

Bat Survey Report

The Walnut Tree, Thwaite, Suffolk



Ms Jan Wise, The Walnut Tree, Thwaite, Suffolk

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Report prepared by Dr J. Huckle for Huckle Ecology Ltd

Executive Summary

- In May 2022, Huckle Ecology was commissioned by Ms Jan Wise to undertake a bat activity survey of The Walnut Tree, Thwaite, Suffolk. The surveys were undertaken to inform a planning application for the re-roofing of the property, which is a Grad II listed building.
- The survey was carried out following a Preliminary Roost Assessment undertaken in January 2022 that evaluated the building as providing moderate potential suitability to support bat roosting habitat; in accordance with recommended BCT survey guidelines (Collins, 2016), it was recommended that a minimum of two bat activity surveys be undertaken during the bat activity season (May – September).
- This report presents the results of bat surveys undertaken in May and June 2022, and which included a site visit to update and corroborate the January 2022 survey and two bat activity surveys undertaken on May 20th 2022 and June 13th 2022.
- The building inspection undertaken on May 12th 2022 confirmed that building supported features consistent with the previous assessment of moderate suitability.
- During the bat activity surveys, bat activity was recorded by three experienced surveyors from three locations to the west, north east and south east of the building.
- No bats were recorded emerging from the building on either of the surveys and no bats were recorded flying outside the building. It is considered likely that the high levels of disturbance arising from the traffic on the adjacent A140 and the operational use of the building as a restaurant contribute to the reduced suitability of the building for bats.
- The results of the bat survey are considered sufficient to provide confidence in a negative conclusion from a presence/absence survey of a structure with Moderate potential suitability as roosting habitat. Consequently, bats are considered to be likely absent from the building and unlikely to use the building as a potential roost.
- A European Protected Species mitigation licence (EPSL) application will not be required for the proposed development.
- Appropriate mitigation measures have been specified including recommendations for lighting specifications and for the use of Type 1F Bitumen Felt as a roof lining.

1 Introduction

1.1 Terms of Reference

- 1.1.1 In May 2022, Huckle Ecology was commissioned by Ms Jan Wise to undertake a Bat Survey of The Walnut Tree, Thwaite, Suffolk. The Walnut Tree is in operation as a restaurant/public house adjacent to the A140. The surveys were commissioned to inform a planning application to Mid Suffolk Council for the re-roofing of the main part of the property.
- 1.1.2 A Preliminary Roost Assessment was undertaken in January 2022 (Greenlight Environmental Consultancy Ltd, January 2022), which concluded that there were no significant ecological constraints that would prevent the proposed works. In relation to bats, the PRA evaluated that there was:
- 'Moderate bat roosting potential in building on site'; and
 - 'Low value commuting and foraging habitat on site'.
- 1.1.3 The PRA report concluded that the proposed development would result in potential disturbance of bat roosts if present in the building and '...low scale loss and potential light disturbance of commuting and foraging habitats on site'. It was recommended that at least two activity surveys should be undertaken between May and September, with the outcome of the surveys informing a detailed mitigation strategy and whether a European Protected Species (EPS) Mitigation Licence would be required from Natural England.
- 1.1.4 This report details the findings of bat activity surveys undertaken in May and June 2022 and mitigation strategy updating the proposed mitigation outlined in the previous PRA report.

1.2 Site Description

- 1.2.1 The proposed development site comprises the existing Walnut Tree Restaurant and Public House, located in Thwaite and adjacent to the A140. The Site Location is presented in Figure 1 with the Property Site Plan presented in Figure 2 below.
- 1.2.2 The Site includes the main Building (B1) which is a Grade II listed brick and timber framed structure with external rendering to the walls. The roof features flat, clay peg tiles and ridge tiles with timber fascia boards.
- 1.2.3 Other buildings present include relatively recent buildings used for storage.

1.3 Proposed Development

- 1.3.1 The proposed development is for the re-roofing of the main Building B1, which has the potential to destroy or modify potential bat roosts if they were present.

Figure 1 Location Plan Showing location of The Walnut Tree, Thwaite

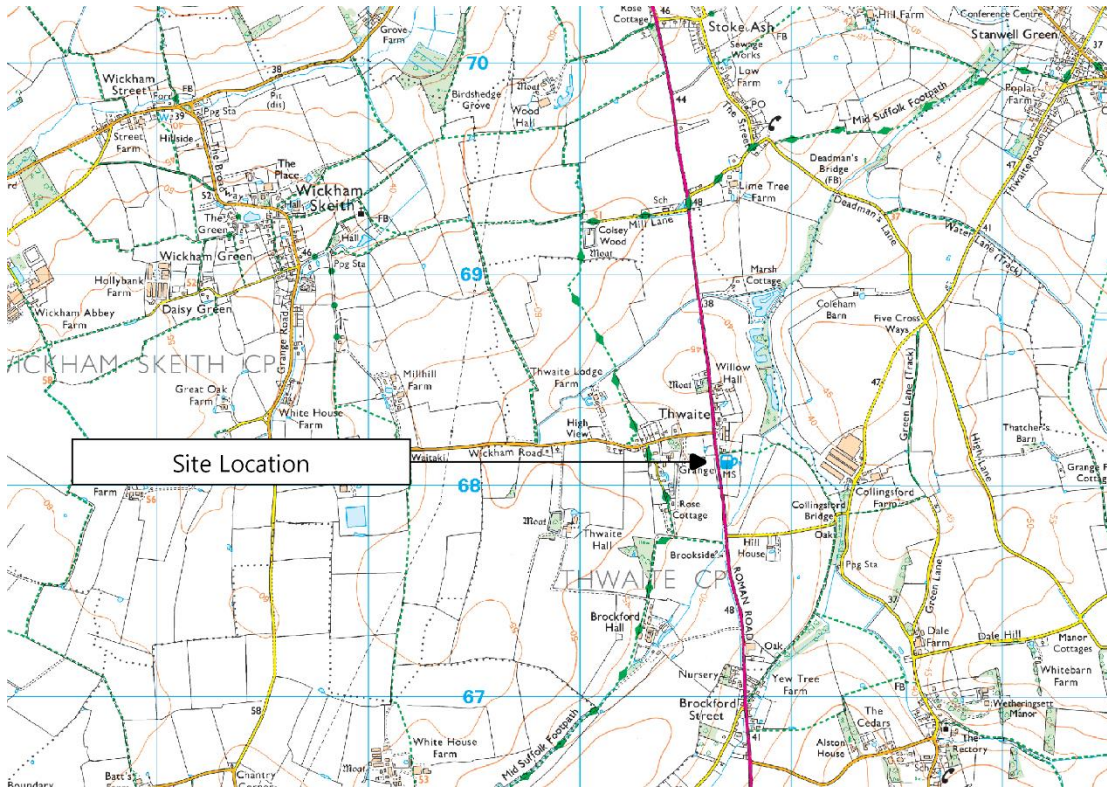


Figure 2 Existing Site Location Plan



1.4 Aim of this Report

- 1.4.1 This report presents the results of bat surveys undertaken at The Walnut Tree in May and June 2022
- 1.4.2 The scope of the protected species surveys undertaken was determined from the information presented in the PRA and Barn Owl Assessment Report (Greenlight Environmental Consultancy Ltd, January 2022) and an updated habitat suitability assessment for bats undertaken in May 2022 (as reported below). These surveys and assessments included evaluation of the potential to support other protected species. Other than bats, the only protected species likely to be an ecological constraint are breeding birds, using the building structure for breeding.

2 Review of PRA and Barn Owl Assessment Report

- 2.1.1 The survey undertaken in January 2022 included a desktop review of existing ecological information which noted that there were no records of granted EPS Mitigation Licences (including bats) within a 2km search area. The study did not include a search of ecological records held by Suffolk Biodiversity Information Service; however, due to the small size of the site and scope of works involved, this is not considered to be an essential aspect of a desk study and is unlikely to provide information required to inform the planning application.
- 2.1.2 The PRA included the findings of a building inspection undertaken on January 4th 2022. This building inspection noted that:

“The building is a grade II listed brick and timber framed structure. The roof features clay peg and ridge tiles, with timber fascias and closed eaves. The latter are beginning to deteriorate in areas, with several crevices present.

Internally, the loft space has undergone recent works in the past 12 months, with new fiberglass insulation and boarding along the floor. The northern third of the loft space is part of a 20th century extension, featuring modern rafters, a ridge beam, bitumen lining and is lightly cobwebbed. The middle and southern third of the loft space are part of the original structure, featuring a mixture of modern and original rafters, a ridge beam in areas and are moderately to heavily cobwebbed. The roof is lined with a mixture of fiberglass insulation, bitumen felt and lath and plaster, and features a combination of open and inaccessible voids. The original structure showed evidence of a fire, which occurred in the 1980's and was subsequently reroofed.

The building features two extensions.

- i. Extension 1a – brick and timber framed extension with clay pantiles. The loft space features modern rafters, a ridge beam and is lined with bitumen felt. The internal loft space is lined with plastic sheeting.
- ii. Extension 1b – a brick and timber framed extension with a flat roof lined with bitumen felt.

*Roosting opportunities are present under slipped, missing and/or raised roof tiles, gaps in the eaves and fascias and within the loft space. Although no bats were visible, a small number of scattered droppings (<5), consistent in size, structure and appearance with brown long-eared *Plecotus auritus* were present throughout the void.*

*The building is assessed as **moderate** summer, but **negligible** hibernation roost suitability for bats due to its location, roosting features and signs of bats. Please note, the building is occupied during winter months and features central heating, which would create fluctuations in temperature and humidity.*

The trees around the site boundary were assessed for bat roosting potential and were considered unsuitable due to their age and/or lack of features.

The site itself provides low value foraging habitat for bats along the building, with bats mainly using nearby woodlands for foraging.

*The landscape immediately adjacent to the site is considered of **low** to **moderate** value for foraging and commuting bats, with linked gardens, hedgerows, treelines and the River Dove providing links to the wider landscape. Residential dwellings adjacent the site and within Thwaite have the potential to provide roosting opportunities for bats.”*

2.1.3 With regard to birds, the report concluded that the site provided suitable nesting habitat for breeding birds, noting that:

“The site provides potential breeding habitat for the following Red listed species: house martin Delichon urbicum, house sparrow Passer domesticus, swift Apus and starling Sturnus vulgaris.

The site provides potential breeding habitat for the following Amber listed species: woodpigeon Columba palumbus.

No signs of barn owl were found on the site and no foraging habitat is present.”

2.1.4 The PRA report recommended bat activity surveys and outline mitigation measures, stating that:

“The following surveys/mitigation is recommended to determine if any bat species are present, the nature of their use of the building and any roosting locations:

- *At least two bat activity survey (comprised of a dusk emergence and a dawn return-to-roost survey) to be conducted on building one between May and September. Please note, at least one survey must be conducted between May and August.*
- *If bats are found to be present and roosting within the building, further activity surveys and a European Protected Species Mitigation Licence may be required for the development.*
- *Any lighting schemes will follow guidance from the Bat Conservation Trust and CIE 150:2003. Warm-white (long wavelength) lights with UV filters will be fitted as close to the ground as possible. Lighting units will be angled below 70° and equipped with movement sensors, baffles, hoods, louvres and horizontal cut off units at 90°..*
- *The outcomes of further activity surveys will inform the detailed recommended mitigation for bats. We consider that the proposed development will be able to accommodate this in the form of alternative roosting opportunities, as required.*

Building Regulations state that the energy efficiency of buildings must be improved where possible and that contractors must assess the condensation risk within the roof space and make appropriate provisions in line with BS 5250:2011. This British Standard states that both High Resistance (bitumen type 1F) and Low Resistance non-bitumen coated roofing membrane (NBCRM) underlays are acceptable as long as appropriate ventilation is provided. As NBCRM are proven to entangle bats through regular contact, which also compromises the integrity of the membrane, the Bat Conservation Trust recommend only traditional type 1F bitumen is used.”

2.1.5 The PRA report concluded that the proposed reroofing works would result in allow scale loss of bird nesting habitat through the construction work to the building. The report recommended that:

“Any works affecting bird nesting habitat such as management of building would ideally need to be conducted outside the main nesting season, which lasts from March to August. If work is planned during the bird nesting season, then a precautionary check of all habitats will be conducted by a qualified ecologist immediately prior to starting any work. If any nesting birds are found, an

appropriate protection zone from the nest will be required and will be maintained until the young have fledged.

As enhancements, the following will be implemented:

- One swift box (Schwegler Brick Nest Box Type 25 – Appendix C).
- One small bird box (Schwegler 1B or 2H Nest Box – Appendix C).

Natural England and Local Planning Authorities (“LPA”) have recognised a significant decline in swift populations across the country and are actively endorsing integrated swift boxes to provide a net gain in biodiversity, as is encouraged by NPPF 2021.”

3 Bat Surveys

3.1 Updated Preliminary Roost Assessment–Scoping Survey

Methodology

- 3.1.1 A Site Visit was undertaken on 12th May 2022 to provide an update to the PRA undertaken in January 2022; building surveys undertaken in winter may not provide evidence of recent bat use, particularly if a building or structure is only used during spring to autumn period when bats are most active. The Site Visit also aimed to confirm the scope of further surveys that would be required to accompany the planning application, in line with best practice guidance on bat surveys (Collins, 2016).
- 3.1.2 The May 2022 survey was undertaken by Dr Jon Huckle.
- 3.1.3 Jon Huckle is an experienced professional ecologist with over 25 years of postgraduate experience and over 20 years operating as an ecological consultant. He has undertaken numerous bat surveys, including building inspections, bat activity transects, emergence and return roost surveys and has managed ecological input to numerous ecology chapters of Environmental Statements. He has provided evidence as an expert witness on bat ecology at several planning inquiries.
- 3.1.4 The preliminary roost assessment comprised a detailed inspection of the exterior and interior of the buildings to look for features that bats could use for entry/exit and to search for signs of bats, in accordance with methodological guidance produced by the Bat Conservation Trust (Collins, 2016). The objective of the survey was to determine the actual or potential presence of bats and to identify potential emergence points to focus on during emergence surveys.
- 3.1.5 For each building or tree, the preliminary roost assessment assigns a category to each structure according to its potential for supporting bat roosts using the criteria detailed in the BCT survey guidelines (Collins, 2016) and summarised in Table 1 below.

Table 1 Guidelines for assessing the potential suitability of proposed development sites for bats, taken from Collins 2016.

<u>Suitability</u>	<u>Description of roosting habitats</u>	<u>Description of commuting and foraging habitat</u>
Negligible	Negligible habitat features onsite likely to be used by roosting bats.	Negligible habitat features on- site likely to be used by commuting or foraging bats.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost	Habitat that could be used by small numbers of commuting bats such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very

<u>Suitability</u>	<u>Description of roosting habitats</u>	<u>Description of commuting and foraging habitat</u>
	<p>sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation.)</p> <p>A tree of sufficient size and age to contain potential roost features but with none seen from the ground or features seen with only very limited roosting potential.</p>	<p>well connected to the surrounding landscape by other habitat.</p> <p>Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.</p>
Moderate	<p>A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only – the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed).</p>	<p>Continuous habitat connected to the wider landscape that could be used by bats for commuting such as lines of trees and scrub or linked back gardens.</p>
High	<p>A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.</p>	<p>Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats such as river valleys, streams, hedgerows, lines of trees and woodland edge.</p> <p>Site is close to and connected to known roosts.</p>

Results of Preliminary Roost Assessment

- 3.1.6 The May 2022 corroborated the findings of the January 2022 PRA undertaken and reported in the PRA and Barn Owl Assessment Report (Greenlight Environmental Consultancy Ltd, January 2022).
- 3.1.7 No bats were recorded within the building and there was evidence of recent works in preparation of re-roofing. The building was evaluated as providing moderate potential suitability to support bat roosting habitat, confirming the recommendation for two bat activity surveys to be undertaken of the building.
- 3.1.8 In summary, potential roosting opportunities were considered to comprise:
- Under missing, slipped flat peg tiles:
 - Under missing ridge tiles, or where mortar was missing;
 - In gaps in some of the eaves under the roofs and in dilapidated fascia boards; and
 - In the loft space itself.

Photo 1 West elevation (front) facing towards A140



Photo 2 North east elevation (rear) showing beer garden



Photo 3 South east elevation (rear) showing modern extension (kitchen)



Photo 4 South east elevation showing missing tiles and dilapidated fascia boards



Photo 5 Interior of loft – north end showing modern roof timbers and new plastic sheets



Photo 6 Interior of loft – south end showing brick chimney and new sheeting



3.2 Bat Activity Survey Methodology

3.2.1 Between May and June 2022, two bat activity surveys were undertaken, consistent with the level of survey effort recommended to provide confidence in a negative result for a building or structure evaluated as providing moderate potential suitability for roosting habitat (Collins, 2016).

3.2.2 Observations were made from outside, from three vantage point locations:

- VP1 - North east of the building, viewing the north and north east elevations;
 - VP2 – South East of the building, viewing the south and south east elevations;
 - VP3 – West of the building, viewing the front elevation close to the road frontage with the A140.
- 3.2.3 These positions were selected to provide as much coverage of the roof and building features most likely to support bat roosts or where bats may access the building.
- 3.2.4 The dusk surveys commenced fifteen minutes before sunset until ninety minutes after sunset, by which time any bats present were expected to have emerged (Collins, 2016).
- 3.2.5 All emergence surveys were undertaken by Jon Huckle, assisted by a team of experienced surveyors comprising Terry Stopher and John Worthington-Hill.
- 3.2.6 Bat activity was surveyed using full spectrum handheld bat detectors: an Elekon Batlogger M2, an Anabat Scout detector and an EMTouch Pro attached to a tablet or smartphone. Time-expanded (x10) recordings were later analysed using computer software (e.g., Sonobat, BatExplorer or Kaleidoscope).
- 3.2.7 Night Vision Aids (NVAs) were used alongside each surveyor comprising two Sony video camcorders and one Nightfox Red IR recorder with infrared illuminators lights to provide additional infrared lighting, covering areas where bats were considered most likely to emerge.
- 3.2.8 The bat surveys were conducted during the bat activity season (May to September) using the correct methodology as per The Bat Conservation Trust Bat Survey - Good Practice Guidelines (Collins, 2016).

Survey Limitations

- 3.2.9 The initial bat preliminary roost assessment was undertaken in January 2022 and was updated and confirmed by the May 2022 survey. Both surveys included an internal inspection of the loft space; both surveys were limited in terms of access due to the size and nature of the interior of the building. However, the loft was well illuminated and with recently laid plastic sheeting and floor boards facilitating relatively easy detection of recent signs of bat activity. The only evidence of bats was two bat droppings at the south end of the loft; both were very old and likely to have originated from the previous year, and may have been the ones noted in January 2022.
- 3.2.10 External features were checked as far as was reasonably possible, although it was not possible to inspect tiles and roof thoroughly.
- 3.2.11 The bat emergence surveys were undertaken in optimal weather conditions for bat activity surveys, in dry weather and at appropriate temperatures. The vantage points were selected to provide coverage of the building elevations that could be easily viewed and accessed.

3.3 Bat Activity Survey Results

Activity Survey 1 – Dusk Emergence Survey – 20th of May 2022

- 3.3.1 Weather conditions were optimal for bat activity surveys:
- Air temperature – 16°C (start) – 13°C (end)
 - Wind – Beaufort scale 2 (light breeze)

- Precipitation – none but rain occurred earlier in the day
- Cloud – cloudy with occasional clear spells (6/8 oktas)

3.3.2 The survey commenced at 20.45 with sunset scheduled for 20.52.

3.3.3 Observations were made from outside, from positions to the northeast, southeast and west of the building providing good visual coverage of the entire roof and elevations of the building.

Summary of Survey on 20.05.2022

3.3.4 In summary, no bats were recorded by any of the three surveyors at all, and no bats were observed emerging from the building.

3.3.5 It is relatively unusual to record no bats during a survey; however, the survey was undertaken on a Friday evening, and this meant that the A140 was busy with light and noise pollution from passing traffic prevalent and noticeable at all survey locations.

3.3.6 In addition, the survey was undertaken on an evening when the restaurant was operational (and relatively busy) with light and noise disturbance noticeable at the rear of the property as well as at the public access present at the front of the building.

3.3.7 While the location of the building next to a busy trunk road and in operational use as a restaurant is likely to decrease the potential suitability of the building for bats, it was decided to undertake the second survey on a quieter evening, when the restaurant was not open.

Activity Survey 2 – Dusk Emergence Survey – 13th of June 2022

3.3.8 Weather conditions were optimal for bat activity surveys:

- Air temperature – 17°C (start) - 14°C (end)
- Wind – Beaufort scale 0 (still)
- Precipitation – none
- Clear sky (0/8 oktas)

3.3.9 The survey commenced at 21.15 with sunset scheduled for 21:21.

3.3.10 Observations were made around the house providing visual coverage of the entire roof and elevations of the building.

Summary of Survey on 13.06.2022

3.3.11 In summary, no bats were recorded at any of the vantage points and no bats emerged from the building during the survey.

3.3.12 The level of disturbance at the rear of the property was significantly reduced due to the restaurant being closed on a Monday evening. However, noise and light pollution (from headlights) was still high from the A140.

3.4 Conclusion of Bat Activity Surveys

- 3.4.1 In summary, no bats were observed emerging from the building or recorded flying around the building during any of the surveys.
- 3.4.2 The results of the bat survey are considered sufficient to provide confidence in a negative conclusion from a presence/absence survey of a structure with Moderate potential suitability as roosting habitat.
- 3.4.3 Although the absence of bat records during the surveys should not be used to conclude that bats are absent from the area, the survey results indicate that the Site is of very low value to local bat populations both in terms of a potential roost site and as foraging or commuting habitat.
- 3.4.4 Consequently, the survey results support the conclusion that the proposed development is not considered likely to result in potential effects on bats; the buildings and trees were considered to provide Very Low potential habitat for roosting bats and the site provides a small area of very low value foraging or commuting habitat for bats.
- 3.4.5 Nevertheless, regardless of the non-significant nature of the potential impacts on bats outlined above, the mitigation measures outline in the previous PRA report (Greenlight Environmental Consultancy Ltd, January 2022) are considered to be applicable and appropriate to minimise the potential effects of the scheme on bats.
- 3.4.6 In particular it is recommended that future lighting of the property will follow guidance from the Bat Conservation Trust and in accordance with CIE 150:2003. External lighting should comprise warm white (long wavelength) lights with UV filters as close to the ground as possible. All lighting should be angled downward (below 70 degrees) and equipped with movement sensors, baffles, hoods, louvres or horizontal shields to prevent upward light spill away from the building.
- 3.4.7 In addition it is recommended that the re-roofing works be undertaken using traditional type 1F bitumen felting to minimise the risk of bat mortality arising from bat becoming entangled within the fibres of Non-bitumen Coated Roofing Membrane (NBCRM).
- 3.4.8 The mitigation and enhancement measures recommended to avoid and benefit breeding birds are considered valid, including the deployment of 1x swift box and 1x small bird nest box on the building or on a suitable tree respectively.

4 References

Collins, J. (2016). *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn)*. London: The Bat Conservation Trust.

Greenlight Environmental Consultancy Ltd. (January 2022). *Preliminary Bat Roost and Barn Owl Assessment*.

MHCLG. (2019). *National Planning Policy Framework*. London, UK.: Ministry of Housing, Communities and Local Government.

Appendices

Appendix 1 – Summary of Legislation - Bats

This section provides a brief guide to legislation and planning policy, and it is recommended that the full text of policy and legislation is consulted for the correct legal wording.

All bat species benefit from statutory protection provided by the 'Habitats Regulations' and the Wildlife and Countryside Act, which have been enshrined within national and local planning policy throughout England and Wales.

All bat species are included in Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended). Under Regulation 43 it is an offence to:

- Deliberately capture, injure or kill a bat;
- Deliberately disturb bats including:
 - impairing their ability to survive, breed or rear young;
 - impairing their ability to hibernate or migrate;
- Significantly affect the local distribution or abundance of that species
- Damage or destroy a breeding site or resting place of a bat;
- Possess, control, transport, sell or exchange any live or dead bat, or any part or thing derived from a bat.

Bats are listed on Schedule 5 of the Wildlife & Countryside Act 1981, as amended, and as such are protected under Section 9 of the Act, which applies to all stages in their life cycle and makes it an offence to:

- intentionally kill, injure or take bats. [Section 9(1)]
- to possess or control a bat, live or dead or any part or thing derived from them. [Section 9(2)]
- to intentionally or recklessly damage, destroy, or obstruct access to any structure or place which bats use for shelter or protection. It is also an offence to intentionally disturb them while occupying a structure or place which it uses for that purpose. [Section 9(4)]
- to sell, offer or expose for sale, or possess or transport for the purpose of sale, any live or dead bat or any part or thing derived from them. [It is also an offence to publish or cause to be published any advertisement likely to be understood as conveying that bats, or parts or derived things of them are bought, sold or are intended to be]. [Section 9(5)]

Prosecution could result in imprisonment, fines of £5,000 per animal affected and confiscation of vehicles and equipment used.

This legislation provides defences so that necessary operations may be carried out in places used by bats, provided the appropriate Statutory Nature Conservation Organisation (in England this is Natural England) is notified and allowed a reasonable time to advise on whether the proposed operation should be carried out and, if so, the approach to be used. The UK is a signatory to the Agreement on the Conservation of Bats in Europe, set up under the Bonn Convention. The Fundamental Obligations of Article III of this Agreement require the protection of all bats and their

habitats, including the identification and protection from damage or disturbance of important feeding areas for bats.

Paragraph 98 of Circular 06/2005 states that ‘the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat’.

Section 9 of the National Planning Policy Framework 2019 (NPPF) (MHCLG, 2019) states that ‘the planning system should contribute to and enhance the natural and local environment by ... minimising impacts on biodiversity and providing net gains in biodiversity where possible.’

Exemptions can be granted from the protection afforded to bats under the Habitat Regulations, by means of an EPS (European Protected Species) Habitats Regulations licence obtained from Natural England.

An ‘EPS Habitats Regulations Licence’ could be required for:

- Demolition of a building known to be used by bats prior to development of a site
- Conversion of barns or other buildings to be used by bats
- Removal of trees known to be used by bats as well as tree pruning
- Significant alterations to roof voids known to be used by bats
- Road building or widening
- Bridge strengthening

There are three tests, which must be satisfied before a licence can be issued to permit otherwise prohibited acts;

- Regulation 55(2)(e), for the purpose of 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; or
- Regulation 55(9)(a) and there is no satisfactory alternative; and
- Regulation 55(9)(b) that the action authorised will not be detrimental to the maintenance of the species concerned at favourable conservation status in their natural range.

A European Protected Species Licence is required before the commencement of any development that might impact on bats and their roosts.