Preliminary Roost Assessment

29 Starmer Place, Hatton, Warwick, CV35 7LB

Konagh Greensall

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)

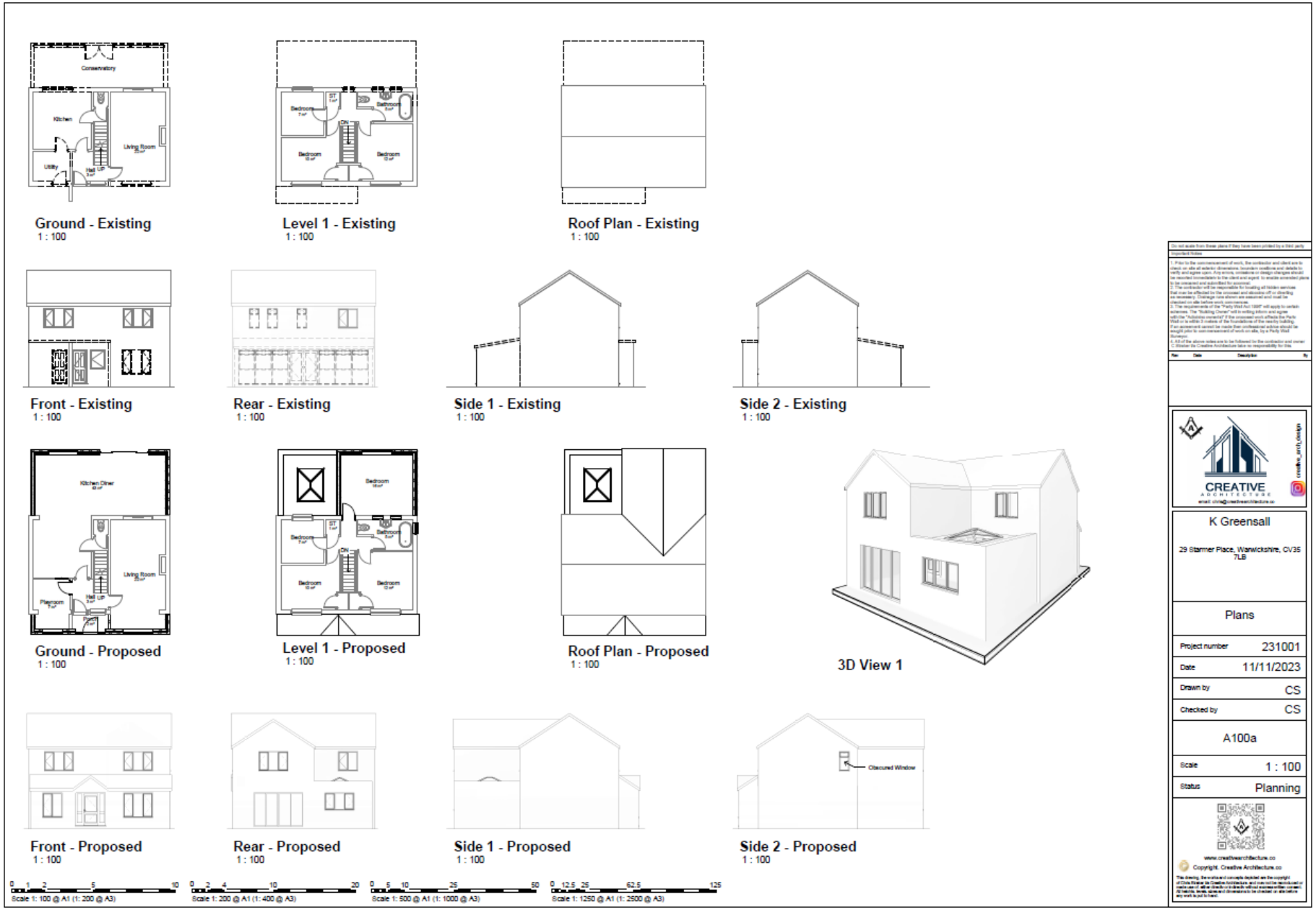
Executive Summary

Arbtech Consulting Limited was instructed by Konagh Greensall to undertake a Preliminary Roost Assessment (PRA) at 29 Starmer Place, Hatton, Warwick, CV35 7LB (hereafter referred to as "the site"). The survey was required to inform a planning application for a two-storey rear extension and single storey front extension of an existing building, B1 (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 (B1)	B1 has low value for roosting bats due to the missing mortar gap on the gable end and access under the roof tiles at the edge of the southern elevation roof. However, as a result of the works to the interior, the building has been assessed as no longer suitable for void dwelling bats.	As no evidence of bats was recovered from the remaining loft space, it cannot be concluded that a bat roost has been impacted by the internal works. The removal of the loft interior makes it unlikely void dwelling bats will begin using the building due to the unsuitable conditions now present.	• Any works to the building will be timed outside the active bat season (May to September), where bats are least likely to be present, insofar as possible. If this can't be avoided, any works within the bat active season will require a pre-works inspection by a suitably licensed ecologist. • Works should only be undertaken during daytime hours. • No external lighting should be used during the proposed works. in particular, no additional external lighting overnight. • Noise and lighting levels used in the loft space during the works will be kept to a minimum, with no loud music or unnecessary noise as so to not cause disturbance. If any evidence of bats is discovered, works will stop immediately a suitably qualified ecologist will be informed and a license applied for from Natural England to continue. (This may need to be supplemented by emergence surveys in the active season (May-September 2024)).
Foraging and commuting bats	Vegetated gardens to the rear 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, which will include the measures detailed in Table 4.

Contents



1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed Konagh Greensall to undertake a Preliminary Roost Assessment (PRA) at 29 Starmer Place, Hatton, Warwick, CV35 7LB (hereafter referred to as "the site"). The survey was required to inform a planning application for a two-storey rear extension and single storey front extension of an existing building, B1 (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, 2023). 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 SP 23458 67206 and has an area of approximately 0.1ha comprising one residential dwelling, B1, with associated garden and a hardstanding driveway. It is surrounded by residential dwellings with arable fields and a main road to the east. The wider landscape comprises of several villages and agricultural land with scattered trees and small areas of woodland. There is a railway line and the Grand Union Canal located ~500m to the south. 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 Knight BSc (Hons), Graduate Ecologist (Accredited Agent on Licence: 2022-10404-CL18-BAT) on 21st March 2024.

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

Assigned bat roosting potential	Description/rationale
Confirmed roost	Evidence of roosting bats within the building.

High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions, and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/ stable hibernation site.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, condition and surrounding habitat but unlikely to support a roost of high conservation status, such as maternity and hibernation.
Low	A building with one or more potential roost sites that could be used by individual bats opportunistically at any time of year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/ stable hibernation site, but could be used by individual hibernating bats).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
None	No habitat features likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/ suitable shelter at all ground. Underground levels.

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. 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.

A biological records data search 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 protected or notable species, 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.

Internal works within the house had already begun before the survey has taken place. These works have altered the loft space, with the ceilings of the second floor and consequently the floor of the loft space having been removed and replaced. One of the chimneys to the west of the roof has also been removed before the time of the survey.

These limitations have been taken into account during the evaluation of the site and requirement for further surveys and mitigation.

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

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

Table 2: Weather conditions during the survey

Date:	21/03/2024
Temperature	13°C
Humidity	59%
Cloud Cover	100%
Wind	1mph
Rain	None

Table 3: PRA Results

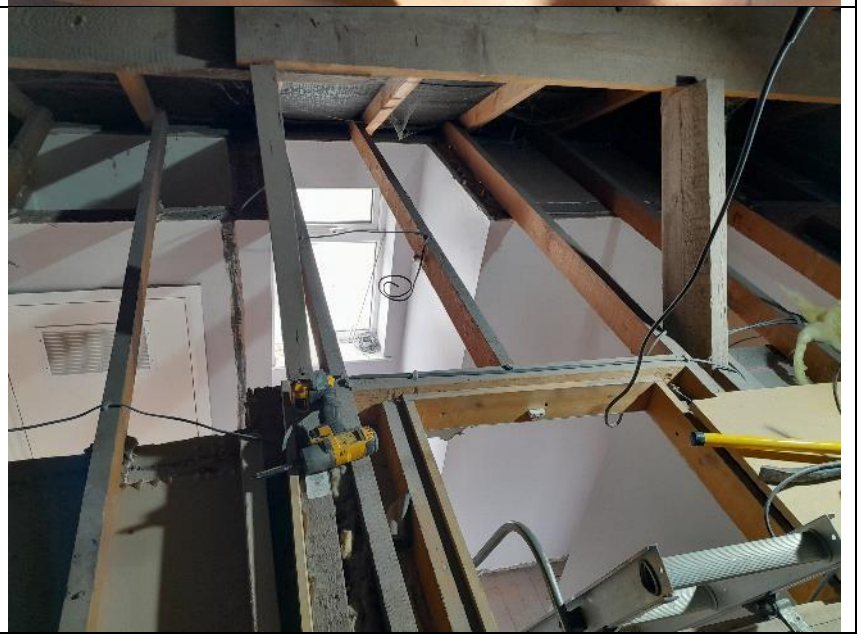
Feature	Description	Photographs
Bat foraging and commuting habitat Figure 1	There is limited foraging and commuting habitat on site as a large amount of the site is comprised of the building and hardstanding driveway, with a small garden area to the rear (shown opposite). The residential gardens with scattered trees around the site could provide suitable foraging habitat for bats, whilst the agricultural fields with tree lined boundaries to the east of the site and the canal and railway line to the south could be used by commuting bats.	
B1 – overview Figure 2 – northern elevation	B1 is a brick-built end terrace residential dwelling, with a pitched roof and is attached to the neighbouring property on the eastern elevation. There is a small porch at the front of the house and a single storey conservatory to the rear and one chimney to the east of the roof. At the time of the survey, building work had already begun resulting in the chimney at the western end of the roof being removed as well as internal works involving the floor and insulation of the loft space being removed.	

B1 – northern elevation Figure 3	The pitched roof is clad in clay tiles that lay flat to the roof, with no raised or missing tiles that bats could use to gain access in to loft space. There is a gap in the roof where the chimney has been removed, shown below in figure 7 and 12. The brickwork of the northern elevation appears to be in good condition, with no gaps or cracks to which bats could roost, as shown in figure 2 above. The soffit (shown opposite) is made from concrete and appears to be in good condition, with no damage or gaps that bats could use to roost or gain access into the building. There is no uPVC present on the underside of the soffit around the entirety of the building.	
B1 – single storey porch on northern elevation Figure 4	The single storey porch (shown opposite) looks to be in excellent condition, with no gaps or crevices in the rendering or brickwork that bats could use to roost. Both doors are well sealed, with no gaps or damage around the frames and the uPVC fascia and bitumen roof lay flat, with no raised areas and no means of ingress for roosting bats.	

B1 – southern elevation Figure 5	The brickwork on the southern elevation appears to be in good condition, with no gaps or missing mortar that bats could utilise. The soffit is made from concrete to which there are no gaps or areas of damage that bats can use, shown below in figures 7 and 8. The roof appears to be in good condition, with no slipped tiles that bats could use to gain access into the loft space and no missing ridge tiles. The only area of damage is to the western end where the chimney has been removed and is now covered with a tarpaulin sheet, shown below in figure 7. The chimney to the eastern end of the roof looks to be in good condition, with no damage or mortar missing and the lead flashing lays flat to the roof. There is a wire mesh along the edge of the roof, blocking the access to the tiles at the edge of the roof, however this mesh stops below the chimney leaving the end tiles exposed, which could allow bats to gain access into the roof structure. These gaps are circled in figure 8 below.	
B1 – conservatory interior Figure 6	The conservatory looks to be in good condition with a glass roof and uPVC windows and doors that are well sealed with no gaps around the frames. The lead flashing where the conservatory meets the brickwork looks to be in good condition, with no raised areas to which bats could roost. The conservatory holds no opportunities for bats to roost.	

B1 – southern elevation roof Figure 7 and figure 8		
B1 – western gable end Figure 9	The western gable end appears to be in good condition, with no missing mortar in the brickwork and no gaps that bats could use to roost. There is one gap along the roof verge where mortar is missing, which bats could utilise to roost which is circled in the figure opposite. Where the chimney has been removed, a gap along the apex of the roof has been created which is currently covered by tarpaulin sheeting. The movement and noise created by this tarpaulin sheet is likely to dissuade bats from using this gap to enter the loft space in its current state.	

B1 – interior Figure 10	There is one loft space within the interior of B1. The approximate internal dimensions of the loft space are: 8.3m (L) x 6m (W) x 1.5m (H) [Height is measured to the highest point of the loft space]. The internal temperature was 8.6° with a relative humidity of 55%. At the time of the survey, works to the loft space had already started. The boarding and floor insulation has been removed and replaced, with the loft left partially boarded. The ceilings of the rooms below had been removed and partly rebuilt, leaving the southern end of the loft area open to the second floor below and letting light into the loft space (shown in figures 10 and 14). There are modern timber beams and a central ridge beam present. The roof is lined with bitumen felt and partially lined with white plastic membrane on the northern elevation (figure 13). These are from the existing loft and have not been touched by the works. There is one tear in the bitumen felt lining (figure 16) where daylight can be coming through, and there is no sagging of the lining. The cobwebs present along the ridge beam were inspected, with no evidence of bats found.	
B1 – interior Figure 11	The chimney at the western end of the roof has been removed (figure 11 and 12), leaving a gap in the roof. This is covered by a tarpaulin sheet that blocks the access. The area around the hole in the roof and the surrounding cobwebs were inspected for any evidence of bats. No evidence of bats was found. The old loft hatch door and small strips of old insulation were found between some of the ceiling structure in the centre of the loft (figure 17) and were inspected for any evidence of bats. No evidence of bats was found.	

B1 – interior Figure 12 and 13		
B1 – interior Figure 14 and 15		

B1 – interior Figure 16 and 17	 
B1 – suitability assessment, breeding birds and other incidental observations Figure 17	The works for the two-storey extension to the rear of the property had commenced prior to inspection. There has been extensive work internally, in which the loft space was entirely disturbed. This was inspected for any evidence of bats by means of droppings or feeding remains that may be present. No evidence of bats was observed internally or externally, although externally there is one gap from missing mortar and a gap under the end roof tiles. These gaps are sufficient to qualify as accesses bats may utilise to enter the building, but with no evidence of bats, it is assumed that no wildlife crime has been committed. However, due to the features still present, the building is confirmed to have low value for supporting roosting bats. As such, two bat boxes will be required along with precautionary working methods for further works. **No evidence of bats or nesting birds was observed internally or externally on the building during the survey.**

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 a two-storey rear extension and single storey front extension.

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 (B1)	B1 has low value for roosting bats due to the missing mortar gap on the gable end and access under the roof tiles at the edge of the southern elevation roof. However, as a result of the works to the interior, the building has been assessed as no longer suitable for void dwelling bats.	As no evidence of bats was recovered from the remaining loft space, it cannot be concluded that a bat roost has been impacted by the internal works. The removal of the loft interior makes it unlikely void dwelling bats will begin using the building due to the unsuitable conditions now present.	• Any works to the building will be timed outside the active bat season (May to September), where bats are least likely to be present, insofar as possible. If this can't be avoided, any works within the bat active season will require a pre-works inspection by a suitably licensed ecologist. • Works should only be undertaken during daytime hours. • No external lighting should be used during the proposed works. in particular, no additional external lighting overnight. • Noise and lighting levels used in the loft space during the works will be kept to a minimum, with no loud music or unnecessary noise as so to not cause disturbance. • If any evidence of bats is discovered, works will stop immediately a suitably qualified ecologist will be informed and a license applied for from Natural England to continue. (This may need to be supplemented by emergence surveys in the active season (May-September 2024)).	The installation of two bat boxes at the site will provide additional roosting habitat for bats. The bat boxes will be installed on new or retained buildings, or any suitable mature trees on site, if present. 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 crevice dwelling species such as boxes by NHBS or a similar alternative brand.
Foraging and commuting bats	Vegetated gardens to the rear 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.	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 rear vegetated gardens 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 (2024).

	could also be used by bats dispersing from nearby roosts outside of the site.	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.	• 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)	B1 offers no opportunities for nesting birds.	None.	None.	The installation of a minimum of two bird boxes on retained buildings will provide additional nesting habitat for birds e.g. Schwegler 1SP Sparrow Terrace (buildings) Woodstone Nest Box (buildings or trees) Or a similar alternative brand.

				Tree boxes should be positioned approximately 3m above ground level where they will be sheltered from prevailing wind, rain and strong sunlight. Small-hole boxes are best placed approximately 1-3m above ground on an area of the tree trunk where foliage will not obscure the entrance hole.

5.0 Bibliography

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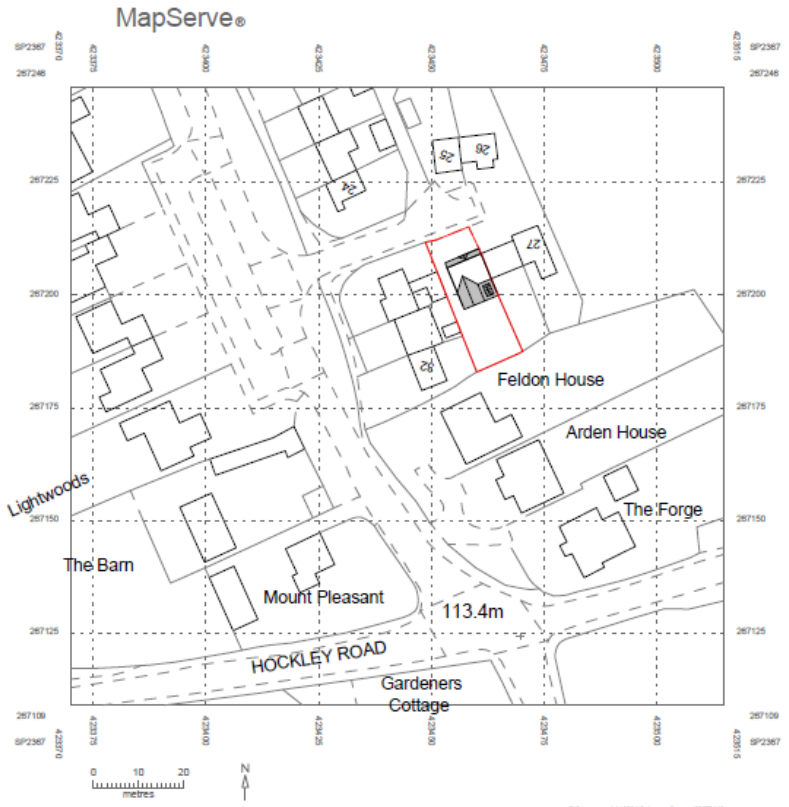
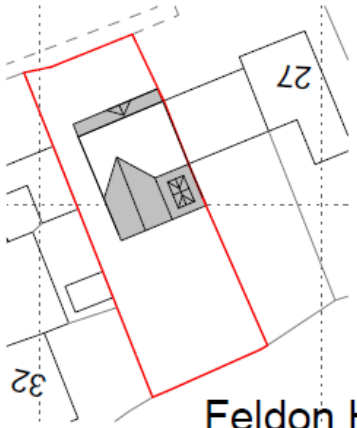
Appendix 1: Proposed Development Plan



Site
1 : 500

Location Plan
1 : 1250



Block Plan
1 : 200

Feldon House

North

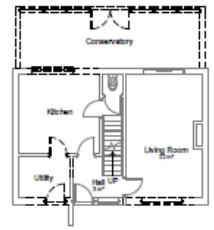
CREATIVE ARCHITECTURE

K Greensall

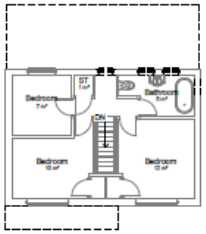
29 Starmer Place, Warwickshire, CV35 7LB

Site Plan

Project number	231001
Date	11/11/2023
Drawn by	CS
Checked by	CS
	A101a
Scale	As indicated
Status	Planning



Ground - Existing
1 : 100



Level 1 - Existing
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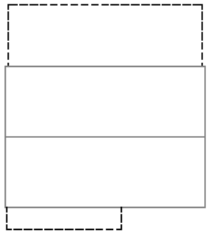

Roof Plan - Existing
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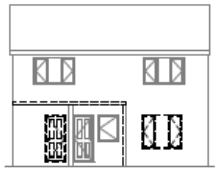

Front - Existing
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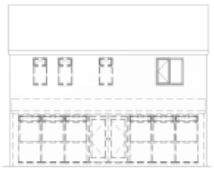

Rear - Existing
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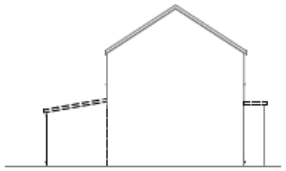

Side 1 - Existing
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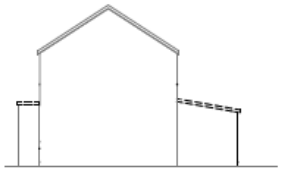

Side 2 - Existing
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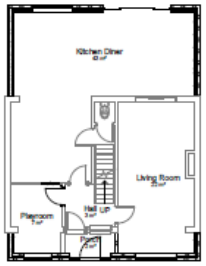
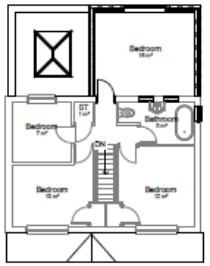
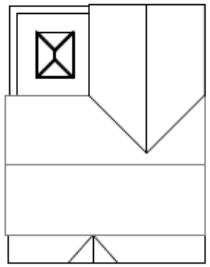


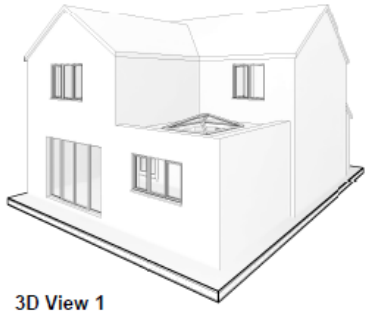
Ground - Proposed
1 : 100



Level 1 - Proposed
1 : 100



Roof Plan - Proposed
1 : 100



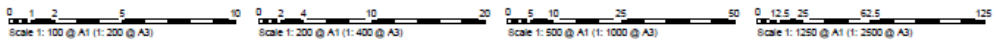
3D View 1

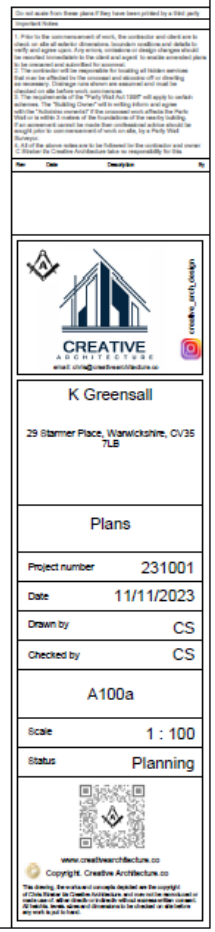
Front - Proposed
1 : 100

Rear - Proposed
1 : 100

Side 1 - Proposed
1 : 100

Side 2 - Proposed
1 : 100





Appendix 2: Site Location Plan

Appendix 3: 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 2024

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:

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.