

Harras Moor, Whitehaven – Bat Technical Note

Terms of reference:

PBA Applied Ecology Ltd was commissioned by Gleasons to undertake a tree climbing bat roost assessment on multiple trees at Harras Moor, Whitehaven (NX 98783 18024) prior to the housing development. PBA completed a ground level tree bat roost assessment previously at the site and identified multiple trees that required a further survey via an aerial assessment.



Figure 1: Map showing the location of the four trees (2, 9, 11, & 15) that had bat potential and were due to be removed for the housing development.

Legislation:

Of the UK's eighteen resident bat species, many will utilise features within the fabric of trees at some point during their life cycle. Trees provide shelter for bats and a diverse variety of insects for bats to feed on. Some species such as common and soprano pipistrelle *Pipistrellus pipistrellus* and *P. pygmaeus* respectively; roost in crevices, while others such as noctules *Nyctalus noctula* prefer larger trunk cavities. Certain species of tree are more likely to support bats such as, beech *Fagus sylvatica*, oak *Quercus sp.* and ash *Fraxinus excelsior*. However, any mature tree with significant features such as, knots, holes, cracks and loose bark will provide bat roosting potential (BCT, 2023). Bats are most likely to be present and seen during the summer months but may be present within trees throughout the year.

Bats are protected by several EU and UK policies and Acts. All bat species are protected under Section 39 of the Conservation of Habitats and Species Regulations 2017 (as amended), commonly referred to as the 'Habitats Regulations'. Importantly, the most recent amendments (the Conservation of Habitats and Species [amendment] [EU Exit] Regulations 2019) consider the UK's departure from the EU. Bats also receive protection under the 1981 Wildlife and Countryside Act (as amended), and the 2000 Countryside and Rights of Way Act. Consequently, it is a criminal offence to capture or kill a bat, disturb a bat whilst in a place of shelter or rest, or damage or destroy a bat's breeding site or resting place. A resting place can include habitats or features which are used for short periods of time, such as a feeding perch where a bat consumes its prey. The breeding sites and resting places of bats are collectively referred to as roosts and resting places. It should be noted that bat roosts are protected even when bats are not present, and that prosecution could result in imprisonment, unlimited fines, and confiscation of vehicles and equipment.

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Methods:

The survey was conducted on 17/08/2026. Trees classified for Potential Roost Feature (PRF) or Further Assessment Required (FAR) were taken for further assessment and analysis by a PBA associate: Dave Marshall (CL19 -2020-46112-CLS-CLS), and Kiri Jones (2015-18157-CLS-CLS), via aerial endoscopy and assessments.

Results:

One sycamore *Acer pseudoplatanus* (T2), two ash *Fraxinus excelsior* (T9 & T11), and one dead ash tree (T15) were identified by PBA to have bat potential, given the categories: T2 – Further Assessment Required, T9 & T15 – Potential Roost Feature Multiple (PRF-M), T11 – Potential Roost Feature Individual (PRF-I) (See Figure 1 above). These were subsequently downgraded by tree climbing surveyors due to their ability to view features closer and endoscope them to determine their depth. Trees T2 & T11 were downgraded to – no bat potential, no further assessment required. T9 & T15 were downgraded to PRF-I.

Conclusion:

T9 & T15, given the tree tags 241 & 259, were classified as PRF-I (See Figure 1). Locations are as follows in British National Grid:

T9: E 298688.74405418190872297 , N 518101.77341169212013483,

T15: E 298937.89010218234034255 , N 517965.53586096683284268

Thus, it is possible for a limited number of roosting bats to be present in the tree. Given the low risk, the trees can be soft felled, with timber left on the ground for 24 hours to allow any bats to escape prior to removal. If a bat is found on site, works should halt, and a suitably qualified ecologist should be contacted prior to the works proceeding any further.

Survey Constraints:

Unless stated otherwise, the information provided within this report is valid for a maximum period of 24 months from the date of survey. If works at the site have not progressed by this time an updated site visit may be required in order to determine any changes in site composition and ecological constraints.

Written by:	Checked by:	Approved by:	Date:
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