



Preliminary Roost Assessment

Abbey Farm Barn, Higham, Gravesham, ME3 7LS

Tom Ledger

Status	Issue	Name	Date
Final	1	Megan Knapp BSc (Hons), Consultant Ecologist	18/04/2023

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Industry Guidelines and Standards

This report has been written with due consideration to:

- Chartered Institute of Ecology and Environmental Management (2017). Guidelines for Preliminary Ecological Appraisal. 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.1. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2017). Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2020). Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- British Standard 42020 (2013). Biodiversity – Code of Practice for Planning and Development.
- British Standard 8683:2021 (2021). Process for Designing and Implementing Biodiversity Net Gain.

Proportionality

The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate.

The desk studies and field surveys undertaken to provide a Preliminary Ecological Appraisal (PEA) might in some cases be all that is necessary.

(BS 42020, 2013)

Executive Summary

Arbtech Consulting Limited was instructed by Tom Ledger to undertake a Preliminary Roost Assessment (PRA) at Abbey Farm Barn, Higham, Gravesham, ME3 7LS (hereafter referred to as “the site”). The survey was required to inform a planning application for conversion of existing barn to holiday let accommodation (hereafter referred to as “the proposed development”).

The following is work you will need to commission to obtain planning permission and to comply with legislation. Further information, along with opportunities for biodiversity enhancement, are outlined in Table 4 of this report.

Building	Survey Results Summary	Impact Assessment	Recommendations
Roosting bats (building)	B1 has moderate value for roosting bats. This is due to the presence of dense ivy on the north-western corner and gaps between the concrete beams and asbestos sheeting on the eastern and western elevations. The interior of the building does not provide suitable habitats for void dwelling bats due to the openness of the interior of the building, which is also subject to high light levels and exposure to weather conditions.	The proposed development will result in the conversion of existing barn to holiday let accommodation. This could result in destruction of any bat roosts present and could cause disturbance, death or injury to bats.	Two bat emergence and re-entry surveys are required during the active bat season (optimal May to August, suboptimal September) to confirm presence or likely absence of a bat roost in the building. Both of the surveys should be completed during the optimal survey period mid-May to August inclusive. Infra-red cameras should be used as an aid. Surveys should be a minimum of two weeks apart. Two surveyors on the exterior of the building and one IR kit on the interior of the building will be required to provide full coverage of the building. If bat roosts are confirmed in the building one additional survey may be required to characterise the roost and to inform an EPSL application to Natural England. The EPSL application requires that surveys have been undertaken within the most recent active bat season and planning permission must have been granted and all relevant wildlife-related conditions have been discharged prior to submission.
Foraging and commuting bats	The site has a scrubby boundary which has a stream within, which could be used by local bat populations for foraging and commuting. These could also be used by bats dispersing from nearby roosts outside of the site.	The proposed development will not result in the removal of any habitats which could be used by foraging or commuting bats. The proposed development may include the use of lighting which could spill on to bat roosting, foraging or commuting habitat and deter bats from using these areas.	A low impact lighting strategy will be adopted for the site during and post-development, please refer to Table 4.

Nesting birds (building)	The building contains evidence of nesting birds, which are present between beams and the roof. The nests are believed to belong to pigeons and collard doves due to presence of feathers and carcasses and style of nest structure and materials. The building has no evidence of use by barn owls, concluding that the building is not used by barn owls for nesting or roosting. However, as barn owls are highly mobile, this could change.	The proposed development could result in the destruction or the disturbance and subsequent abandonment of active bird nests.	Works should be undertaken outside the period 1st March to 31st August. If this timeframe cannot be avoided, a close inspection of the building should be undertaken immediately, by qualified ecologist, prior to the commencement of work. All active nests will need to be retained until the young have fledged. The bat emergence surveys will also note about any barn owl activity, should there be any.
Other ecological constraints	The South Thames Estuary and Marshes SSSI and Thames Estuary and Marshes RAMSAR and SPA are located directly adjacent to the site, ~40m north and west of the building.	These designated sites do not have any bat qualify interests, however, as the proposed development is within very close distance to the designated sites (SPA, RAMSAR and SSSI), indirect impacts such as pollution could occur during construction.	The Local Planning Authority will notify the client of any recommendations regarding the designated sites. A Construction Environmental Management Plan (CEMP) may be required, outlining best practice measures delineate the construction zone and to minimise the possibility of pollution during construction.

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed by Tom Ledger to undertake a Preliminary Roost Assessment (PRA) at Abbey Farm Barn, Higham, Gravesham, ME3 7LS (hereafter referred to as “the site”). The survey was required to inform a planning application for conversion of existing barn to holiday let accommodation (hereafter referred to as “the proposed development”). A plan showing the proposed development is provided in Appendix 1.

The aim of the PRA was to determine the presence or evaluate the likelihood of the presence of roosting bats, and to gain an understanding of how bats could use the site for roosting, foraging or commuting. This has been undertaken with due consideration to the “Bat Surveys for Professional Ecologists —Good Practice Guidelines” publication (Collins, 2016). No previous ecology reports have been produced for this site by Arbtech Consulting Ltd or, to the author’s knowledge, by any other consultancy.

1.2 Site Location and Landscape Context

The site is located at National Grid Reference TQ 71718 74301 comprising farmyard infrastructure include two barns and a yard. One of the barns is subject to the proposed development and is designated as B1. It is directly surrounded by previously used farmyard including concrete yard and barns, residential dwellings to the south and agricultural fields to the north, east and west. The wider landscape comprises agricultural fields in all directions, residential dwellings to the south, a churchyard ~75m south-west and a railway line ~95m north. A site location plan is provided in Appendix 2.

1.3 Scope of the Report

This report provides a description of all features suitable for roosting, foraging and commuting bats and evaluates those features in the context of the site and wider environment. It further documents any physical evidence collected or recorded during the site survey that establishes the presence of roosting bats. It provides information on possible constraints to the proposed development as a result of bats and summarises the requirements for any further surveys to inform subsequent mitigation proposals, achieve planning or other statutory consent and to comply with wildlife legislation.

To achieve this, the following steps have been taken:

- A desk study has been carried out.
- A field survey has been undertaken, including an inspection of built structures, to determine the presence or the suitability of any features which bats could use for roosting and to assess the suitability of the site’s bat foraging and commuting habitat.
- An outline of potential impacts on any confirmed or unidentified roosts has been provided, based on the proposed development.
- Recommendations for further surveys and mitigation have been made, along with advice on the requirements for a European Protected Species Licence (EPSL) application if appropriate.
- Opportunities for the enhancement of the site for roosting, foraging and commuting bats have been set out.

2.0 Methodology

2.1 Desk Study

The desk study included a 2km radius review of statutory designated sites with bat qualifying interests and granted EPSL records for bats held on magic.gov.uk database. An assessment of the surrounding landscape structure was also completed using aerial images from Google Earth and OS maps.

2.2 Field Survey

The survey was undertaken by Megan Knapp BSc (Hons), Consultant Ecologist [Natural England Level 1 bat licence number 2022-10627-CL17-BAT and accredited agent to Natural England Level 2 bat licence number 2018-33540-CLS-CLS] on 18th April 2023.

The PRA focussed on one built structure which will be affected by the proposed development as well as providing an overview of the wider site and the surrounding landscape for bat roosting, foraging and commuting habitat.

For any surveyed buildings:

A non-intrusive visual appraisal was undertaken from the ground, using binoculars to inspect the external features of the building for features which bats could use for roosting, including access or egress points and for signs of bat use including droppings, scratch marks, insect remains and urine smear marks. An internal inspection of the building was also made using a torch and binoculars. The surveyor paid particular attention to the floor and flat surfaces, lintels above doors and windows, and carried out a detailed search of numerous features within the roof space.

2.3 Breeding Birds and Other Incidental Observations

The surveyor also made note of any other ecological constraints observed during the survey, notably the likelihood of presence or signs of breeding birds, and the suitability of the site for barn owls *Tyto alba*.

2.4 Suitability Assessment

Built structures were categorised according to the likelihood of bats being present and the types of roost that the identified features could support. This is summarised in Table 1 below. Roost suitability is classified as high, moderate, low and negligible and dictates any further surveys required before works can proceed.

Table 1: Features of a building that are correlated with use by bats

Classification	Feature of building and its context
Moderate to high	Buildings or structures with features of particular significance for larger numbers of 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). Buildings with high suitability could support roosts of high conservation value such as maternity or hibernation roosts.
Low	A small number of possible roost sites or features, used sporadically by individual or small numbers of bats. Potential roost features may be suboptimal for reasons such as shallow depth, poor thermal qualities or upwards orientation with exposure to inclement weather or predators. 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.
Negligible	Unsuitable for use by bats.

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. Bats are highly mobile creatures that switch roosts regularly and therefore the usage of a site by bats can change over a short period of time.

No biological records data search had been authorised at the time of writing this report.

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

3.0 Results and Evaluation

3.1 Designated Sites

No statutory designated sites with bat qualifying interests were identified within 2km of the site. However, the South Thames Estuary and Marshes Sites of Special Scientific Interest (SSSI) and Thames Estuary and Marshes Special Protection Areas (SPA) and RAMSAR are located directly adjacent to the site, ~40m north and west of the building (B1). The Local Planning Authority will notify the client of any recommendations regarding the designated sites.

3.2 Historical Records

A search of the magic.gov.uk database for granted EPSLs within a 2km radius of the site has been completed. Displaced bats from licensed sites <2km 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 licensed site. No EPSL records for bats have been returned within 2km of the site.

3.3 Field Survey Results

The weather conditions recorded at the time of the survey are shown in Table 2. The results of the field survey are detailed in Table 3 and illustrated in Appendix 3.

Table 2: Weather conditions during the survey

Date:	18/04/2023
Temperature	10°C
Humidity	87%
Cloud Cover	100%
Wind	13mph
Rain	None

Table 3: PRA Results

Feature	Description	Photographs
Bat foraging and commuting habitat	The site has a moderate habitat value for foraging and commuting bats due to the presence of a scrubby boundary. A stream is present within this scrub, which can also provide more habitat for foraging bats. In the wider landscape, there are scattered trees which lead to tree lines and hedgerows. There are more streams and ponds within the surrounding landscape.	

B1 – exterior

B1 is a detached single storey barn which comprises of concrete beams with wooden board cladding on the lower half and corrugated asbestos sheets on the upper half. The two material (wood and asbestos sheets) overlap in length and has a large gap between them, which creates an access point into the building. There are gaps within the wooden boards and holes in the asbestos sheeting. The roof is pitched and clad in corrugated asbestos sheets and plastic. The roof appears in good condition with no missing panels. A section of dense ivy is present on the north-western corner of B1, which can be used by roosting bats or obstruct possible roosting features. Metal gates are present on the eastern and western elevation. The eastern and western elevations are open which allows for the interior to be easily accessible, exposed to high light levels and exposure to weather conditions.



Figure 1 Southern and western elevation of B1.



Figure 2 Eastern and northern elevation of B1.



Figure 3 Dense ivy on the north-western corner of B1.

		 Figure 4 Gap between the upper section and lower section of B1.
B1 – interior	B1 is single skinned, which means there are no crevices between external and internal materials. The gaps within the wooden boards and asbestos sheets enter directly into the interior of the building. There are concrete beams within the interior of the building. There are gaps between the beams and asbestos sheeting on the eastern and western elevation. These gaps can be used by roosting crevice dwelling bats. The ivy noted on the exterior in the north-western corner, enters the interior of the building and provides roosting features which bats could use.	 Figure 5 Interior of B1.

		 Figure 6 Ivy on the interior of the north-western corner of B1.
B1 – suitability assessment for bats	There was no evidence of bats observed during the survey, within the interior and exterior of B1. The dense ivy on the north-western corner and gaps between the concrete beams and asbestos sheeting on the eastern and western elevations provide suitable features for bats to use for roosting. The interior of the building does not provide suitable habitats for void dwelling bats due to the openness of the interior of the building, which is also subject to high light levels and exposure to weather conditions. As the building is open on two elevations, the interior is easily accessible and could be used by bats during the night for resting. Although the features provide a low value, the building has an overall moderate value for roosting bats due to the presence of a moderate habitat value in the surrounding landscape.	 Figure 7 Gap between the beam and eastern elevation of B2 (circled).

B1 - breeding birds and other incidental observations	Barn owls are known for using open barns, like B1, for roosting and nesting. However, there was no evidence of barn owls within the interior or exterior of B1. Evidence of barn owls would include owl pellets, faecal splashing, feathers, live/deceased owl and nests. There is evidence of nesting birds, such as pigeons and collard doves, within B1, due to the presence of nests and bird carcasses. Bird nests are present between beams and the roof. B1 has a high value for nesting birds.	 <i>Figure 8 Bird nest on the eastern elevation (circled).</i>
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4.0 Conclusions, Impacts and Recommendations

Taking the desk study and field survey results into account, Table 4 presents an evaluation of the value of the site for bats and also details any other ecological constraints identified such as nesting birds in relation to the proposed development which will comprise conversion of existing barn to holiday let accommodation.

Table 4: Evaluation of the site for bats and any other ecological constraints

Building	Survey Results Summary	Impact Assessment	Recommendations	Biodiversity Enhancement Opportunities ¹
Roosting bats (building)	B1 has moderate value for roosting bats. This is due to the presence of dense ivy on the north-western corner and gaps between the concrete beams and asbestos sheeting on the eastern and western elevations. The interior of the building does not provide suitable habitats for void dwelling bats due to the openness of the interior of the building, which is also subject to high light levels and exposure to weather conditions.	The proposed development will result in the conversion of existing barn to holiday let accommodation. This could result in destruction of any bat roosts present and could cause disturbance, death or injury to bats.	Two bat emergence and re-entry surveys are required during the active bat season (optimal May to August, suboptimal September) to confirm presence or likely absence of a bat roost in the building. Both of the surveys should be completed during the optimal survey period mid-May to August inclusive. Infra-red cameras should be used as an aid. Surveys should be a minimum of two weeks apart. Two surveyors on the exterior of the building and one IR kit on the interior of the building will be required to provide full coverage of the building. If bat roosts are confirmed in the building one additional survey may be required to characterise the roost and to inform an EPSL application to Natural England. The EPSL application requires that surveys have been undertaken within the most recent active bat season and planning permission must have been granted and all relevant wildlife-related conditions have been discharged prior to submission.	To be confirmed upon completion of the surveys.
Foraging and commuting bats	The site has a scrubby boundary which has a stream within, which could be used by local bat populations for	The proposed development will not result in the removal of any habitats which could be used by foraging or commuting bats.	A low impact lighting strategy will be adopted for the site during and post-development, which will include the following measures: Light spill on to the north-western, northern and western boundary should be avoided.	The following habitat creation and enhancement opportunities could be incorporated into the proposed

¹ The Local Planning Authority has a duty to ask for enhancements under the NPPF (2021).

	foraging and commuting. These could also be used by bats dispersing from nearby roosts outside of the site.	The proposed development may include the use of lighting which could spill on to bat roosting, foraging or commuting habitat and deter bats from using these areas.	• Use narrow spectrum light sources to lower the range of species affected by lighting. • Use light sources that emit minimal ultra-violet light. • Avoid white and blue wavelengths of the light spectrum to reduce insect attraction and where white light sources are required in order to manage the blue shortwave length content they should be of a warm / neutral colour temperature <4,200 kelvin. • Not use bare bulbs and any light pointing upwards. The spread of light will be kept in line with or below the horizontal. • Light spill will be reduced via the use of low-level lighting used in conjunction with hoods, cowls, louvers and shields. Lights will also be directional to ensure that light is directed to the intended areas only. • External lighting will be on PIR sensors that are sensitive to large objects only (so that they are not triggered by passing bats) and will be set to the shortest time duration to reduce the amount of time the lights are on. • Wall lights and security lights will be 'dimmable' and set to the lowest light intensity settings. There are several products on the market that allow the control of the light intensity and the duration that the lights are on. All lighting on the developed site will make use of the most up to date technology available.	development which would be beneficial for foraging bats: • Planting of native tree, shrub and hedgerows to increase foraging opportunities.
Nesting birds (building)	The building contains evidence of nesting birds, which are present between beams and the roof. The nests are	The proposed development could result in the destruction or the disturbance and subsequent abandonment of active bird nests.	Works should be undertaken outside the period 1st March to 31st August. If this timeframe cannot be avoided, a close inspection of the building should be undertaken immediately, by qualified ecologist, prior	The installation of a minimum of two bird boxes on retained buildings will provide additional nesting habitat for birds e.g.

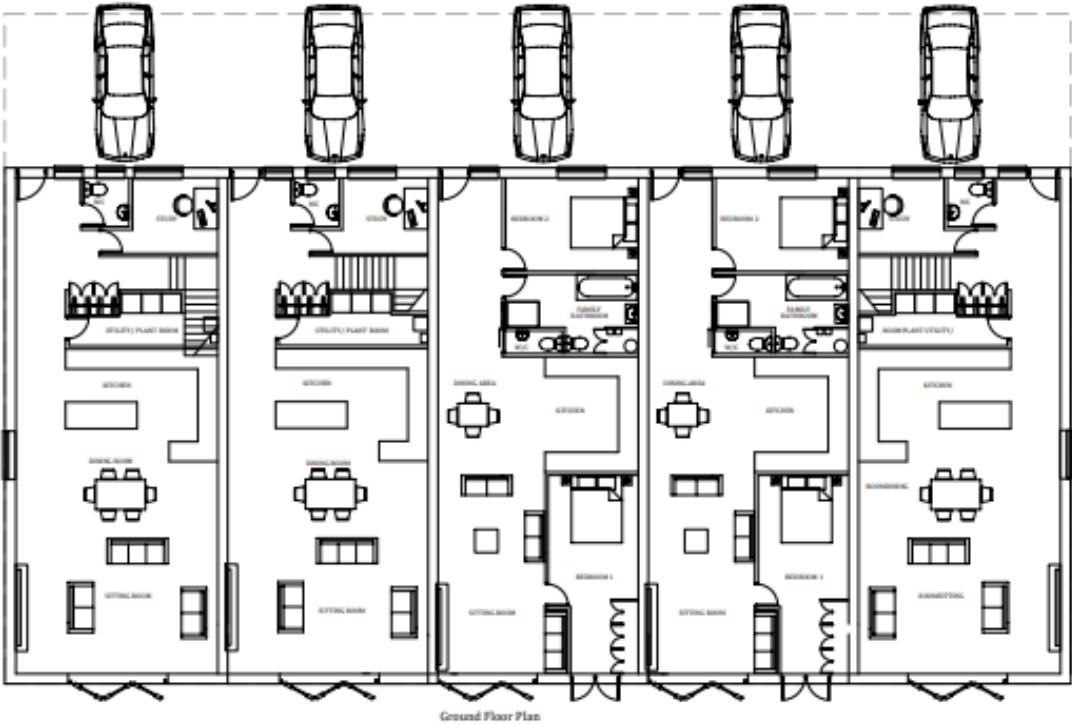
	believed to belong to pigeons and collard doves due to presence of feathers and carcasses and style of nest structure and materials. The building has no evidence of use by barn owls, concluding that the building is not used by barn owls for nesting or roosting. However, as barn owls are highly mobile, this could change.		to the commencement of work. All active nests will need to be retained until the young have fledged. The bat emergence surveys will also note about any barn owl activity, should there be any.	Woodstone Nest Box, Swift and sparrow boxes/cups or a similar alternative brand. Tree boxes should be positioned approximately 3m above ground level where they will be sheltered from prevailing wind, rain and strong sunlight. Small-hole boxes are best placed approximately 1-3m above ground on an area of the tree trunk where foliage will not obscure the entrance hole. Swift and sparrow boxes should be positioned at the eaves of a building and can be incorporated into the fabric of the building during construction.
Other ecological constraints	The South Thames Estuary and Marshes SSSI and Thames Estuary and Marshes RAMSAR and SPA are located directly adjacent to the site, ~40m north and west of the building.	These designated sites do not have any bat qualify interests, however, as the proposed development is within very close distance to the designated sites (SPA, RAMSAR and SSSI), indirect impacts such as pollution could occur during construction.	The Local Planning Authority will notify the client of any recommendations regarding the designated sites. A Construction Environmental Management Plan (CEMP) may be required, outlining best practice measures delineate the construction zone and to minimise the possibility of pollution during construction.	N/A

5.0 Bibliography

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Appendix 1: Proposed Development Plan





THIS NOT SCALE THREE DIMENSIONAL SKETCH FOR PLANNING PURPOSES

Check and verify all dimensions against the full set of drawings and all relevant planning and building regulations. Do not rely on this sketch for any other purpose. The architect is not responsible for any errors or omissions in this sketch. The architect is not responsible for any errors or omissions in this sketch. The architect is not responsible for any errors or omissions in this sketch.

Revised drawings: 11/05/2022
 A revised drawings: 04/05/2022

Rev	Description	Date
1	Initial Design	11/05/2022
2	Revised Design	04/05/2022

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Project Name: Abbey Farm Tailored Cottages
 Project: 11/05/2022
 Location: Rochester ME3 7LS

Working Drawings
 Sketch Drawings

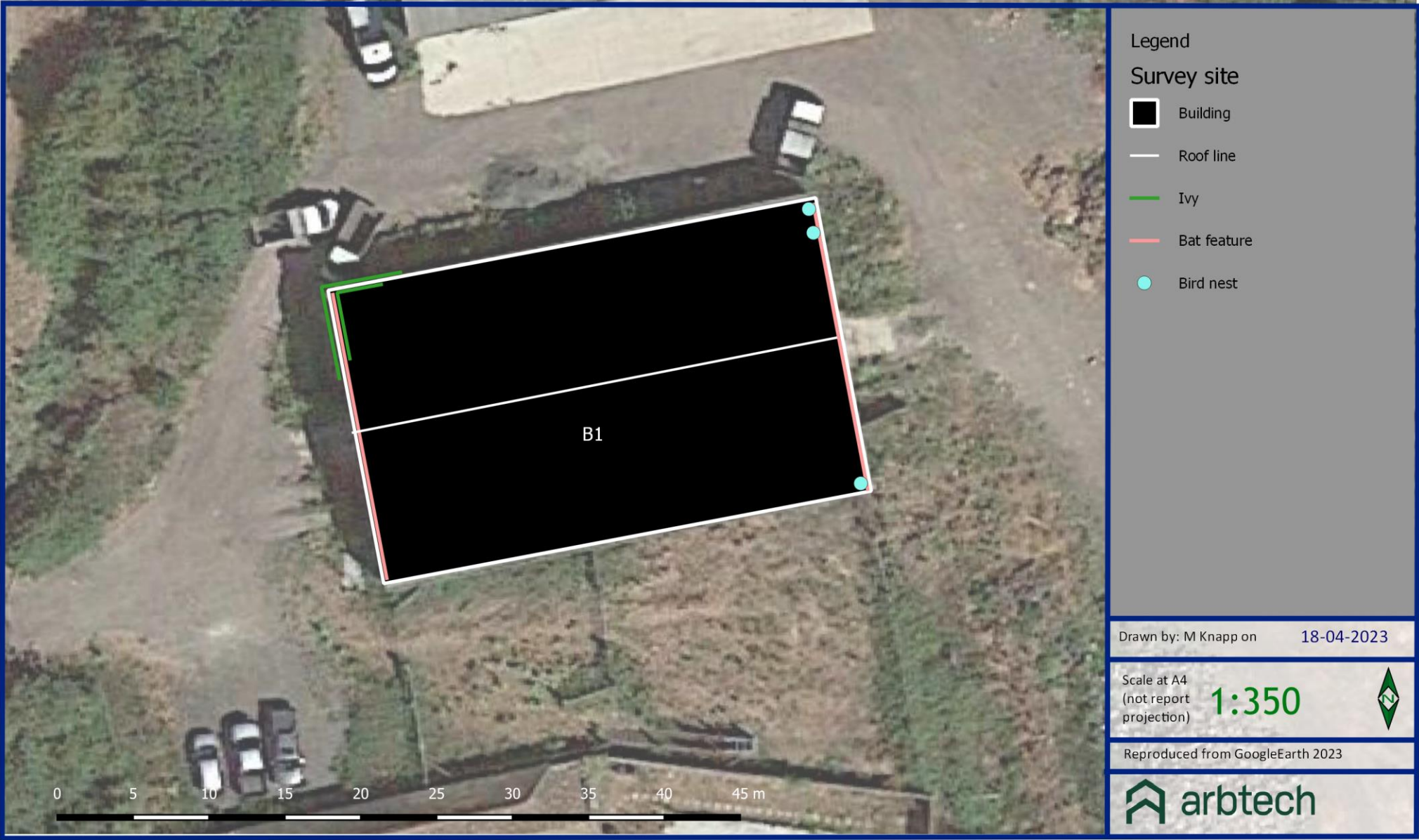
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2	04/05/2022	AL

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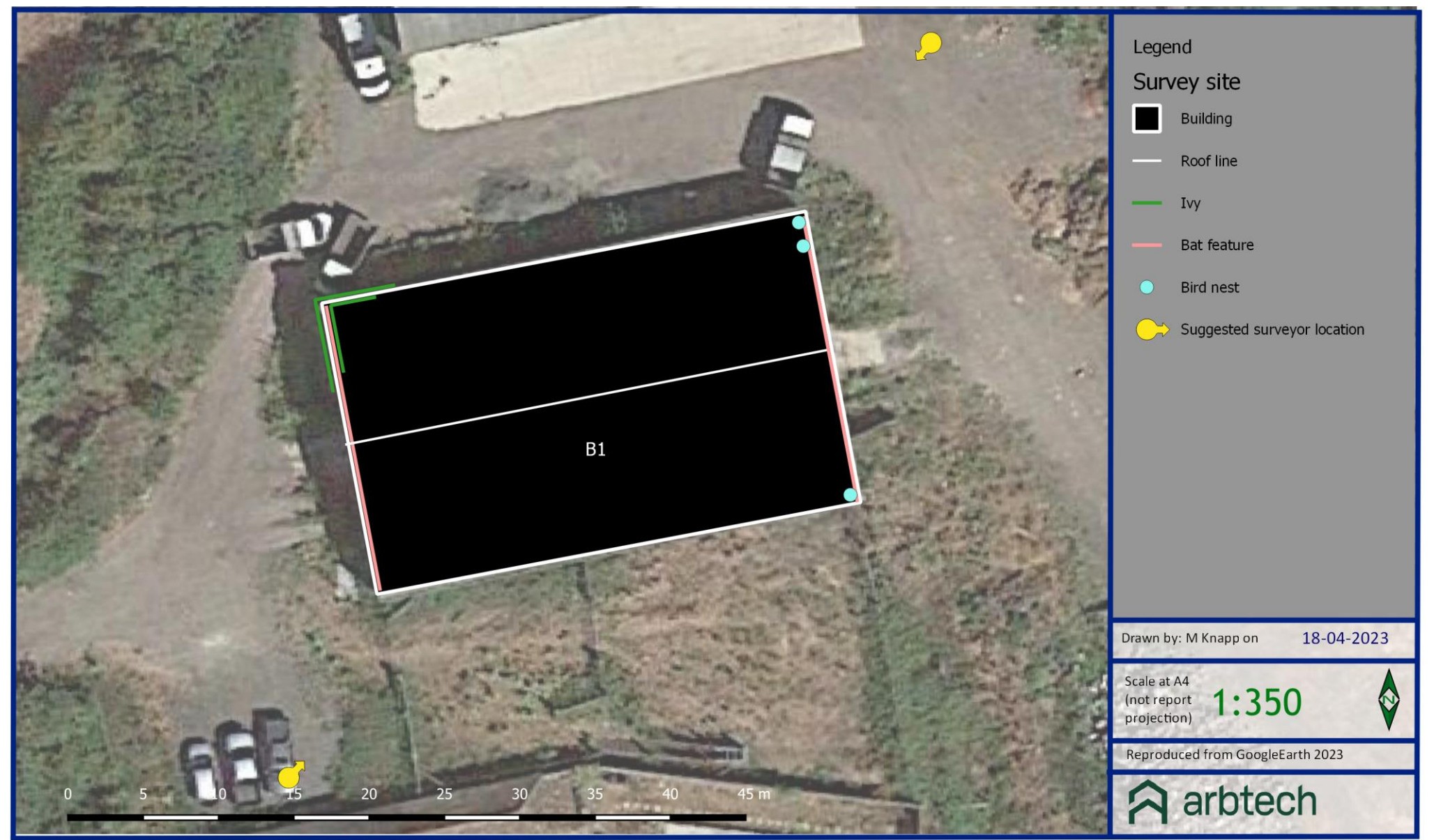
Appendix 2: Site Location Plan



Appendix 3a: PRA Plan



Appendix 3b: Proposed BERS Plan



Appendix 4: Legislation and Planning Policy Related to Bats

LEGAL PROTECTION

All species of bat are fully protected under ***The Conservation of Habitats and Species Regulations 2017*** (as amended) through their inclusion on Schedule 2.

Regulation 43: Protection of certain wild animals - offences

(1) A person is guilty of an offence if they:

- (a) Deliberately captures, injures or kills any wild animal of a European protected species,
- (b) Deliberately disturbs wild animals of any such species,
- (c) Deliberately takes or destroys the eggs of such an animal, or
- (d) Damages or destroys a breeding site or resting place of such an animal,

(2) For the purposes of paragraph (1) (b), disturbance of animals includes in particular any disturbance which is likely—

- (a) To impair their ability:
 - (i) To survive, to breed or reproduce, or to rear or nurture their young; or
 - (ii) In the case of animals of a hibernating or migratory species, to hibernate or migrate; or
- (b) To affect significantly the local distribution or abundance of the species to which they belong.

Bats are also protected under the ***Wildlife and Countryside Act 1981*** (as amended) through their inclusion on Schedule 5. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection
- Selling, offering or exposing for sale, possession or transporting for purpose of sale

NATIONAL PLANNING POLICY

National Planning Policy Framework 2021

The National Planning Policy Framework promotes sustainable development. The Framework specifies the need for protection of designated sites and priority habitats and species. An emphasis is also made on the need for ecological infrastructure through protection, restoration and re-creation. The protection and recovery of priority species (considered likely to be those listed as species of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006) is also listed as a requirement of planning policy.

In determining a planning application, planning authorities should aim to conserve and enhance biodiversity by ensuring that: designated sites are protected from harm; there is appropriate mitigation or compensation where significant harm cannot be avoided; measurable gains in biodiversity in and around developments are incorporated; and planning permission is refused for development resulting in the loss or deterioration of irreplaceable habitats including aged or veteran trees and also ancient woodland.

The Natural Environment and Rural Communities Act 2006 and the Biodiversity Duty

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'.

Section 41 of the Act requires the Secretary of State to publish a list of habitats and species which are of 'principal importance for the conservation of biodiversity'. This list is intended to assist decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications. A developer must show that their protection has been adequately addressed within a development proposal.

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A European Protected Species Licence (EPSL) issued by Natural England will be required for works likely to affect a bat roost or for operations likely to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g. survive, breed, rear young and hibernate). The licence is to allow derogation from the relevant legislation but also to enable appropriate mitigation measures to be put in place and their efficiency/success to be monitored. The legislation may also be interpreted such that, in certain circumstances, important foraging areas and/or commuting routes can be regarded as being afforded *de facto* protection, for example, where it can be proven that the continued usage of such areas is crucial to maintaining the integrity and long-term viability of a bat roost (Garland & Markham, 2008).

There are 17 species of bat breeding in England and Natural England issues licences under Regulation 55 of the Habitats Regulations to allow you to work within the law.

Licences are issued for specific purposes stated in the Regulations, if the following three tests are met:

- The purpose of the work meets one of those listed in the Habitats Regulations (see below);
- That there is no satisfactory alternative;
- That the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range

The Habitats Regulations permits licences to be issued for a specific set of purposes including:

1. include preserving public health or public safety or other imperative reasons of over-riding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment;
2. scientific and educational purposes;

3. ringing or marking; and,
4. conserving wild animals.

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

EUROPEAN PROTECTED SPECIES POLICIES

In December 2016 Natural England officially introduced the four licensing policies throughout England. The four policies seek to achieve better outcomes for European Protected Species (EPS) and reduce unnecessary costs, delays and uncertainty that can be inherent in the current standard EPS licensing system. The policies are summarised as follows:

- Policy 1; provides greater flexibility in exclusion and relocation activities, where there is investment in habitat provision;
- Policy 2; provides greater flexibility in the location of compensatory habitat;
- Policy 3; provides greater flexibility on exclusion measures where this will allow EPS to use temporary habitat; and,
- Policy 4; provides a reduced survey effort in circumstances where the impacts of development can be confidently predicted.

The four policies have been designed to have a net benefit for EPS by improving populations overall and not just protecting individuals within development sites. Most notably Natural England now recognises that the Habitats Regulations legal framework now applies to 'local populations' of EPS and not individuals/site populations.