

CONTRACTORS PACK



EXTERNAL WALL INSULATION (EWI) AND ASSOCIATED WORKS TOOLKIT

Pack C: Contractors | Part 2: Guidance for
Contractors

Home Improvement Series





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Ceredigion County Council.

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Project Leaders: Graeme Lane and Leanne Bird

Edited by: Leanne Bird of Ceredigion County Council

Written by: Catharine Wüster of Green Man Ecology Ltd.

Contributions by: Graeme Lane of Ceredigion County Council, freelance Ecologist Tom McOwat, Willmott Dixon Energy Services Ltd, Barbara Owsianka of Conwy County Borough Council and Ian Thomas (volunteer)

Designed by: InSynch

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Consultees: Welsh Government, Natural Resources Wales and Bat Conservation Trust

Ceredigion County Council, Penmorfa, Aberaeron, SA46 0PG



TOOLKIT PACKS



Pack A: Clients Pack

Part 1 - General introduction

Part 2 - Guidance for clients



Pack B: Ecologist's Pack

Part 1 - General introduction

Part 2 - Guidance for Ecologists

Part 3 - Precautionary Derogation Licence Application

- *application form*

- *MS template*



Pack C: Contractors Pack

Part 1 - General introduction

Part 2 - Guidance for Contractors

Part 3 - Mitigation method statement

Part 4 - Toolbox talk



Pack D: Mitigation Pack

Part 1 - Property mitigation audit form

Part 2 - Example of a completed mitigation audit form

Part 3 - Mitigation solutions and enhancements catalogue

Part 4 - Bat and bird public information request

Part 5 - Information on protected species and wildlife boxes for property owners



OVERALL PROCESS

STAGE 1: Determine risk to bats and breeding birds

- Desktop survey including Local Record Centre search
- Walkover survey by suitably qualified ecologist checking for signs of bats, bat potential including potential access points and signs of breeding birds

Property has NO signs of breeding birds or bats / potential for bats – continue with works incorporating enhancements on those properties

Property has signs of breeding birds or bats / potential for bats – continue to stage 2

STAGE 2: Mitigate through design

- Avoid impacts by ensuring all bat access points are retained and the roofline/soffits are not affected
- Carry out works outside of bird breeding season
- Provide replacement bird nests appropriate for relevant species

Property's bat access points CAN be retained / no extensions to the roof required / no new soffits/fascias required

- Produce method statement including bat and bird mitigation and enhancements and apply for precautionary bat licence
- continue with works in accordance with method statement for those properties

Property's bat access points CANNOT be retained / extensions to the roof required / new soffits/fascias required – continue to stage 3

STAGE 3: Presence / absence survey

- Where potential impacts can't be avoided, bat presence / absence surveys will be required in accordance with published guidelines

Property has NO evidence of bats

- Produce method statement including bat and bird mitigation and enhancements and apply for precautionary bat licence
- Continue with works in accordance with method statement for those properties

Property HAS evidence of bats - Apply for specific bat (derogation) licence for that property and carry out works in accordance with method statement (incorporating bird mitigation and enhancements) OR do not carry out works



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1 INTRODUCTION

1.1 Aim of this document

- 1.1.1 The purpose of this document is to provide guidance (not rules) for the contractors delivering and fitting External Wall Insulation (EWI) on:
- Why to engage with an ecologist.
 - How to engage with an ecologist.
 - How to avoid harm to protected species (and thereby avoid committing a wildlife offence).
 - The document does not aim to repeat any of existing published guidance (for example the bat survey guidelines).
- 1.1.2 The installation of EWI is constrained by time and resources (see General Introduction). In many cases a minimum level of ecological survey is permissible (desktop, walkover and inspection from the scaffold) *on the condition that off-the-peg mitigation is implemented* wherever potential wildlife features are found under the provision of a Derogation Licence (see Part 1 and Part 3 of the Ecologist pack). The strategy assumes that time and resources will not allow a sufficient level of survey to confirm use of a potential feature by wildlife and so a precautionary approach to mitigation is adopted.
- 1.1.3 In certain instances, comprehensive survey will be necessary and more tailored mitigation strategy required for a given property (e.g. an emergence survey and the possibility that a European Protected Species licence may be required for that property).

2 ENGAGING WITH AN ECOLOGIST

2.1 Why engage with an ecologist?

- 2.1.1 It is essential to consult with an ecologist because the application of EWI has the potential to disturb or destroy resting places of European protected species (bats) and nationally protected species (nesting birds). Bats and their resting places are protected. Destruction of a resting place, or disturbance to bats constitutes a criminal offence. Wild birds are protected during the nesting season but the installation of EWI can also result in the loss of suitable nesting sites. See Part 1 for a summary of the legislation.

2.2 When to engage with an ecologist

- 2.2.1 Engage with an ecologist as soon as possible. An ecologist will provide an estimate for the cost of the work when companies keen to deliver the work are bidding for the contracts.
- 2.2.2 Ecological surveys must be undertaken as soon as the project starts so that any protected species issues can be addressed and followed up in time.



2.3 How to find an ecologist

- 2.3.1 **Local authorities:** Many local authorities have lists of ecologists in the area. Request lists of consultants from the County Ecologist or Biodiversity Officer. Engaging a local ecologist is advantageous because those consultants are more likely to be available at short notice (as is often necessary) and will have a good knowledge of the local wildlife and other relevant local information. Contracting a local consultant also reduces travel costs.
- 2.3.2 **Professional registers:** Although many local ecologists in Wales are not members, you may be able to source an ecologist by using a professional register. The two largest registers are:
- The Chartered Institute of Ecology and Environmental Management
 - The Institute of Environmental Management and Assessment.
- 2.3.3 **Social media:** Many ecologists are members of professional social networks.
- 2.3.4 It is the responsibility of the contracting company to check the qualifications/experience of the ecological consultant, to check that they have appropriate insurance, and that they have had appropriate health and safety training for working on a construction site (i.e. that they hold an appropriate CSCS card). Where there is a risk to disturb bats, or bats need to be handled, ecologists will need to have the appropriate licence. Therefore, it is recommended you employ a licenced bat ecologist to prevent delays in these occurrences. In order to determine whether an ecologist is suitably qualified it is recommended that you refer to the CIEEM Competence for Species Survey: Bats¹.
- 2.3.5 It is also important to try find an ecologist who you can build a good working and trusting relationship with.

3 WILDLIFE SURVEYS

3.1 What to expect

3.1.1 The ecologist will need to undertake surveys as detailed in Table C2-1.

3.1.2 The ecological survey strategy (used by the ecologist) is given in Appendix A, figure C2-2.

¹ http://www.cieem.net/data/files/Resource_Library/Technical_Guidance_Series/CSS/CSS_-_BATS_April_2013.pdf

**Table C2-1:** Ecological surveys for EWI.

	Survey	Details	Delivery
1*	Desktop	<ul style="list-style-type: none"> • The ecologist will request bat and bird records from the local records centre. • Alerts the site manager of any properties with a history of bats (if records have been submitted for that property; an absence of records does not mean that protected species are absent). 	When the scheme starts.
2*	Walkover	<ul style="list-style-type: none"> • Inspection of outside of all properties in the scheme. • Conducted from ground level. • Non-invasive (i.e. from the street; no entry to grounds) • Aims to alert site manager to all properties requiring further survey for protected species 	When the scheme starts.
3†	Void inspection	<ul style="list-style-type: none"> • Required if holes/gaps found that might lead to a roof void and that might be blocked by EWI. • Required if any roof-work being carried out (e.g. loft insulation, re-slating, extension of roof line). 	When the scheme starts.
4†	Emergence survey†	<ul style="list-style-type: none"> • May be required by the local authority (e.g. if planning consent required). • May be necessary if there is a history of bats for a given property and further information is needed on current use. 	Can only be carried out during active bat season (mid-Spring to early Autumn).
5^	EPS Licence	<ul style="list-style-type: none"> • If any bat roost potential is found, a precautionary licence will need to be applied for. This incorporates a licence application (which the site manager will be named responsible) and a method statement 	In place before works begin



Survey	Details	Delivery	Survey
6**	Inspection from the scaffold	<ul style="list-style-type: none"> Any structural features with wildlife potential (e.g. with holes in stonework, gaps behind fascia, holes in soffit, holes in eaves etc.) that do not have a void inspection or an emergence survey will require close inspection from the scaffold. Close inspection allows the ecologist to confirm the real nature of the feature and what sort of mitigation is required. 	As soon as the scaffold is secure.
7††	Mitigation audit	<ul style="list-style-type: none"> The ecologist will inspect all mitigation from the scaffold. 	Before the scaffold is removed.
8	Biodiversity enhancement	<ul style="list-style-type: none"> The ecologist will identify any properties that are suitable to receive a biodiversity enhancement feature (bat or bird box). Note: biodiversity enhancement is not mitigation and not compulsory. They are likely to be a requirement if contracted by a local authority. The features can be installed on any suitable property with the owner's consent. 	Before the scaffold is removed.

*necessary for the whole EWI scheme; †may be necessary for some properties (ecologist will advise); **necessary for any properties with holes and gaps that have not had a void inspection or an emergence survey; ††necessary for any properties receiving bat and/or bird mitigation; ^necessary if any bat potential is found.

3.2 Survey outcomes and mitigation

- 3.2.1 Any structural features with potential for wildlife (as identified by the ecologist) must be retained or replaced.
- 3.2.2 The ecologist will agree an appropriate mitigation strategy for a given property with the contractor.
- 3.2.3 The diagram given in figure C2-3 in Appendix B shows how an appropriate mitigation solution is chosen (after all the ecological surveys have been completed).
- 3.2.4 Refer to the Mitigation Method included in this pack. This is the method that is also followed as part of the precautionary EPS licence.



4 ENGAGEMENT WITH HOUSEHOLDERS / REGISTERED SOCIAL LANDLORDS (RSLs)

- 4.1.1 Integration of bats and birds into property works can be a controversial subject. Householders/RSLs may have pre-conceived opinions/thoughts regarding the potential impacts of these features.
- 4.1.2 It is imperative that householders/RSLs are engaged early on in the process. Discussions regarding ecological mitigation should be entered into when approaching householders/RSLs for the first time/when they have approached the contractor for the first time.
- 4.1.3 At the time of seeking agreement for the EWI, householders/RSLs should be made aware that ecological mitigation and enhancement may be required to be integrated into the scheme on their property/s, and seek written agreement for this at that stage.
- 4.1.4 Where householders refuse, ecological surveys may need to be carried out (depending on walkover results) to determine whether bats and birds are using the property, which may result in the requirement for mitigation and enhancement anyway. Where householders out-right refuse or it is not possible to do the sufficient survey work because of timescales, then, if bat potential is identified, EWI should not go ahead on their property and they should not be put into the scheme.
- 4.1.5 If these discussions and agreements are not had and sought from the outset, then issues can arise later on, causing delays and potentially rendering the scheme unachievable.
- 4.1.6 In addition, the EPS Derogation Licence cannot be achieved as householders/RSLs are refusing for the works to be carried out in accordance with the ecological report (and therefore method statement).
- 4.1.7 It is the contractor who is named on the licence and therefore the contractor that would be committing an offence by not according with the licence. Bird mitigation and all enhancements are not covered by this licence but will be requirements in order to meet WG and LA duties (see Pack A Part 2: Guidance for Clients).

4.2 Concerns about bat and bird boxes

- 4.2.1 **They require maintenance** - This is not true, as long as the right boxes are chosen, and for birds, they are using them, then there is no maintenance required.
- 4.2.2 **They will cause a mess** – bat and bird boxes should not be placed about doors or windows where they could cause an inconvenience
- 4.2.3 **They will stop owners getting planning in the future** – again this is not true. The presence of bat species very rarely results in a planning refusal, as long as appropriate surveys have been carried out and mitigation considered. Having bats or birds using a box rather than the house is also easier to mitigate as it is known where the bats are and the box can just be removed at the appropriate time of year and replaced on the new extension (for example).
- 4.2.4 **They are ugly** – many bat boxes are integrated into the cladding, leaving just a slit visible, smaller than a ventilation vent (see Figure C2-1).



Figure C2- 1: Bat box mitigation/enhancement example



APPENDIX A: ECOLOGIST SURVEY METHODS

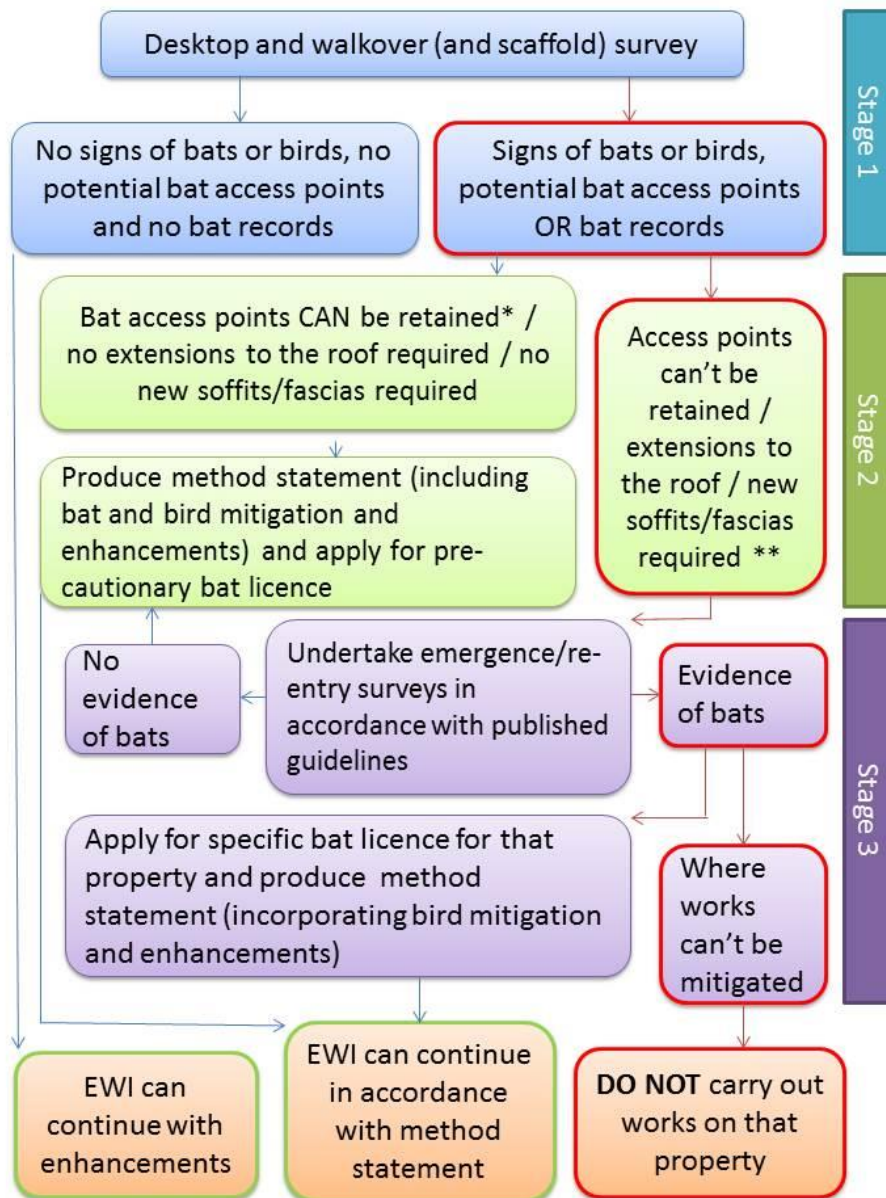


Figure C2- 2: Protected species survey strategy

*Where bat records exist, lack of bat access MUST be confirmed by closer inspection and void inspection where necessary, otherwise emergence/re-entry surveys are required.

**if access points can't be retained or roof works are proposed but there is no access to the void (confirmed through internal inspection/endoscope from scaffold), suitable mitigation can be proposed in accordance with B2.2 as part of the method statement and precautionary licence application and therefore further survey work would be needed may be avoided.



APPENDIX B: MITIGATION METHODS

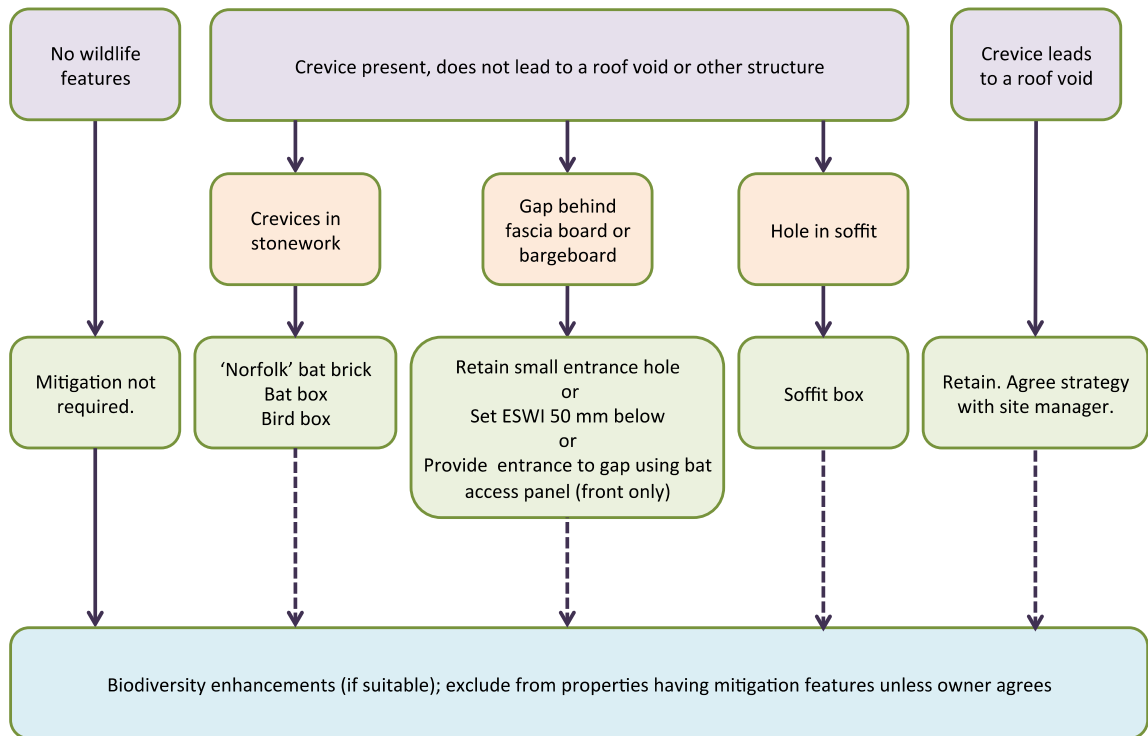


Figure C2- 3: Mitigation selection strategy