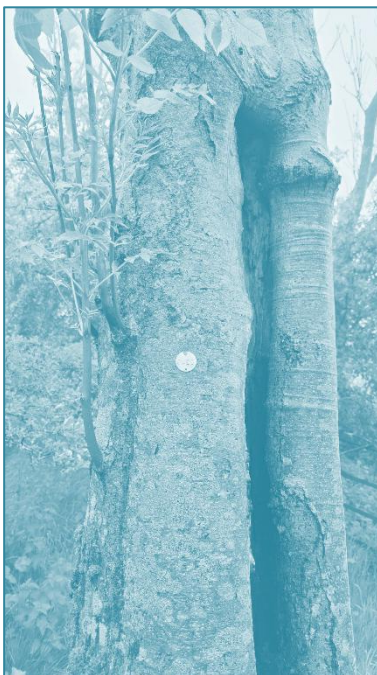


Harras Moor, Whitehaven

Ground Level Tree Assessment



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Declaration of Compliance

This Bat Scoping Assessment has been undertaken in accordance with the Bat Conservation Trust *Bat Surveys for Professional Ecologists – Good Practice Guidelines* (4th Edition, 2023). The information has been prepared and provided in compliance with the CIEEM's Code of Professional Conduct (2022), British Standard 42020:2013: *Biodiversity: Code of Practice for planning and development*, and CIEEM *Guidelines for Ecological Report Writing* (2017).

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CONTENTS

1. Introduction.....	1
1.1. Terms of reference	1
1.2. Site description and context	2
1.3. Description of works	3
1.4. Previous surveys	3
2. Approach.....	3
2.1. Personnel and schedule	5
2.2. Survey conditions and constraints.....	5
2.1. Quality standards	5
3. Survey Results	5
3.1. Ground level tree assessment.....	5
3.2. Habitat and connectivity	7
3.1. Additional species of interest.....	7
4. Advice and Recommendations	7
References	9
Appendices	10
Appendix A – Policy and Legislation.....	11
Appendix B – Location of Trees with Bat Potential.....	14
Appendix C – Photographs & Target Notes.....	16

TABLES

Table 1: Potential tree roost assessment classifications (BCT Table 4.2)	4
Table 2: Potential suitability of PRFs (BCT Table 6.2)	4
Table 3: <i>Scoping assessment details.</i>	5
Table 4: Tree survey results	5

FIGURES

Figure 1: <i>Site location (Bing Maps, 2025).</i>	2
Figure 2: <i>Site context (Google Maps, 2026).</i>	3
Figure 3: <i>Example bird boxes</i>	9

1. INTRODUCTION

1.1. TERMS OF REFERENCE

PBA Applied Ecology Ltd (PBA) was commissioned by Gleeson to undertake a Ground Level Tree Assessment (GLTA) at Harras Moor, Whitehaven, Cumbria, to determine the ecological importance and likely use of the project site by bats. The bat scoping assessment was required to provide information on the potential presence of bats, prior to the proposed works. The approach adopted follows current Bat Conservation Trust Guidelines: Chapter 4 – Preliminary Ecological Appraisal for Bats (BCT, 2023).

On the 21/05/2026, PBA conducted a ground level scoping inspection of trees present on the project site. This report details the findings of this survey and provides details of any future survey or licensing work required because of these findings.

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 bat such as, beech *Fagus sylvatica*, oak *Quercus sp.* and ash *Fraxinus excelsior*. However, any mature tree with significant features such as, knots, holes, crack 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.

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 use of the site by bats.



Figure 1: Site location (OSMaps, 2026).

1.2. SITE DESCRIPTION AND CONTEXT

The survey site is located at Harras Moor on the eastern side of the town of Whitehaven, Cumbria (NX 98788 18010, Figures 1 & 2). The site comprises grazed fields and woodland patches.

The wider landscape is dominated by the town of Whitehaven, pasture fields and the Lake District National Park to the west (Figures 1 & 2).



Figure 2: Site context (Google Maps, 2026).

1.3. DESCRIPTION OF WORKS

The proposed works are to include a large residential development.

1.4. PREVIOUS SURVEYS

A Preliminary Ecological Appraisal (PEA) was undertaken on the 15/07/2025 (PBA Ecology, 2025). This identified several trees which may have potential to support bat roosts and suitable habitat for foraging and commuting. It was recommended that specific Ground Level Assessment of trees be undertaken of the trees to be affected by the works.

2. APPROACH

Ground level tree assessments were conducted for the trees within woodland patches located across the site, to identify features on or within the trees with potential to accommodate roosting bats. Surveyed trees are shown on the site plan in **Appendix B**. The approach adopted follows current Bat Conservation Trust Guidelines (BCT, 2023). The assessments were completed by Senior Project Ecologist Ben Davies BSc ACIEEM and Project Ecologist Katie Holmes BSc working as accredited agents under the licence of Neil Wilkinson MSc ACIEEM (Natural England Class Licence 2025-84707-CL18-BAT).

The exterior of each tree was inspected from ground level to look for features that could be used by bats for roosting. Tree Potential Roost Features (PRFs) include:

- Knotholes or cavities formed from naturally shed branches,
- Woodpecker holes,
- Cracks/splits in stems and branches,
- Hollow core,
- Partially detached flaking bark,
- Cankers in which cavities have developed,

- Intersecting stems or branches with suitably sized space in between,
- Ivy stems with diameters in excess of 50 mm with suitable roosting space behind,
- Bird and bat boxes on trees.

Trees were also inspected for signs of bat presence such as staining or smoothing around potential entry points, droppings, or accumulated prey debris.

The inspection was carried out systematically and consistently around all parts of the tree. All trees were viewed from the ground using binoculars and torches, and classified according to their potential for bat roost presence, following a standardised scale adapted from the BCT Guidelines (Table 1).

Table 1: *Potential tree roost assessment classifications (BCT Table 4.2)*

Roost Potential	Description
NONE	Either no potential roost features (PRFs) in the tree or highly unlikely to be any.
FAR	Further assessment required (FAR) to establish if PRFs are present in the tree.
PRF	A tree with at least one PRF.

Only the trees considered FAR or to have a PRF were recorded. These were marked on QGIS and photographed to allow easy identification. The 'Tree ref.' provided in Table 4 relates to the Target Note on the map. Trees with negligible potential were not recorded.

Table 2: *Potential suitability of PRFs (BCT Table 6.2)*

Roost Potential	Description
PRF-I	PRF is only suitable for individual bats or very small numbers either due to size or lack of surrounding habitat.
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony.

2.1. PERSONNEL AND SCHEDULE

Table 3: *Scoping assessment details.*

Date	Start	Finish	Type of Survey	Personnel	Conditions	Equipment
21/05/2026	n/a	n/a	Tree inspections	Ben Davies BSc ACIEEM and Katie Holmes BSc	Drizzle, overcast, ~10°C	Maglite torch, digital camera, binoculars

2.2. SURVEY CONDITIONS AND CONSTRAINTS

Weather conditions at the time of survey were: overcast, low wind, and a temperature of ~10°C. Sufficient access was available to view all aspects of the trees. Surveys were conducted at a sub-optimal time of year, when leaf cover was high, limiting the view of all tree features.

2.1. QUALITY STANDARDS

The survey and reporting process used in this report are consistent with *The Bat Conservation Trust Good Practice Guidelines for Bat Surveys*, Fourth Edition (BCT 2023); *Natural England Standing Advice: Bats* (NE 2013); *English Nature (now Natural England) Bat Mitigation Guidelines* (Reason and Wray 2023); and, *The Chartered Institute of Ecology and Environmental Management (CIEEM) Professional Competency Framework: Competencies for Species Surveys: Bats* (CIEEM, 2013).

3. SURVEY RESULTS

3.1. GROUND LEVEL TREE ASSESSMENT

The features inspected onsite consisted of trees within woodland patches on site.

Table 4 shows the results for individual trees. The tree ID, species, a description of the potential roost features and an overall assessment of the potential of the tree to support bats is given. Tree locations are marked on the site plan (Appendix B) and photographs are provided in Appendix C.

In total fifteen trees within the survey area were considered of interest. Eight trees are classified as FAR, three trees have PRF-I's and three trees have PRF-M's (Table 4). Some trees were not tagged due to dense ivy cover.

Table 4: *Tree survey results*

Tree Ref.	Tree tag number	Species	Potential Roost Features	Roosting potential	Approach if tree is to be retained	Approach if tree is to be removed
			Description			
1	Not tagged	Sycamore <i>Acer pseudoplatanus</i>	Tree with dense ivy cover. Ivy not likely to provide a feature but limits visibility and may conceal a feature on the tree.	FAR	No further requirements.	Aerial survey required.
2	Not tagged	Ash <i>Fraxinus excelsior</i> (dead)	Dense ivy may conceal a feature on the tree.	FAR	No further requirements.	Activity survey required.

Tree Ref.	Tree tag number	Species	Potential Roost Features	Roosting potential	Approach if tree is to be retained	Approach if tree is to be removed
			Description			
3	Not tagged	Alder <i>Alnus glutinosa</i>	Dense ivy may conceal a feature on the tree.	FAR	No further requirements.	Aerial survey required.
4	Not tagged	Unknown dead tree	Ivy covered standing deadwood. Ivy may conceal a feature on the tree.	FAR	No further requirements.	Activity survey required.
5	101	Ash (dead)	Small hole on the western aspect. Could be reached with an endoscope.	PRF-I	No further requirements.	Pre-felling inspection then soft felling required with timber left on the ground for 24hrs.
6	102	Ash	Multiple holes from 2m up on the northern aspect.	PRF-M	No further requirements.	Activity survey required.
7	Not tagged	Two ash and one alder	Three trees with dense ivy-cover that may conceal PRF's.	FAR	No further requirements.	Activity survey required.
8	103	Multiple dead trees	Could not access to view from all sides.	FAR	No further requirements.	Repeat ground level assessment when other trees have been removed..
9	241	Ash	Dieback as caused lots of holes to form. Unable to confirm if holes extend back.	PRF-M	No further requirements.	Activity survey required.
10	249	Ash	Tear-out accessible from ground with an endoscope.	PRF-I	No further requirements.	Pre-felling inspection then soft felling required with timber left on the ground for 24hrs.
11	259	Ash (dead)	Standing deadwood with several holes and cavities.	PRF-M	No further requirements.	Activity survey required.
12	262	Ash	A potential crack or tear out present. Can't	FAR	No further requirements.	Pre-felling inspection

Tree Ref.	Tree tag number	Species	Potential Roost Features	Roosting potential	Approach if tree is to be retained	Approach if tree is to be removed
			Description			
			see due to canopy being in full leaf.			then soft felling required with timber left on the ground for 24hrs.
13	271	Ash	Knot hole	PRF-I	No further requirements.	Activity survey required.
14	274	Ash (dead)	Standing deadwood with several small holes.	PRF-I	No further requirements.	Activity survey required.
15	278	Ash	Several holes from dieback. Potential PRF-M but can't see if any of the holes extend back. Can't climb or inspect further.	FAR	No further requirements.	Activity survey required.

* All trees with dense ivy that require an aerial survey will need to ensure that the ivy is cut at the base to ensure ivy coverage reduces through decay. This will allow the aerial survey to proceed.

3.2. HABITAT AND CONNECTIVITY

The surrounding habitat is determined to be of moderate suitability for a range of bat species. Nearby trees and buildings provide additional roost opportunities. Foraging opportunities are associated with the nearby woodland and gardens. Connectivity throughout the landscape is provided by field margins and woodland strips.

3.1. ADDITIONAL SPECIES OF INTEREST

Evidence of previous breeding bird activity was recorded throughout the woodlands.

The Invasive Non-Native Species (INNS) Himalayan Balsam *Impatiens glandulifera* was recorded in the woodland in the northeast of the boundary, and to the north of the landfill site. Himalayan balsam was also recorded in the woodland to the central east side of the application boundary.

4. ADVICE AND RECOMMENDATIONS

The proposed works are expected to include a large residential development. These works will require the removal of trees within woodland patches.

If trees with PRF's and FAR are to be retained, no further action is required. Measures should be taken to avoid trees being felled into or onto trees with bat potential.

If trees with PRF's and FAR are to be removed, aerial surveys by a suitably licenced tree climber, pre-felling inspections by a licenced ecologist and soft felling of the tree or three activity surveys will be required (Table 4).

Activity surveys would aim to determine whether bats are present at the site, and if so, provide information on bat numbers, species, and how they are using the site. In line with current best practice guidance (BCT, 2023), emergence/re-entry surveys for maternity or summer roosts must be scheduled within the period May to August. Subject to favourable weather conditions, emergence surveys for transitional roosts (i.e. those used outside of breeding), may be scheduled in April and September/October. Where practicable, activity surveys should be distributed across the survey season to ensure that any seasonal bat roosts are recorded. The approach adopted should follow that specified by the Bat Conservation Trust Guidelines: Chapter 7: Emergence/Re-entry Surveys (BCT, 2023).

Outcomes of activity surveys and implications for works:

No bat roosts identified - no further survey or mitigation required. Works may proceed without further survey or need for a European Protected Species Mitigation Licence (EPSML).

Bat roost(s) identified – Works may proceed, but only once a European Protected Species Mitigation License (EPSML) has been applied for and approved by Natural England. This will involve the creation of a mitigation plan to be followed throughout the works.

The following general recommendations should be followed:

- Bats are highly mobile and opportunistic, and may move into trees following surveys, or during construction activities. Therefore, all contractors must be made aware of the potential for bat presence prior to any works.
- If it is necessary to remove a bat to save it from harm, gloves should be worn. The bat should be carefully caught in a cardboard box, and kept in the dark in a quiet place. In this eventuality, an ecologist would need to be contacted for further advice.

Since evidence of previously nesting birds was found in the hedgerow along the inside of the redline boundary, relevant checks and mitigation for nesting birds may be necessary before the works proceed.

All wild birds are protected under the Wildlife and Countryside Act 1981 (as amended). As such, it is a criminal offence to intentionally or recklessly kill or injure any wild bird, damage, or destroy the nest of any wild bird while it is in use or under construction, or take or destroy the egg of any wild bird. **Works should be timed to avoid the nesting bird season, which runs from March to August, inclusive. If works must be carried out during the nesting bird season, a check must be carried out for active birds' nests immediately prior to works commencing. If any nests are found, work should be delayed until all chicks have fledged.**

To mitigate against the loss of any bird nesting opportunities from the site, it is recommended that bird boxes be affixed to the exterior of retained mature trees. These should be constructed from a hardwearing material such as woodcrete. Examples of birdboxes can be seen below, and they can be purchased from websites such as NHBS (www.nhbs.com) or CJ Wildlife (<https://www.birdfood.co.uk/>). These boxes should be located as close to the original nest locations as reasonably possible.



Vivara Pro Seville
32mm Woodstone Nest
Box.



1SP Schwegler Sparrow
terrace



Eco Swallow Nest

Figure 3: *Example bird boxes*

REFERENCES

- BCT (2023) 'Bat Surveys for Professional Ecologists: Good Practice Guidelines', Bat Conservation Trust, London.
- BSI (2013) 'Biodiversity - Code of practice for planning and development (BS 42020:2013)', British Standards Institution.
- CIEEM (2013) 'Technical Guidance Series. Competencies for Species Survey: Bats', Chartered Institute of Ecological and Environmental Management, Winchester.
- CIEEM (2017) 'Guidelines on Ecological Report Writing', Chartered Institute of Ecological and Environmental Management, Winchester.
- CIEEM (2022) 'Code of Professional Conduct', Chartered Institute of Ecology and Environmental Management, Winchester.
- Reason, P.F. and Wray, S. (2023) 'UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.1', Chartered Institute of Ecology and Environmental Management, Ampfield.
- Natural England (2013) 'Standing Advice Species Sheet: Bats'.
- PBA Applied Ecology. 2025. Preliminary Ecological Appraisal - Harras Moor, Whitehaven.

APPENDICES

Appendix A – Policy and Legislation

A number of statutory measures are in place to protect habitats and wildlife. These measures range from a global to local scale, and variously give protection to whole ecosystems or single species. Included below is a brief summary of the legislation and planning policy most applicable to the current project/works. Please note that this is not an exhaustive list, and the original texts should be consulted for further details.

All bat species are protected under Section 39 of *Conservation of Habitats and Species Regulations 2017* (as amended), which are commonly referred to as the '*Habitats Regulations*'. Importantly, the most recent amendments (the Conservation of Habitats and Species [amendment] [EU Exit] Regulations 2019¹), take account of the UK's departure from the EU. The Habitats Regulations give bats, their breeding sites, and resting places, a high level of protection.

Bats also receive protection under the 1981 Wildlife and Countryside Act (as amended) and the 2000 Countryside and Rights of Way Act, as well as under Annex IV of the Council Directive 92/43/EEC 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora (EC Habitats Directive). This directive lists animal and plant species of Community interest in need of strict protection, and includes all bat species.

In summary, 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, for example, 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'. **Bat roosts are protected even when bats are not present.** Prosecution could result in imprisonment, unlimited fines, and confiscation of vehicles and equipment.

In certain circumstances, a license may be granted to allow an activity which would otherwise be an offence. This may include the destruction of a bat roost in order to perform certain essential building works. Regulation 53 of the Habitats Regulations allows licenses to be issued under certain (strict) circumstances. Regulation 53 allows for the circumvention of Article 12 of the Habitats Directive, which prohibits certain activities in relation to European Protected Species (EPS).

An EPS licence may be required for any activity which: (i) is likely to result in the deliberate capture, injury or killing of a bat; (ii) will result in the deliberate disturbance of bats; or (iii) will damage or destroy a breeding site or resting place used by bats. Disturbance of bats includes any disturbance that is likely to: (i) impair their ability to survive, breed, reproduce, nurture their young, or to hibernate; or (ii) affect significantly the local distribution or abundance of the species to which they belong.

A licence can only be granted if the following tests can be met:

- 1) the consented operation must be for "*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*",
- 2) there must be "*no satisfactory alternative*",
- 3) the action authorised "*will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their range*".

When exercising their functions, local authorities must have regard to the requirements of the Habitats Directive, including during decisions on whether to grant planning permission.

As an illustration of this, the judgement in the case of *Morge (FC) (Appellant) v Hampshire County Council* [2011] UKSC 2, is applicable. In this case, the Supreme Court concluded that if the Planning Authority concludes that the carrying out of the development for which permission has been applied for (even if it were to be conditioned), would be likely to offend Article 12(1) (by, say, causing the disturbance of a species with which that Article is concerned), then it must consider the likelihood of a licence being granted.

The licensing authority is Natural England. When considering the likelihood of a licence being granted, it may be helpful to view guidance on how Natural England applies the tests listed above, when considering planning applications which affect European Protected Species: <http://publications.naturalengland.org.uk/publication/113030?category=12002> .

Appendix B – Location of Trees with Bat Potential



Appendix C – Photographs & Target Notes

#	Photograph	Notes
		Multiple trees were assessed as FAR as any potential features could not be seen due to dense ivy cover.

#	Photograph	Notes
Tree 14 (tag number 274)		Dead ash with multiple holes.

#	Photograph	Notes
Tree 15 (tag number 278)		Multiple holes from die back. Cannot see whether they extend back.

#	Photograph	Notes
Tree 10 (tag number 249)		Tear out which extends upwards.

#	Photograph	Notes
Tree 13) tag number 271)	 A photograph of a tree trunk, likely a deciduous species, showing a knot hole. The knot hole is a small, dark, irregular opening in the bark, circled in red. The tree is surrounded by green foliage, and the sky is visible in the background.	Knot hole

#	Photograph	Notes
		Himalayan balsam was found throughout the woodland to the north of the landfill site. Additionally, it was identified to the central east side of the site within the woodland.