

Dusk Survey Results

October 2025

Project Reference: PR-25-0252

Wyndhowe
Sea Mill Lane
St. Bees
CA27 0BD

National Grid Reference: NX 9712 1113



Wyndhowe, Sea Mill Lane, St. Bees, CA27 0BD
Dusk Survey Results in Relation to Bats

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Executive Summary

As part of a proposed planning application with Cumberland Council (Copeland) concerning a development at a plot of land at Wyndhowe, Sea Mills Lane in St. Bees, Tyrer Ecological Consultants Ltd carried out a daytime preliminary roost assessment in relation to bats with an inclusive inspection for breeding birds in August 2025.

Following the Inspection & Assessment in relation to Bats & Breeding Birds with included Preliminary Roost Assessment (PRA) which categorised the building as pertaining to '**Low**' bat roost potential, Tyrer Ecological Consultants Ltd were recommissioned to undertake the recommended further bat survey; the single dusk emergence survey was carried out in August 2025, in accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023).

Bats

From the dusk survey results, it can be concluded that whilst using best practice survey methodology, emergence of bats was absent at Wyndhowe, with activity limited constant foraging and commuting by up to three common pipistrelle bats and a single soprano pipistrelle bat.

There are no further recommendations in relation to bats Wyndhowe.

Survey Validity

Bat emergence/re-entry surveys are typically **valid for a period of 12 – 18 months**; Ideally, the survey data should be from the most recent optimal survey season before a planning or licence application is submitted, however this is at the discretion of the Local Planning Authority and/or Natural England. Should your planning application not achieve consent, or a licence application (where required) not be applied for within this time period, updated surveys may be required.

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1.0 Background & Introduction

- 1.1 As part of a proposed planning application with Cumberland Council (Copeland) concerning a development at a plot of land at Wyndhowe, Sea Mills Lane in St. Bees, Tyrer Ecological Consultants Ltd carried out a daytime preliminary roost assessment in relation to bats with an inclusive inspection for breeding birds in August 2025.
- 1.2 The survey was commissioned by McDonald Wilkinson Tonge (MWT) Planning on behalf of their client Mr. Harry Hill; the exact scope of proposals are unknown but are likely to involve demolition of the existing structures with subsequent development of the site. See **Figure 1.1** for a location plan.

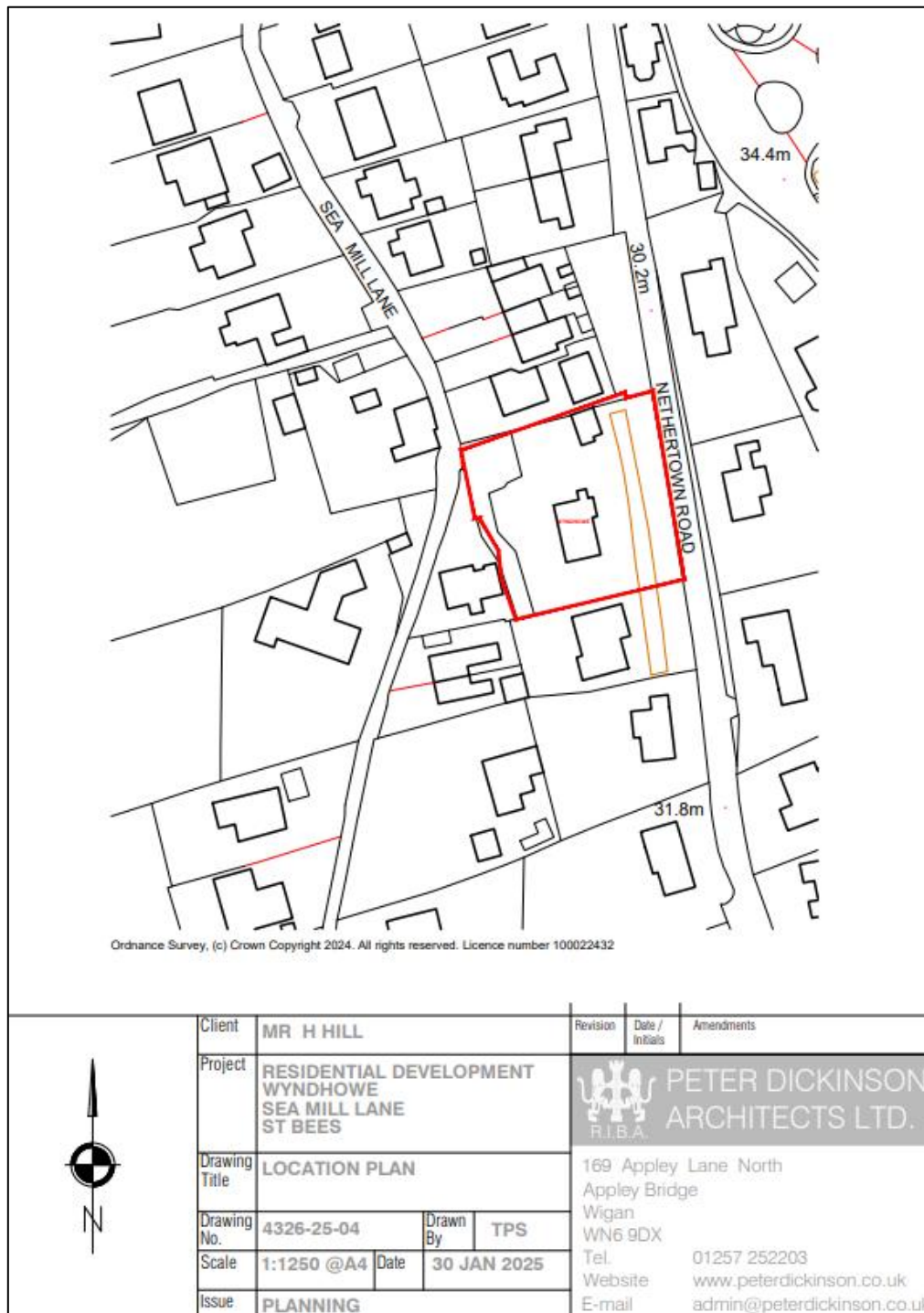


Figure 1.1 – Location plan (© Peter Dickinson Architects Ltd)

- 1.3 Included within the Inspection & Assessment in relation to Bats & Breeding Birds was a Preliminary Roost Assessment (PRA) of any built structures and trees on site in relation to bats. Based on the findings of the PRA, the main dwelling B1 is determined to pertain to a bat roost suitability of '**Low**', in accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023).

Table 7.2. Recommended minimum number of survey visits for presence/absence surveys to give confidence in a negative result for structures (also recommended for trees but unlikely to give confidence in a negative result).		
Low roost suitability or PRF-I	Moderate roost suitability	High roost suitability or PRF-M
One survey visit. One dusk emergence survey ^a (structures). No further surveys required (trees).	Two separate dusk emergence survey visits ^b .	Three separate dusk emergence survey visits ^b .

Figure 1.2 – BCT extract on 'Low' suitability survey implications

- 1.4 Tyrer Ecological Consultants Ltd were therefore recommissioned to undertake the recommended further bat survey; the dusk emergence survey was carried out in August 2025, in accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023).
- 1.5 The survey aimed to identify the presence or reasonably conclude the absence of bats within the buildings. The results, conclusions and recommendations following the survey, including any indicative mitigation to inform an application to Natural England for a European Protected Species Mitigation Licence (EPSML), where necessary, will be supplied within this report.
- 1.6 This report should be read, understood and presented to the local authority as an additional document to **Appendix I** (see Contents page).

2.0 Bats – Legislation & Policy

2.1 All British bats and their **roosts are afforded full protection under the Wildlife & Countryside Act (1981) (as amended) and are listed in Schedule 2 of the Conservation of Habitats and Species Regulations (2017) (as amended). When dealing with cases where an EPS (all UK bats) may be affected, a planning authority is a competent authority within the meaning of Regulation 7 of the Regulations, and therefore has a statutory duty, as the local authority, to have due regard to the provisions of the Regulations in the exercise of its functions.

2.2 Uses of Buildings by Bats

- a) Summer breeding roost, and day/occasional roost (May – August)
- b) Hibernation roost (October – March)
- c) Transitional or temporary roost (other months)

2.3 Roost selection is often closely correlated to suitable foraging habitat within a reasonable commuting distance from the roost and different sites are used depending upon insect densities and abundance; climatic conditions can also affect their ability to successfully forage. All British bats are insectivorous.

*** The term roost is generically referred to as a place that bat/s use for the any of the above reasons, however it should be noted that under the Conservation of Habitats and Species Regulations (2019) (EU Exit) (Regulation 43 (d) the term roost is not used but refers to “a breeding site or resting place of such an animal” and is afforded legal protection. The roost, breeding site or resting place of bats, which ever terminology is used is legally protected whether or not bats are in occupation.*

2.4 Up to nine bat species have been regularly recorded within Cumbria to date, most of which use built structures, notably occupied residential buildings, for roosting. The most frequently encountered bat species is the common pipistrelle (*Pipistrellus pipistrellus*) and its abundant status in Cumbria is reflected throughout the UK.

Policy

2.5 Guidance for Local Authorities: Extract from Office of the Deputy Prime Minister – Circular 06/2005:

“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision”.

2.6 Paragraph 193 of the National Policy Planning Framework (as revised in December 2024) states:

“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;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons¹ and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”

- 2.7 The Copeland Local Plan 2021-2039² echoes this national focus on preserving biodiversity in Strategic Policy N1: Conserving and Enhancing Biodiversity and Geodiversity, stating:

“The Council is committed to conserving Copeland’s biodiversity and geodiversity including protected species and habitats.

Potential harmful impacts of any development upon biodiversity and geodiversity must be identified and considered at the earliest stage.

Proposals must demonstrate, to the satisfaction of the Council, that the following mitigation hierarchy must have been undertaken:

Avoidance – *Biodiversity and geodiversity must be considered when drafting up proposals and any potential harmful effects on biodiversity and geodiversity must be identified along with appropriate measures that will be taken to avoid these effects.*

Mitigation – *Where harmful effects cannot be avoided, they must be appropriately mitigated in order to overcome or reduce negative impacts.*

Compensation – *Where mitigation is not possible or viable or in cases where residual harm would remain following mitigation, harmful effects should be compensated for. Where this is in the form of compensatory habitat an area of equivalent or greater biodiversity value should be provided. Compensation is a last resort and will only be accepted in exceptional circumstances.”*

¹ For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat

² See: https://www.copeland.gov.uk/sites/default/files/attachments/copeland_local_plan.pdf

3.0 Survey Methods

- 3.1 Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023) edition states:

“The guidelines do not aim to either override or replace knowledge and experience. It is accepted that departures from the guidelines (e.g. either decreasing or increasing the number of surveys carried out or using alternative methods) are often appropriate. The guidance should be interpreted and adapted on a case-by-case basis according to site-specific factors and the professional judgement of an experienced ecologist. Where examples are used in the guidelines, they are descriptive rather than prescriptive.”

- 3.2 Relative to the above the survey protocol has been determined using the collective and long standing experience of Tyrer Ecological Consultants Ltd and knowledge of the specific nature of the site.

Survey Protocol

- 3.3 The surveys took place in August 2025, thus within the highly active and social breeding season, at a time where pups are starting to fly and forage independently, and when some species of bat are beginning to disperse from their maternity roosts.

- 3.4 In accordance with Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023), it is specified that:

“The bat active period is generally considered to be between April and October inclusive”, though the period of **May – August** is the optimal most productive period that Natural England accept bat surveys and grant EPSMLs in relation to bats.

- 3.5 Typically only surveys within this period are accepted by licensing authorities, as the results of these surveys are used to inform an EPS licence application or a non-licensable Precautionary Working Method Statement (PWMS).

- 3.6 Where bats are roosting, they are likely to be detected by the ecologists who are trained in the use of bat detector hardware and call analysis software, and specifically how to detect bats and to correctly identify / disseminate bat calls.

- 3.7 When considering survey protocol, the decisions about whether dusk or dawn surveys are selected are based on the extensive experience of Tyrer Ecological Consultants Ltd, the nature of the building and species that can be anticipated as being present either at the property or in the locality as well as any visual limitations at the survey site.

- 3.8 Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th ed. (2023), it is specified that:

“Roost re-entry visits prior to dawn are no longer routinely recommended for presence/absence surveys due to the risk of bats returning early and being missed ... As return times appear to be far more variable (Andrews & Pearson, 2022).”

- 3.9 In this case, the bat roost potential that exists at Wyndhowe presents no problems for dusk observations; if a building is complex, or observations were restricted, or species that are difficult to detect at dusk are suspected then dawn surveys would be conducted where appropriate. At the site there are no visual constraints and to date there is no evidence to suggest the presence of such species.

- 3.10 Survey protocol should not be determined by parties who are 1) not familiar with the site 2) do not have a sufficient level or experience in relation to the undertaking of dusk / dawn bat surveys.
- 3.11 The number of surveys and surveyors was adequate relative to the roost potential that was identified on attendance of the site, i.e. '**Low**', and requiring two surveyors to accurately monitor potential roost features (PRFs) across the structure. Surveyor credentials are provided in **Table 3.1** below:

Table 3.1 – Surveyor credentials

Surveyor(s)	Experience	Surveyor Credentials
Mr. B. Richards ACIEEM	3 years	• Senior Ecologist, with a range of training and experience, • MBiolSci in Biological Sciences (Zoology), • Holder of a Natural England Bat Level 2 Survey Class Licence (2025-12596-CL18-BAT).
Miss. E. Robinson	1 year	• A seasonal consultant with experience of undertaking professional bat surveys.

- 3.12 Surveyors were strategically positioned so that all elevations with bat roost potential could be observed without limitation. The surveyors were aided by full spectrum electronic bat detectors including the Anabat Scout, Elekon Batlogger M & M2, Echometer EM2 Pro, Peersonic RPA3, or equivalent detectors which enable the locating and recording of the high frequency calls that are emitted by bats; echolocation calls were analysed the next day using, Anabat Insight, Kaleidoscope, BatExplorer, Sonobat or equivalent computer software to verify field observations.
- 3.13 Elevations were also surveyed via the use of a Night Vision Aid (NVA) Camera (Panasonic HC-VXF990, Canon XA35 or Canon XA70) or Nightfox Whisker Night Vision Binoculars with additional illumination provided by infra-red (IR) lighting (for example Nightfox Arc, Nightfox XB5, or additional IR floodlights) where deemed necessary by the attending ecologist(s) – recordings would be subject to review the following day to identify emergences / flight lines and species / abundance.

Survey Limitations

- 3.14 Following the completion of the further surveys, having carefully considered the results and conclusions derived from all surveys to date, no significant constraints were experienced that might hinder the gathering of ecological data on which to base sound conclusions and recommendations.

4.0 Results

- 4.1 One dusk emergence survey was undertaken at the site, during August 2025 by two surveyors at any one time. **Table 4.1** shows survey timings and weather conditions, whilst **Table 4.2** alongside **Figure 4.1** document the results of the dusk survey.

Table 4.1 – Survey date, times and weather conditions

Times of Survey	Date	Weather Conditions
Dusk survey 1 2028 – 2218	14/08/2025	Sunset: 2048: Dry, Calm (0/12 Beaufort), 80% cloud cover Start temp: 22°C End temp: 20°C

Table 4.2 – Dusk survey results

Survey Dates	Time	Activity
14/08/2025	2028 – 2218	No emergence of any bat species from the target building during the survey. 2108 hrs: A common pipistrelle (CP) commuted along the eastern elevation of B1 from south to north. 2110 – 2122 hrs: x3 CP foraged constantly along the dense scrub vegetation on the bankside to the east of B1. 2125 – 2131 hrs: x2 CP and a soprano pipistrelle (SP) foraged frequently over the garden space to the north of B1 in proximity to the mature ash tree. 2138 hrs: A CP commuted along the western elevation of B1, from south to north. 2138 – 2218 hrs: A CP & SP foraged over the scrub vegetation and garden space sporadically. General activity comprised of constant foraging and commuting by up to three common pipistrelle bats and a single soprano pipistrelle bat.



Dusk Survey 1 – 14/08/2025

Key			
	Surveyed structure		Foraging activity
	Surveyor positions		Commuting activity
	Directional compass		

Figure 4.1 – Visual Aid – Dusk survey results with Key

5.0 Conclusions & Recommendations

- 5.1 From the dusk survey results, it can be concluded that whilst using best practice survey methodology, emergence of bats was absent at Wyndhowe, with activity limited constant foraging and commuting by up to three common pipistrelle bats and a single soprano pipistrelle bat.
- 5.2 As bats are a highly transient species group and can use buildings that offer potential roost features at any time of the year, it should be stated that if bats, or evidence of bats (see **Figure 5.1**), is found at any stage during the works then as a legal requirement the work at the site should immediately cease and a bat ecologist be contacted for further advice.



Figure 5.1 – Bat droppings (left) and pipistrelle bat (right)

- 5.3 If bat(s) or their roost will be affected then a Natural England Mitigation licence will be required to legally continue with the work. Notwithstanding the granting of a licence, works that would affect a roost cannot take place if a maternity colony is in occupation.
- 5.4 Notwithstanding the absence of roost behaviour observed, the proposed development scheme might consider enhancement for bats as part of its biodiversity goals, in accordance with local and national planning policy.
- 5.5 See Figures overleaf for indicative ideas which could be integrated during the proposed new development however, a bespoke enhancement plan can be provided by Tyrer Ecological Consultants at the applicant's request whereby types of provision and locations can be annotated on site plans / elevation drawings.

Enhancing a development site for Bats

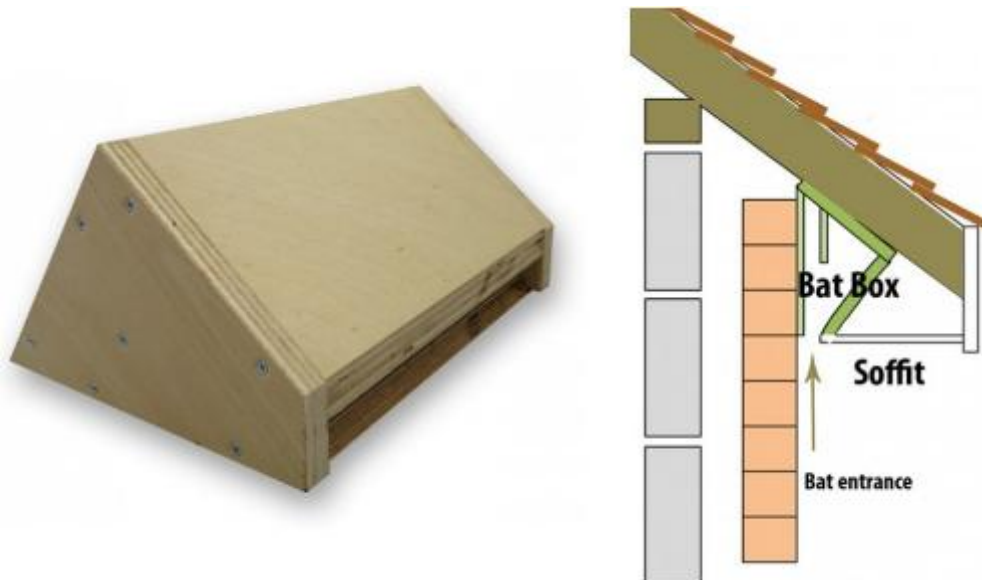
Integrated bat box

The Habibat Bat Box is a solid box made of insulating concrete with internal roosting space. The box blends seamlessly into brick-built properties and may be incorporated into the fabric of buildings, being best placed on gable elevations.



Soffit access

Where soffits are instated at gable elevations, roost provision may be instated in the form of a soffit bat box with internal roosting space.



Externally fitted boxes

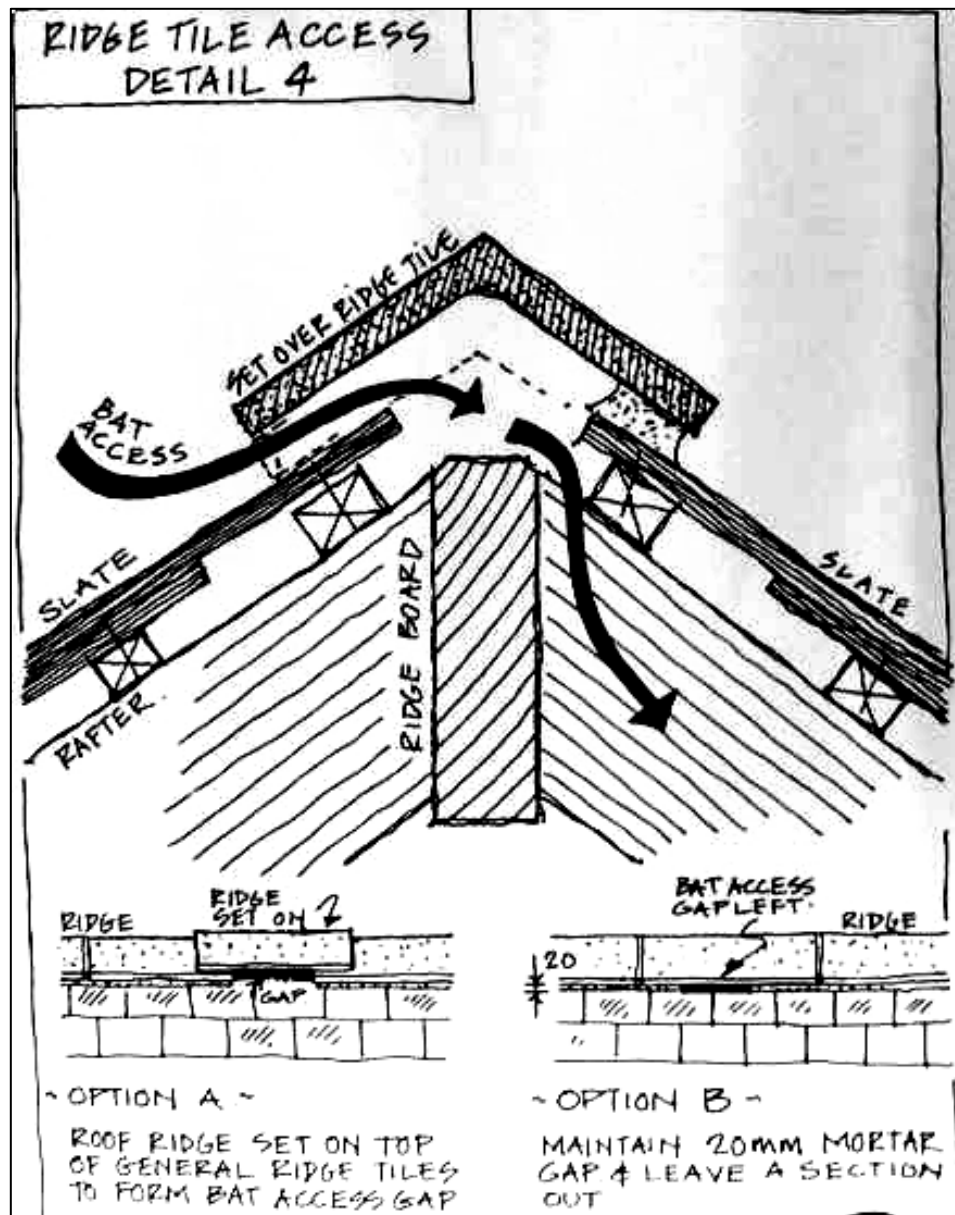
A large number of externally fitted box models for bats exist for buildings and trees. Suitable models for both buildings and trees may include the Eco Kent Bat Box.



Ridge access

Where appropriate, ridge tile access should be made with the incorporation of traditional Bitumen 1F underfelt immediately beneath ridge tiles. A non-bitumen coated roofing membrane (NBCRM), including modern breathable roofing membranes (BRM) can cause significant problems where bats are in contact with it, whereby their fine claws become entangled within the fibres of the membrane, entrapping and killing bats.





6.0 References

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Appendix I: *PR-25-0252 Wyndhowe, Sea Mill - Bats & Breeding Birds* (Tyrer Ecological Consultants Ltd, October 2025)