

Date: 11 February 2019  
 Reference: Installation of security system and replacement of stolen lead  
 Your ref: CAM\_PE67NH\_301118



Ms Sally Ann Jackson  
 c/o St. Pega  
 Rectory Lane  
 Peakirk  
 Peterborough  
 Cambridgeshire  
 PE6 7NH

Technical Services Wildlife  
 Licensing (EPS)  
 Natural England  
 Horizon House  
 Deanery Road  
 Bristol  
 BS1 5AH

*C.c. Mr William Assheton via wfa@gotch.co.uk*

*C.c. Ms Sheila Lever via sheila.lever@btinternet.com*

Dear Ms Jackson,

**Bat Roost at St. Pega, Rectory Lane, Peakirk, Peterborough, Cambridgeshire, PE6 7NH**

Thank you for seeking advice from Natural England regarding the bats living in your church.

We very much appreciate your co-operation in helping us protect these special but scarce species. The loss of natural roosts, such as hollow trees, has meant that most species of bat have become increasingly reliant on buildings, many of them churches, and are now dependent upon the goodwill of people such as yourself if they are to survive.

Because many bat species are so rare the laws protecting them are strict. Therefore any work on buildings used by bats must be organised so that any risk of harming the bats or their roosts is avoided, for example, by timing operations to fit with the life-cycle of the bats. This is important not only to help protect these vulnerable species, but also because it will help you get the work done in the most efficient way possible within the constraints of these strict laws.

Natural England provides a free advice service for small scale repair works to a church where bats may be affected, and relies on the generosity of volunteers to be able to run this service. We can advise on how and when proposed work should be carried out in order to prevent harm to bats and comply with the relevant legislation (please see the Bat legislation section in the Annex for a summary). If you are unable to resolve matters by following the advice, please contact Natural England<sup>1</sup> (via the Bat Conservation Trust on 0345 1300 228) for further advice.

**Background and survey information**

I am sorry to hear that the lead covering to this church has been stolen from the majority of the church roof. I understand that a meter wide strip of lead has been left on the chancel at the eastern end directly over the main access point and roosting area, with lead also remaining on the south aisle and porch, and a small section of the western end of the north aisle unaffected. I understand that works to temporarily cover the roof and install an alarm system are required whilst funding is applied for to replace the roof covering. We would like to thank you for taking the bats into consideration when planning this work and for seeking expert advice. Acting as you have will help

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to protect the bats and their roosts from potential harm, and it will also ensure that you don't inadvertently breach the strict laws protecting bats.

Following a visit to St. Pega Church on 12 December 2018 by Malcolm Hillier, Natural England's Volunteer Bat Roost Visitor, I have received a report and am writing to confirm our advice with you.

The table below summarises the bat roost information based on this report.

<b>Bats visible at visit</b>	No bats seen during winter visit.
<b>Bat species and numbers</b>	Pipistrelle and long-eared bats known to be present.
<b>Bat droppings information</b>	Church cleaned daily. A few fresh bat droppings found on the window ledge, on internal walls and below main access point.
<b>Roost location</b>	The maternity roost is above the eastern wall of the chancel and in a gap between the chancel ceiling boards and lining of slate roof. In gaps in roof timbers of chancel and possibly the nave.
<b>Roost type</b>	Pipistrelle maternity roost present; hibernation roost possibly present.
<b>Bat access points location</b>	Main access point is a small gap in the stonework, four metres above ground, on the south-eastern corner of the chancel; additional access points under guttering boards on southern side of the chancel and the north aisle. Droppings over south porch door indicate bats also access church via this, with a further gap between the roof and wall in this area possibly providing access into a roost site. Via gaps in roof timbers.
<b>Previous visits</b>	Solid stone church dates from 1016 AD. No areas of external cladding. Timber lined lead roof, with gaps between lead boards and inner roof lining boards offering bat roosting potential.  24 May 2012 – Confirmed roost location and access points. Emergence count at 21:20 – 21:50 recorded 126 bats. May/August 2013 – Bristol University PhD radio-tracking study of bats from their roost to their foraging ground (Deeping Lakes). Additional roosting locations observed, all occasional usage involving solitary bats. September 2013 – Visit undertaken by Antony Mould involving a dusk/dawn survey and leaving an Anabat detector within the churches interior to try and quantify the level of activity. An advice letter was issued on 19 December 2013 following this survey regarding the restoration of paintings and the concern over droppings. October 2014 – Visit undertaken by Antony Mould following ongoing concerns regarding bat activity and droppings in the church and potential damage to wall paintings. And advice letter was issued on 8 December

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2014 following this visit.  
 CAM\_PE67NH\_230715 - 20 July 2015 by Antony Mould, Natural England's Volunteer Bat Roost Visitor, regarding droppings within church, proposed changes to lighting scheme and possible works to degraded lime mortaring.

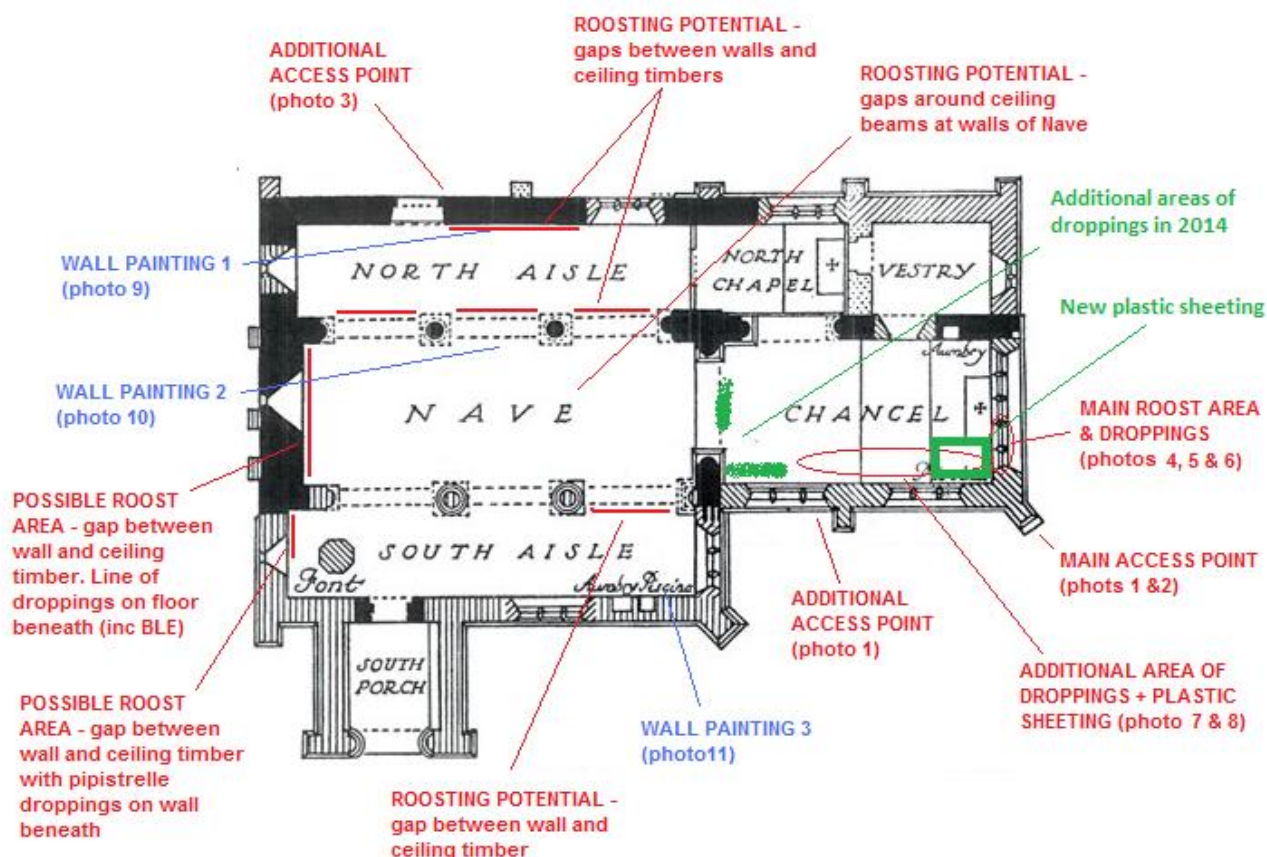


Diagram 1, prepared by Volunteer during 2014 Natural England roost visit: Bat evidence found during 2014 and 2015 roost visits.

### Method statement for temporary covering and installation of alarm system

In order to avoid harming bats or their roosts the works must be undertaken according to the Timings and Procedures below. If for any reason you cannot follow this course of work, please contact Natural England<sup>1</sup> for further advice. Please contact us for further advice if other works are required.

In order to avoid harming bats or their roosts the works must be undertaken according to the below Timings and Procedures. If for any reason you cannot follow this course of work, please contact Natural England (via the Bat Conservation Trust on 0345 1300 228) for further advice. Please contact us for further advice if other works are required.

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**Further information must be sought once the method of roof repair is known. Please note that the works to replace the roof must be carried out outside the maternity season (i.e. works must not be carried out between May and August inclusive) and ideally outside the coldest winter months. Please contact Natural England<sup>1</sup> once further information is known.**

### Timing

Bats may utilise crevice type locations such as under roof tiles, slates or lead, within eaves, behind any hanging tiles or cladding such as shingles, in gaps around window masonry, in crevices between beams and within mortice and tenon joints, in crevices in rubble filled walls and at wall tops and even behind notice boards and wall hangings as roost sites in addition to roosts within roof voids, apses, tower floors and bell chambers and in any vaults. Bats may form maternity colonies during the summer or use churches as non-breeding roosts during the active season and may also hibernate within churches during winter. Bats are very vulnerable to disturbance during hibernation, late pregnancy, and while dependent young that are unable to fly are in the roosts.

On this basis we advise that this work is undertaken **between now and 30 April 2019**. If this work cannot be carried out in this time please contact Natural England<sup>1</sup> for further advice.

### Procedure

#### *Prior to works*

- Brief all contractors on the location of the bat roost, if known and that bats may utilise crevices wider than 8mm. Inform them that bats may also be present in other areas of the building, such as under tiles and slates, in gaps between timbers and in wall crevices, at any time of year.
- Make a copy of this letter available on site at all times for contractors to follow. Contractors must read the procedure in full before commencing works.
- Make the contractors aware that the bats access point at the eastern end of the chancel must be retained during all works, and the access area and area beneath this must be left clear of all obstructions to ensure the bats flight path is not impeded.
- Before work commences, thoroughly check any accessible areas affected by works for bats.
- Mark any gaps which are known to be used by bats or which cannot be filled due to bat potential clearly with chalk and ensure all contractors are aware that these areas must not be blocked during works.
- Ensure that any crevices that will be blocked or obstructed when the temporary roof covering is installed is thoroughly examined immediately preceding works to ensure no bats are roosting here.
- Please position any audible alarms and direct lights away from the access areas in case these go off in the maternity season and disturb the bats.

#### *Scaffolding*

Please note that the above timings include installation and dismantling of scaffolding.

- Take care not to cover or damage any bat access points or crevices where bats may be roosting when installing and dismantling scaffolding. Gaps which are larger than 8mm by

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20mm, where the back of the gap cannot be seen, may give access or be used by roosting bats.

- Known and potential bat access points must be kept clear.
- Any coverings on scaffolding;
  - must have an opening of a minimum 1x 2 metres which must be opened at dusk and left open until dawn. This is to maintain flight routes to and from the building in the event that a bat or bats are roosting in the fabric of the building.

#### *During works*

- Work with caution, remain vigilant and check for the presence of bats throughout works. Wear gloves at all times.
- Please note that bats are very small and may be hidden within narrow crevices in brick and stonework, beneath any flashing and tiles or slates
- Undertake work systematically and remove roof structures carefully. Complete one section before moving to the next to allow any hidden bats access to an undisturbed part of the roof at all times.
- **The strip of lead around the bat access point must be retained. If any works are required which will involve removing this strip, further advice must be sought from Natural England<sup>1</sup>.**
- Loosen and lift each section of flashing, lead or temporary roof covering vertically by hand to avoid crushing any bats that may be underneath. Before discarding, closely examine the underside of each section for bats clinging to it.
- Take care to examine all gaps and crevices using a torch to look for bats prior to work commencing.
- Bats can also be found lower down in any roof spaces, even on ceiling joists where they are in danger of being stepped on.
- Leave open any gaps which are larger than 8mm by 20mm and appear to lead to a larger cavity. Ensure that any potential access gaps or roost sites are not drilled into when fitting alarms or covered by wires or apparatus.
- The temporary roof covering should not be walked on directly, to avoid injuring any bats which may be underneath.

**If any bats are discovered, during a survey prior to work, or whilst work is in progress**, we recommend that you pause work and consult Natural England<sup>1</sup> for further advice immediately. This will ensure that no harm comes to the bats and that the legislation is adhered to.

#### *Bat-friendly roofing materials*

Breathable Roofing Membranes (BRMs), made from spun-bond polypropylene/polyethylene filaments, should not be installed into a roof that is used by bats. The long fibres that make up BRMs have a tendency to be pulled out by roosting bats and pose an entanglement threat to the

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bats. BRMs are not obligatory under any Building Regulations. Ventilation, regardless of the roofing felt or BRM used, is still required (see British Standard BS 5250:2011).

- If roofing felt is to be installed in a roof that is used by bats then only bituminous roofing felt that does not contain polypropylene or polyethylene filaments should be used. For example bitumen felt type 1F, which is hessian reinforced. Bituminous felt is dark-coloured, with a rough surface that bats can grip onto and will help maintain a suitable and safe environment for bats within the roof structure. Sarking boards, as used in Scotland, may be an alternative to bituminous felt.

It is important to follow this advice to ensure that the law is not broken and to help conserve the bat colony that depends on the roost in the long term.

Please note that the above advice refers only to the aforementioned works. If you plan to carry out any other works, or if the schedule of works is altered in any way, further advice should be sought before works may proceed.

If an injured or grounded bat is found, gloves must always be worn if it is necessary to handle the bat and the Bat Conservation Trust should be contacted immediately on 0345 1300 228.

**If any bats are found during the work, please pause work in this area, gently cover the bat over and contact Natural England<sup>1</sup> immediately.** This will ensure that no harm comes to the bats and that the legislation is adhered to.

**Please show a copy of this letter to any person employed by the church or assisting the church in carrying out this work.** As the person commissioning or managing the work, please ensure that the advice given is passed to all contractors carrying out work affecting the bats or their roost. We recommend that you retain this letter as a record of having sought advice, and of the advice given.

Please do not hesitate to contact Natural England<sup>1</sup> quoting your reference number, if you foresee any difficulties or have any questions about this advice. We may contact you to see if the advice was helpful.

## Lighting

Bat roosts (including access points) should not be directly illuminated. If you are considering the use of lighting at the church, please seek further advice from Natural England<sup>1</sup>.

## National Bat Monitoring Programme (NBMP)

Many of our bat species have declined dramatically over the last century. Because of this, a number of national, annual surveys are organised through the Bat Conservation Trust to monitor the status of many of our bat species across a range of habitats. The surveys are carried out by a network of volunteers and form the NBMP and they are very important as they help to track changes in bat populations.

If members of your congregation are interested in the bats, you may want to let them know they can sign up to the roost count, which involves counting the bats as they emerge on two evenings during the summer survey period. Not only is this an enjoyable way to spend an evening and to learn more about bats, but the results from this and other NBMP surveys are very important, as they enable us to track changes in the UK's bat populations. For more information and to sign up to take part, please visit: <http://nbmp.bats.org.uk/Surveys.aspx> or contact us at [nbmp@bats.org.uk](mailto:nbmp@bats.org.uk) / 020 7820 7166.

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## Planning future work

The presence of bats should be considered when planning works to any building. As churches have high potential for bat roosts, and bats use of a church may change over time, it is always advisable to seek advice from Natural England<sup>1</sup> prior to planning works. It is best to seek advice at the earliest possible stage of planning to allow for adequate survey work to be arranged and in case any alterations to the plan of works is necessary.

If in the future any other works are proposed at this church (such as those included on, but not limited to, the list below), please contact Natural England<sup>1</sup> at your earliest opportunity.

1. Roof repairs/replacement, chimney/flashing works, replacement of lead
2. Internal and external pointing works and other masonry repairs
3. Timber treatment, repairs or replacement
4. Renewal or repairs of fascias, soffits, bargeboards, rainwater goods, hanging slates or any work at the eaves
5. Work within the roof space such as insulating or plumbing
6. Window (including stained glass pane replacement), door or porch works
7. Electrical wiring works
8. Control of rodents, wasps, cluster flies or birds
9. Changes to internal and external lighting (including street lighting and flood lighting)
10. Internal and external re-decoration (including lime washing, surface wood treatments), renewal/ repairs to ceilings and walls
11. Removal and/or replacement of pews
12. Use of any scaffolding; internal/external
13. Installation of high level heaters
14. Conversions or extensions
15. Investigative works
16. Crypt works

Please note that some works may not fall within the scope of the free advice service, for example some lighting projects, full roof replacements, conversions and extensions, and you may be advised to employ an ecological consultant.

## Summary of the law relating to bats

As population numbers have fallen, all bats and their roosts are protected under The Wildlife and Countryside Act 1981 (as amended) and Conservation of Habitats and Species Regulations 2017. Bats use roosts on a seasonal basis and therefore bat roosts are protected whether the bats are in occupation or not. Under this legislation it is an offence to:

- deliberately capture (or take), injure or kill a bat;
- intentionally, recklessly or deliberately disturb a bat (in relation to the Wildlife and Countryside Act 1981 (as amended) the offence applies whilst the species is occupying a structure or place which it uses for shelter or protection; in relation to the Conservation of Habitats and Species Regulations 2017 as it applies anywhere;
- damage or destroy the breeding or resting place (roost) of a bat;
- possess a bat (alive or dead), or any part of a bat;
- intentionally or recklessly obstruct access to a bat roost;
- sell (or offer for sale) or exchange bats (alive or dead), or parts of bats.

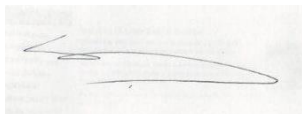
Thank you again for seeking our advice. The successful conservation of threatened mammals such as bats depends on their having access to suitable sites for breeding and hibernation. In view of their

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current dependence on churches, which are now central for their continuing existence, their survival now and into the future is very much dependent on the goodwill of individuals such as yourself.

We look forward to working with you on finding a constructive way forward, so please do not hesitate to get in touch again if you require further advice.

Yours sincerely,



Graham Irving  
Wildlife/Technical Advisor  
Natural England

**Email:** [jpope@bats.org.uk](mailto:jpope@bats.org.uk)

**Contact Natural England via the Bat Conservation Trust on 0345 1300 228**

*Enclosed; Bats in churches, Bats during works poster, NE Approved timber treatment product list TIN092*

As a result of recent cases involving a rare type of rabies, Natural England's current advice is that members of the public should not handle bats; if you find a grounded or injured bat, please call the Bat Conservation Trust on 0345 1300 228. Further Information is available from [www.defra.gov.uk](http://www.defra.gov.uk) and [www.bats.org.uk](http://www.bats.org.uk).

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