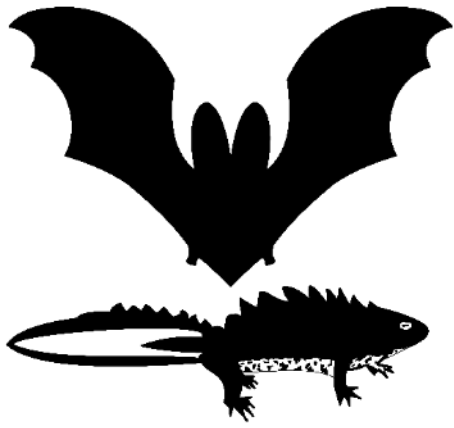




AEWC^{Ltd}

Animal Ecology & Wildlife Consultants

Bat Survey Report

The Old Woodyard

**Slaugham Lane
Staplefield
West Sussex
RH17 6AP**

Brigitte de Coriolis

24-096
November 2024

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Contents

Summary.....	2
1 Introduction	3
2 Methods.....	7
3 Constraints/Limitations.....	9
4 Results.....	9
5 Evaluation	16
6 Conclusions & Recommendations	17
7 References.....	20
Figure 1: Showing the location of the site.....	4
Figure 2: Showing the building subject to survey.	4
Figure 3: Showing the existing and proposed plans.	6
Figure 4: Showing statutory designated sites and granted eps licences within 2km of the site. Bat licences shown in blue, dormouse licences in pink and great crested newt licences in green	10
Figure 5: Showing priority habitats in proximity to the site.....	11
Figure 6: Showing positions of surveyors and night vision cameras during the 4 th August 2024 emergence survey.....	15
Figure 7: Showing positions of surveyors and night vision cameras during the 29 th August 2024 emergence survey.....	16

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Summary

- AEWCLtd were commissioned by Jonathan Talley Architects Ltd on behalf of their client to undertake detailed bat survey at The Old Woodyard, Slaugham Lane, Staplefield, West Sussex, RH17 6AP at central grid reference TQ 26934 28072 to help inform the proposed development of the site.
- The site contains a T-shaped building situated within an amenity garden. The western wing was previously converted to a 1.5-storey residential dwelling. The proposal is for the conversion of the northern and eastern wings into a 1.5-storey residential dwelling which will include alterations to some existing windows and doors and associated areas of weatherboarding, and installation of roof glazing and sun tubes.
- A bat assessment was carried out on the 31st of July 2024 which identified confirmed roosts for at least two bat species, which will be impacted by the proposed works, further detailed bat survey was therefore required.
- This report details the results of the detailed bat survey, which was carried out between 31st July and 29th of August by Brigitte de Coriolis, a Natural England licensed bat ecologist.
- The surveys across the site have confirmed the presence of a day or occasional roost for a likely long-eared bat (*Plecotus spp.*) within the interior spaces of the building, in addition to a roost for a small, crevice-dwelling bat species within the batten space of the northern gable end weatherboarding.
- The proposed work will result in the loss of both roosts. **Therefore, a Natural England development licence will be required for works to proceed to ensure that an offence will not be committed.** This will encompass a Mitigation Strategy to ensure that the development is designed to protect bats and to minimise long term impacts upon the local bat population.
- **A third emergence survey is recommended within the earlier part of the breeding season (late May to June) to increase confidence in the likely absence of any maternity roosts from the site.**
- **If the species present cannot be confirmed during the third survey, DNA analysis of the droppings collected will be required to inform a licence application and mitigation strategy.**

This report has been prepared by AEWCLtd, with all reasonable skill, care and diligence within the terms of the Contract with the client. We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above. This report is confidential to the client and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at their own risk.

The information and data which has been prepared and provided is true and has been prepared and provided in accordance with the Professional Guidance and 'Code of Professional Conduct' issued by the Chartered Institute of Ecology and Environmental Management (CIEEM). We confirm that the opinions expressed are our true and professional bona fide opinions.

1 Introduction

- 1.1 AEWCLtd were commissioned by Jonathan Talley Architects Ltd on behalf of their client to undertake a detailed bat survey at The Old Woodyard, Slaugham Lane, Staplefield, West Sussex, RH17 6AP to help inform the proposed development of the site.
- 1.2 The bat surveys and report writing were carried out in accordance with Bat Surveys: Good Practice Guidelines (Bat Conservation Trust, 2023).
- 1.3 A survey carried out in September 2013 by Arbtech Consulting Ltd to inform the proposed conversion of the western wing of the building on the site, identified that the building had negligible potential to support roosting bats.
- 1.4 The building is now proposed for a conversion of the remaining sections. Therefore, a bat assessment of the northern and eastern wings was carried out by AEWCLtd on the 31st July 2024. The survey identified confirmed roosts within the batten space and the internal space.
- 1.5 Further surveys were therefore required for these sections of the building to confirm species and characterise roosts to determine whether bats represent a constraint to the proposed development and identify any mitigation, compensation and licensing requirements for the development.
- 1.6 This report details the results of the bat survey and outlines recommendations in relation to bats and the proposed development of the site.

Aims and objectives

- 1.7 The objectives of the survey were to:
 - Identify whether bats are present using the buildings on site;
 - Estimate the size and status of any existing bat roost within the building;
 - Determine the potential impacts on any bat roost from the proposed development schedule; and
 - Provide information for use in the design and development of ecological mitigation and enhancement measures where appropriate.

Site Location

- 1.8 The proposed development site is located at The Old Woodyard, Slaugham Lane, Staplefield, West Sussex, RH17 6AP at central grid reference TQ 26934 28072. The site is located approximately 419m to the east of the A23 in a semi-rural part of West Sussex on the edge of the village of Staplefield and is immediately surrounded by agricultural land. The wider landscape comprises of agricultural land with hedge and tree line boundaries, residential properties with associated amenity gardens and areas of woodland. See Figure 1.

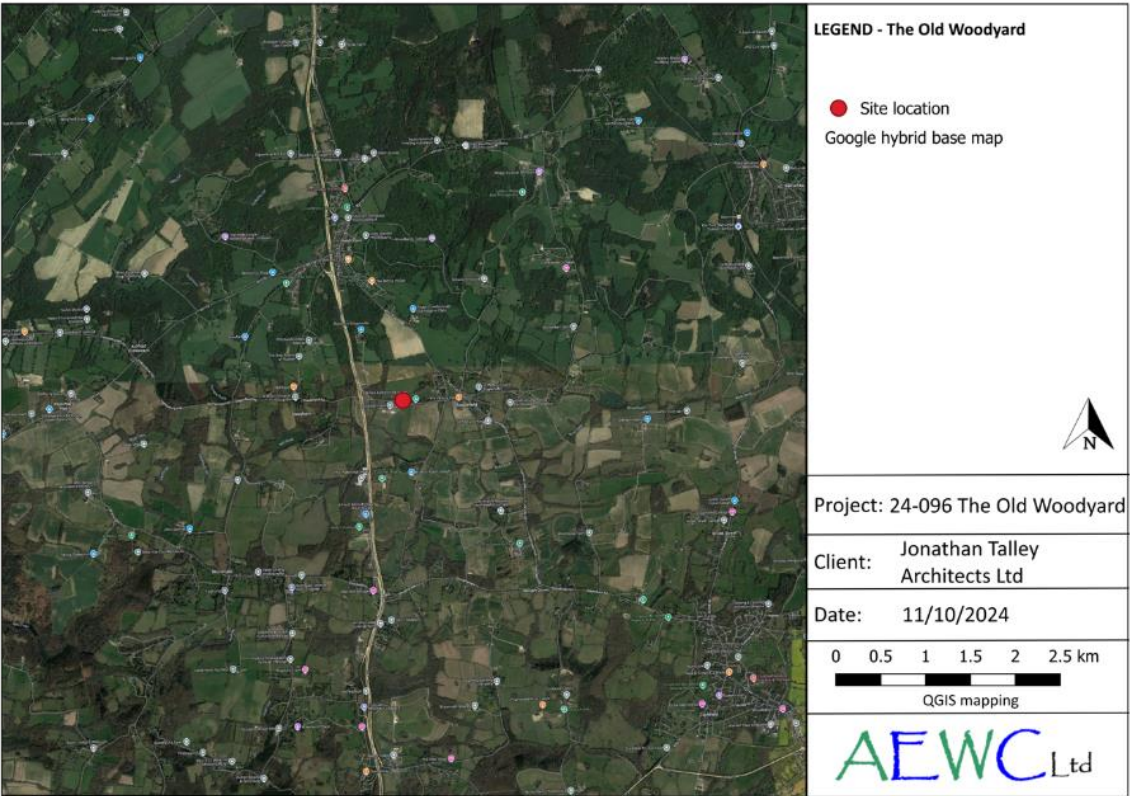


FIGURE 1: SHOWING THE LOCATION OF THE SITE

1.9 The site contains a T-shaped building situated within an amenity garden. The western wing was previously converted to a 1.5-storey residential dwelling. The northern and the eastern wings subject to survey are currently used as storage.



FIGURE 2: SHOWING THE BUILDING SUBJECT TO SURVEY.

Legislation

1.10 All species of bats are listed on *Schedule 5 of the Wildlife and Countryside Act 1981 (as amended)* which affords them protection under *Section 9*, as amended. They are also protected under the *Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019*. In combination, this makes it an offence to:

- intentionally kill, injure or take (capture etc.);
- possess;
- intentionally or recklessly damage, destroy, obstruct access to any structure or place used by a scheduled animal for shelter or protection, or disturb any animal occupying such a structure or place; and
- sell, offer for sale, possess or transport for the purpose of sale (live or dead animal, part or derivative) or advertise for buying or selling such things.

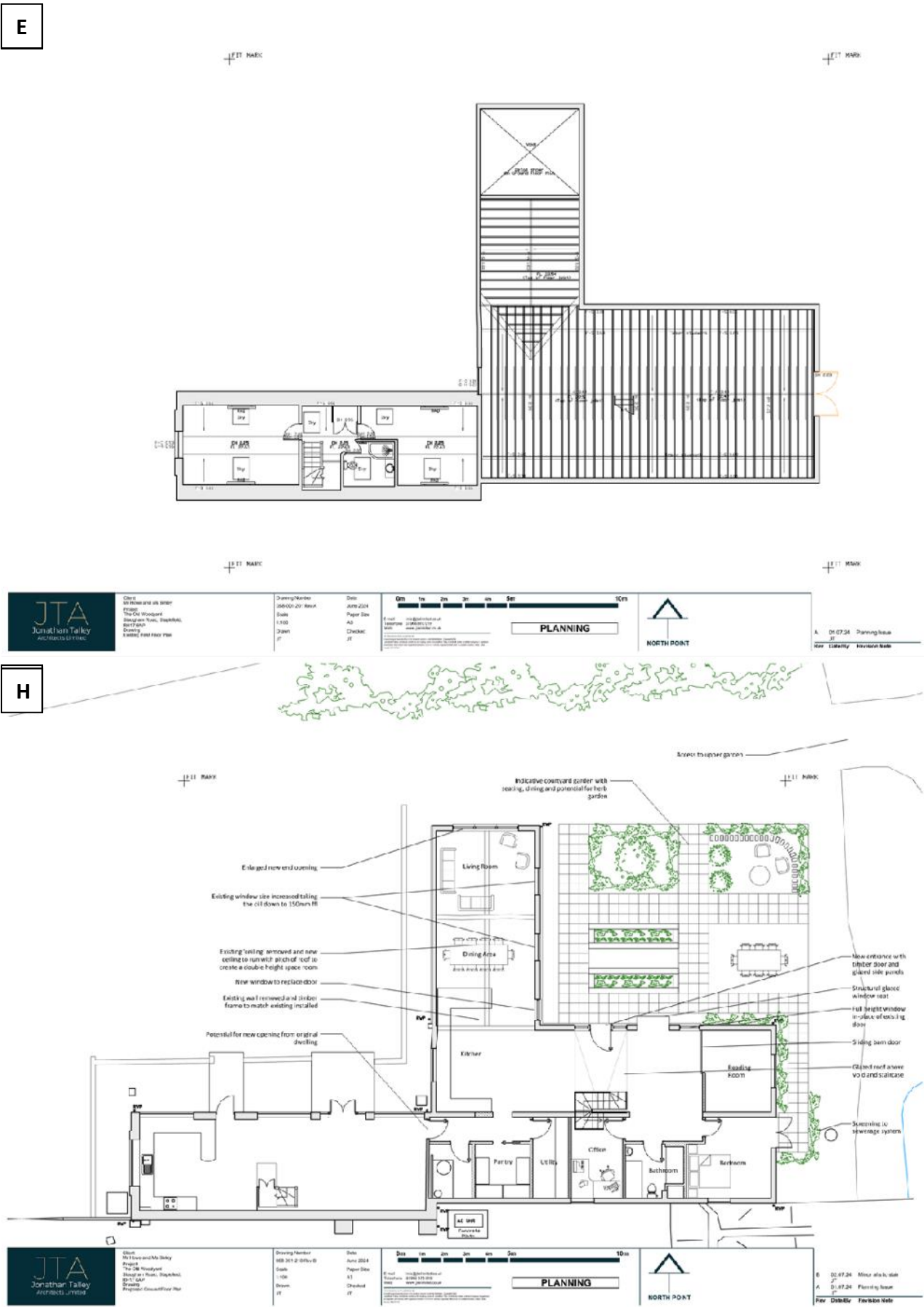
1.11 A roost is defined as ‘any structure or place which a bat uses for shelter or protection’. As bats tend to reuse the same roosts, legal opinion is that a roost is protected whether or not bats are present.

1.12 Any disturbance of a bat occupying a roost can lead to prosecution. Disturbance can be caused by noise, vibration and artificial lighting. Penalties for breaking the law can include fines of £5,000 per bat, imprisonment and the seizure of equipment.

1.13 Furthermore, seven bat species (barbastelle, Bechstein’s, noctule, soprano pipistrelle, brown long-eared, lesser horseshoe and greater horseshoe) are also Species of Principal Importance in England under *Section 41* of the *Natural Environment and Rural Communities Act 2006*.

Development proposals

1.14 The proposal is for the conversion of the northern and eastern sections of the building into a 1.5-storey residential dwelling and creation of a courtyard garden. This will entail alterations to some of the existing windows and doors, impacting areas of the weatherboarding, as well as the addition of a glazed roof area and sun tubes to the north-facing roof pitch. See Figure 3.



2 Methods

Pre-existing Information Search

- 2.1 The Multi Agency Geographic Information for the Countryside (MAGIC) website provided by the Department for Environment, Food and Rural Affairs (Defra) was consulted to obtain information about any international or European level designated nature conservation sites within 2km of the site boundary, afforded protection either directly by the Conservation of Habitat and Species (Amendment)(EU Exit) Regulations 2019 or to the same level of protection through planning policy (the National Planning Policy Framework and Local Development Framework). Information regarding statutory designated sites, such as Sites of Special Scientific Interest (SSSI), within a 2km radius of the site were also obtained from MAGIC.
- 2.2 MAGIC was also used to assess the habitats surrounding the site and obtain records of granted EPS licences within 2km of the site, to infer species likely to be present and better assess in-combination impacts of the proposed works.

Daytime Assessment

- 2.3 A detailed bat building inspection was undertaken on the 31st July 2024 by Brigitte de Coriolis, a Natural England licensed bat ecologist.
- 2.4 A systematic internal inspection of the building was conducted using a high-powered torch to illuminate all areas thought to be suitable for roosting bats. Additionally, an external search around the perimeter of the building was conducted and any possible access points i.e. gaps and crevices were noted and surveyed with a high-powered torch and ladder as appropriate.
- 2.5 The building's suitability for bat roosting was assessed by examining structural features that may influence the suitability of a building to support roosting bats; these include the presence of a roof void, the presence of access points into the building (including gaps beneath barge boards, weatherboarding, soffits and fascias, gaps under lead flashing, gaps within masonry and under loose tiles, gaps between tenon and mortise joints), the complexity and size of any roof void and daytime light levels in the roof void.
- 2.6 The building's suitability for roosting bats was also assessed by examining the surrounding habitat. Important habitat features surrounding the structure which may influence roost potential include whether the structure is in a semi-rural or parkland location, its proximity to significant linear habitat features such as a watercourse, mature hedgerow, wooded lanes or an area of woodland.
- 2.7 All surfaces were also surveyed for signs of bat presence. Features of potential value to bats were surveyed not only for the presence of bats but also for signs that could indicate use by bats, such as:
 - bat droppings that are dry and do not putrefy, but can crumble away to dust;
 - staining of access points used by bats to enter the structure; and
 - feeding remains such as moth and butterfly wings.

- 2.8 The survey included an external inspection of the trees present within the survey area to look for the presence of Potential Roosting Features including woodpecker and rot holes, horizontal cracks and splits in stems and branches, partially detached platey bark, cankers, hollows and cavities, double-leaders forming compression forks with included cavities, gaps between overlapping branches, partially detached ivy with stem diameter exceeding 50mm and bat, bird or dormouse boxes.
- 2.9 Taking account of these architectural, habitat features and signs of presence, the building was then assigned a level of roost suitability based the criteria given in the Bat Conservation Trust's Bat Surveys: Good Practice Guidelines (Collins, 2023) and professional judgement. The primary objective of this exercise was to identify the need for further detailed bat survey later in the year, or alternatively to obtain sufficient information that would dismiss the need for further assessment.

Emergence Surveys

- 2.10 The evening emergence surveys were conducted on the 4th and 28th August 2024, a time of year when bats are active but when maternity colonies for some early-breeding species may have disbanded. Conditions were good for all bat surveys with warm weather, and any bats present were likely to be active. The emergence surveys began a minimum of 15 minutes before sunset and finished a minimum of 1 and a half hours after sunset on each survey.
- 2.11 Batlogger M bat detectors were used for taking time-expanded recordings of any bats when they may emerge from the buildings. These recordings were analysed on Elekon bat analysis software that facilitates species identification.
- 2.12 Professional Canon XA night vision video cameras were used as night vision aids (NVA's) alongside surveyors to film areas of the buildings with the assistance of external infra-red lamps to ensure suitable lighting to accurately identify if bats emerge from the building. Cameras were deployed on tripod stands to view areas with bat roosting potential. Footage was reviewed at an appropriate speed on a computer after the survey using VLC player software which does not skip frames at any review speed, to ensure any bat emergences and bat emergence points were recorded. Where necessary footage was slowed down to ensure the exact emerge point could be identified.
- 2.13 Two surveyors, a standalone detector and five professional night vision cameras were used for the first emergence survey. (Figure 6), with an additional camera added during the second survey (Figure 7). The surveyors and cameras were positioned to get a good all-round view of the building with a particular focus on the areas of impact and where potential roost features were identified, with two cameras positioned inside the building to record any bats flying within.

3 Constraints/Limitations

- 3.1 Bats are difficult to locate in large structures, with so many potential roosting areas, particularly in inaccessible areas such as large buildings, finding the exact roosting site can be difficult, especially male/single bat roosting sites. It should be noted that it is not always possible to identify bat presence by examining externally around buildings as poor weather conditions may have washed away droppings which were deposited on exposed surfaces.
- 3.2 Bats can have seasonal use of buildings and being so mobile may arrive and start using a site after it has been surveyed, or roost somewhere else during the period it was surveyed. For this reason, bats may potentially be present but remain undetected, particularly during daytime assessment.
- 3.3 Due to extent of potential roost crevices internally as a result of the unfinished internal construction of the building and the lack of boarding at the joist level, not all internal areas could be covered by cameras. Therefore, it is possible that bats recorded flying within the building might have emerged from internal locations out of the camera's view.
- 3.4 The emergence surveys were carried out in August, when maternity colonies for early-breeding species such as *Pipistrellus spp.* may already have disbanded and may therefore not have been detected.

4 Results

Pre-existing Information Search

Statutory Designated Sites:

- 4.1 There are statutory designated sites located within 2km of the proposed site. The site is located within High Weald Area of Outstanding Natural Beauty and located 1290m from Cow Wood and Harry's Wood Site of Special Scientific Interest (SSSI). See Figure 4.

Non-statutory Designated Sites

- 4.2 There are non-statutory sites located within 2km of the proposed site. The nearest non-statutory designated site is Rowlands Wood RSPB reserve, located approximately 1200m to the east of the site.

Granted EPS Bat Licences

- 4.3 There are granted EPS licences for bats within 2km of the site. These are detailed in Table 1 and shown in Figure 4.

TABLE 1: EPS LICENCES WITHIN 2KM OF THE SITE

Case reference of granted application	Species on the licence	Licence Start Date	Licence End Date	Impact on a breeding site	Damage of a breeding site	Damage of a resting place	Destruction of a breeding site	Destruction of a resting place
EPSM2011-3779	GCN	31/07/2013	30/06/2017	N	N/A	N/A	N	Y
EPSM2020-1906	DORMOUSE	18/02/2013	30/11/2018	N	N/A	N/A	N	Y
2017-28531-EPS-MIT	BLE, C-PIP	25/04/2017	25/04/2027	Y	Y	N	Y	N
2017/28531-EPS-MIT-1	BLE, C-PIP	05/12/2017	15/11/2027	Y	Y	N	Y	N
2018-33253-EPS-MIT	BLE	13/03/2018	31/03/2019	N	N	N	N	Y
2018-34194-EPS-MIT	BLE, C-PIP	11/04/2018	10/04/2023	N	N	N	N	Y
2019-39669-EPS-MIT	BLE, C-PIP	07/03/2019	31/08/2024	N	N	N	N	Y
2019-42581-EPS-MIT	BLE, C-PIP, S-PIP, WHISK	13/09/2019	30/09/2024	N	N	N	N	Y
2019-42581-EPS-MIT-1	BLE, C-PIP, S-PIP, WHISK	01/04/2020	01/04/2025	N	N	N	N	Y
2014-1997-EPS-MIT	DORMOUSE	11/07/2014	30/11/2018	N	N	Y	N	Y

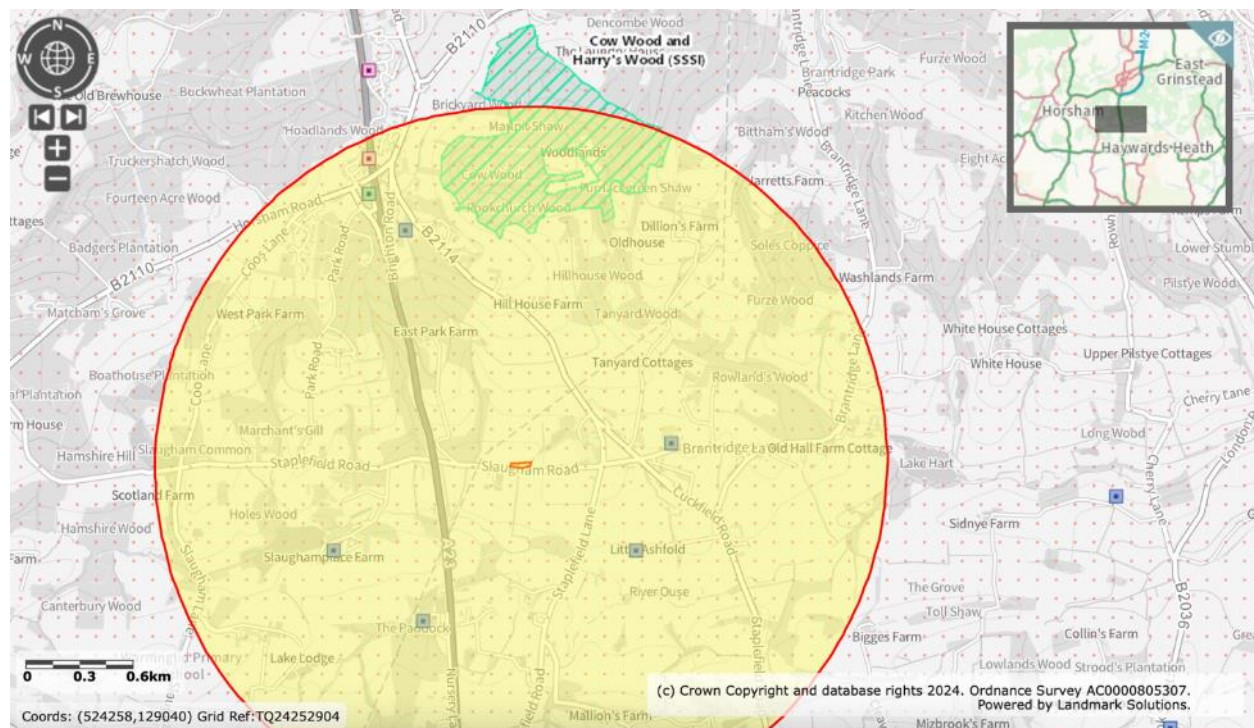


FIGURE 4: SHOWING STATUTORY DESIGNATED SITES AND GRANTED EPS LICENCES WITHIN 2KM OF THE SITE. BAT LICENCES SHOWN IN BLUE, DORMOUSE LICENCES IN PINK AND GREAT CRESTED NEWT LICENCES IN GREEN

Habitats of Principal Importance

4.4 There are no HPI located within or immediately adjacent to the site. However, there are areas of deciduous woodland, broadleaved forest, and ancient and semi-natural woodland within close proximity. See Figure 5.

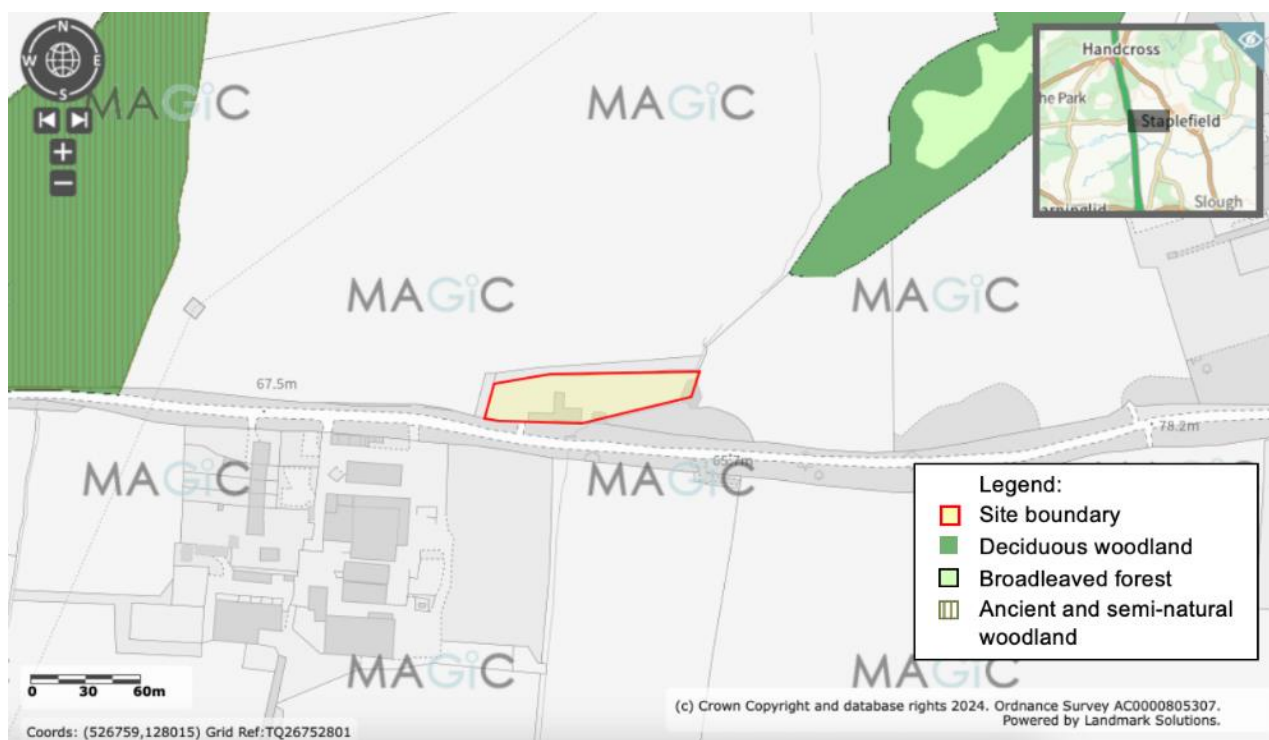


FIGURE 5: SHOWING PRIORITY HABITATS IN PROXIMITY TO THE SITE.

Daytime Assessment

- 4.5 The section of the building subject to survey is a single-storey L-shaped building which is currently used for storage. The west wing of the building will not be affected by the current development proposals. The eastern wing comprises of brick walls and a tall gabled roof supporting clay tiles with timber weatherboarding present at the gable ends. The northern wing comprises of lower brick walls and upper walls of timber weatherboarding, with a gabled roof supporting modern concrete roof tiles.
- 4.6 The roof was noted to have several lifted, slipped, and broken tiles on both wings. The weatherboarding was found to be lifted in several places, with a broken panel present on the eastern elevation on the north wing, providing access into the batten spaces. Small-sized bat droppings typical of *Pipistrellus spp.* bats were visible on the weatherboarding and the window of the northern gable. Further small bat droppings were identified in a gap below the windowsill of the same window. Gaps were also present above the ground floor door and the eastern gable hayloft door, which provide access directly into the interior space for bats.
- 4.7 Internally the roofs are lined with modern non-bitumen-coated membrane, with the weatherboarded areas of the walls lined with timber boarding. The external door and window openings and internal doorway openings are all unfinished, exposing the wall cavities and providing access into the wall cavity for roosting bats. There is no formal ceiling in place; however, a staircase provides access up to the joist level, where temporary boarding across the joists allowed for closer inspection of the ridges and gables.
- 4.8 Small accumulations of medium-sized bat droppings typical of long-eared bats were identified within the northern intersecting wing, both on stored items at ground floor

level, and on temporary joist boarding within the roof space, with further droppings scattered throughout other areas of the building. Feeding remains were also found present within the ground floor area of the northern wing.

- 4.9 Due to the features described the building was identified as a confirmed roost for at least two bat species. However, no bats were visible at the time of survey to enable visual species identification.



Photograph 1: North and east wings of the barn.



Photograph 2: Missing and lifted tiles on the north elevation of the east wing.



Photograph 3: Small bat droppings below the weatherboarding on the northern gable end.



Photograph 4: Small bat droppings in the crevice below the window on the northern gable end.



Photograph 5: Gap at apex on the northern gable end.



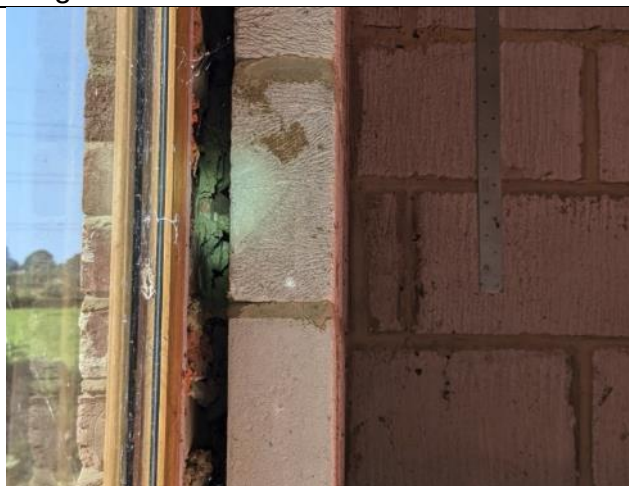
Photograph 6: Gaps in the weatherboarding on the eastern gable hayloft door.



Photograph 7: Internal 1st floor of the east wing.



Photograph 8: Internal ground floor of the north wing.



Photograph 9: An internal cavity between the wall and the unfinished window.



Photograph 10: Small accumulation of medium-sized bat droppings on the temporary boarding at the joist level.



Photograph 11: Small accumulation of medium-sized bat droppings.



Photograph 12: Moth wings within the building.

Emergence Surveys

- 4.10 **4th August 2024** – Weather conditions were good for the survey (14.8°C, calm and largely clear with hazy, thin cloud cover) and any bats present were likely to be active. The survey recorded no bats emerging from the external features of the building. The internal cameras both recorded a bat flying within the building, however the exact internal emergence point was not within camera view. This was considered most likely to be a long-eared bat based on the size, appearance and flight behaviour recorded. A moderate level of common pipistrelle (*Pipistrellus pipistrellus*) foraging activity was recorded during the survey, with low levels of long-eared bat, *Myotis spp.* and serotine (*Eptesicus serotinus*) commuting and foraging activity.
- 4.11 A diagram showing the locations of the surveyors and night vision cameras during the 4th August 2024 evening emergence survey can be seen in Figure 6 below.

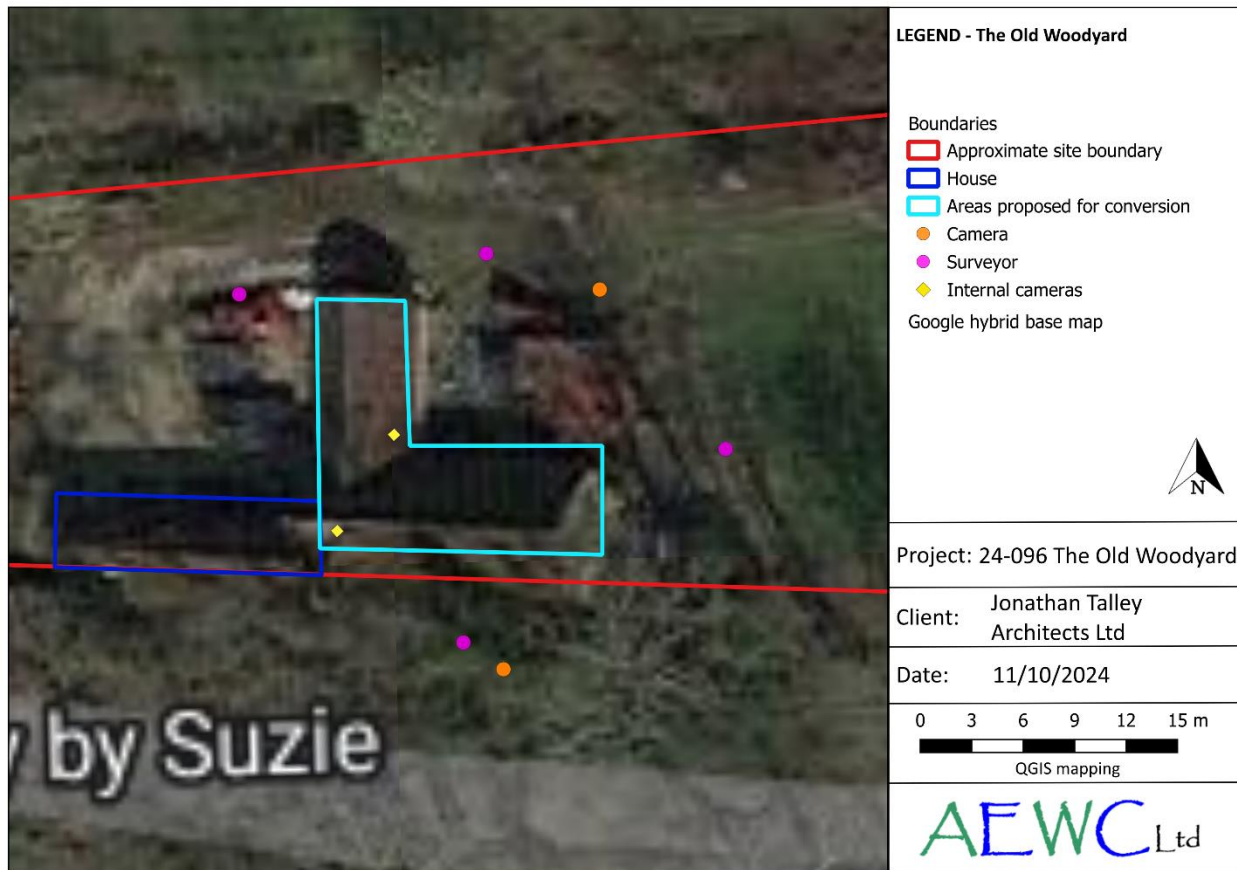


FIGURE 6: SHOWING POSITIONS OF SURVEYORS AND NIGHT VISION CAMERAS DURING THE 4TH AUGUST 2024 EMERGENCE SURVEY.

4.12 **29th August 2024** – Weather conditions were good for the survey (18°C, clear, calm and dry) and any bats present were likely to be active. The survey recorded no bats emerging from the building or bat activity within the building. A high level of common pipistrelle foraging activity was recorded during the survey, with some mid-survey foraging activity from soprano pipistrelles (*Pipistrellus pygmaeus*) and commuting passes by noctule (*Nyctalus noctula*) and *Myotis spp.*

4.13 A diagram showing the locations of the surveyors and night vision cameras during the 29th August 2024 evening emergence survey can be seen in Figure 7 below

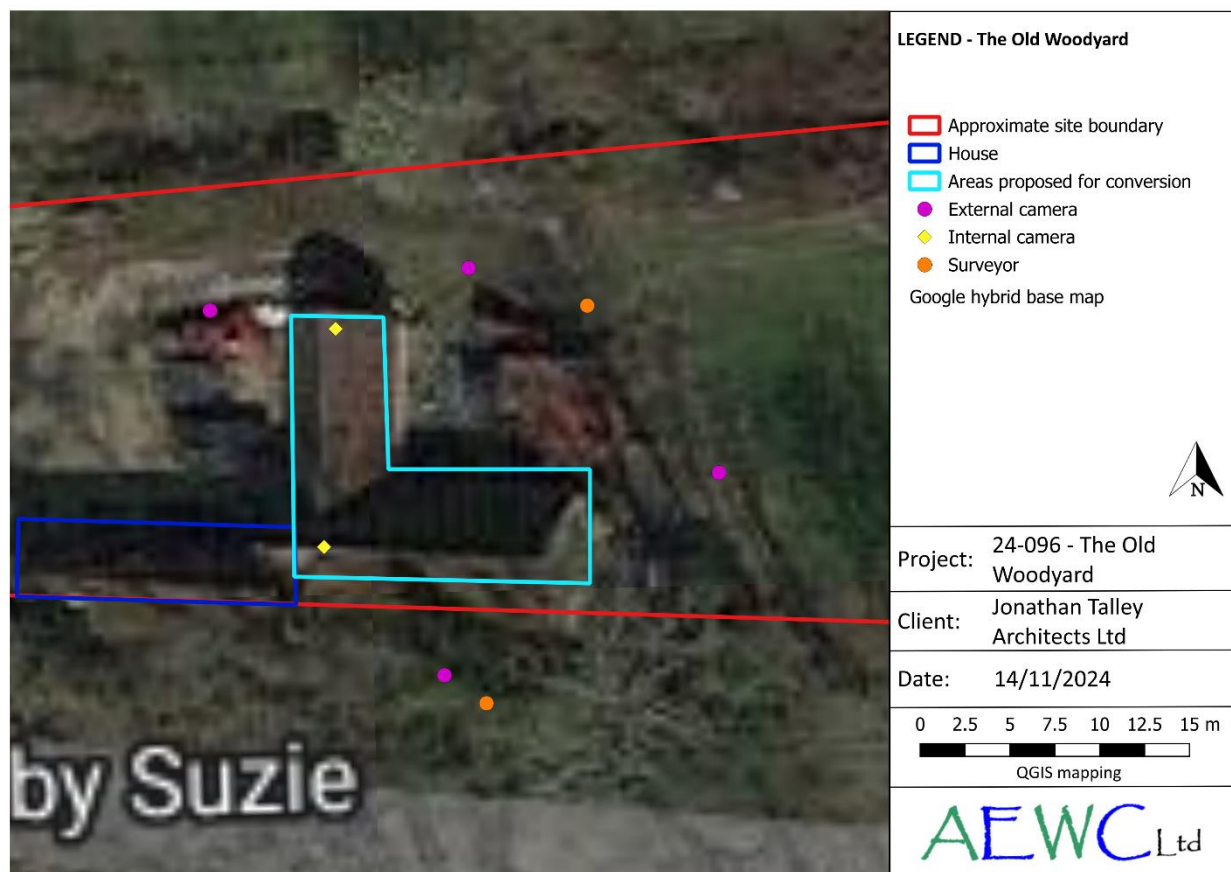


FIGURE 7: SHOWING POSITIONS OF SURVEYORS AND NIGHT VISION CAMERAS DURING THE 29TH AUGUST 2024 EMERGENCE SURVEY.

5 Evaluation

- 5.1 Initial observations consider the local area suitable for bats. Extensive woodland and pasture in close proximity to the site with a network of connective tree and hedge lines provides excellent foraging and commuting habitat for a range of bat species. Buildings and trees within the local area additionally offer potential roosting opportunities.
- 5.2 The daytime assessment identified confirmed roosts for at least two bat species within the batten space and internal space of the building, due to the presence of small-sized bat droppings on the timber weatherboarding and medium-sized bat droppings and feeding remains internally.
- 5.3 Emergence surveys carried out on 4th and 29th August 2024 did not record any bats emerging from the external features of the building. A bat was recorded flying internally during the first emergence survey, although the exact internal emergence point could not be confirmed.
- 5.4 The size, shape and scatter pattern of the droppings and feeding remains observed within the building are typical of long-eared bats, with the size and flight behaviour of the bat recorded internally considered consistent with this genus. Long-eared bats

are a later-breeding species with bats often remaining within their maternity roosts into the early autumn. Larger accumulations of bat droppings would be expected had bats been breeding within the building, with bats visible and/or higher activity recorded internally during the emergence surveys. Therefore, the combine survey evidence is considered indicative of a day or occasional roost for a likely long-eared bat species.

- 5.5 Bat droppings identified externally were characteristic of small bats such as *Pipistrellus spp.* Whilst only low numbers of droppings were identified, evidence of crevice-dwelling species can remain trapped within batten spaces and undetected. Pipistrelles are considered to be early breeding species, with maternity roosts often beginning to disband from late July, however, the emergence surveys were conducted in August. Therefore, the potential presence of a maternity colony of crevice-dwelling bats cannot be ruled out.
- 5.6 The proposed works to convert the building into a residential dwelling will lead to the loss of both identified roosts.

6 Conclusions & Recommendations

- 6.1 The current plans do not impact the west wing of the building and as such, it was not subject to survey. However, the west wing does hold additional suitability for use by crevice-dwelling bats due to gaps beneath roof tiles. Should plans change such that there will be any impacts to the roof of the west wing of the building, further surveys of these areas will be required.
- 6.2 The surveys across the site have identified a day or occasional roost for a likely long-eared bat within the interior space of the building, and a roost for a small, crevice-dwelling bat species within the batten space of the northern gable weatherboarding. Both roosts will be lost under the current proposals to convert the northern and eastern wings of the building to a residential dwelling.
- 6.3 **A lack of any mitigation would result in a negative impact on at least two bat species through potential death, roost damage, destruction and modification as well as disturbance to bats present on the site.**
- 6.4 The proposed work will have a detrimental effect on bats or disturb or damage their roost, therefore **a Natural England development licence will be required for works to proceed to ensure that an offence will not be committed.** This will encompass a Mitigation Strategy to ensure that the development is designed to protect bats and to minimise long term impacts upon the local bat population.
- 6.5 Mitigation and compensation for the species confirmed to be roosting on site will be required. Following the mitigation hierarchy this will include the avoidance of impacts through retention and enhancement of any current roosts in the existing building where possible, and creation of new roost potential as compensation to replace roosts being lost. **This compensation will ensure that there is no loss of roost**

availability, and the favourable conservation status of the species is maintained.

- 6.6 There are three tests detailed in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 which must be satisfied before a Natural England licence can be issued to permit otherwise prohibited acts:
- 1 Regulation 53(2)(e) states that licences may be granted for “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 53(9)(a) states that a licence may not be granted unless the licensing authority (Natural England) is satisfied that “there is no satisfactory alternative”.
 - 3 Regulation 52(9)(b) states that a licence cannot be issued unless the licensing authority (Natural England) is satisfied that the action proposed “will not be detrimental to the maintenance of the species concerned at a favourable conservation status in their natural range”.
- 6.7 For Natural England to be able to issue such a licence, full planning permission must first be obtained as this will satisfy tests 1 and 2, described above. Test 3 can be satisfied by measures to ensure that minimal disturbance to bats is caused by the works to be carried out on the site and that the site plans include the adequate replacement of any roosts that are lost.
- 6.8 The site will need to be licenced under a full EPS licence, registered under the Bat Mitigation Class Licence (BMCL) or registered under the Bat Earned Recognition (BER) Class Licence Pilot Scheme. Under this licence a full plan of compensation is required in addition to confirmation of adherence to suitable mitigation strategies, under the BER scheme the licensee and joint licensee are jointly responsible for adherence to the mitigation and compensation requirements for the site. For this site the outline mitigation would include the following measures:
- Works directly impacting the identified roosting areas of the building will need to be carried out whilst temperatures are above 8°C. **Should the third survey identify the presence of a maternity colony, these works must additionally avoid the breeding period (May to August inclusive) and be timed in spring (March/April) or autumn (late September/October).**
 - Prior to works commencing, the building must be fully inspected by a licensed bat ecologist. All known roost areas and areas with potential for bats will be soft-stripped under direct supervision of the licensed ecologist, able to handle and check any bats found and move them to a safe place.
 - Bat boxes will be erected near the site to act as a safe place to move any bats found into.
 - Any new lining or any existing linings to be replaced must not use a modern breathable roofing membrane, it must have a traditional Bitumen Type 1F (with a hessian Matrix) roofing felt. Polypropylene filaments used in the manufacture of modern breathable underlays are known to entangle and kill bats and warranty can be invalidated; therefore, they must not be used in known or potential bat roosts and cannot be used at sites with EPS licences for replacement bat roosts. This applies to existing roof areas to be fitted with

a lining, as well as any new roofs over proposed extensions and lining behind cladding such as tile hangings or weatherboarding.

- New access points will be created in the building, to provide access for bats to roost in similar areas and locations to existing providing the same aspect and microclimate.
- **Lighting should be designed in accordance with the Institute of Lighting Professionals Guidance note 8: ‘Bats and Artificial lighting in the UK’ which can be downloaded for free from the ILP website.**

6.9 A Reasoned Statement (which sets out the planning background to the site and includes a copy of the planning permission) is not required in this instance. The exception in this instance is because Natural England guidance states a reasoned statement is not required where:

- where bats and their roosts will be affected by:
 - repairs and maintenance
 - roof replacements, loft conversions and extensions
 - renovations of existing domestic dwellings and associated structures, such as garages
 - existing buildings and associated structures that may need to be demolished before redevelopment takes place (whether domestic dwellings or other types of buildings)
 - barn conversions for domestic dwellings (this doesn’t include conversions for commercial use, such as holiday lets)

6.10 Natural England licenses are usually completed by an ecological consultant who must be suitably qualified to carry out the mitigation (for example, holds a licence to survey for bats) or by a consultant registered under the Bat Mitigation Class Licence and Bat Earned Recognition Licence schemes.

6.11 **A third emergence survey is recommended within the earlier part of the breeding season (late May to June) to increase confidence in the likely absence of any maternity roosts from the site.**

6.12 **If species present cannot be identified during the third survey, then DNA analysis of the small and medium droppings collected will be required to inform licence application and mitigation strategy.**

7 References

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