

PRELIMINARY ECOLOGICAL APPRAISAL & PRELIMINARY BAT ROOST ASSESSMENT OF:

LYNWOOD GUEST HOUSE
CHURCH STREET
HUGH TOWN
ST MARY'S
ISLES OF SCILLY
TR21 0JT

Client: Mr David Parr

Our reference: BS19-2019

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Non-Technical Summary

- On 12th July 2019, the Isles of Scilly Wildlife Trust (IoSWT) conducted a Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) of Lynwood, Church Street, St Mary's, Isles of Scilly, TR21 0JT (BS19-2019), for which there is a proposal to convert the rear single-storey garage/workshop and outbuildings into a two-storey annex for living accommodation
- This report outlines the findings of the PEA and PRA assessment and provides advice based on the surveys' conclusions.
- During the PRA an external/internal inspection of the building was undertaken (where accessible).
- All areas could be accessed and evaluated for roost potential and for evidence of bats.
- No evidence of nesting birds was found.
- No vegetation of conservation interest was found in the immediate surrounding habitat.
- No mammal droppings were found during the inspection.
- The habitat surrounding the proposed development suggests limited opportunity for bats to feed and to commute to and from, primarily due to very limited feeding opportunities immediately surrounding the development; those opportunities within close proximity are lit by street-lighting or to reach more preferred habitat bats would need to navigate further street lighting, or feed and commute out in the open along the strand-line to reach more preferred habitat
- The proposed development, both externally and internally presented with minimal features that bats may use as a roost.
- Therefore, the characteristics of the building and the surrounding habitat suggest negligible roost potential for bats.
- **The recommendations of this PEA and PRA suggest that no further surveys are recommended and there should be no further ecological constraints to the development proposals.**

1.0 Introduction

1.1 Survey and reporting

This report details the results of a preliminary ecological appraisal and a preliminary bat roost assessment of Lynwood Guest House, Church Street, St Mary's, Isles of Scilly TR21 0JT. The survey, carried out on 12th July 2019, was undertaken in order to inform proposals to convert the rear single-storey garage/workshop and outbuildings into a two-storey annex for living accommodation.

1.2 The application site

The house is located centrally in Hugh Town St Mary's (National Grid Reference SV9047810499). The application site is comprised of a large, terraced townhouse that has been extended extensively that includes a single-storey garage/workshop and outbuildings situated at the rear (southern end) of the building with an approximate north/south aspect (Photo 1). The footprint of the proposed development is approximately 44m² and the sites total footprint approximately 245m² (red area, see Figure 1).

1.3 Details of proposed works

It is proposed to convert the rear single-storey garage/workshop and outbuildings into a two-storey annex for living accommodation.



Figure 1



Photo 1.

2.0 Methodology

2.1 Preliminary Ecological Appraisal - Desk Study

A desk study data search was undertaken. This involved carrying out a review of the Local Records Centres (LRC) available records for bat species and publicly available datasets and citations of statutory designated sites of importance for nature conservation for sites within the zone of influence (ZOI) of the survey area (considered to be a maximum of 2km in this case). The desk study was also undertaken to identify habitats and features that are likely to be important for bats and assess their connectivity through the use of aerial photographs.

2.2 Preliminary Bat Roost Assessment

The Preliminary Bat Roost Assessment comprised a survey of the building for bats, signs of bats and features potentially suitable for use by roosting bats, and an assessment of the surrounding habitat in terms of its suitability for commuting and foraging bats.

The survey consisted of a ground based inspection and a detailed search of the interior and exterior of the building (from ground level), looking for bats and/or evidence of bats including droppings (on walls and

windowsills and in roof and loft spaces), rub or scratch marks, staining at potential roosts and exit holes, live or dead bats and features, such as raised or missing tiles, potentially suitable for use by roosting bats. Binoculars, a ladder and a high-powered torch were used as required.

2.3 Classification of building

The building was classified according to its suitability for use by roosting bats. The classification was dependent on a number of factors including:

- Bats and/or signs of bats;
- External and internal features potentially suitable for use by roosting bats (e.g. raised or missing tiles, gaps behind fascia boards etc);
- Setting;
- Night time light levels;
- Disturbance levels;
- Proximity of suitable foraging habitat and commuting routes (e.g. ponds, streams, woodland, large gardens, hedgerows).

The categories used to classify buildings and the survey effort required to determine the presence or absence of bats (as per the Bat Conservation Trust's Bat Survey Guidelines¹, referred to by Natural England in their standing advice to planning officers) are described in Table 1 (see below).

2.4 Surveyor details

The survey was undertaken by Darren Mason BSc and Darren Hart BSc of the Isles of Scilly Wildlife Trust. Both have undertaken professional Bat Licence Training to permit him to undertake professional surveys and are currently gathering sufficient 'working hours' to achieve a Natural England Class Level 1 licence.

Table 1 – Description of the categories used to classify a building’s bat roost potential and the survey effort required to determine the likely presence or absence of bats

	Roost status	Description	Survey effort required to determine the likely presence or absence of bats
Bat Roost Potential	High	Numerous features potentially suitable for use by roosting bats, optimal or good quality bat foraging habitat nearby and good habitat connectivity. Alternatively, a building with fewer features potentially suitable for use by roosting bats and optimal foraging habitat nearby.	Three dusk emergence and/or pre-dawn re-entry surveys between May and September. Optimum period May – August. Two surveys should be undertaken during the optimal period and at least one survey should be a pre-dawn survey.
	Moderate	More than a few features potentially suitable for use by roosting bats, good foraging habitat nearby and limited habitat connectivity. Alternatively, a building with a few features potentially suitable for use by roosting bats but optimal foraging habitat nearby.	Two or three dusk emergence and/or pre-dawn re-entry surveys between May and September (but only if features will be affected by the proposals).
	Low	Only a few features potentially suitable for use by roosting bats but good bat foraging habitat nearby. Alternatively, a building with more than a few features potentially suitable for use by roosting bats but sub-optimal foraging habitat nearby and limited habitat connectivity.	One or two dusk emergence and/or pre-dawn re-entry surveys between May and September (but only if features will be affected by the proposals).
	Negligible	Very few features potentially suitable for use by roosting bats and / or in an area (such as a densely populated urban area) which has limited habitat connectivity and poor foraging habitat.	No further surveys required.

Table 1. Categorising and classifying a building’s bat roost potential

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

3. Results

Preliminary Ecological Appraisal

3.1 Pre-existing information on bat species

The desk study showed that no species of bat had previously been recorded within the building. A data search of LRC records for bats revealed information on 4 species of bat recorded within the 2km ZOI of the site. The species conclusively identified were Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*) and Brown Long-eared Bat (*Plecotus auritus*) both UK Biodiversity Action Plan (BAP) priority species and the rare Nathusius Pipistrelle (*Pipistrellus nathusii*). Several bat roosts are known to exist within the 2km of the proposed development, with 2 known roosts within 500m of the property.

3.2 Statutory and non-statutory sites

In addition, the desk study revealed the presence of the following statutory designated sites within the 2Km ZOI of the site:

- i.) **Peninnis Head SSSI** – Lying 533m south east of the proposed development is Peninnis Head SSSI. The site designated primarily for its maritime heathland, maritime grassland and scrub habitats together with good populations of a number of rare plant and lichen species, in addition to its significant quaternary geomorphology.
- ii.) **Lower Moors SSSI** – Situated 504m due east of 7 Garrison lane lies Lower Moors SSSI. A topogenous mire that has a range of wetland habitats supporting a diverse range of wetland wildflower species, including the Nationally Scarce Tubular Water-dropwort (*Oenanthe fistulosa*). The site also holds locally important populations of Royal Fern (*Osmunda regalis*) and Southern Marsh Orchid (*Dactylorhiza praetermissa*) and is particularly important feeding for passage and wintering birds including Corncrake (*Crex crex*) and Spotted Crake (*Porzana porzana*).
- iii.) **Higher Moors & Porth Hellick Pool SSSI** – 1.6km east north-east of the proposed development is Higher Moors SSSI. A topogenous mire designated for several rare and notable plant species) including; Bog pimpernel (*Anagallis tenella*), Star Sedge (*Carex echinata*) and Marsh St John's-wort (*Hypericum elodes*).

- iv.) **Porthloo SSSI** – Situated 1.09km north-east of the proposed development lies Porthloo SSSI designated for its geology, particularly for its Quaternary sediments in the cliffs that show changes in the climates and environments of the Quaternary period in Scilly.

3.3 Habitats surrounding the application site

Lynwood Guest House lies within the Built-Up Areas Boundaries² (2011) for England and Wales published by the Office for National Statistics (Geography). Lynwood sits relatively centrally within Hugh Town, with the proposed development situated to the south of the main building, along Porthcressa Road. The street lighting throughout the town is intermittent and minimal, consisting of orange sodium lighting. Though intermittent, there are three lights along the length of Porthcressa Road, with the nearest being only 7m away to the south-west-west and a further 2 within 45m of the proposed development to the east and north respectively. The nearest potential foraging feature to the proposed development lies 33m due west of the proposed development consisting of a lone Dutch Elm (*Ulmus x hollandica*), with a further two situated approximately 60m to the north-east. The first mature garden with mixed shrubs and lawn lies 60m to the east-south-east which is lit by a streetlight. This garden links Hugh Town to Buzza Hill, an area of open grassland and scrub, which is linked to the wider countryside and to the SSSI of Lower Moors by further mature gardens, the old school site at Carn Thomas and the small allotments below Pilot's Retreat. Due west lies a small park on the Strand, comprising of open lawn, small flowered borders and occasional mature trees which is lit by a single street light. Due south of the proposed development is the beach of Porthcressa, with its strandline stretching 300m and 200m to the west and east respectively. To the west the beach links into the wider countryside via the mature woodland blocks along the eastern edge of the Garrison which also includes habitats including large open expanses of grassland, heathland and scrub. To the south-east the beach meets Porthcressa allotments, comprising of small hedgerow enclosed cultivated fields. Beyond these and further to the south-east is the open headland of Peninnis Head SSSI.

In summary, the habitat surrounding the proposed development has limited opportunity for bats to commute and feed as street lighting which has been shown to negatively impact upon a bats commuting and foraging routes³ are present immediately around the development, two of which illuminate potential feeding areas. To reach more suitable feeding habitat and the wider countryside bats would also need to navigate further street-lighting, particularly to the west and east. In contrast, it has been shown that species such as Common Pipistrelle will feed around street-lighting, to take advantage of the insectivorous prey that congregates around them. However, this has been shown to be dependent on the light emitting

from the lamps, with orange sodium light (found here in this instance) having the greatest negative impact on feeding opportunities⁴.

Though Soprano Pipistrelle have been shown to utilise more built up areas, compared to Common Pipistrelle⁵ all species of bat require 'edge' habitat like hedgerows to both feed from and commute to other feeding areas^{6, 7&8}. This type of habitat is limited, particularly to the north and to the west and quickly breaks down after approximately 150m, where the landscape becomes very open, which most species of bat prefer not to utilise⁹. Furthermore, the preferred habitat for species such as Soprano and Nathusius Pipistrelle, which includes open bodies of water and watercourses^{6,7&8} which lies over 1km to the east. Though this could be reached utilising the 'strand-line' along the beach to the south, it has been shown that of all the pipistrelle species only Common Pipistrelle is known to use this as feeding habitat¹⁰.

3.4 Habitats within the application site

Lynwood is a terraced property, with the adjacent properties forming the west and east boundaries. Both boundaries appear to be rendered stone walls. Between the main building and the proposed development of Lynwood the garden area is laid primarily to low-maintenance patio, with a small raised bed running along the western boundary edge, consisting of ornamental shrubs. The adjacent properties have similar style gardens, with the only notable flowering species being a climbing Rose (*Rosa sp.*) to the west.

In summary, the habitat within the footprint of Lynwood Guest house provides a very limited number of species which would attract a wide variety of invertebrates which bats can feed on.

Preliminary Roost Assessment

3.5 External

The proposed development at Lynwood guest house is currently a single-storey garage/workshop with an associated out-building (on its northern aspect) that is bounded on both sides by adjacent properties. The timber-framed building is part-rendered on both aspects and part timber clad on its southern aspect along with the whole of the outbuilding on its northern side. The fascia on both aspects is wooden, sitting tight against the northern face, whilst sitting proud from the southern face by approximately 100mm creating a large, open gap between the fascia and cladding. The roofs have a north/south aspect with an

approximate pitch of approximately 4° and 6° respectively. The northern roof has a skim of fibreglass laid over the top of the tiles, creating a smooth, sealed surface. The roof and fascia of the outbuilding on the same aspect has a similar pitch and is constructed of fibreglass also. The southern roof is comprised of slate roof tiles, capped by concrete ridge tiles. The southern roof is then tied into a flat fibre-glass roof forming an open porch in the south-west corner. Both roofs are tied in to the adjacent buildings by lead/zinc flashing. Throughout the flashing is well-fitting, as are the tiles on the southern aspect. All the mortar is also present along the ridge-line tiles and appears to be in good condition. All windows are single-glazed and wooden as are all the doors. All the guttering is plastic.



Photo 2.

The proposed development has negligible features potentially suitable for roosting bats, primarily due to the sealed northern roof, well-fitting roof tiles on its southern aspect, fascia that sits very tight or creates very large gaps between the vertical faces of the outbuilding and well-fitted flashing tying the building into the adjacent buildings.

3.6 Internal

Internally the proposed development can be split into three distinct areas; the first is an integrated storage area for refuse and various building materials that can be accessed from one of the three sets of doors on the southern aspect; the out-building on the north aspect that is used for storage of garden furniture and finally the main garage/workshop. Both the integrated storage area and out-building are well maintained.

No droppings from any mammal species were found during the inspection, but cobwebs were abundant, that were covered in dust along with many active spiders. The rafters were exposed and tight fitting to the plywood roof, or the external walls (see photos 3. and 4.). No obvious claw marks, urine or grease stains were present and no obvious cracks/crevices that could potentially be used by bats were recorded.

The garage/workshop was open centrally with shelving along every wall. The roof was 'vaulted,' so that the tie beams and rafters were exposed along with the plywood 'sarking,' This roof space along with the shelving was solely used for storage. Inspection of the joints between the tie beams and the rafters and the rafters and the sarking revealed no obvious staining or claw marks. Inspection of the floor, the shelving and the numerous storage boxes and work bench revealed no dropping from any mammal species though dust was present throughout, suggesting no recent sweeping up had taken place.



Photo 3.

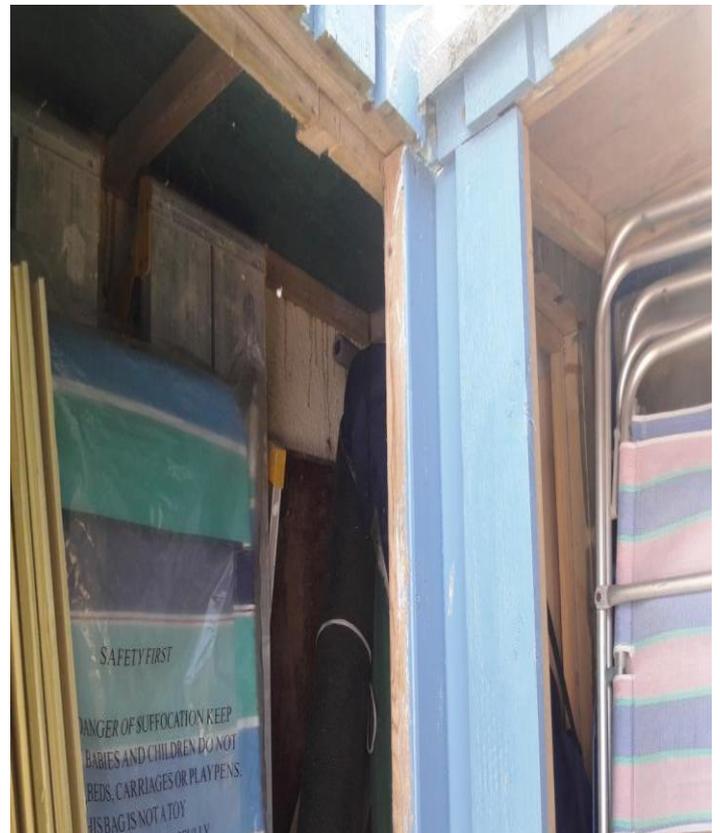


Photo 4



Photo 5.

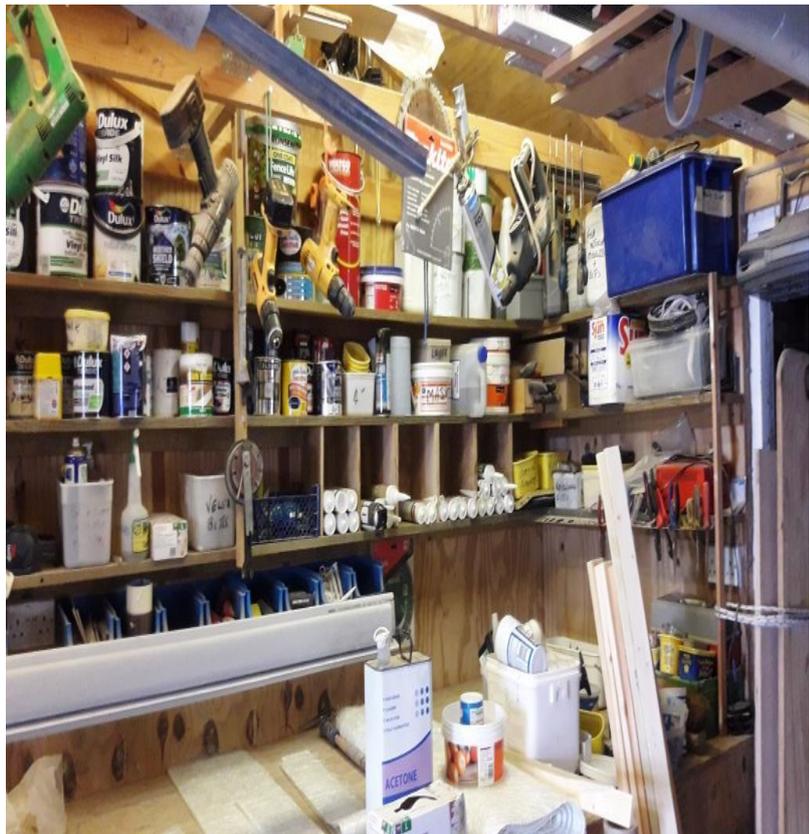


Photo 6.

4. Evaluation of Results

4.1 Protected sites

The proposed development falls into the SSSI Impact Risk Zones of Lower Moors, Higher Moors & Porth Hellick Pool and Penninis Head SSSIs. Impact zones are used in the assessment of planning applications for likely impacts on SSSI's, Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar Sites (England). However, the impact in this zone is for large-scale residential developments and therefore the development is not likely to impact on the surrounding SSSIs.

4.2 Ecological features of importance

To identify which ecological features are important and which could potentially be affected by the proposed project, an evaluation of their importance for example; in a geographical context, degree of scarcity or level of protected status needs to be undertaken¹¹. The table below outlines those features identified as important, the nature conservation legislation relevant to those features and an assessment of the level of impact from the proposed development on those features.

Ecological Feature	Relevant Legislation	Evaluation (of importance)	Mitigation Hierarchy	Impact Level
Habitats:				
Building (roost sites)	CHSR, W&CA	Negligible	A	Low
<p>Impacts:</p> <p>Demolition: – None predicted as long as Reasonable Avoidance Measures (RAM) are followed (see section 5)</p> <p>Construction: – None.</p> <p>Operational impact: - None predicted. Please note a summary of criminal offences with respect to bats and their roosts. This can be found at: http://www.bats.org.uk/pages/bats_and_the_law.html</p>				
Species:				
Bats	CHSR, W&CA	International	A, E	Low
<p>Impacts:</p> <p>Demolition – None predicted as long as Reasonable Avoidance Measures (RAM) are followed (see section 5)</p> <p>Construction/post-construction –_None. Positive impact may result through enhancement by increased roost availability¹²</p> <p>Operational impact: - None predicted, however please note a summary of criminal offences with respect to bats and their roosts. This can be found at: http://www.bats.org.uk/pages/bats_and_the_law.html</p>				
Key to Legislation and Mitigation Hierarchy				
<p>CHSR – Conservation of Habitats and Species Regulations 2017¹³- http://www.legislation.gov.uk/uksi/2017/1012/made W&CA – Wildlife & Countryside Act 1981 (as amended)¹⁴ - http://www.legislation.gov.uk/ukpga/1981/69/contents A – Avoid, M – Mitigate, C – Compensate, E - Enhancement</p>				

Table 1.

5. Recommendations and Mitigation (bats)

The recommendations in this section are provided as information only and are the professional opinions of the author. Note; if building works are delayed for more than one year, then re-assessment may be required.

5.1 Further survey requirements

In the professional opinion of the author **no further surveys are required**. BCT guidance suggests that for buildings with negligible roost potential no further surveys are required¹. The survey carried out to date follows this guidance, is proportionate to the scale of the development and the information provided is believed to be sufficient to inform the planning decision.

5.2 EPS Licence requirement

For any development that is likely to commit an offence (or offences) in respect to a European Protected Species (EPS) i.e. bat, or their habitat, a licence will be required (see Appendix A for details). In this instance based on sufficient survey work **no EPS licence is required**. If in the unlikely event a bat were found during the demolition phase of the project, Reasonable Avoidance Measures (RAM) must be followed and will determine any further action, such as licensing.

5.3 Mitigation – Further Action

As there is a very low risk that bats may roost within the building, prior to demolition, precautions should be taken to reduce the probability of committing an offence. If affected RAM should include:

Avoidance (A) - Bats

- i. Ensure all workers on site (including sub-contractors) are made familiar with bat legislation and agree to work in accordance with and fully follow best practice measures
- ii. Aim to carry out the work when the risk of disturbance is least likely to affect the main breeding season of bats (typically between 1st November and the 1st April inclusive).
- iii. Carry out careful checks of any cracks/crevices and cavities in or on the building prior to demolition. Signs of usage include; bat droppings, discoloration or polishing of access points where bats rub against them, urine stains and a lack of cobwebs, particularly if other crevices around them have plenty.
- iv. Individual bats may be found in/under; cladding, between timber boards, between corrugated sheeting, in soffit boxes, behind lead flashing and sometimes just clinging to timber beams around

joins as well as others areas. If any of these are removed, please do so carefully, lifting outwardly, and checking for bats continually. If in doubt, consult a licensed bat worker.

v. In the unlikely event that a bat is found please see below:

1. At no point should a worker handle a bat. Untrained handling may cause undue stress and injury to the bat, and if bitten may expose the worker to rabies-related European Bat Lyssavirus
2. Where possible replace any covering without damaging the bat, then halt works and contact **Natural England** (Tel: 0845 601 4523), or the **Bat Conservation Trust Helpline** (0845 1300 228), or **IoSWT** (01720 422153) for advice.
3. Any bats that go to ground should be covered with a box and left alone until a licensed bat worker arrives to assess the condition of the bat
4. If the bat attempts to fly at any point allow it to do so. Preventing natural behavior will cause unnecessary stress and may cause injury. Attempt to see where bat goes. If the bat returns to the building, halt works and report the escaped bat to the local bat worker

vi. Try to minimise any dust generated from demolition works from entering off-site buildings and gardens

Enhancement (E) – Bats

The Isles of Scilly have the most southern population of Common Pipistrelle (*Pipistrellus pipistrellus*) bats in the United Kingdom. Any loss of roosting, commuting or foraging sites could have a detrimental effect on this species distribution as a whole and cause a net loss in biodiversity on the islands. Each local planning authority in England and Wales has a statutory obligation under Part 3 Section 40 of the Natural Environment & Rural Communities Act 2006¹⁵ (NERC 2006) to have due regard for biodiversity when carrying out their functions and must pursue sustainable development and a net gain in biodiversity set out under the guidelines in the National Planning Policy Framework 2018¹⁶. Therefore, this planning application should be permitted with the following being considered and at least two options being undertaken:

- i. All new roofing felt laid to be traditional Type 2 bitumen felt, as modern breathable membranes have been shown to kill bats¹⁷.

- ii. Select 10 tiles on each roof aspect (if tiles are to be used) and raise their leading edge by 25mm (using mortar) to create a wedge shaped crevice that provides access to the underlying felt, to provide potential roost space
- iii. Alternatively, Erect two free-standing bat boxes developed for crevice-dwelling species (see figure 2 for examples and Appendix B for supplier details) one on the northern aspect and a second on the eastern aspect of the proposed 1st floor extension
- iv. Provide a 25mm gap between any new fascia and the rendering of the proposed 1st floor extension to permit bats to utilize this space
- v. Any internal lighting on the 1st floor extension to be recessed into the ceiling, rather than pendant fittings to reduce glare and light-spill between the adjoining building to the east, which may otherwise compromise a potential flight line used by bats



Figure 2. free-standing bat box examples

https://www.nhbs.com/browse/search?q=bat%20boxes&hPP=30&idx=titles&p=0&is_v=1&qtview=158636

<https://www.nhbs.com/browse/search?q=bat+boxes&qtview=176916>

6. Summary

It is believed that the proposed development at Lynwood Guest House offers negligible roost potential and limited favourable foraging habitat immediately surrounding the development and has limited potential for linking with more favourable habitat. In the professional opinion of the author **no further surveys are required and no EPS licence is required.**

If the recommendations given in this report regarding bats are adhered to, there should be no further ecological constraints to the proposal.

7. Bibliography

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APPENDIX A – LEGISLATION AND LICENSING

a) Legislation

All species of bats receive special protection under UK law making it a criminal offence under Schedule 5 section 9 (4) (b) and (c) of the Wildlife and Countryside Act 1981 (as amended) to *"intentionally or recklessly disturb a bat at a roost"* or *"intentionally or recklessly obstruct access to a roost"* and under Regulations 43 (1) and (2) of the Conservation of Habitats and Species Regulations 2017 (The Habitat Regulations) to *"deliberately disturb a bat in a way that would affect its ability to survive, breed or rear young or, affect the local distribution or abundance of the species; or to "damage or destroy a roost"* without first having obtained the relevant licence for derogation from The Habitat Regulations from the Statutory Nature Conservation Organisation (the SNCO – Natural England in England).

The word 'roost' is not used in the legislation, but is used here for simplicity. The actual wording in law is 'any structure or place which any wild animal...uses for shelter or protection' or 'breeding site or resting place'. Because bats tend to re-use the same roosts after periods of vacancy, legal opinion is that the roost is protected whether or not the bats are present at the time.

Penalties on conviction of a bat-related crime - the maximum fine is £5,000 per incident or per bat, up to six months in prison, and forfeiture of items used to commit the offence, e.g. vehicles, plant, machinery.

b) Licensing

In order to obtain such a licence (as set out above) the SNCO must apply the requirements of the Regulations and, in particular, the three tests set out in sub-paragraphs 55(2)(e), (9)(a) and (9)(b). These are as follows:

(1) Regulation 55 (2)(e) states that a licence can be granted for the purposes of *"preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment"*.

(2) Regulation 55 (9)(a) states that the appropriate authority (the SNCO) shall not grant a licence unless they are satisfied *"that there is no satisfactory alternative"*.

(3) Regulation 55 (9)(b) states that the appropriate authority (the SNCO) shall not grant a licence unless they are satisfied " *that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.*"

The licence would permit an otherwise unlawful activity to take place, and it requires of the licensee measures to ensure that negative impacts are prevented, reduced or offset, and that the favourable conservation status of the bats is maintained. **Once a licence is granted, failure to comply with its contents, including its attached Method Statement is a Criminal Offence with fines of a maximum of £5,000 per infringement.** A licensed bat consultant must be appointed to assist in the preparation and the delivery of the mitigation proposals that ensure the species protection requirements (Favourable Conservation Status 'FCS' test) can be met.

Additional information on the tests is available from the Natural England website.

<http://publications.naturalengland.org.uk/publication/4727870517673984?category=12002>

The ecologist is responsible for providing evidence to meet Test 3. The evidence to satisfy tests 2 and 3 is submitted on a part of the license application called the Reasoned Statement. The Reasoned Statement must be filled in by the client or their agent. Applicants often approach planning consultants, architects or similar for advice regarding completion of the Reasoned Statement.

- **Permissions**

The development must have **full permission** before the licence application will be registered including any ecology-related conditions or reserved matters that can be discharged before the date of application.

- **Further bat surveys**

If a full active bat season is going to pass between the granting of planning permission and the licence application period, Natural England will require **update survey(s)** (March-Aug) prior to application submission. The number of surveys required will vary by site depending on the size and complexity of the site as well as the species and roost types present.

- **Land ownership**

If mitigation, compensation or monitoring is anticipated to be on land not owned by the applicant, then written consent from the landowner will be required by Natural England. Responsibility for management and maintenance must also be agreed.

- **Commitments**

Applications should not give any commitments to undertake licensed works (or actions relating to the licence) that cannot be delivered.

- **Multi-phased projects**

If a plan is phased, Natural England will require a Master Plan with all mitigation and timetables included on it.

c) **Licence timescales:**

- **Licensing decision**

The licence application pack can take anywhere from **2 to 3 weeks** to produce and Natural England allow themselves **30 working days** from the date of receipt to respond to applications, a window which can be extended if further information is requested by themselves. It is important that clients, developers, contractors, agents, etc. keep this in mind when designing work timetables. Occasionally, further information will be requested by NE, which can result in additional delays; therefore application as soon as possible is advised.

- **Timing of works**

In most cases, the works most likely to affect bats (bat exclusion work, soft strip, re-roofing, ecologist-advised timber treatment, etc.) will normally be timed to avoid the hibernation and maternity periods. Thus, these works tend to be timed for either the **September-October period** or the **March-April period**. This means licence application is normally completed 3 months prior to these periods, and cannot be submitted any earlier.

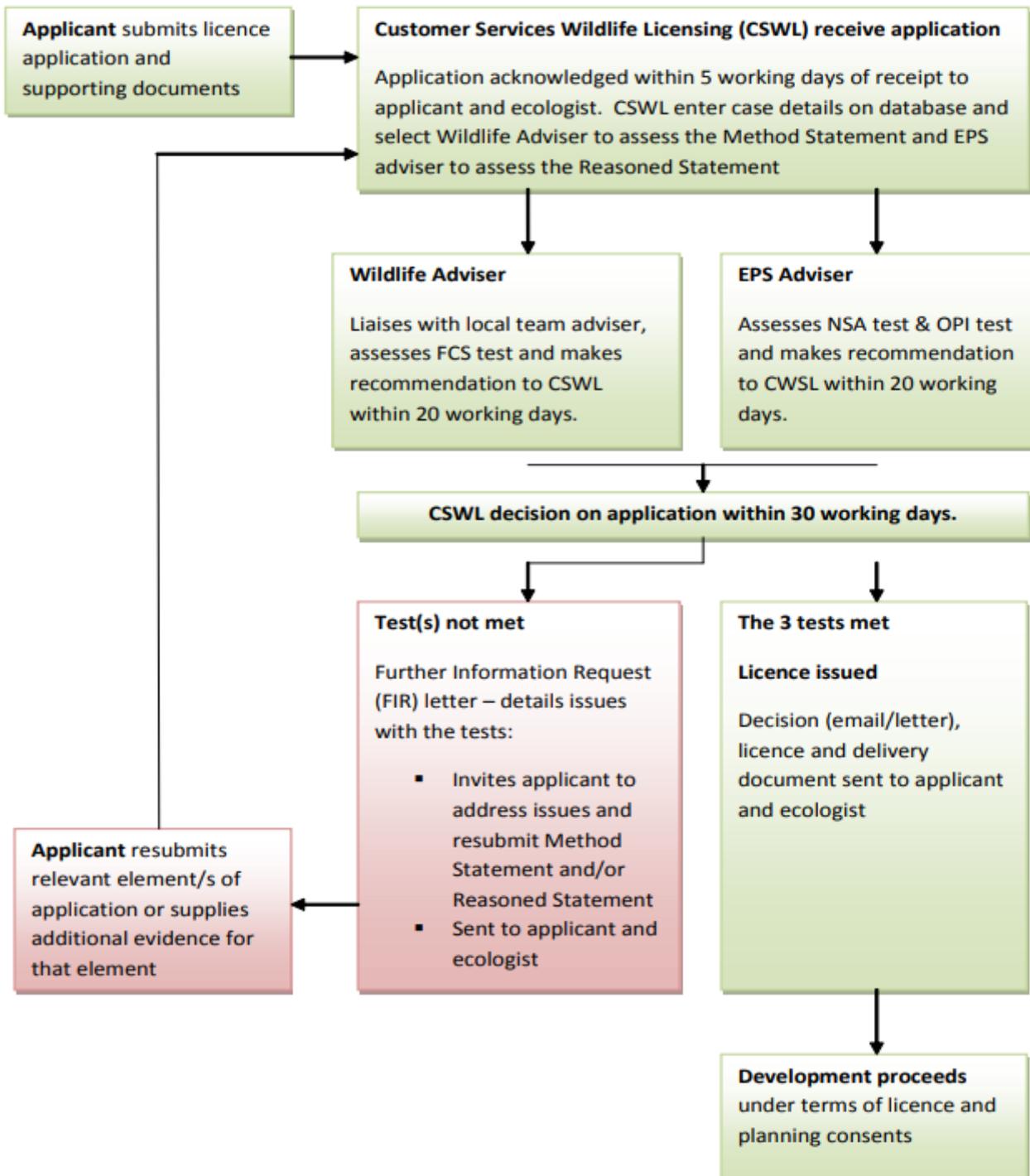
- **Other Timing**

All timescales are weather-dependent (e.g. 5 days post-exclusion period extended due to inclement weather) and also may be impacted by other aspects of the project not related to ecology. In some situations license periods can be extended, but this involves more work and is not guaranteed as they must ensure that Test 3 is still met.

d) Scale of work involved:

- **Mitigation** Production and submission of the license application pack as well as the completion of the licensed works themselves are time intensive and involve inspections, exclusions, site induction and other works requiring onsite supervision such as bat roost creation, soft strip and other necessary checks under the terms of the license. Costs for materials and equipment including bat boxes, exclusion materials, lifts/scaffolding to carry out soft strips, roost construction materials, etc. needs to be considered. Costs can vary considerably by project, but the applicant should ensure provision for all aspects of the licensed works is well-budgeted.
- **Monitoring** Most mitigation schemes require some sort of post-development monitoring, the type and extent of which would be confirmed in the license method statement. A contract with the ecologist for all survey, mitigation and post-development monitoring surveys needs to be agreed for this at the application stage.

EPS Process



EPS application procedure flowchart (updated December 2011). Taken from WML-G12-EPS Mitigation Licensing – How to get a licence Version December 2013

APPENDIX B – SUPPLIERS

1. Natural History Book Service
1-6 The Stables
Ford Road
Totnes
Devon, TQ9 5LE
Tel: 01803 865913
Email: customer.services@nhbs.com
Website: <https://www.nhbs.com/>
2. Habibat
Tel: 01642 724626
Email: <http://www.habibat.co.uk/contact>
Website: www.habibat.co.uk
3. Dreadnought Tiles
Dreadnought Works
Brierley Hilly
West Midlands, DY5 4TH
Tel: 01384 77405
Email: sales@dreadnought-tiles.co.uk
Website: www.dreadnought-tiles.co.uk
4. Wildlife & Countryside Services
Covert Cottage
Pentre Lane
Rhuddlan
North Wales, LL18 6LA
Tel: 0333 9000927
Email: support@wildlifeservices.co.uk
Website: www.wildlifeservices.co.uk
5. Wildcare
Eastgate House
Moreton Road
Longborough
Gloucestershire, GL56 0QJ
Tel: 01451 833181
Email: sales@wildcare.co.uk
Website: www.wildcare.co.uk