



Bat Emergence and Re-entry Surveys

4 Stumps End, Bosham, Chichester, West Sussex PO18 8RB

Mags Watney

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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.

This approach is enshrined in Government planning guidance, for example, paragraph 174 of the National Planning Policy Framework for England.

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 Mags Watney to undertake bat emergence surveys at 4 Stumps End, Bosham, Chichester, West Sussex PO18 8RB (hereafter referred to as “the site”). The survey was required to inform a planning application for roof replacement and small extension (hereafter referred to as “the proposed development”).

The following bat roosts were identified at the site:

- Day roost of one common pipistrelle in B1

An EPSL application to Natural England will be required to legally permit the proposed works. Due to the number of roosts and species present, the site is eligible for a Bat Mitigation Class Licence (BMCL). The BMCL application requires that surveys have been undertaken within the most recent active bat season (May to September) and planning permission must have been granted and all relevant wildlife-related conditions have been discharged prior to submission.

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed by Mags Watney to undertake bat emergence surveys at 4 Stumps End, Bosham, Chichester, West Sussex PO18 8RB (hereafter referred to as “the site”). The survey was required to inform a planning application for roof replacement and small extension (hereafter referred to as “the proposed development”). A plan showing the proposed development is provided in Appendix 1 where available.

The aim of the BERS surveys were to determine the presence or likely absence of roosting bats and to characterise any roosts present. This has been undertaken with due consideration to the “Bat Surveys for Professional Ecologists —Good Practice Guidelines” publication (Collins, 2016).

The BERS have been informed by a Preliminary Roost Assessment (PRA) which was completed by Arbtech on 06/07/2022. The survey results are summarised in Table 1 below.

Table 1: Results of the PRA and subsequent survey requirements

Feature	Survey conclusions (with justification)	Foreseen impacts	Recommendations
Roosting bats B1	<p>B1 has moderate habitat value for bats, based on numerous suitable roosting opportunities throughout the building under roof tiles.</p> <p>No evidence of bat use was found which indicates a likely absence of void dwelling bats, but does not indicate absence of crevice dwelling bats as droppings will be trapped between roof tiles and roof felt. External evidence is quickly weathered away.</p>	<p>The proposed development will replace the entire roof, destroying all suitable roost sites present.</p> <p>Any bats present during the work will be disturbed and could be killed or injured.</p>	<p>Two bat emergence or re-entry surveys are required during the active bat season (May – September) to determine the presence or likely absence of bat roost in the property. The surveys should be completed during the optimal survey period May to August inclusive.</p> <p>Two surveyors are required to provide full coverage of the building.</p> <p>Surveys are likely to be required before planning permission can be granted.</p>

1.2 Site Context

The site is located at National Grid Reference SU81090383 and has an area of approximately 0.09ha of dwelling, garage and gardens.

Bat Emergence and Re-entry Surveys

A site location plan is provided in Appendix 2.

1.3 Scope of the Report

This report provides a description of the bat activity observed and recorded during BERS. The aim of the surveys was to determine the presence or likely absence of bats and to characterise any roosts present including species, number of individuals, number and location of roost access points, and to gain an understanding of how bats use the site. The report provides information on possible constraints to the proposed development as a result of bats and summarises the requirements for any mitigation proposals, including a European Protected Species Licence (EPSL), where appropriate, to achieve planning or other statutory consent and to comply with wildlife legislation.

To achieve this, the following steps have been taken:

- BERS of built structures and/or trees has been undertaken to determine the presence or likely absence of bat roosts.
- An outline of potential impacts on any confirmed or unidentified roosts has been provided, based on the proposed development.
- Recommendations for 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 BERS

Dusk emergence and/or dawn re-entry surveys have been carried out as per the recommendations from the Preliminary Roost Assessment. The survey(s) involved surveyors positioned around the structure ensuring that all elevations with suitable roosting features could be clearly observed. Particular attention was paid to the areas of the structure identified as providing suitable access points to bat roosts. Each surveyor was assigned an area of the structure to observe for the duration of the survey.

Surveyors used heterodyne and frequency division bat detectors, and Echo Meter Touch detectors connected to iPads or Android tablets. Bat echolocation calls recorded during the surveys were analysed using Wildlife Acoustics sound analysis software Kaleidoscope V3.1.7 when required. The Echo Meter Touch includes an auto ID function for bat species, however this is not 100% accurate and further post-survey sound analysis is often required to confirm species that could not be identified by the auto ID software during the survey. Surveyors also used head torches, survey record sheets and pens/pencils for recording all activity observed during the surveys. Each surveyor was also provided with a handheld radio for communication between surveyors to assist with confirming ambiguous bat activity e.g. a bat emergence or a bat passing over the structure.

An infrared recording kit was set up to monitor the structure during the BERS. This comprised Nightfox Red Goggles set up on a tripod with two separate infrared lamps on additional tripods to provide additional illumination. Analysis of the footage was subsequently undertaken to detect roosting activity.

Dusk emergence surveys commence 15 minutes before sunset and continued for 1½ - 2 hours after sunset – depending upon bat activity and surveyor visibility. Dawn re-entry surveys commence 2 hours before sunrise and continued until 15 minutes after sunrise.

Surveys were completed during optimal weather conditions i.e., when temperatures were above 10°C, with no rain or strong winds (greater than 5m/s), as these adverse weather conditions can impact upon bat emergence and foraging behaviour. Periods of high moon illuminance (>80%) were also avoided insofar as possible as this can reduce bat activity.

2.2 Surveyors

The lead surveyor was Joanna Andrews, supporting Natalie Evans, (Natural England Bat Licence Number: 2018-37888-CLS-CLS) who was assisted by one surveyor with several years of bat survey experience. The designated position of each surveyor during each survey is detailed in the tables in Section 3.1 below and shown on the plan in Appendix 3.

2.3 Limitations

The surveys followed best practice guidance to confirm presence or likely absence of roosting bats and where present, characterise the roost. However, this information is collected at finite dates and times, and provides an indication of the conditions on site only. The use of the structure and the site as a whole by bats, at all times cannot be

established based on this information. 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.

3.0 Results and Evaluation

3.1 Survey Results

The results of the surveys are provided in the tables below.

Table 2: Survey results

Date		21/07/2022	
Start and End Times		20:35 – 22:35 Sunset: 21:05	
Weather Conditions		Start: Temp: 22.6°C Relative Humidity: 62% Cloud Cover: 100% Wind: 5mph Rain: None	End: Temp: 19.8°C Relative Humidity: 74% Cloud Cover: 100% Wind: 7mph Rain: None
Surveyor (position) As shown in Appendix 3		Natalie Evans, (Natural England Bat Licence Number: 2018-37888-CLS-CLS). (Position 1 – observing the northern and eastern elevations and roof structure of B1) Jonathan Kewell (Position 2 – observing the northern and western elevations and roof structure of B1) IR camera – (observing the west facing elevations and roof structures of B1).	
Building Reference	Surveyor Position	Notes/observations: One common pipistrelle emergence from B1	
B1	1	From 21:21 frequent activity and feeding was observed from both common and soprano pipistrelles around the driveway and passing north-south and south-north over the eastern garage. Passes were also seen rounding the western elevations of B1 from the direction of surveyor 2. Common and soprano pipistrelle activity become much less frequent after 21:58 with a pass only once every two to three minutes. At 21:32 and 21:45 a noctule was seen flying high over the trees to the north-east of the property. A serotine was seen crossing the south-east road at 21:58. A brown long-eared bat was seen crossing the south-east road at 21:59.	
B1	2	A common pipistrelle emerged from the top of the north-west velux window at 21:28 (shown below) and flew south-west around B1.	



Frequent passes from at least three common and one soprano pipistrelle were observed between 21:21 and 21:50. All but one pass were seen flying north along the eastern elevation of B1, over the garage and to the trees at the north-east corner, then around the border of the garden, and finally south past the western elevation of B1 and over the adjacent property. One such pass was observed approximately every thirty to sixty seconds during this time.

The one exception being at 21:41 when a common pipistrelle did this lap in reverse.

At 21:34 a noctule flew around the tree at the north-east corner of the property, feeding.

Table 3: Survey results

Date		08/08/2022		
Start and End Times		20:07 – 22:07 Sunset: 20:37		
Weather Conditions		<table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> Start: Temp: 19.3°C Relative Humidity: 64% Cloud Cover: 0% Wind: 1mph Rain: None </td> <td style="width: 50%; vertical-align: top;"> End: Temp: 14.8°C Relative Humidity: 82% Cloud Cover: 0% Wind: 0mph Rain: None </td> </tr> </table>	Start: Temp: 19.3°C Relative Humidity: 64% Cloud Cover: 0% Wind: 1mph Rain: None	End: Temp: 14.8°C Relative Humidity: 82% Cloud Cover: 0% Wind: 0mph Rain: None
Start: Temp: 19.3°C Relative Humidity: 64% Cloud Cover: 0% Wind: 1mph Rain: None	End: Temp: 14.8°C Relative Humidity: 82% Cloud Cover: 0% Wind: 0mph Rain: None			
Surveyor (position) As shown in Appendix 3		Jonathan Kewell (Position 1 – observing the northern and eastern elevations and roof structure of B1) Natalie Evans, (Natural England Bat Licence Number: 2018-37888-CLS-CLS) . (Position 2 – observing the northern and western elevations and roof structure of B1) IR camera 1 – (observing the northern and western elevations and roof structure of B1). IR camera 2 – (observing the northern and eastern elevations and roof structure of B1).		
Building Reference	Surveyor Position	Notes/observations:		
B1	1	At 21:06 two soprano pipistrelles flew north long the eastern face of B1 and into the adjacent property. Brief episodes of feeding by one common pipistrelle were recorded at 21:12 and 21:19. Two soprano pipistrelle passes were observed along the southern face of B1; the first at 21:15 headed west, and the second at 21:16 headed east. At 21:36 a brown long-eared bat flew south along the eastern hedge of the property, over surveyor 1 and into the road.		
B1	2	Between 20:49 and 21:02 constant feeding activity was observed by one soprano and one common pipistrelle in the north-western garden. After 21:02 the constant activity ceased but regular passes were still observed by common and soprano pipistrelles approximately once a minute. These passes were either north or south along the western face of B1, or to and from the large tree along the north boundary of the property. At 21:15 and 21:31 a myotis was observed flying south over the north garden, and passing over to the adjacent property there. A brown long-eared bat was heard but not seen at 21:38.		

4.0 Conclusions, Impacts and Recommendations

4.1 Informative Guidelines

A summary of the relevant legislation and planning policies is provided in Appendix 4.

Bats are protected under the Wildlife and Countryside Act and the Conservation of Habitats and Species Regulations 2017 (amended by the Conservation of Habitats and Species Regulations (amendment) (EU Exit) Regulations 2019).

When bat roosts are present, the bat surveys undertaken at a site facilitate the characterisation of the roost type. This allows for appropriate mitigation and compensation to be designed to inform a European Protected Species Licence (EPSL) application to Natural England.

The definitions of bat roost types are provided below, taken from the *Bat Mitigation Guidelines* (English Nature, 2004) and the Bat Conservation Trust (BCT) publication *Bat Surveys for Professional Ecologists – Good Practice Guidelines* (Collins, 2016).

Day roost: a place where individual bats, or small groups of males, rest or shelter in the day but are rarely found by night in the summer.

Night roost: a place where bats rest or shelter in the night but are rarely found in the day. May be used by a single individual on occasion or it could be used regularly by the whole colony.

Feeding roost: a place where individual bats or a few individuals rest or feed during the night but are rarely present by day.

Transitional / occasional roost: used by a few individuals or occasionally small groups for generally short periods of time on waking from hibernation or in the period prior to hibernation.

Swarming site: where large numbers of males and females gather during late summer to autumn. Appear to be important mating sites

Mating sites: sites where mating takes place from later summer and can continue through winter.

Maternity roost: where female bats give birth and raise their young to independence.

Hibernation roost: where bats may be found individually or together during winter. They have a constant cool temperature and high humidity. Sites where hibernating bats have been confirmed by appropriate survey effort should be classed as 'hibernation confirmed'.

Satellite roost: an alternative roost found in close proximity to the main nursery colony used by a few individual breeding females to small groups of breeding females throughout the breeding season.

Other: roost types are interchangeable and not always easy to classify according to the nuances of certain species.

An EPSL **will be required** to enable the proposed development to be lawfully undertaken, whilst ensuring the favourable conservation status of the species concerned in their natural range. Appropriate justification for this assessment is provided in Table 4 of this report. The EPSL application requires that all surveys have been undertaken within the most recent active bat season and planning permission must have been granted and all relevant wildlife-related conditions have been discharged prior to submission.

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
4. conserving wild animals

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

4.2 Evaluation

Taking the field survey results into account, Table 4 presents an evaluation of the value of the building for roosting bats in relation to the proposed development.

Table 4: Evaluation of buildings on site for roosting bats

Feature	Survey conclusions (with justification)	Foreseen impacts	Recommendations <i>Measures required to adhere to guidance, legislation and planning policies.</i>	Enhancements <i>The Local Planning Authority has a duty to ask for enhancements under the NPPF (2021)</i>
B1	<p>Day roost of one common pipistrelle has been confirmed in B1. This roost is considered to have low conservation value, in line with the Bat Mitigation Guidelines (English Nature, 2004).</p> <p>The survey effort to date has characterised the roost and has ruled out the presence of a maternity roost.</p> <p>The gardens around the property are a feeding ground and navigational/commuting marker for common and soprano pipistrelles, as well as noctules, serotines and brown long-eared bats.</p>	<p>The proposed development will result in the replacement of the roof. This will result in the destruction of the bat roost and could cause disturbance, death or injury to bats.</p> <p>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.</p>	<p>As the development is unlikely to commence prior to May 2023, updated surveys will be required prior to obtaining a licence. It is not considered necessary to carry out a third survey at this stage.</p> <p>An EPSL application to Natural England will be required to legally permit the proposed works. Due to the number of roosts and species present, the site is eligible for a Bat Mitigation Class Licence (BMCL). The BMCL application requires that surveys have been undertaken within the most recent active bat season (May to September) and planning permission must have been granted and all relevant wildlife-related conditions have been discharged prior to submission. The survey effort should include at least one survey between May and June when the detection rate of bat roosts is highest.</p> <p>The BMCL will include the following measures:</p> <ul style="list-style-type: none"> The installation of 1 bat box at the site (one bat box per species) prior to works commencing to form a receptor site for any bats found during the works. These boxes may be installed on buildings or trees but must be in an undisturbed location and will need to be maintained in this location post-development. Bat boxes should be positioned 3-5m above ground level facing in a south or 	<p>A wall mounted bat box should be added to a gable end to provide replacement roost habitat on site. Under BMCL this is considered an enhancement and should be secured by a planning condition.</p>

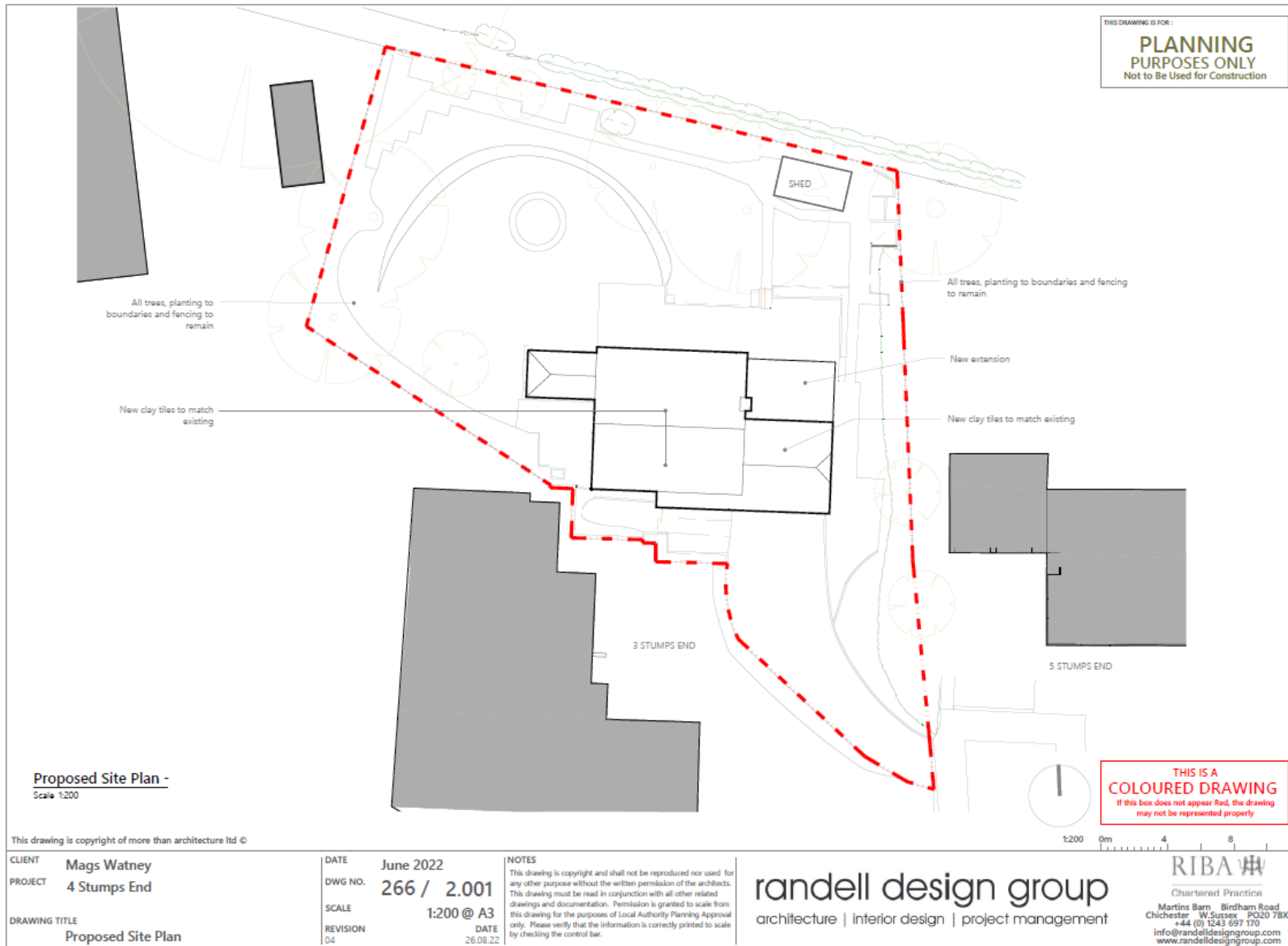
			<p>south-westerly direction with a clear flight path to and from the entrance, away from artificial light.</p> <ul style="list-style-type: none"> • The provision of a toolbox talk to contractors, by the Registered Consultant or an Accredited Agent, to inform them of the presence of bat roosts. • A pre-commencement inspection of any roost features by the Registered Consultant or an Accredited Agent using a torch and an endoscope (this may be via ladders, scaffolding or a mobile elevated platform). • The removal of bat roost features by hand under the supervision of the Registered Consultant or an Accredited Agent (where it is not possible conclude absence of bats during the pre-commencement inspection). • Avoiding the use of unnecessary lighting, particularly at night, or implementing a low impact lighting strategy to avoid illumination of retained or newly created roosts or roost features. • Avoiding excessive noise or vibration disturbance e.g. from power tools or radios, within close proximity of retained or newly created roosts or roost features. <p>New roof lining - You must include a certificate that proves the roofing membrane has passed a 'snagging propensity test' if you are using a non-bitumen coated roofing membrane. A snagging propensity test checks that the membrane can stand the repeated snagging actions of roosting bats. To pass, a membrane must show no change in the average number of loops per cm² as rotations are increased from 0 to 1000. You do not need a certificate for bitumen 1F felt that has a non-woven, short fibre construction.</p>	
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			<p>A low impact lighting strategy will be adopted for the site during and post-development, which will include the following measures:</p> <ul style="list-style-type: none"> • 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. <p>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.</p> <p>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.</p> <p>Wall lights and security lights will be 'dimnable' 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.</p>	
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5.0 Bibliography

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Appendix 1: Proposed Development Plan



Proposed Site Plan -
Scale 1:200

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CLIENT **Mags Watney**
PROJECT **4 Stumps End**
DRAWING TITLE **Proposed Site Plan**

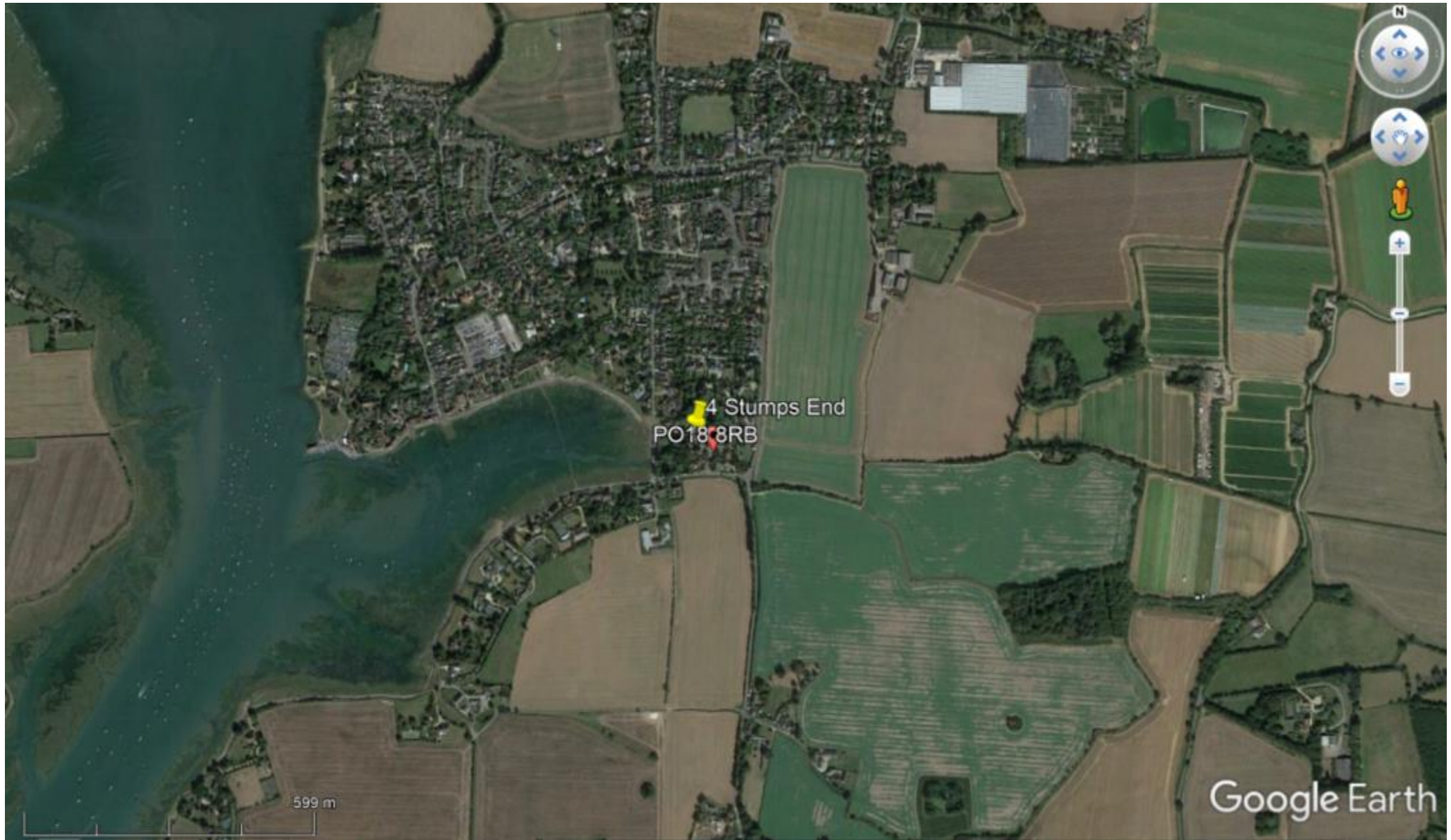
DATE **June 2022**
DWG NO. **266 / 2.001**
SCALE **1:200 @ A3**
REVISION **04** DATE **26.08.22**

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Appendix 2: Site Location Plan



Appendix 3: Bat Survey 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 (ENGLAND)

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.

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:

- 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;
- scientific and educational purposes;

- ringing or marking; and,
- 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.