



Preliminary Roost Assessment Survey

9 Upper Crown Street, Reading, Berkshire, RG1 2SS

ARK Environmental Consultancy Ltd

Status	Issue	Name	Date
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Executive summary

Arbtech Consulting Limited was commissioned by ARK Environmental Consultancy Ltd to carry out a Preliminary Roost Assessment, (PRA) at 9 Upper Crown Street, Reading, Berkshire, RG1 2SS. The survey was completed on 22nd February 2021. The aim of the assessment was to search for bats/field signs of bats and to consider the value and suitability of the structures for roosting bats. 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.

Project description

The development proposals are for '*Redevelopment of the site for a residential scheme comprising blocks of flats.*' A planning application is being prepared for submission to Reading Borough Council.

Summary of Recommendations - This is work you will need to commission (if any) to obtain planning permission and comply with legislation.

Ref:	Summary	Recommendations
Bats	In line with Good Practice Guidelines (Collins, J. (Ed) 2016, the site is assessed to have a 'negligible habitat value' for supporting roosting bats. This is due to a lack of suitable features and a lack of evidence of bat use, inside and out. Due to a lack of vegetation, on or adjacent to the site, the habitat is unlikely to play any role in the landscape for foraging bats. It is reasonable to assume an absence of bats at any time of year. For full details please go straight to Table 7, section 4.0 Conclusions, Impacts and Recommendations, (p.18).	Bats are very unlikely to be roosting on site and no impacts on bats are foreseen. No further surveys are recommended. In the unlikely event that bats are found during any stage of the development, work should stop immediately and a suitably qualified ecologist should be contacted for advice. New lighting schemes for the developed site should follow guidance from the Bat Conservation Trust. (See, recommendations, p.18). The creation of additional habitat for bats and birds is recommended in line with the local authorities' duty to ask for enhancements under the NPPF, (Feb 2019).
Breeding birds/barn owls	No evidence of nesting birds is present on site and there is little opportunity for birds to gain purchase to the building for nesting. No natural nesting habitat occurs. (This site does not present suitable habitat for barn owls).	No further surveys required, but habitat enhancements are recommended. Precautionary methods of working will apply. If works are undertaken during the breeding season (1st March to 31st August), a close inspection of the building will need to be undertaken immediately prior to the commencement of work. All active nests will need to be retained until the young have fledged. The creation of additional habitat for birds is recommended as part of the development in line with the local authorities' duty to ask for enhancements under the NPPF, (Feb 2019). (p.19).

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1.0 Introduction and Context

1.1 Background

The assessment is informed by the Bat Conservation Trust publication, *Bat Surveys for Professional Ecologists – Good Practice Guidelines* (Collins, J. (Ed) 2016). No previous reports have been produced by Arbtech.

1.2 Site Context

The site is centred around National Grid Reference SU 7177 7279 and has an area of approximately 0.3ha. The site comprises a surface car park with basement storage and associated hardstanding. The building is designated B1 in this report.

1.3 Scope of the report

This report provides a description of all features suitable for roosting 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 constraints to the proposals as a result of roosting 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.

The aim of the assessment was to determine the presence or evaluate the likelihood of the presence of roosting bats, and to gain an understanding of how they could use the site. To achieve this, the following steps have been taken:

- A desk study has been carried out.
- A field survey has been undertaken, including an external survey and internal inspection where possible.
- An outline of likely impacts on any known roosts has been provided, based on current development proposals.
- Recommendations for further survey and assessment have been made, along with advice on the requirements of a European protected species mitigation Licence (EPSML) application if appropriate.

The site location is shown in Appendix 1, site plans and proposed plan in Appendix 2, (where provided) and desk study results in Appendix 3. Relevant legislation is presented in Appendix 4.

1.4 Project Description

The development proposals are for 'Redevelopment of the site for a residential scheme comprising blocks of flats.' A planning application is being prepared for submission to Reading Borough Council.

2.0 Methodology

2.1 Desk Study methodology

The desk study included a 2km radius review of statutory and non-statutory designated sites, Biodiversity Action Plan (BAP) Priority Habitats and granted EPSML records for bats held on Magic database. An assessment of the surrounding landscape structure was also completed using aerial images from Google Earth and OS maps.

Existing bat records relating to the site and a surrounding 2km radius are required to conform to national guidelines. The data search is confidential information that is not suitable for public release and has been analysed and summarised for presentation in this report.

2.2 Site Survey methodology

The survey was undertaken by Josephine McCarthy (Natural England bat licence number: 2019-41480-CLS-CLS).

All features that will be impacted by the project proposals were assessed for their bat roosting and/or commuting habitat. The surveyor systematically surveyed all features suitable for-bats and signs of bat activity.

For any surveyed buildings:

A non-intrusive visual appraisal from the ground using binoculars, inspecting the external features of the building(s) for potential access/egress points, and for signs of bat use. An internal inspection of the building was also made, including the living areas of derelict or abandoned buildings and the accessible roof spaces of all buildings, using an endoscope, 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.

For any surveyed trees:

A visual inspection from ground level using binoculars and where accessible and safe to do so, an internal inspection of potential roosting features using an endoscope, torch and ladders.

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 *Tyto alba*.

2.4 Suitability Assessment

All affected survey features on site were categorised according to the likelihood of bats being present, in line with best practice guidelines (Collins, J. (ed) 2016). The features that dictate the likelihood of roosting bats are summarised in Tables 1 and 2 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

Likelihood of bats being present	Feature of building and its context
Higher	Buildings/structures with features of particular significance for roosting bats e.g. mines, caves, tunnels, icehouses and cellars. Habitat on site and surrounding landscape of high quality for foraging bats e.g. broadleaved woodland, tree-lined watercourses and grazed parkland. Site is connected with the wider landscape by strong linear features that would be used by commuting bats e.g. river and or stream valleys and hedgerows. Site is proximate to known or likely roosts (based on historical data).
Lower	A small number of possible roost sites/features, used sporadically by more widespread species. Habitat suitable for foraging in close proximity, but isolated in the landscape. Or an isolated site not connected by prominent linear features. Few features suitable for roosting, minor foraging or commuting.

Table 2: Features of a tree that are correlated with use by bats

Likelihood of bats being present	Feature of tree and its context
Higher	A tree 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.
Lower	A tree of sufficient size and age to contain potential roosting features but with none seen from the ground or features seen with only very limited roosting potential.

2.5 Limitations

It should be noted that whilst every effort has been made to describe the features on site in the context of their suitability for roosting bats, this does not provide a complete characterisation of the site. This survey provides a preliminary view of the likelihood of bats being present. This is based on suitability of the habitats on site and in the local area, the ecology and biology of bats as currently understood, and the known distribution of bats as recovered during the desk study.

Limitations: None.

3.1 Desk Study Results

A summary of desk study results is provided below, full details are presented in Appendix 3.

3.2 Designated sites

Details of any statutory and non-statutory designated sites within a 2km radius of the survey site, including their reasons for notification, are provided in Table 3 below.

Table 3: Designated sites within 2km radius of the site

Designated Site Name	Distance from Site (approx.)	Reasons for Notification from Natural England and/or BRD or LPA policy maps
Statutory Sites		

Designated Site Name	Distance from Site (approx.)	Reasons for Notification from Natural England and/or BRD or LPA policy maps
None known within 2km. (The nearest designated site is Highwood LNR, approx. 3km east). (See Appendix 3, p.28).	>3,000m east.	'The site has exotic tree species which were part of an arboretum (collection of trees) in the house grounds and include giant redwoods and monkey puzzle. It is a fine example of mixed lowland woodland with an attractive heathland area.'

Table 4: Priority Habitat Inventory within 2km (Magic.gov.uk):

Habitat	Closest distance from site
Deciduous Woodland	~400m west
Coastal and Floodplain Grazing Marsh	~1,250m south-west
Woodpasture and Parkland	~1,500m south-east
Good quality semi-improved grassland	~1,750m north-east

3.3 Landscape

The site is situated in Reading Town. It is surrounded by residential and commercial development to all sides which extends for a 1km radius. Aside from isolated playing fields, few green spaces occur within 1km. However, there are numerous large lakes and natural habitats approximately 1.5km from the site. The River Loddon flows approx. 400m east and north through the town and its confluence with the River Thames is approx. 1.5km north-east. Urban bats could use suitable structures within the town for roosting and the combination of river corridors and artificial roosts provide ideal resources for urban species of bat.

Landscape



Figure 1: Aerial photo of site, showing landscape structure.

3.4 Historical records: *Records from the past 10 years

The client was advised by Arbtech that local bat records are unlikely to contribute to this assessment owing to the negligible habitat value of the building to support roosting bats. A search of the Magic database for granted European protected species mitigation licences (EPSMLs) within a 1km radius of the site has been completed. Displaced bats from Licenced sites <1km away from the survey site will find alternative habitat either within the mitigation measures implemented as part of the Licence, or will relocate to other known roosts sites in close proximity to the Licenced site. The EPSML records show that seven bat roosts have been destroyed within 2km. Three records occur within 1km of the site; the most recent dated 2017-2022. The records confirm that bats are known to use local structures for roosting and at least three species are present locally. It is reasonable to assume the presence of further bat roosts in unmolested structures within the search range.

Table 5: Granted EPSMLs (bats) within 2km of the site

Case reference of granted application	Approx. distance from site	Bat Species Effected	Licence Start Date:	Licence End Date:	Impacts allowed by licence
2016-22301-EPS-MIT	~300m north-east	C:PIP	21/04/2016	20/04/2021	Destruction of a resting place.
2017-32379-EPS-MIT	~700m west	C:PIP	04/12/2017	29/11/2022	Destruction of a resting place.
EPSM2013-6155	~1,000m north-west	C-PIP	19/09/2013	31/08/2015	Destruction of a resting place.
2014-3941-EPS-MIT	~1,450m north	C-PIP; S:PIP	21/10/2017	30/11/2019	Destruction of a resting place.
2017-28045-EPS-MIT	1,600m south-east	DAUB	08/03/2017	08/03/2022	Unknown
EPSM2010-2126	1,800, south-east	C-PIP; BLE	02/09/2010	31/08/2012	Destruction of a resting place
EPSM2010-2266	2,000m south-east	C-PIP; BLE	01/09/2010	28/02/2011	Destruction of a breeding site.

3.5 Field Survey Results

The weather conditions recorded at the time of the survey are shown in Table 6.

Table 6: Weather conditions during the survey

Date: 22/02/2021	
Temperature	9.2°C
Humidity	89%
Cloud Cover	99%
Wind	7mph
Rain	None

3.6 Site Feature descriptions and photos

B1 – South elevation (front).

B1 is a surface carpark with a brick and concrete basement, (pictured opposite). A parking ramp and associated hardstanding occur on the east. (pictured below). The curtilage is dominated by hardstanding with no natural habitat on site for bats to exploit.

The building has few features associated with roosting bats. No suitable gaps in the external brickwork were noted and the windows on the south, (pictured opposite) are well sealed to the building with exterior grills in place preventing bird and bat access to the interior.

**B1 – East elevation.**

The vents and openings along the east are covered with louvred doors which are fitted with interior grills preventing bird and bat access.



B1 – East elevation.

An example of the grills is pictured opposite.

**B1 - North-east corner**

The only possible point of entry for bats or birds would be via the concertina doors on the north-east corner, where they do not form a tight fit with the frame.

However, although access is possible, no suitable habitat for bats occurs internally. No voids are present and the concrete ceiling is exposed. There is no suspended ceiling or sub-space which bats could utilize. No crevices occur and the storage facility is in use and well-lit during the day. It is unlikely to provide suitable climatic conditions for any species of day roosting bat. (see below).



B1 - Internal

Looking south along the roof structure.

(There is no access to the interior via the roof due to the car park area above it).

**B1 – Internal**

Looking north along the roof structure.

The floor and the flat surfaces of the stored items were inspected for evidence of bat use, e.g., bat droppings.



B1 –Surface car park – looking south-east across the site.**B1 – Surface carpark - storage units.**

Within the carpark are two open-sided, storage units. One building is a bike store and the other contains assorted items indicating recent use.

The structures are rendered to the eaves with tight-fitting soffits to all elevations. The roofs are formed of concrete-mix tiles with no missing or raised tiles noted and no suitable gaps for roosting bats identified. The interiors are open to the roof with their roof timbers and roof linings exposed. No voids are present.



Surface car park - storage unit 1. The interiors are subject to draughts and regular temperature fluctuations due to the open sides. Although they could be accessed by bats, they offer sub-optimal conditions for day roosting.	 A photograph of a small, single-story storage unit with a gabled roof and a metal gate. The unit is light-colored and has a small circular vent on the side. It is situated in a parking area with other cars and buildings in the background.
Storage unit 1. Showing an example of the tight-fitting soffits and fascia with no points of entry to the soffits identified. The example opposite is representative of their condition throughout.	 A close-up photograph of the roofline and fascia of a building. The fascia is white and appears to be tightly fitted to the roof structure. A black downspout is visible on the right side. A sign is attached to the fascia, which reads "PCM (UK) LTD PRIVATE LAND TERMS AND CONDITIONS" and includes contact information.

Internal Unit 2.

Although the roof timbers are accessible for perching bats, they are exposed to daylight and ambient changes in temperature. No voids or cavities occur and there are no crevices to support crevice dwelling species of bat.

**Internal – Unit 2**

Showing the well-lit, open roof structure. The walls and floors were inspected for evidence of bat use, e.g., bat droppings and feeding remains. No evidence was found.



4.0 Conclusions, Impacts and Recommendations

4.1 Informative guidelines

Bats are protected under the Wildlife and Countryside Act and Conservation Regulations (see Appendix 4 for a summary of legislation protecting bats in the UK). Legislation protects all wild birds whilst they are breeding, and prohibits the killing, injuring or taking of any wild bird or their nests and eggs. Certain species of bird, including the barn owl, are subject to special provisions; it is an offence to disturb any bird or their young during the breeding season.

There are three possible outcomes of this survey, each with specific recommendations. These are outlined below:

Confirmed bat roost

Best practice survey guidelines (Collins, 2016) recommends additional surveys for confirmed roosts. Three further surveys are required to characterise the bat roost present including species, roost type and access points to inform a European protected species mitigation licence (EPSML) application with Natural England. Surveys must be completed during the active bat season (May – September). At least two of the surveys should be completed during the optimal survey period mid-May to August, and at least one of the surveys should be a dawn re-entry survey (Collins, J. 2016).

Low, moderate or high likelihood of a bat roost present

Best practice survey guidelines (Collins, 2016) recommends additional surveys for features assessed as having low to high suitability for roosting bats. One, two or three further surveys are required to confirm presence/likely-absence of a bat roost, based on a low, medium or high roost likelihood evaluation. Surveys must be completed during the active bat season (May – September). If more than one survey is recommended, at least one of them should be completed during the optimal survey period mid-May to August, and at least one of the surveys should be a dawn re-entry survey (Collins, J. 2016). If two or one further survey is recommended these surveys must be completed during the optimal survey period (mid-May to August). For low and moderate roost likelihood evaluation the survey effort recommended at this stage is iterative and if bats roosts are confirmed in the building, a further survey will be required to provide sufficient information to inform an EPSML application to Natural England.

Negligible likelihood of a bat roost present

Buildings assessed as comprising negligible suitability for roosting bats do not normally require further surveys. However, if bats are found during any stage of the development, work should stop immediately and a suitably qualified ecologist should be contacted for further advice.

4.2 Evaluation

Taking the desk-based assessment and site survey results into account, the following value for roosting bats has been placed on each site survey feature.

Table 7: Evaluation of buildings on site

Ref	Survey assessment conclusions (with justification)	Foreseen impacts	Recommendations	Enhancements The Local Planning Authority has a duty to ask for enhancements under the NPPF (Feb 2019)
Bats	In line with Good Practice Guidelines (Collins, J. (Ed) 2016, the building is assessed to have a negligible habitat value for supporting roosting bats. No evidence of bat presence was found and the building does not appear to have any gaps or crevices that are likely to be used by roosting bats or to give bats access to masonry cores for over-wintering. It is assessed that the building does not have the potential to support roosting bats at any time of the year. There was also no secondary evidence – droppings, fur stains etc to suggest any previous use. The general locale is a low-quality batscape, suitable for widespread, urban species. The site itself presents no significant foraging or commuting habitat and is surrounded by residential properties and commercial development with minimal proximate vegetation. However, watercourses are within 1.5km of the site and records show that common bats have sought out artificial structures within the town for roosting.	Bats are unlikely to be roosting on site and no impacts on bats are foreseen as a result of the development works. There will be no loss of suitable bat habitat. No further surveys are required. Research shows that development and its associated artificial lighting can impact on existing bat commuting routes. Bat roosts could be present in nearby structures and could be impacted by any increase in local levels of light pollution.	In the unlikely event that bats are found during any stage of the development, work should stop immediately and a suitably qualified ecologist should be contacted for advice. <u>Lighting</u> In order to avoid an increase in local levels of light pollution, any new lighting scheme should follow guidance from the Bat Conservation Trust. Low impact lighting strategies will be adopted from the guidance outlined in the new Bats and Lighting Publication produced by the Institution of Lighting Professionals and the Bat Conservation Trust "Guidance Note 08/18 Bats and artificial lighting in the UK Bats and the Built Environment series publication: http://www.bats.org.uk/news.php/406/new_guidance_on_bats_and_lighting. The lighting on the site will: • 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.	To enhance the value of the site for bats, and to secure onsite gains for biodiversity: ➤ install one bat box into the building during construction: • 1 x Integrated Eco Bat Box (or suitable alternative). Or 1 x 1FE Schwegler Bat Access Panel, (or suitable alternative). To be installed within the walls of the building during construction. Bat boxes should be positioned 3-5m above ground level facing in a south/south-westerly direction with a clear flight path to and from the entrance. Bat boxes should also be positioned away from any artificial light sources. Integrated products can be obtained from: http://www.habibat.co.uk/integrated-products https://www.nhbs.com/4?slug=integrated-bat-boxes&q=&fR[hide][0]=false&fR[live][0]=true&fR[shops.id][0]=4&fR[subsidaries][0]=1&hFR[subjects_equipments.lv11][0]=Bat%20Boxes%20%3E%20Integrated%20Bat%20Boxes

			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.	
Birds	There is little opportunity for birds to gain purchase to the building for nesting and no vegetation is present on site.	No impacts on birds are foreseen and no suitable bird nesting habitat will be lost. However, their presence on site cannot be entirely ruled out and in the unlikely event that birds are present during the works, their nests could be disturbed, abandoned or destroyed. This could lead to death or injury of birds. Birds are protected under Sections 1-8 of the WCA. Among other things, this makes it an offence to: 'obstruct or prevent any wild bird from using its nest.'	If works are undertaken during the period 1st March to 31st August, a close inspection of the building must be taken immediately prior to the commencement of works. Precautions should be taken with machinery and noise levels when working close to any nests so as not to cause disturbance. At least a 3-5m buffer should be created between any machinery and active nests during works and all active nests will need to be retained until the young have fledged.	Alternative provision for swifts, starlings and sparrows could be included to achieve on site gains for biodiversity: 2 x WoodStone Build-in Swift Nest Box A Or No. 17 Schwegler Swift Nest Box (Single Cavity) <i>'Can be installed on or in the outer surface of the facade. Surface mounting is also possible, for example on walls. When set into an external wall the box also can be painted with standard air-permeable external wall paint.'</i> <i>Height and direction: This box should be installed at least six to seven metres above the ground, ensuring that there is unobstructed access for birds entering and leaving. If possible, boxes should be sited under the shelter of eaves or overhanging roofs.</i>

				1 x Starling Box - Smooth Brick <i>The Starling Box is a large, solid box made of insulating concrete with an internal nesting space which can be incorporated into the fabric of a building as it is built or renovated. The box is designed especially to be unobtrusive and aesthetically pleasing.</i>
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5.0 Bibliography

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Appendix 1: Site Location



Appendix 2: Proposed Elevations





East Elevation: Access Road



Internal Street Elevation: Looking East



	Project: 9 Upper Crown Street Reading, RG1 2SS		
	Drawing: Site Elevations Sheet 3		
Collaborating with: Edward Richardson	Date: Oct 2020	Drawn: For Information	Colony Architects Ltd. One West Works, Reading One West Works, Reading, RG1 2SS Tel: 0118 380 0328 Email: info@colonyarchitects.com www.colonyarchitects.com
Job: 222	Drawing: 05-002	Revision: -	Drawn By: MC



Internal Street Elevation: Looking West



East/West Elevation 01



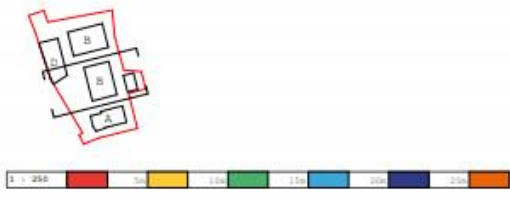
 Collaborating with: Edward Richardson	Project: 9 Upper Crown Street Reading, RG1 2SS		 Chartered Practice		
	Drawing: Site Elevations Sheet 3				
Job: 222	Drawings: 05-003	Revisions: -	Drawn By: MC	Checked By: RM	Project: The New Street, Reading RG1 2SS
			Colony Architects Ltd. The New Street, Reading RG1 2SS +44 (0)118 380 6328 hello@colonyarchitects.com colonyarchitects.com		



East/West Elevation 02



East/West Elevation 03



 collaborating with Edward Rickardson	Project: 9 Upper Crown Street Reading, RG1 2SS		 Chartered Building
	Drawing: Site Elevations Sheet 4		
Date: 22/05/2020 Drawing: 05-004	Issue: 01 Date: 01/10/2020 Drawing: 05-004	Author: For Information Checked: For Information Drawn: For Information MC	Colony Architects Ltd. The Hive, 100, Reading, RG1 2SS Tel: 0118 380 0000 Email: info@colonyarchitects.com colonyarchitects.com



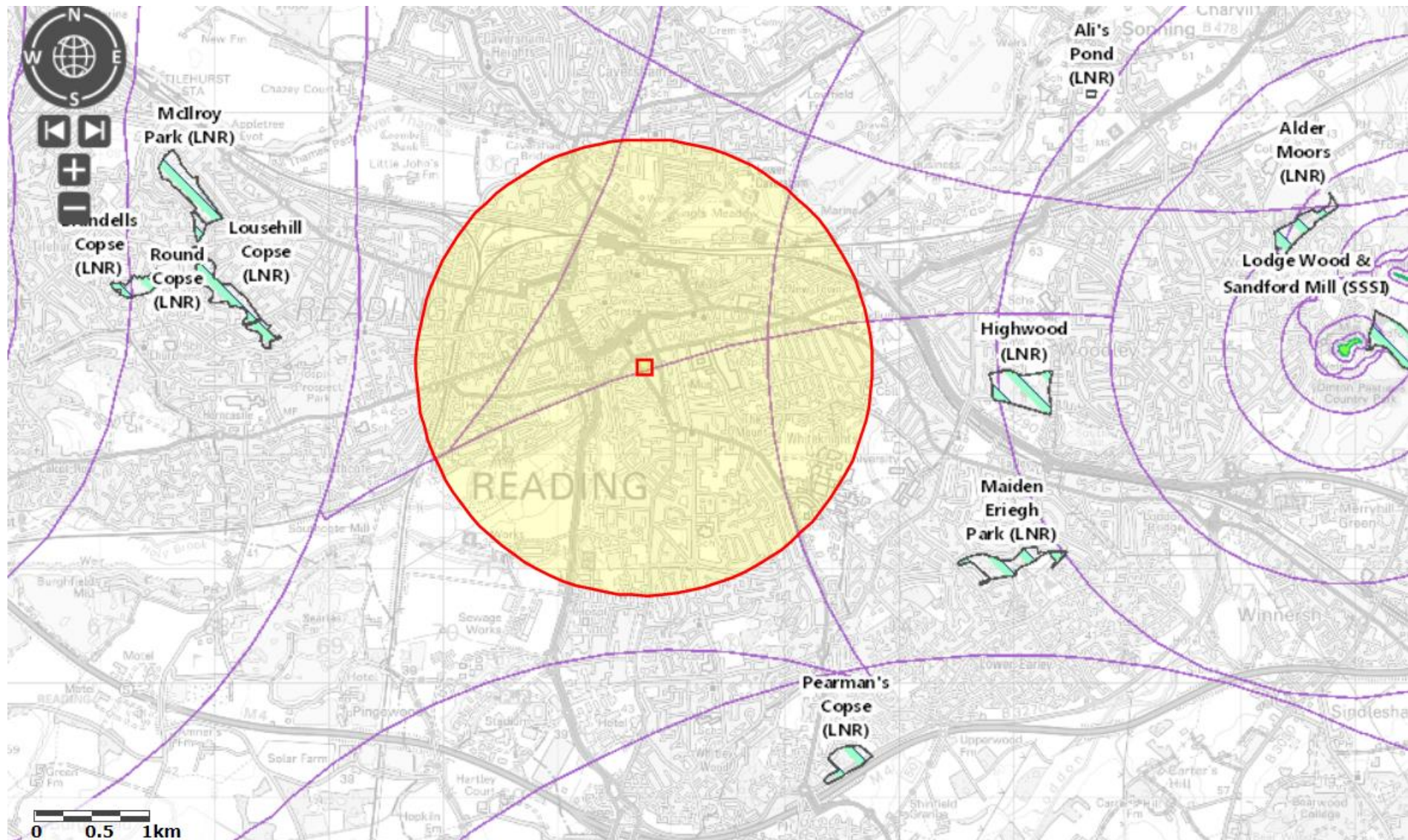
East/West Elevation 04



 Collaborating with: Edward Richardson Job: Drawings 222 05-005 Revision: -	9 Upper Crown Street, Reading, RG1 2SS Drawing: Site Elevations Sheet 5 Date: 04c 2020 Author: Rjt MC	 Chartered Architect Colony Architects Ltd. 101 West Street, Reading Reading, RG1 2SS +44 (0)1235 380 032 hello@colonyarchitects.com colonyarchitects.com
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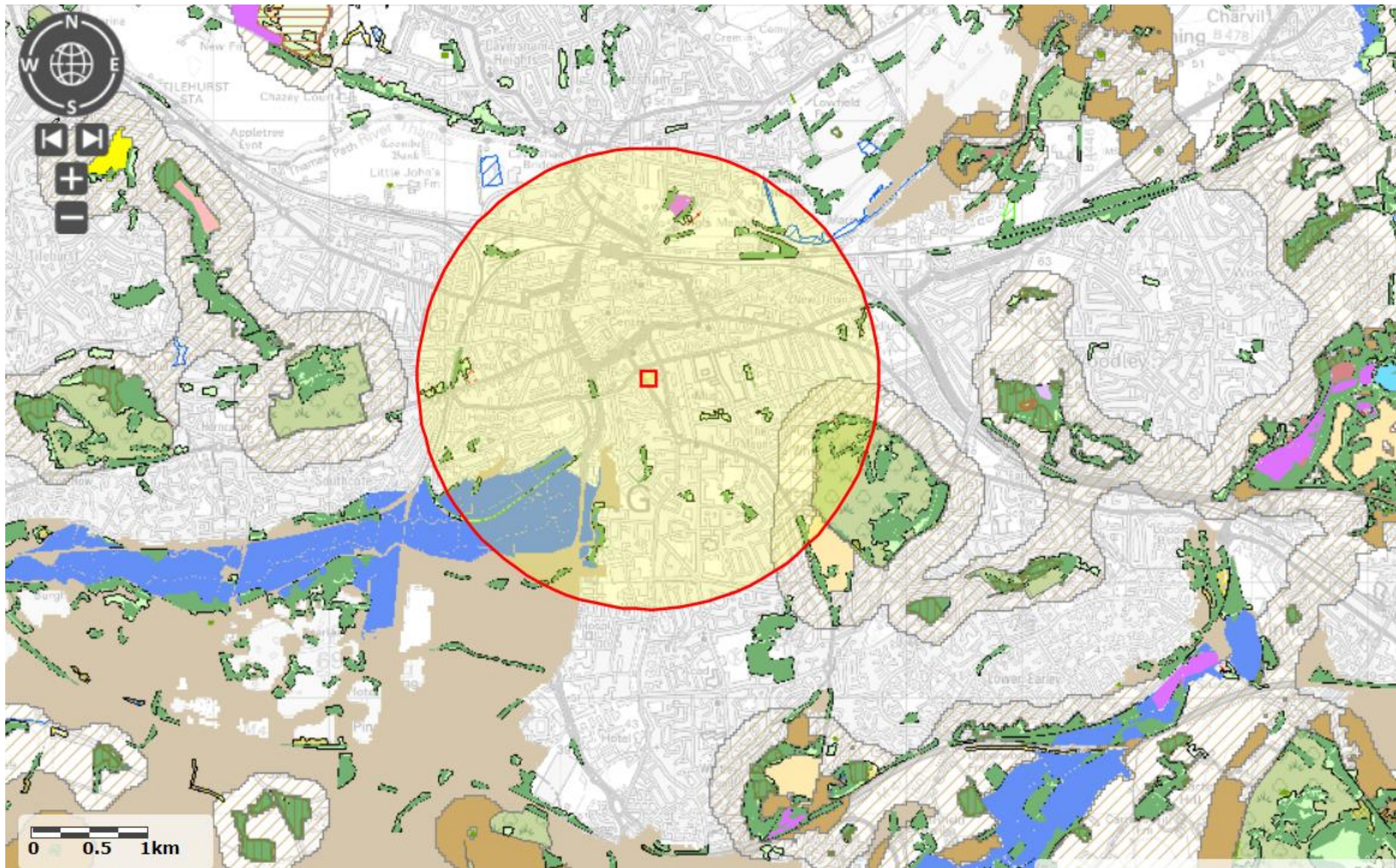
Appendix 3: Desk Study Information

Designated sites - (Magic.gov.uk database, 2019. Accessed 2021).



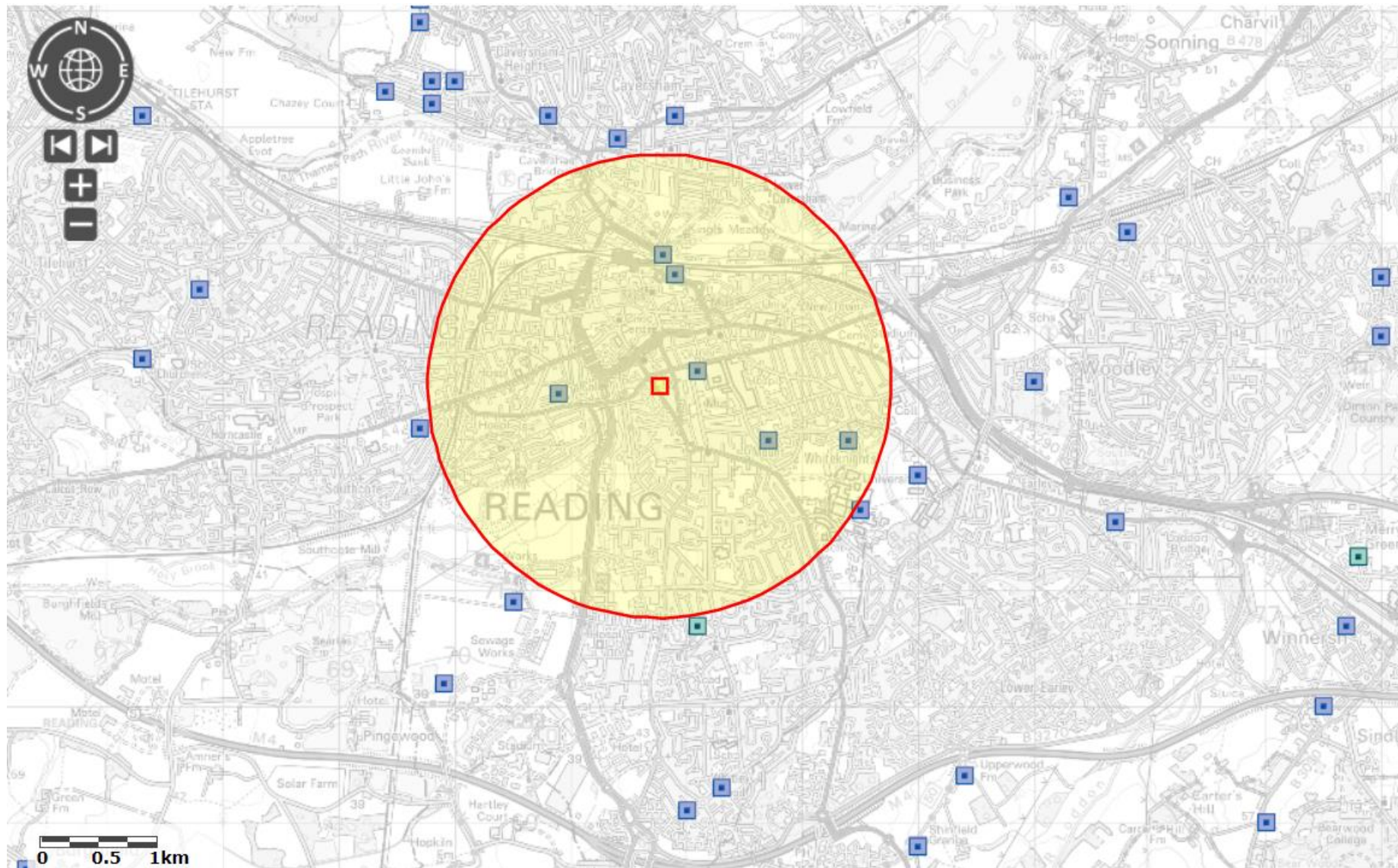
2km radius – circled red.

Habitats. (Magic.gov.uk database, 2019. Accessed 2021).



2km radius – circled red.

Granted European Protected Species Licences (Magic.gov.uk database, 2019. Accessed 2021).



2km radius – circled red.

Appendix 4: Legislation and Planning Policy related to bats.

LEGAL PROTECTION

New legislation (2020)

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 came into force when Britain left the European Union on 31st January 2020. It covered amendments relevant to this survey to:

Wildlife and Countryside Act 1981: England and Wales (x1 amendment)

Conservation of Habitats and Species Regulations 2017 (x29 amendments)

All species of bat are fully protected under ***The Conservation of Habitats and Species Regulations 2017*** 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 2017

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 UK Biodiversity Action Plan priority species) 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; opportunities to incorporate biodiversity in and around developments are encouraged; 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 on development works:

A European protected species mitigation (EPSM) Licence 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
4. conserving wild animals

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