



Preliminary Roost Assessment

23 Old Market Street, Stowmarket, Suffolk, IP14 5RZ

Marcus Keeble

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Industry Guidelines and Standards

This report has been written with due consideration to:

- Chartered Institute of Ecology and Environmental Management (2017). Guidelines for Preliminary Ecological Appraisal. 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.1. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2017). Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2020). Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- British Standard 42020 (2013). Biodiversity – Code of Practice for Planning and Development.
- British Standard 8683:2021 (2021). Process for Designing and Implementing Biodiversity Net Gain.

Proportionality

The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate.

The desk studies and field surveys undertaken to provide a Preliminary Ecological Appraisal (PEA) might in some cases be all that is necessary.

(BS 42020, 2013)

Executive Summary

Arbtech Consulting Limited was instructed by Marcus Keeble to undertake a Preliminary Roost Assessment (PRA) at 23 Old Market Street, Stowmarket, Suffolk, IP14 5RZ (hereafter referred to as “the site”). The survey was required to inform a planning application for the demolition of the existing partially collapsed outbuilding and construction of a new garage/workshop (hereafter referred to as “the proposed development”).

The following is work you will need to commission to comply with planning policy and legislation. Further information, along with opportunities for biodiversity enhancement, are outlined in Table 4 of this report.

Feature	Survey Results Summary	Impact Assessment	Recommendations
Roosting bats (B1a)	B1a has negligible value for roosting bats due to the exposed, partially collapsed nature of the structure and a lack of potential roost features.	Bats are very unlikely to be roosting within this part of the building and as such, there are not anticipated to be any impacts on roosting bats as a result of the demolition of the building.	In the unlikely event that a bat or evidence of bats is discovered during the development all work must stop and a bat licensed ecologist contacted for further advice.
Roosting bats (B1b)	B1b has low value for roosting bats due to the presence and height of roost features on the building and the location of the site in terms of foraging and commuting habitat and connectivity to the wider landscape.	The proposed development will result in the demolition to this building. This could result in the destruction of any bat roosts present and could cause disturbance, death or injury to bats.	One bat emergence or re-entry survey is required during the active bat season (optimal May to August, suboptimal September) to confirm presence or likely-absence of a bat roost in the building. Please refer to Table 4.

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed by Marcus Keeble to undertake a Preliminary Roost Assessment (PRA) at 23 Old Market Street, Stowmarket, Suffolk, IP14 5RZ (hereafter referred to as “the site”). The survey was required to inform a planning application for the demolition of the existing partially collapsed outbuilding and construction of a new garage/workshop (hereafter referred to as “the proposed development”). A plan showing the proposed development is provided in Appendix 1.

The aim of the PRA was to determine the presence or evaluate the likelihood of the presence of roosting bats, and to gain an understanding of how bats could use the site for roosting, foraging or commuting. This has been undertaken with due consideration to the “Bat Surveys for Professional Ecologists —Good Practice Guidelines” publication (Collins, 2016). No previous ecology reports have been produced for this site by Arbtech Consulting Ltd or, to the author’s knowledge, by any other consultancy.

1.2 Site Location and Landscape Context

The site is located at National Grid Reference TM 10411 65836 and has an area of approximately 0.031ha comprising one main residential building, one outbuilding/shed and associated parking (hardstanding) and garden with grassland. It is located in a rural context within the village of Mendlesham, Suffolk. It is surrounded by built-up areas on all sides, comprising residential properties with gardens. A minor road (Old Market St) runs adjacent to the north of the site and a track/lane directly to the south. The land surrounding the built-up areas of the village predominantly comprises arable land and grassland with some scattered hedgerows/trees, beyond which lies two small pockets of woodland to the north and south. The wider landscape comprises a vast expanse of arable land and scattered residential and agricultural infrastructure and isolated pockets of UK BAP priority deciduous woodland and traditional orchards. There are no suitable bat habitats on site, though nearby scattered trees within residential gardens may provide some opportunities for foraging. There are no distinct linear features providing connectivity through the landscape to habitats beyond the built-up areas of the village, though the small woodland pockets within the 2km may provide good commuting and foraging habitat and provide bat roosting value.

A site location plan is provided in Appendix 2.

1.3 Scope of the Report

This report provides a description of all features suitable for roosting, foraging and commuting bats and evaluates those features in the context of the site and wider environment. It further documents any physical evidence collected or recorded during the site survey that establishes the presence of roosting bats. It provides information on possible constraints to the proposed development as a result of bats and summarises the requirements for any further surveys to inform subsequent mitigation proposals, achieve planning or other statutory consent and to comply with wildlife legislation. To achieve this, the following steps have been taken:

- A desk study has been carried out.
- A field survey has been undertaken, including an inspection of built structures, to determine the presence or the suitability of any features which bats could use for roosting and to assess the suitability of the site’s bat foraging and commuting habitat.

- An outline of potential impacts on any confirmed or unidentified roosts has been provided, based on the proposed development.
- Recommendations for further surveys and mitigation have been made, along with advice on the requirements for a European Protected Species Licence (EPSL) application if appropriate.
- Opportunities for the enhancement of the site for roosting, foraging and commuting bats have been set out.

2.0 Methodology

2.1 Desk Study

The desk study included a 2km radius review of statutory designated sites with bat qualifying interests and granted EPSL records for bats held on magic.gov.uk database. An assessment of the surrounding landscape structure was also completed using aerial images from Google Earth and OS maps.

2.2 Field Survey

The survey was undertaken by Georgia Arnold (BSc, MSc, Accredited Agent under Natural England Bat Licence Number: 2018-33540-CLS-CLS) on 31/06/2023.

The PRA focussed on one built structure which will be affected by the proposed development as well as providing an overview of the wider site and the surrounding landscape for bat roosting, foraging and commuting habitat.

For any surveyed buildings:

A non-intrusive visual appraisal was undertaken from the ground, using binoculars to inspect the external features of the building for features which bats could use for roosting, including access or egress points and for signs of bat use including droppings, scratch marks, insect remains and urine smear marks. An internal inspection of the building was also made, including the living areas and any accessible roof spaces, using a torch and ladders. The surveyor paid particular attention to the floor and flat surfaces, window shutters and frames, lintels above doors and windows, and carried out a detailed search of numerous features within the roof space.

2.3 Breeding Birds and Other Incidental Observations

The surveyor also made note of any other ecological constraints observed during the survey, notably the likelihood of presence or signs of breeding birds, and the suitability of the site for barn owls.

2.4 Suitability Assessment

Built structures were categorised according to the likelihood of bats being present and the types of roost that the identified features could support. This is summarised in Table 1 below. Roost suitability is classified as high, moderate, low and negligible and dictates any further surveys required before works can proceed.

Table 1: Features of a building that are correlated with use by bats

Classification	Feature of building and its context
High	Buildings or structures with features of particular significance for larger numbers of roosting bats e.g. mines, caves, tunnels, icehouses and cellars. Habitat on site and surrounding landscape of high quality for foraging bats e.g. broadleaved woodland, tree-lined watercourses and grazed parkland. Site is connected with the wider landscape by strong linear features that would be used by commuting bats e.g. river and or stream valleys and hedgerows. Site is proximate to known or likely roosts (based on historical data). Buildings with high suitability could support roosts of high conservation value such as maternity or hibernation roosts.

Moderate	Buildings or structures with one or more features suitable for more regular roosting due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation value such as maternity or hibernation roosts. Continuous habitat connected to the wider landscape which could be used by bats for commuting such as lines of trees, linked gardens. Foraging habitat in the surrounding area such as trees, scrub, grassland or water.
Low	Buildings or structures with one or more features suitable for use sporadically by individual or small numbers of bats. Potential roost features may be suboptimal for reasons such as shallow depth, poor thermal qualities or upwards orientation with exposure to inclement weather or predators. Habitat suitable for foraging in close proximity, but largely isolated in the landscape. Or an isolated site not connected by prominent linear features.
Negligible	Unsuitable for use by bats.

2.5 Limitations

It should be noted that whilst every effort has been made to describe the features on site in the context of their suitability for roosting bats, this does not provide a complete characterisation of the site. This survey provides a preliminary view of the likelihood of bats being present. This is based on suitability of the habitats on site and in the local area, the ecology and biology of bats as currently understood, and the known distribution of bats as recovered during the desk study. Bats are highly mobile creatures that switch roosts regularly and therefore the usage of a site by bats can change over a short period of time.

There were no specific limitations to the survey.

A search for biological records data has not been undertaken. However, given the location of the site, the nature of the habitats present, and the assessed suitability of the site for bats, it is not anticipated that the purchase of biological records data will add any significant weight or alter the conclusions and recommendations outlined in this report. A search of historical records data including granted EPSLs within a 2km radius of the site has been taken into account.

3.0 Results and Evaluation

3.1 Designated Sites

No statutory designated sites with bat qualifying interests were identified within 2km of the site.

3.2 Historical Records

A search of the magic.gov.uk database for granted EPSLs within a 2km radius of the site has been completed. Displaced bats from licensed sites <2km away from the survey site will find alternative habitat either within the mitigation measures implemented as part of the licence or will relocate to other known roosts sites in close proximity to the licensed site. No EPSL records for bats have been returned within 2km of the site.

3.3 Field Survey Results


The weather conditions recorded at the time of the survey are shown in Table 2.



Table 2: Weather conditions during the survey



Date:	31/06/2023
Temperature	14°C
Humidity	87%
Cloud Cover	100%
Wind	12mph
Rain	None



The results of the field survey are detailed in Table 3 and illustrated in Appendix 3.



Table 3: PRA Results



Feature	Description	Photographs
<p>Bat foraging and commuting habitat</p>	<p>There are no habitats on site which could provide suitable foraging and commuting habitat for bats. The site is set centrally within the village of Mendlesham, and the surrounding landscape is one of small to medium sized gardens with little tree cover. Though nearby scattered trees within residential gardens may provide some opportunities for foraging, there are no distinct linear features providing connectivity through the landscape to habitats beyond the built-up areas. Outside of the village, there is a scattered network of hedgerows leading to some small woodland pockets within the 2km of the site which may provide good commuting and foraging habitat. The pockets of woodland could also provide bat roosting value.</p> <p>Map reproduced from Google imagery (2023).</p>	
<p>B1 - overview</p>	<p>B1 is a small, detached, L-shaped outbuilding used as a shed/workshop. Part of the building is partially collapsed (B1a) and the remainder is intact, but the structural integrity is compromised (B1b). The partially collapsed structure (B1a) comprises damaged timber beams and no roof cover, with some sections of loose/damaged bitumen felt lining and tarp adjoining the intact shed. This structure is highly exposed and unsuitable for use by bats. The main shed (B1b) comprises a timber and brick structure over concrete foundations, with single-skinned wooden cladding lining and a pitched roof clad in fitted pantiles and hipped ridge tiles. There are some lifted/raised tiles on the roof (see below for potential roost features). The wooden cladding around the building is tight and appears in good condition, though there are gaps along the roofline which could be used to access the internal space (see below). The doors and windows around the building are wood and UPVC framed and show signs of wear but appear in good condition with no suitable bat roosting sites. There is a wooden weatherboard on the western gable end of B1b which has a gap which could be used by bats (see below).</p>	<p>No photo (see elevation photos below).</p>


<p>B1a – southern elevation</p>	<p>There are no roost features or bat evidence on the eastern elevation of the partially collapsed structure. Due to damage to the structure, the gap behind the weatherboard on the gable end is too shallow and exposed to be used by bats.</p>	
<p>B1a – western elevation</p>	<p>There are no roost features or bat evidence on the western elevation.</p>	

<p>B1a – eastern elevation</p>	<p>There are no roost features or bat evidence on the eastern elevation.</p>	
<p>B1b – western elevation</p>	<p>There are potential roost features on the western elevation in the form of raised/lifted tiles on the roof and a gap behind the weatherboard on the gable end. These tile lifts and gaps could be used as a roost feature by crevice dwelling bats and some provide an access point into the roof void. There are also gaps along the roofline between the cladding and the roof structure which could be used by void-dwelling bats to access the roof void, though no evidence of bats was found internally. Close-up photos are provided below.</p>	

<p>B1b – western elevation Close-up</p>	<p>This photo shows a close-up of some of the lifted tiles on the western elevation of the roof (circled red).</p>	
<p>B1b – western elevation Close-up</p>	<p>This photo shows a close-up example of the gaps present along the roofline between the wooden cladding and the roof structure (circled red).</p>	

<p>B1b – western elevation Close-up</p>	<p>This photo shows a close-up of the gap present between the wooden weatherboard on the gable end and the wooden cladding (outlined red).</p>	
<p>B1b – northern and eastern elevation</p>	<p>There are potential roost features on the northern and eastern elevations in the form of more raised/lifted tiles on the roof which could be used as a roost feature by crevice dwelling bats and a hole/damage to the roof on the eastern elevation which provides an access point into the roof void. There are also further gaps along the roofline between the wall and the roof structure which could be used by void-dwelling bats to access the roof void, though no evidence of bats was found internally. Close-up photos are provided below.</p>	

<p>B1b – eastern elevation Close-up</p>	<p>This photo shows a close-up of some of the lifted tiles and the hole/damage on the eastern elevation of the roof (circled red).</p>	
<p>B1a – interior</p>	<p>The interior of B1a comprises a timber structure over a concrete foundation. There are stored items and materials present. The floor and items were searched and no evidence of roosting bats or nesting birds was found. The space is highly exposed and unsuitable for roosting bats due to the partially collapsed structure.</p>	

<p>B1b – interior</p>	<p>There is no loft space within B1b as the room extends into the roof void. The space comprises a timber beam structure with bitumen felt lining which contains several tears/holes through which daylight can be seen. The doors and windows around the building subject the internal space to light disturbance, rendering the roof void less suitable for void-dwelling bats. The floor comprises concrete and there are numerous stored items present, including some wooden boards within the roof void. The floor, stored items and boards were searched, and no evidence of roosting bats or nesting birds was found. There was evidence of mouse droppings on the floor.</p>	
<p>B1a – suitability assessment</p>	<p>B1a is assessed to have negligible value for bats due to a lack of roost features present internally and externally on this part of the survey building.</p>	<p>N/A</p>
<p>B1a - breeding birds and other incidental observations</p>	<p>There was no evidence of nesting birds located internally or externally on this part of the survey building. B1a is considered unsuitable for nesting birds due to its partially collapsed and highly exposed structure.</p>	<p>N/A</p>
<p>B1b – suitability assessment</p>	<p>B1a is assessed to have low value for bats due to the presence and height of roost features on the building and the location of the site in terms of foraging and commuting habitat and connectivity to the wider landscape. Features include tiles gaps on the roof, a gap behind the weatherboard on the western gable end, and gaps below the roofline around the building.</p>	<p>N/A</p>
<p>B1b - breeding birds and other incidental observations</p>	<p>There was no evidence of nesting birds located internally or externally on this part of the survey building. Some of the features on B1b could be used by nesting birds to access the roof void internally. However, given that the building is used as an active workshop/shed and subject to regular disturbance, the presence of nesting birds is considered unlikely.</p>	<p>N/A</p>

4.0 Conclusions, Impacts and Recommendations

Taking the desk study and field survey results into account, Table 4 presents an evaluation of the value of the site for bats and also details any other ecological constraints identified such as nesting birds in relation to the proposed development which will comprise the demolition of the existing partially collapsed outbuilding and construction of a new garage/workshop.

Table 4: Evaluation of the site for bats and any other ecological constraints

Building	Survey Results Summary	Impact Assessment	Recommendations	Biodiversity Enhancement Opportunities ¹
Roosting bats (B1a)	B1a has negligible value for roosting bats due to the exposed/partially collapsed nature of the structure and a lack of potential roost features.	Bats are very unlikely to be roosting within this part of the building and as such, there are not anticipated to be any impacts on roosting bats as a result of the demolition of the building.	In the unlikely event that a bat or evidence of bats is discovered during the development all work must stop and a bat licensed ecologist contacted for further advice.	To be confirmed upon completion of the survey on B1b.
Roosting bats (B1b)	B1b has low value for roosting bats due to the presence and height of roost features on the building and the location of the site in terms of foraging and commuting habitat and connectivity to the wider landscape.	The proposed development will result in the demolition of this building. This could result in the destruction of any bat roosts present and could cause disturbance, death or injury to bats.	One bat emergence or re-entry survey is required during the active bat season (optimal May to August, suboptimal September) to confirm presence or likely-absence of a bat roost in the building. Infra-red cameras should be used as an aid. Two surveyors are required to provide full coverage of the building. If the absence of a bat roost cannot be determined during the first visit, then further surveys will be required. If bat roosts are confirmed in the building two additional surveys may be required to characterise the roost and to inform an EPSL application to Natural England. Surveys should be a minimum of two weeks apart. The EPSL application requires that surveys have been undertaken within the most	To be confirmed upon completion of the survey.

¹ The Local Planning Authority has a duty to ask for enhancements under the NPPF (2021).

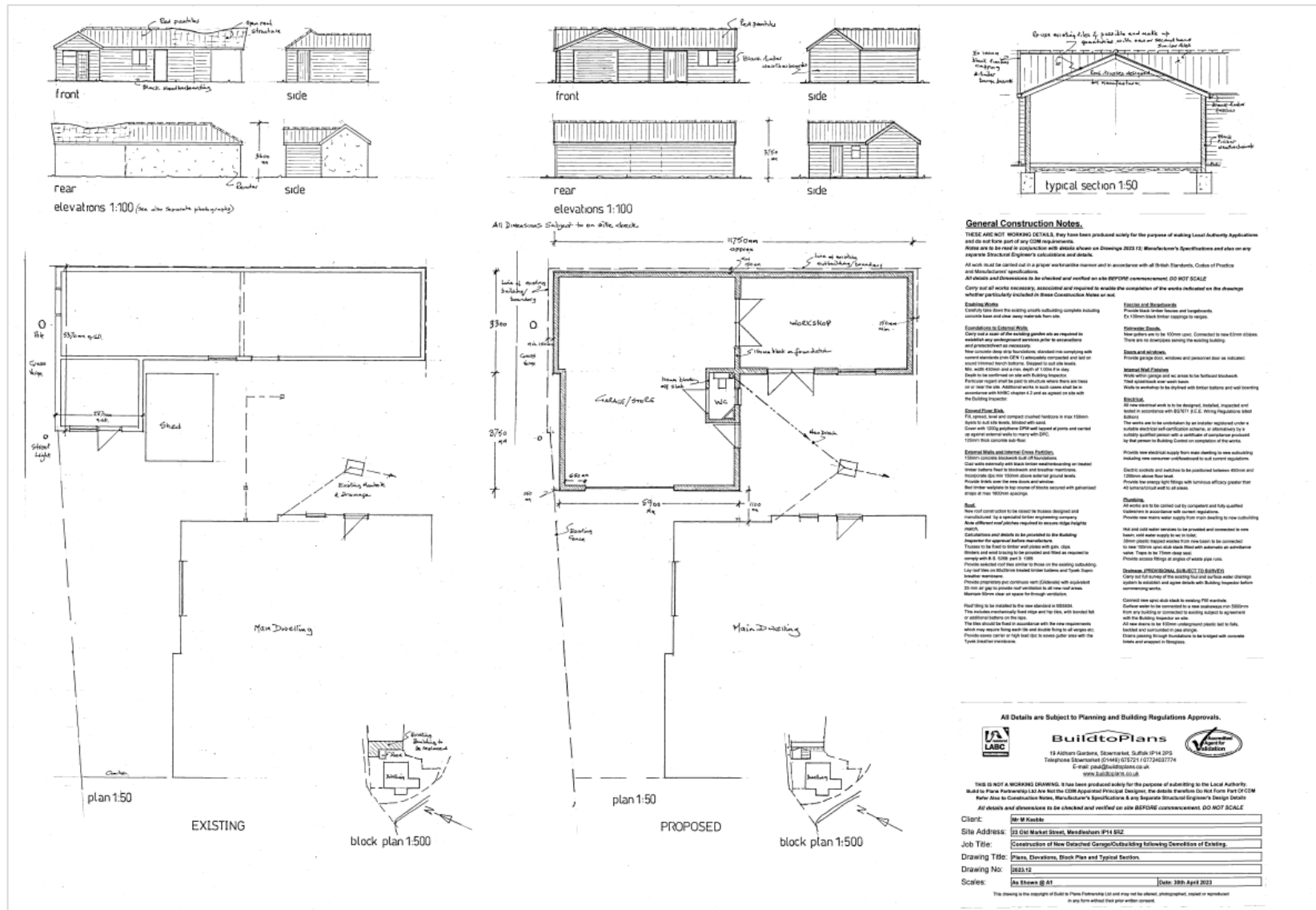
			recent active bat season and planning permission must have been granted and all relevant wildlife-related conditions have been discharged prior to submission.	
Foraging and commuting bats	There are no habitats on the site which could be used by bats for foraging or commuting.	<p>The proposed development will not result in the removal of any habitats which could be used by foraging or commuting bats.</p> <p>There is no foraging or commuting habitat within the immediate vicinity of the building which would be impacted by light spill from the use of lighting with the proposed development.</p>	None.	<p>The following habitat creation and enhancement opportunities could be incorporated into the proposed development which would be beneficial for foraging bats:</p> <ul style="list-style-type: none"> Planting of native tree, shrub and hedgerows to increase foraging opportunities.
Nesting birds (B1)	<p>B1a offers no opportunities for nesting birds.</p> <p>Some of the features on B1b could be used by birds to access the roof void internally. However, given that the B1b is used as an active workshop/shed and subject to regular disturbance, the presence of nesting birds is considered unlikely.</p>	None.	None.	<p>The installation of a minimum of one bird box on the new shed/workshop or on the retained two-storey residential building within site boundary will provide additional nesting habitat for birds.</p> <p>e.g. Woodstone nest box Vivara Pro woodstone swift box Woodstone sparrow nest box Or a similar alternative brand. Woodstone nest boxes should be positioned approximately 3m above ground level where they will be sheltered from</p>

				prevailing wind, rain and strong sunlight. Swift and sparrow boxes should be positioned at the eaves of a building and can be incorporated into the fabric of the building during construction.
Other ecological constraints	None identified.	N/A	N/A	N/A

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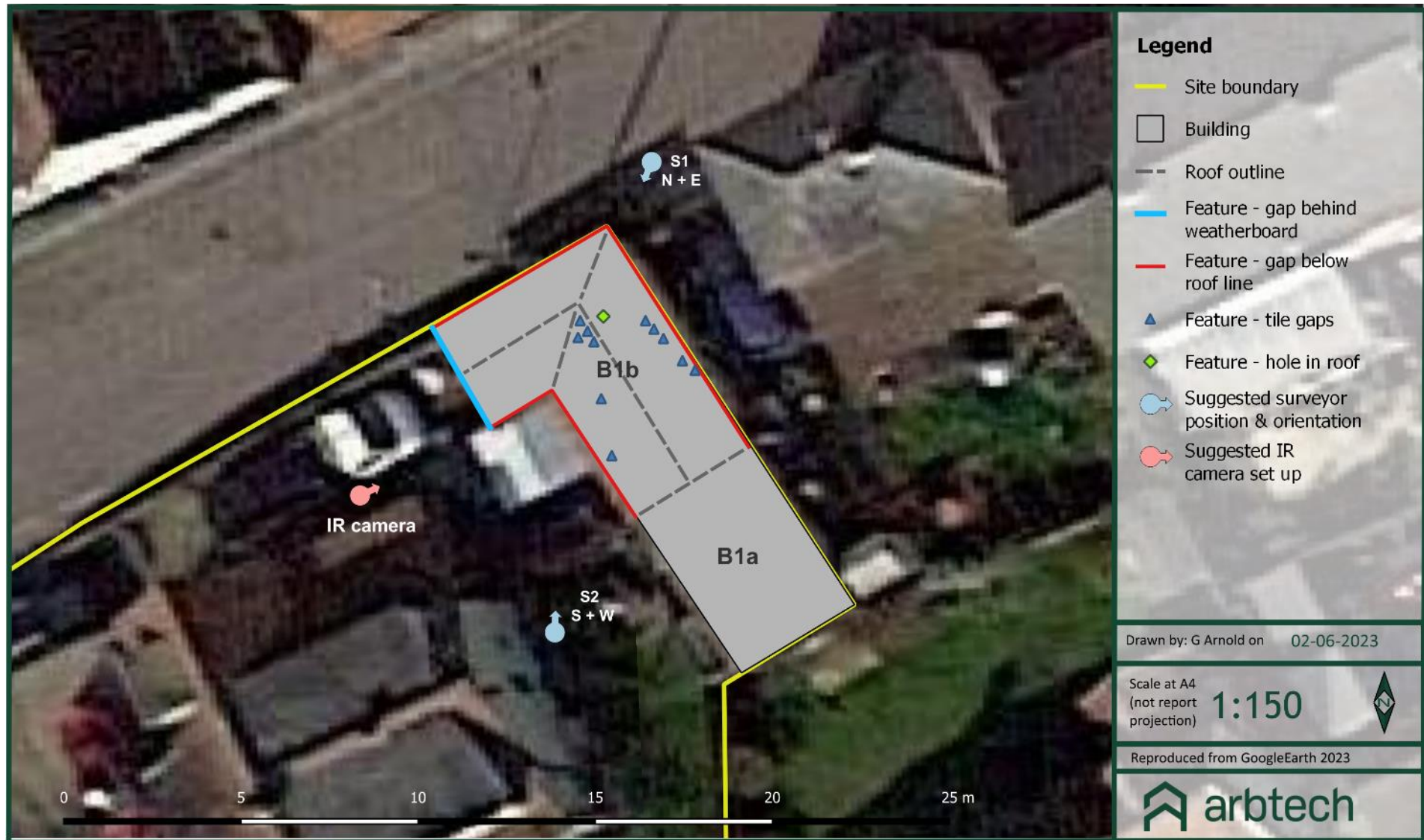
Appendix 1: Proposed Development Plan



Appendix 2: Site Location Plan



Appendix 3a: PRA and Proposed BERS Plan



Appendix 4: Legislation and Planning Policy Related to Bats

LEGAL PROTECTION

All species of bat are fully protected under *The Conservation of Habitats and Species Regulations 2017* (as amended) through their inclusion on Schedule 2.

Regulation 43: Protection of certain wild animals - offences

(1) A person is guilty of an offence if they:

- (a) Deliberately captures, injures or kills any wild animal of a European protected species,
- (b) Deliberately disturbs wild animals of any such species,
- (c) Deliberately takes or destroys the eggs of such an animal, or
- (d) Damages or destroys a breeding site or resting place of such an animal,

(2) For the purposes of paragraph (1) (b), disturbance of animals includes in particular any disturbance which is likely—

- (a) To impair their ability:
 - (i) To survive, to breed or reproduce, or to rear or nurture their young; or
 - (ii) In the case of animals of a hibernating or migratory species, to hibernate or migrate; or
- (b) To affect significantly the local distribution or abundance of the species to which they belong.

Bats are also protected under the *Wildlife and Countryside Act 1981* (as amended) through their inclusion on Schedule 5. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection
- Selling, offering or exposing for sale, possession or transporting for purpose of sale

NATIONAL PLANNING POLICY

National Planning Policy Framework 2021

The National Planning Policy Framework promotes sustainable development. The Framework specifies the need for protection of designated sites and priority habitats and species. An emphasis is also made on the need for ecological infrastructure through protection, restoration and re-creation. The protection and recovery of priority species (considered likely to be those listed as species of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006) is also listed as a requirement of planning policy.

In determining a planning application, planning authorities should aim to conserve and enhance biodiversity by ensuring that: designated sites are protected from harm; there is appropriate mitigation or compensation where significant harm cannot be avoided; measurable gains in biodiversity in and around developments are incorporated; and planning permission is refused for development resulting in the loss or deterioration of irreplaceable habitats including aged or veteran trees and also ancient woodland.

The Natural Environment and Rural Communities Act 2006 and the Biodiversity Duty

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the ‘biodiversity duty’.

Section 41 of the Act requires the Secretary of State to publish a list of habitats and species which are of ‘principal importance for the conservation of biodiversity’. This list is intended to assist decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications. A developer must show that their protection has been adequately addressed within a development proposal.

LOCAL PLANNING POLICY

Babergh and Mid Suffolk Joint Local Plan (2020)

The Babergh and Mid Suffolk Joint Local Plan (2020) can be viewed here: <https://www.babergh.gov.uk/planning/planning-policy/new-joint-local-plan/>

The following planning policies have implications for developers in relation to bats:

- Policy LP18 - Biodiversity & Geodiversity:
 - All development should follow a hierarchy of seeking firstly to; enhance habitats, avoid impacts, mitigate against harmful impacts, or as a last resort compensate for losses that cannot be avoided or mitigated for. Adherence to the hierarchy should be demonstrated. Development should:
 - Conserve, restore and contribute to the enhancement of biodiversity and geological conservation interests including priority habitats and species. Enhancement for biodiversity should be commensurate with the scale of development.
 - Plan positively for the creation, protection, enhancement and management of local networks of biodiversity with wildlife corridors that connect areas. Where possible, link to existing green infrastructure networks and areas identified by local partnerships for habitat restoration or creation so that these ecological networks will be more resilient to current and future pressures.
 - Apply additional measures to assist with the recovery of species listed on S41 of the NERC Act 2006.
 - Development which would have an adverse impact on species protected by legislation, or subsequent legislation, will not be permitted unless there is no alternative and the local planning authority is satisfied that suitable measures have been taken to:
 - Reduce disturbance to a minimum.
 - Maintain the population identified on site.

- Provide adequate alternative habitats to sustain at least the current levels of population.
- Where appropriate, the local planning authority will use planning obligations and/or planning conditions to achieve appropriate mitigation and/or compensatory measures and to ensure that any potential harm is kept to a minimum.

Suffolk Local Biodiversity Action Plan

The Suffolk Local Biodiversity Action Plan (Grouped plan for bats) can be viewed here: <https://www.suffolkbis.org.uk/species/mammals-bats>

The following bat species are included in the plan:

- Barbastelle
- Brandts
- Brown long-eared
- Common Pipistrelle
- Daubentons
- Leislars
- Lesser horseshoe
- Nathusius' pipistrelle
- Natterer's
- Noctule
- Serotine
- Soprano pipistrelle
- Whiskered

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A European Protected Species Licence (EPSL) issued by Natural England will be required for works likely to affect a bat roost or for operations likely to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g. survive, breed, rear young and hibernate). The licence is to allow derogation from the relevant legislation but also to enable appropriate mitigation measures to be put in place and their efficiency/success to be monitored. The legislation may also be interpreted such that, in certain circumstances, important foraging areas and/or commuting routes can be regarded as being afforded *de facto* protection, for example, where it can be proven that the continued usage of such areas is crucial to maintaining the integrity and long-term viability of a bat roost (Garland & Markham, 2008).

There are 17 species of bat breeding in England and Natural England issues licences under Regulation 55 of the Habitats Regulations to allow you to work within the law.

Licences are issued for specific purposes stated in the Regulations, if the following three tests are met:

- The purpose of the work meets one of those listed in the Habitats Regulations (see below);
- That there is no satisfactory alternative;
- That the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range

The Habitats Regulations permits licences to be issued for a specific set of purposes including:

1. include preserving public health or public safety or other imperative reasons of over-riding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment;
2. scientific and educational purposes;
3. ringing or marking; and,
4. conserving wild animals.

Development works fall under the first purpose and Natural England issues bat mitigation licences for developments.

EUROPEAN PROTECTED SPECIES POLICIES

In December 2016 Natural England officially introduced the four licensing policies throughout England. The four policies seek to achieve better outcomes for European Protected Species (EPS) and reduce unnecessary costs, delays and uncertainty that can be inherent in the current standard EPS licensing system. The policies are summarised as follows:

- Policy 1; provides greater flexibility in exclusion and relocation activities, where there is investment in habitat provision;
- Policy 2; provides greater flexibility in the location of compensatory habitat;
- Policy 3; provides greater flexibility on exclusion measures where this will allow EPS to use temporary habitat; and,
- Policy 4; provides a reduced survey effort in circumstances where the impacts of development can be confidently predicted.

The four policies have been designed to have a net benefit for EPS by improving populations overall and not just protecting individuals within development sites. Most notably Natural England now recognises that the Habitats Regulations legal framework now applies to ‘local populations’ of EPS and not individuals/site populations.