (2020) *Guidelines for Accessing, Using and Sharing Biodiversity data in the UK.* https://cieem.net/wp-content/uploads/2016/03/Guidelines-for-Accessing-and-Using-Biodiversity-Data-March-2020.pdf

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

Eaton, M, Aebischer, N, Brown, A, Hearn, R Lock, L, Musgrove, A, Stroud, D and Gregory, R (2014) *Birds of Conservation Concern 4: the population status of birds in the UK, Channel Islands and Isle of Man. British Birds 108. December 2015. 708-746*. Available online at http://bit.ly/2h23DqV.

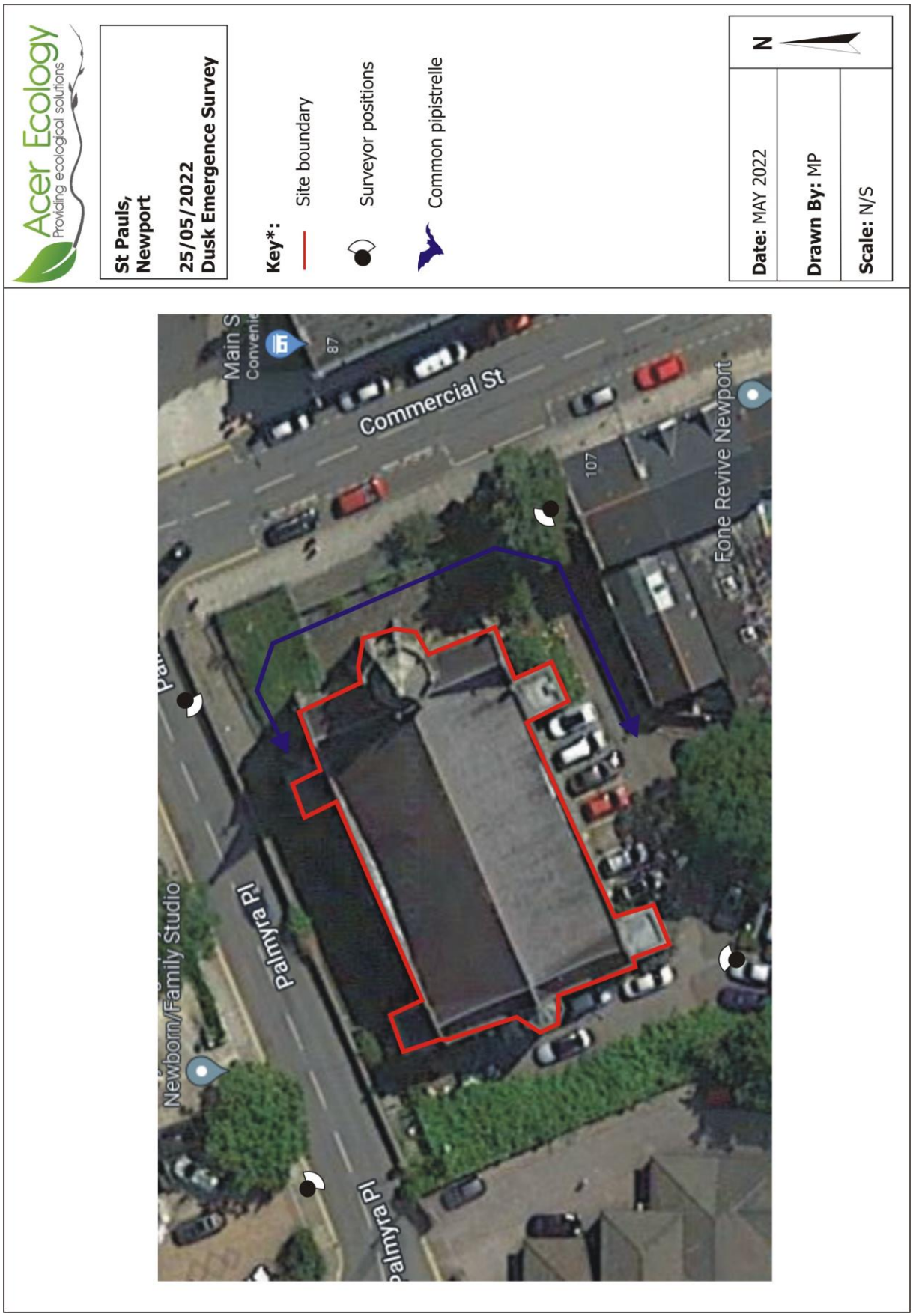
Institute of Lighting Professionals (2012) *Guidance for The Reduction of Obtrusive Light*.

Mitchell-Jones, A.J, & McLeish, A.P. Ed., (2004) *Bat Workers' Manual* (*3rd Edition).* Joint Nature Conservation Committee, Peterborough.

Mitchell-Jones, A.J. (2004) *Bat Mitigation Guidelines*. Natural England, Peterborough.

Plan 1: Location Plan – Ethos Ecology

Plan 2: Dusk Emergence Survey (25/05/2022)



Appendix 1: Bat Ecology and Legislation Protecting Bats and Their Roosts

Bat Ecology

There are 17 known breeding species of bat found in the UK, with additional species recorded as migrants or vagrants. They are all small, nocturnal, flying, insectivorous mammals that are under conservation threat with many have undergone massive population declines over the last century. Some species, such as common and soprano pipistrelle (*Pipistrellus pygmaeus*) are relatively common and widespread in the UK, while others, such as greater horseshoe (*Rhinolophus ferrumequinum*) bats, have an extremely restricted distribution.

Most bats will use a variety of roosts of different types throughout the year. The winter hibernation sites typically have cool, humid conditions with a stable microclimate and low levels of disturbance. Most British bats hibernate in caves or artificial structures that fulfil these requirements, such as mines, tunnels and cellars. Bats emerge from hibernation around late March or early April and move into transition or intermediary roosts. Around early May, female bats gather in colonies to form summer or maternity roosts, and it is here where they will give birth between late May and early July. A colony may consist of many individuals (sometimes hundreds of bats) of mixed age and sex. Roosts occur in a variety of habitat types, including tree-holes, caves, buildings and other secure crevices or internal spaces with appropriate stable temperatures and humidity. Bats may change roost locations many times during a year, and colonies may split up and reform during this period. Males occupy solitary roosts in autumn, to which they attract females for mating.

Legislation

All British bat species and any place used for shelter or protection, or as a breeding site or resting place (their roosts) are fully protected under the amended Wildlife and Countryside Act 1981 through inclusion in Schedule 5. The roosts are protected irrespective of whether bats are present at the time. All bats fully protected under the Wildlife and Countryside Act 1981 (as amended) and Conservation of Habitats and Species (Amendment) (EU Exit) ['CHSAEU'] Regulations 2019. The aforementioned legislation make it illegal to deliberately or recklessly:

- kill, injure or capture bats;
- disturb bats;
- damage, destroy, or obstruct access to bat roosts (including sites that are currently unoccupied);
- possess or transport a bat or any part of a bat unless acquired legally; or
- sell, barter or exchange bats or parts of bats.

Disturbance is defined as that which is likely to impair bats ability:

- to survive, to breed or reproduce, or to rear or nurture their young;
- to hibernate or migrate; or
- to significantly affect the local distribution or abundance of the species to which they belong.

Habitats Regulations Licensing

If a European Protected Species will be affected by a development, Natural Resources Wales (NRW) can issue licences under the Habitats Regulations to permit otherwise prohibited acts. Licences for certain activities can be granted providing "three tests" are satisfied, that is:

1. the purposes of "preserving public health or safety, or for reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment";
2. there must be "no satisfactory alternative"; and,
3. the derogation is "not detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range".

Where Planning regulations apply, NRW will only issue a licence after planning consent has been granted. The licence application will require the production of a detailed method statement, which sets out the activities to be carried out under the licence to minimise the risk of bats being harmed during construction works and ensure that bats will be conserved during the development of the site. This will need to detail the mitigation proposed (such as the replacement or compensation roost); the timescale and schedule of works, the number, size and locations of bat access points to be provided; the type of materials to be used (roofing material, roof lining, fascias, soffits, and bargeboards etc.); lighting proposals; action to be taken in the event bats are found during works; and a post-development monitoring programme. The method statement will need to be accompanied by scaled plans and maps detailing the bat mitigation features. A cross-section of the access points and roost space is often required. The method statement must ensure that provision is made for new or continued roosting opportunities after the completion of development works. In some instances, a method statement is requested by the Local Planning Authority or Natural Resources Wales before the planning application is determined.

Planning Policy Wales

Section 6.4 Paragraph 6.4.5 of Planning Policy Wales Edition 11 (2021) that focuses on Biodiversity and Ecological Networks, Section 6 of The Environment (Wales) Act 2016[14] that details the requirement for enhanced biodiversity and resilience of ecosystems, TAN 5 and Section 40(1) of the Natural Environment and Rural Communities Act (NERC) 2006 all encourage developments in Wales to provide a net benefit for biodiversity conservation with no significant loss of habitats or populations of species, locally or nationally.

Part 1, Section 7 of the Environment (Wales) Act 2016 provides a list of the '*living organisms of principal importance for maintaining and enhancing biodiversity in relation to Wales*'. This includes seven bat species (soprano pipistrelle, barbastelle (*Barbastella barbastellus*), Bechstein's (*Myotis bechsteinii*), noctule (*Nyctalus noctula*), brown long-eared (*Plecotus auritus*), lesser horseshoe (*Rhinolophus hipposideros*) and greater horseshoe bats (*Rhinolophus ferrumequinum*)).

[14] http://www.legislation.gov.uk/anaw/2016/3/contents

Appendix 2: Guidelines for Assessing Potential Bat Roosting Suitability and Determining Required Number of Dusk/Dawn Surveys

Suitability	Description of Roosting Habitat	Minimum Number of Dusk/Dawn Surveys Required[15]
Negligible	Negligible habitat features on site likely to be used by roosting bats.	None.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection appropriate conditions[16] and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity) or hibernation[17].	One survey visit. One dusk emergence or dawn re-entry survey (Survey period from May to August) (Collins 2016).
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status[18] (with respect to roost type only) the assessments in this table are made irrespective of conservation status, which is established after presence is confirmed.	Two separate survey visits. One dusk emergence and a separate dawn re-entry survey[19]. Surveys should be undertaken from May to September, with at least one of the survey between May and August (Collins 2016).
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for long periods of time due to their size, shelter, protection, conditions and surrounding habitat.	Three separate survey visits. At least one dusk emergence and a separate dawn re-entry survey. The third visit could be either dusk or dawn. Surveys should be undertaken from May to September, with at least two of the surveys from May to August (Collins 2016).
Confirmed Roost	Evidence of bats or use of bats found.	Three separate surveys recommended to characterise the roost. If no evidence of bat roosting is detected during the dusk and dawn surveys, DNA analysis of the droppings may be required.

[15] Adapted from Tables 4.1 and 7.3 of the Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2016).

[16] For example, in terms of temperature, humidity, height above ground levels, light levels or levels of disturbance.

[17] Evidence from the Netherlands shows mass swarming events of common pipistrelle bats in the autumn followed by mass hibernation in a diverse range of building types in urban environments (Korsten *et al.*, 2015). This phenomenon requires some research in the UK, but ecologists should be aware of the potential for large numbers of this species to be present during the autumn and winter in large buildings in highly urbanized environments.

[18] 'High roost status' is not defined within Collins, 2016. Acer Ecology Ltd. interpret maternity, hibernation, swarming sites, mating sites, and satellite roosts as being of 'high roost status' and exclude day roosts, night roosts, feeding roosts, transitional/occasional roosts from this definition. Pre-maternity/collecting roosts are not included within Collins, 2016 and will be assessed on an individual basis.

[19] Multiple surveys should be spread out to sample as much of the survey period as possible. It is recommended that surveys are spaced at least two weeks apart, preferably more. A dawn survey immediately after a dusk survey is considered only one visit.

Appendix 3: Guidelines for Assessing Bat Habitat Suitability

Suitability	Commuting and Foraging Habitat
Negligible	Negligible habitat features on-site likely to be used by commuting and foraging bats.
Low	Commuting Habitat Habitat that could be used by small numbers of commuting bats such as a gappy hedgerow or un-vegetated stream, but isolated, i.e. not very well connected to the surrounding landscape. Foraging Habitat Suitable but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	Commuting Habitat Continuous habitat connected to the wider landscape that could be used by bats for commuting, such as lines of trees and scrub or linked back gardens. Foraging Habitat Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	Commuting Habitat Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats such as river valleys, streams, hedgerows, lines of trees and woodland edge. Foraging Habitat High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Proximity to Known Bat Roosts The site is close to and connected to known roosts.