Preliminary Roost Assessment

2 Stapeley Farm Cottage, Odiham, RG29 1JE

JPS FARMING LTD

Status	Issue	Name	Date
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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 JPS FARMING LTD to undertake a Preliminary Roost Assessment (PRA) at 2 Stapeley Farm Cottage, Odiham, RG29 1JE (hereafter referred to as "the site"). The survey was required to inform Hart District Council, planning application 23/01861/PREAPP for the demolition of existing 2no. semi-detached houses and erection of 2no. new semi-detached houses (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 5 of this report.

Feature	Survey Results Summary	Impact Assessment	Recommendations
Roosting bats B1	B1 has **negligible** value for roosting bats due to a lack of potential roost features. The slate tiles appeared flat throughout with no gaps suitable for bats to access the loft void. The bargeboards sat flush against the walls with no roosting opportunities. **No evidence of bats was found internally or externally.**	Bats are very unlikely to be roosting within this building and as such, there are not anticipated to be any impacts on roosting bats as a result of the demolition to this 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.
Foraging and commuting bats	Hedgerows could be used by local bat populations for foraging and commuting. These could also be used by bats dispersing from nearby roosts outside of the site.	The proposed development will not result in the removal of any habitats which could be used by foraging or commuting bats. The proposed development will include the use of lighting which could spill on to bat roosting, foraging or commuting habitat and deter bats from using these areas.	A low impact lighting strategy will be adopted for the site during and post-development. **See table 5 for full details.**

Contents

1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed by JPS FARMING LTD to undertake a Preliminary Roost Assessment (PRA) at 2 Stapeley Farm Cottage, Odiham, RG29 1JE (hereafter referred to as "the site"). The survey was required to inform Hart District Council, planning application 23/01861/PREAPP for the demolition of existing 2no. semi-detached houses and erection of 2no. new semi-detached houses (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 SU 75684 47983 and has an area of approximately 0.2ha comprising of one residential dwelling used as two cottages and associated gardens. It is surrounded by arable fields and an industrial estate directly east of the site. The wider landscape includes Bowsaw and Billhook Lakes northeast of the site which is used locally for fishing, and pockets of deciduous woodland 500m to the north-east of site which will provide foraging and commuting habitat. The wider landscape is predominantly arable fields. 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 Romany Poole (Accredited Agent on Natural England Bat Licence Number: 2018-37888-CLS-CLS) on 01/11/2023.

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 historical bat records 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 historical records data will add any significant weight or alter the conclusions and recommendations outlined in this report.

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. EPSL records for bats are summarised in Table 2.

Table 2: Granted EPSLs for bats within 2km of the site. A maternity roost is located 1.3km to the north-east of the site.

EPSL reference	Distance from site (km)	Bat species affected	Impacts allowed by licence
EPSM2009-641	1.3km to the north-east	Common pipistrelle, serotine, brown long-eared bat	Destruction of a resting place Destruction and impact of a breeding site
EPSM2012-5354	1.9km to the south-west	Brown long-eared bat	Destruction of a resting place

3.3 Field Survey Results

The weather conditions recorded at the time of the survey are shown in Table 3. The results of the field survey are detailed in Table 4 and illustrated in Appendix 3.

Table 3: Weather conditions during the survey

Date:	01/11/2023
Temperature	13°C
Humidity	77%
Cloud Cover	70%
Wind	12mph
Rain	Light

Table 4: PRA Results

Feature	Description	Photographs
Bat foraging and commuting habitat *Figure 1*	Habitats onsite consist of hedgerows and scattered trees which will likely provide foraging and commuting opportunities for bat. There are interconnected tree lines and hedgerows along field boundaries that connect the site to pockets of deciduous woodland located 600m to the east of the site. A review of aerial imagery reveals that Bowsaw & Billhook Lakes lies ~600m to the east of the site. The lakes are surrounded by woodlands which will provide excellent habitat for bats due to their mosaic of habitats (i.e. tree lines and water bodies, etc.) and the opportunities these afford bats for roosting, foraging and commuting.	

B1 – overview *Figure 2 (top) & Figure 3 (bottom)*	B1 is a brick built building that has been converted into two semi-detached cottages. It has a gabled roof that is clad in slate roof tiles which appear to be in good condition throughout (figure 4). There is a flat roof section located on the eastern elevation of the building. The flat roof is clad in slate roof tiles and appears in good condition (figure 6). There are two single storey extensions with a gabled roof on the northern elevation; one of which is clad in slate roof tiles while the other is part ruined with no roof (Figure 8). The doors and windows are a combination of both UPVC and wooden framed, alongside this the bargeboards and soffit boxes are wooden framed which appear tight fitted with no gaps (Figure 7). The brickwork around the building is rendered and appears to be in poor condition in places due to cracks on the building (figure 5). There is one chimney located on the roof of B1. The brickwork on the chimneys is in good condition. There is lead flashing around the bases of the chimney which is flat and without gaps. **B1 is due to be demolished.**	 

B1 – southern elevation *Figure 4*	An example of the slate roof tiles which are all tight-fitting and well-sealed.	

B1 – eastern elevation *Figure 5 (top) & Figure 6 (bottom)*	The slate roof tiles located on the single storey extension are coated in moss and appear damp indicating inadequate environmental conditions for roosting bat. The render is in poor condition with cracks, however after inspection the cracks did not provide roosing opportunities for crevice dwelling bats due to the small width and depth.	 

B1 – northern elevation (Figure 7)	An example of the tight fitting bargeboards against all the gable ends.	
B1 – western elevation *(Figure 8)*	There are no areas of missing mortar between the ridge tiles which could allow access for roosting. The single storey section is missing a roof and although it is easily accessible internally, there is no protection from fluctuating temperatures and weather therefore it provides sub-optimal conditions for bats to roost.	

B1 – interior *Figure 9 (top) & Figure 10 (bottom)*	There is one loft space within the interior of B1. It compromises a central section with a brick chimney breast and two gable side sections. It is constructed from timber beams, including the ridge beam and rafters (figure 9). The beams may provide roosting sites for void-dwelling bats. There are high level of hanging cobwebs along the loft which may suggest a lack of recent roosting activity. There is no roof lining within the loft with exposed slate tiles throughout (figure 10). This can make visual observation of crevice dwelling bats and any evidence easier due to the lack of roof lining collecting evidence, or hiding bats themselves. The floor is insulated with mineral wool insulation and is not boarded. The floor was searched for bat droppings; however none were identified. No light could be seen entering the loft, indicating that it is well-sealed. **No evidence of bats (e.g. droppings, oil feeding remains, etc.) was identified within the interior of B1.**	 
B1 – suitability assessment	In line with Good Practice Guidelines (Collins, J. (Ed) 2016) B1 is assessed to have '**negligible**' habitat value for roosting bats due to a lack of potential roost features. The slate tiles appeared flat throughout with no gaps suitable for bats to access the loft void and the bargeboards sat flush against the walls with no roosting opportunities.	

B1 - breeding birds and other incidental observations	No evidence of nesting birds was identified during the survey. However, there is access into the small single storey section on the northern elevation due to the lack of a roof.

4.0 Conclusions, Impacts and Recommendations

Taking the desk study and field survey results into account, Table 5 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 existing 2no. semi-detached houses and erection of 2no. new semi-detached houses.

Table 5: Evaluation of the site for bats and any other ecological constraints

Building	Survey Results Summary	Impact Assessment	Recommendations	Biodiversity Enhancement Opportunities[1]
Roosting bats B1	B1 has **negligible** value for roosting bats due to a lack of potential roost features. The slate tiles appeared flat throughout with no gaps suitable for bats to access the loft void. The bargeboards sat flush against the walls with no roosting opportunities. **No evidence of bats was found internally or externally.**	Bats are very unlikely to be roosting within this building and as such, there are not anticipated to be any impacts on roosting bats as a result of the demolition to this 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.	The installation of two bat boxes at the site will provide additional roosting habitat for bats. The bat boxes will be installed on retained mature trees, or on the new building. Bat boxes should be positioned 3-5m above ground level facing in a south or south-westerly direction with a clear flight path to and from the entrance, away from artificial light. The bat boxes will be a specification suitable for both crevice and void dwelling bats such as NHBS Beaumaris Woodstone Bat Box and NHBS Improved Cavity Bat or a similar alternative brand.
Foraging and commuting bats	Hedgerows and scattered could be used by local bat populations for foraging and commuting. These	The proposed development will not result in the removal of any habitats which could be used by foraging or commuting bats. The proposed development will include the use of lighting which could spill on to bat roosting,	A low impact lighting strategy will be adopted for the site during and post-development, which will include the following measures: • Light spill on to hedgerows and scattered trees should be avoided.	The following habitat creation and enhancement opportunities could be incorporated into the proposed development which would be beneficial for foraging bats:

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

	could also be used by bats dispersing from nearby roosts outside of the site. There is direct connectivity to pockets of deciduous woodland which surrounds the Bowsaw & Billhook Lakes. This will provide good commuting and foraging habitat.	foraging or commuting habitat and deter bats from using these areas.	• Use narrow spectrum light sources to lower the range of species affected by lighting. • Use light sources that emit minimal ultra-violet light. • Avoid white and blue wavelengths of the light spectrum to reduce insect attraction and where white light sources are required in order to manage the blue shortwave length content they should be of a warm / neutral colour temperature <4,200 kelvin. • Not use bare bulbs and any light pointing upwards. The spread of light will be kept in line with or below the horizontal. • Light spill will be reduced via the use of low-level lighting used in conjunction with hoods, cowls, louvers and shields. Lights will also be directional to ensure that light is directed to the intended areas only. • External lighting will be on PIR sensors that are sensitive to large objects only (so that they are not triggered by passing bats) and will be set to the shortest time duration to reduce the amount of time the lights are on. • Wall lights and security lights will be 'dimmable' and set to the lowest light intensity settings. There are several products on the market that allow the control of the light intensity and the duration that the lights are on. All lighting on the developed site will make use of the most up to date technology available.	• Planting of native tree, shrub and hedgerows to increase foraging opportunities.
Nesting birds B1	There was no evidence of nesting birds within the building, however the small section with no roof on the northern elevation	The proposed development could result in the destruction or the disturbance and subsequent abandonment of active bird nests.	Works should be undertaken outside the period 1st March to 31st August. If this timeframe cannot be avoided, a close inspection of the building should be undertaken immediately, by qualified ecologist, prior to the commencement of work. All active nests will need to be retained until the young have fledged.	The installation of two bird boxes at the site will provide additional The installation of two integrated swift bricks (e.g. Ibstock Swift Eco Habitat or similar alternative brand) at the site will provide

	could provide opportunities for nesting birds. Alongside this, the nearby habitat such as hedgerows and scattered trees will provide nesting habitat.			additional nesting habitat for birds in line with the measures outlined in the British Standard " Integral nest boxes. Selection and installation for new developments. Specification" (BS 42021:2022). Swift bricks should be integrated into the fabric of the building during construction. Boxes should be positioned close together (0.6-1.0m between bricks) as swifts prefer to nest gregariously. The bricks should be placed at least 5m above ground level under the eaves of a building, on a north or east elevation, where they will be sheltered from prevailing wind, rain and strong sunlight. To be suitable for swifts, the bricks require an open aspect with no trees or large shrubs potentially obstructing the birds' flight path up to 5m from the brick. Swift bricks are a universal nest brick for small bird species, including red-listed species such as common swift, house sparrow, house martin, and starling nesting habitat for birds. The bird boxes will be installed on mature trees within the eastern side of the garden. General purpose bird boxes should be positioned 3m above ground level where they will be sheltered from prevailing wind, rain and strong sunlight. Species-specific bird boxes should be installed in line with manufacturers specifications.

Other ecological constraints	None identified.	N/A	N/A	N/A

5.0 Bibliography

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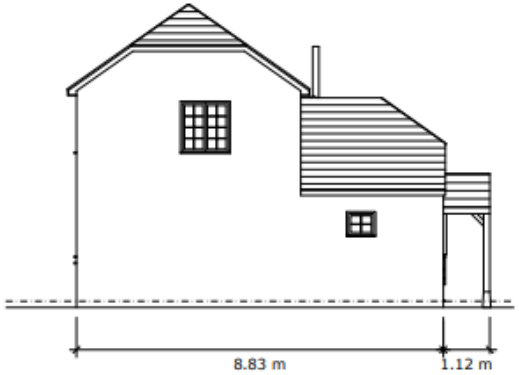
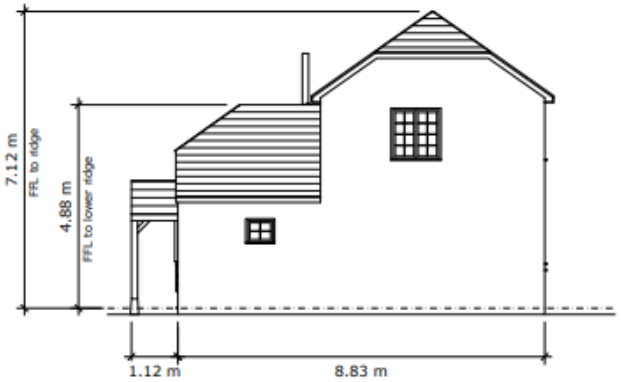
Appendix 1: Proposed Development Plan

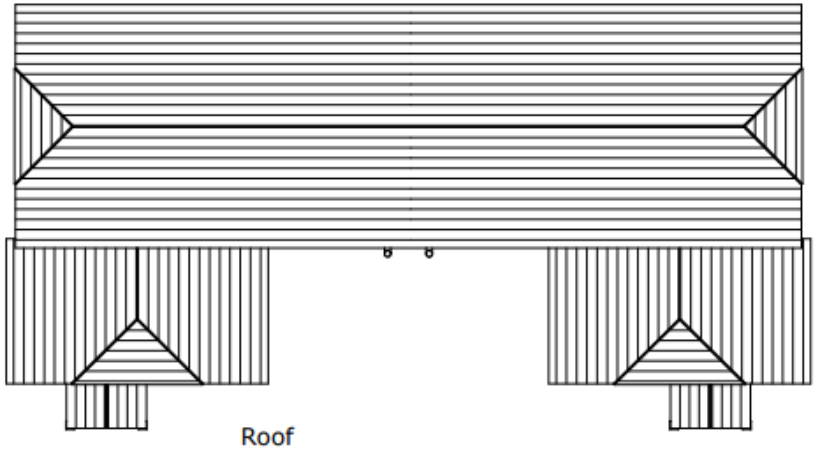


Side Elevation (West)



Side Elevation (East)

Isometric view



Roof

Notes:

All dimensions are in metres unless otherwise noted

Project Title

Stapeley Farm Cottages

Drawing Title

Side Elevations & Roof

Drawing Size:

A3

Date	Rev
17/08/23	B

Revision description:

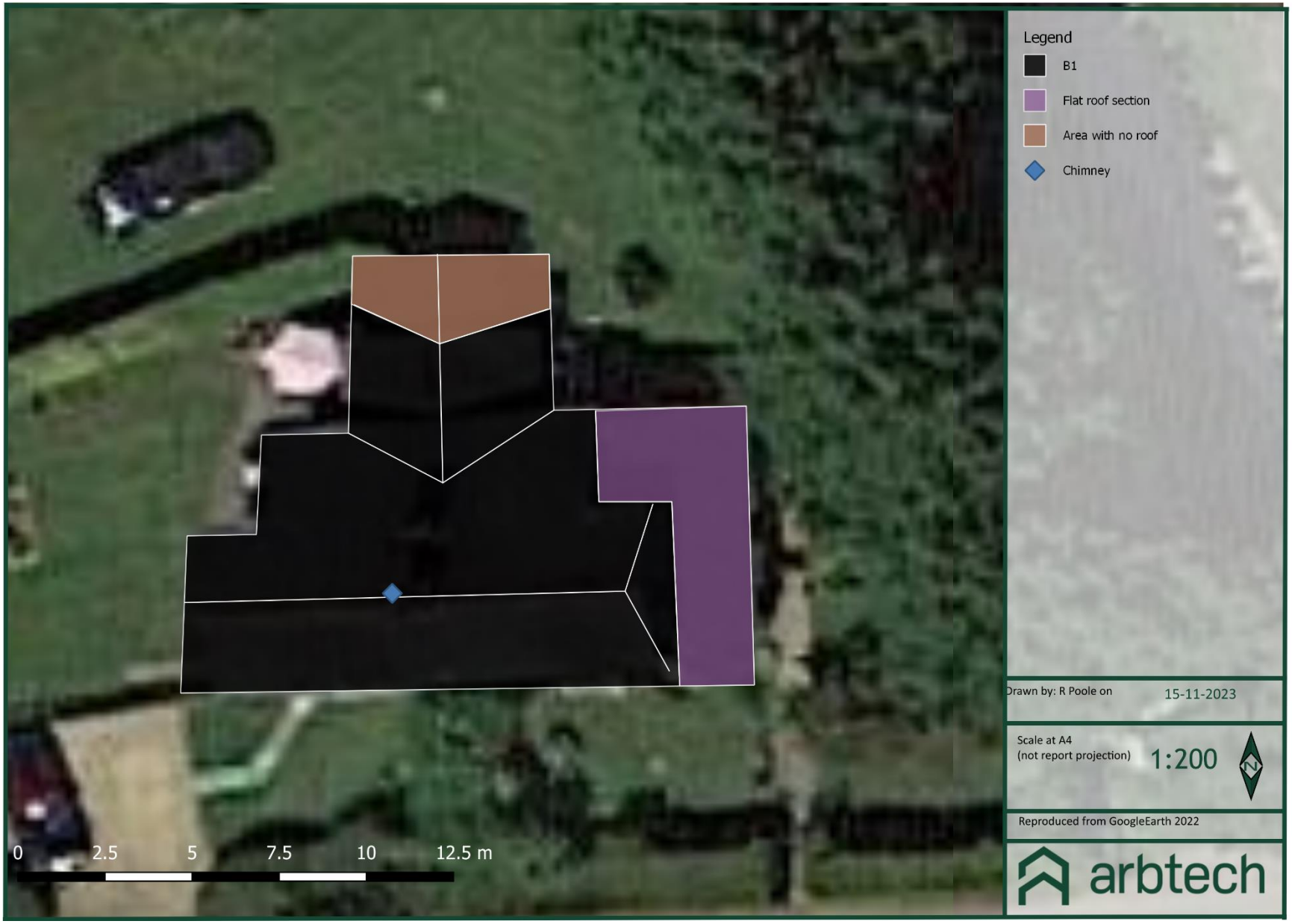
A - Planning
B - Pre-app submission

Drawing No.

SC-EL-02

Appendix 2: Site Location Plan

Appendix 3a: PRA 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

Hart Local Plan (adopted 2032)

The local plan can be viewed here: https://www.hart.gov.uk/sites/default/files/2022-11/hart_lpss.pdf

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

- Policy NBE 4 Biodiversity
    - In order to conserve and enhance biodiversity, new development will be permitted provided: a) It will not have an adverse effect on the integrity of an international, national or locally designated site including the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSIs), Sites of Importance for Nature Conservation (SINCs) and National and Local Nature Reserves (NN Rs and LN Rs).

        a) The level of protection afforded to these sites is commensurate with their status within this hierarchy and gives appropriate weight to their importance and contribution to wider ecological networks.

        b) It does not result in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss;

        c) Opportunities to protect and enhance biodiversity and contribute to wildlife and habitat connectivity are taken where possible, including the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations.

All development proposals will be expected to avoid negative impacts on existing biodiversity and provide a net gain where possible. If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, or, in the case of European Protected sites does not comply with the Conservation of Habitats and Species Regulations 2017, then planning permission will be refused.

Hart District Council Biodiversity Action Plan (BAP)

The local BAP can be viewed here: https://www.hart.gov.uk/sites/default/files/2023-08/Biodiversity-Action-Plan-final-2018-23.pdf

All bat species are included in the plan.

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.