

Bat Activity Surveys

Northfleet School for Girls, Gravesend, Kent

A Report To: Labosport
Report Number: RT-MME-180683-06
Date: August 2025



Quality Assurance

Date	Version	Author	Checked by	Approved by
22/08/2025	Final	Ruby Hill (Ecological Project Officer) and Matt Fletcher (Field Ecologist)	James Sharma MSc (Ecological Consultant)	Indre Barsketyte MSc (Principal Ecological Consultant)

Declaration of Compliance

This study has been undertaken in accordance with British Standard 42020:2013 “Biodiversity, Code of Practice for Planning and Development”. The information which we have prepared is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management’s Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

Disclaimer

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Validity of Data

The findings of this study are valid for a period of 24 months from the date of survey. If works have not commenced by this date, it may be necessary to undertake an updated survey to allow any changes in the status of bats on site to be assessed, and to inform a review of the conclusions and recommendations made.

Non-Technical Summary

Project Background

Middlemarch Environmental Ltd was commissioned by Labosport to undertake Bat Activity Surveys at Northfleet School for Girls in Gravesend, Kent.

Scope of Survey

The site was subject to bat activity surveys in order to allow a profile of site usage by bats to be compiled. Two Night-time Bat Walkover surveys were completed in May and June 2025. In addition, automated surveys were used to supplement the data collected from the Night-time Bat Walkover surveys.

Summary of Key Bat Features

A total of three bat species – common pipistrelle, noctule, and Leisler's bat were recorded during the Night-time Bat Walkover surveys completed on 27th May 2025 and 25th June 2025. The majority of bats recorded on site were common pipistrelles, with occasional activity from noctules and a single recording from Leisler's bat.

The static detectors also recorded a total of three bat species across the two positions on site, between 27/05/2025 - 01/06/2025 and 20/06/2025 - 25/06/2025. The species recorded were, common pipistrelle, noctule, and Leisler's bat. In addition, unidentified *Nyctalus* species were also recorded, the genus of which both noctule and Leisler's bat belong to.

Potential Impacts on Bats

There are no known roosts present on site; however, suitable roosting locations are present in the wider landscape. The survey data collected indicates that the site contains habitats that are suitable for a range of common bat species, with the habitats on site used for foraging and commuting. In addition, further suitable habitat resources are present in the area, and some have connectivity to the development site, with higher quality habitats abutting the site and present in the wider landscape.

In the absence of a sensitively designed operational lighting strategy, the new development has the potential to adversely impact local populations of bats by severing commuting routes and fragmenting potential foraging areas. Conversely, the proposed development presents the opportunity to enhance the value of the site for bats and other wildlife, and it is recommended to incorporate plant species which attract night flying insects to enhance the foraging resource for bats on site.

Recommendations

R1 Lighting: In accordance with best practice guidance relating to lighting and biodiversity (Bat Conservation Trust and Institute of Lighting Professionals, 2023¹; Gunnell et al, 2012²), any new lighting should be carefully designed to minimise potential disturbance and fragmentation impacts on sensitive receptors, such as bat species

R2 Scheme Design: The proposed development should be designed to minimise effects on bats in accordance with the ecological mitigation hierarchy as set out in the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG).

Habitat enhancements including the planting of species which attract night flying insects is encouraged as this will be of value to foraging bats, for example: evening primrose, goldenrod, honeysuckle and fleabane.

¹ Bat Conservation Trust and Institute of Lighting Professionals (2023) *Guidance Note 08/23: Bats and artificial lighting at night*. ILP, Rugby

² Gunnell, K., Grant, G. and Williams, C. (2012) *Landscape and urban design for bats and biodiversity*. Bat Conservation Trust.

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1. Introduction

1.1 Project Background

In May 2025, Labosport commissioned Middlemarch to undertake bat activity surveys at the site of a proposed development at Northfleet School for Girls in Gravesend, Kent. This assessment is required to inform a planning application associated with the creation of a new artificial grass pitch.

Middlemarch has previously carried out the following surveys for Labosport at this site:

- Preliminary Arboricultural Assessment (RT-MME-180683-01);
- Arboricultural Impact Assessment (RT-MME-180683-02);
- Arboricultural Method Statement (RT-MME-180683-03);
- Preliminary Ecological Appraisal (RT-MME-180683-04); and,
- Biodiversity Statement and Metric Assessment (RT-MME-180683-05).

An additional Ecological Walkover Assessment was undertaken in November 2024 to accommodate for changes to the red line boundary of the site. The findings of this survey are made available within the revised Preliminary Ecological Appraisal (Report RT-MME-180683-04 Rev A).

1.2 Site Description and Context

Table 1.1 provides a brief summary of the site and its surroundings.

Attribute	Description
Location	Northfleet School for Girls, Gravesend
National Grid Reference	TQ 62962 72672
Site Area (ha)	1.59
Topography	There is a significant fall across the proposed pitch footprint from south to north, of between around 3.5 to 4.9m.
Land Cover (on site)	The proposed pitch is located within a sports playing field located to the east of Northfleet School for Girls school buildings. There is a mature tree adjacent to the south west corner of the survey area. This playing field was delineated by dense scrub and woodland at the site's northern and eastern boundaries. A tennis court was present within the southern section of the site, whilst a sand pit was present to the north. An additional area of amenity grassland lay south of the tennis court.
Land Cover (site surrounds)	The site forms part of a wider area of greenspace within Northfleet School for Girls, which is largely built-up in nature, but also includes areas of amenity grassland, tree lines and areas of tree cover. The school is surrounded on all sides by residential development, whilst a number of areas of open greenspace, such as Wombwell Park, are present.

Table 1.1: Summary of Site and Surroundings

1.3 Documentation Provided

The conclusions and recommendations made in this report are based on information provided by the client regarding the scope of the project. Documentation made available by the client is listed in Table 1.2.

Document / Drawing Number	Author
Northfleet School LSUK 21 0 04 GENERAL ARRANGEMENT 106X70M G 218481	Labsport
Northfleet School LSUK 21 0 04 PROPOSED PLAN G 218481	Labsport
R-SI-27677-01-00 Site Investigation Report	JPP
G218481 Northfleet School 6 x 15 m columns 200lux R1	Signify

Table 1.2: Documentation Provided by Client

2. Methods

2.1 Desk study

As part of the Preliminary Ecological Appraisal (Report RT-MME-180683-04) an ecological desk study was undertaken in 2024. The consultee for the desk study was Kent & Medway Biological Record Centre.

Middlemarch then assimilated and reviewed the desk study data provided by these organisations. Relevant bat data are discussed in Chapter 3. In compliance with the terms and conditions relating to its commercial use, the full desk study data is not provided within this report.

2.2 Field Survey

Manual Bat Activity Survey: Night-time Bat Walkover

The site was subject to two Night-time Bat Walkover surveys in order to allow a profile of site usage by bats to be compiled. These surveys were completed in May and June.

In line with the specifications detailed in Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2023)³, the Night-time Bat Walkover surveys commenced at sunset and continued until 120 minutes after sunset. For the first 30 minutes to 1 hour after sunset the surveyors were stationed on potential flight lines close to potential roost locations. During this time, surveyors remained in position to count, observe behaviour and record commuting or foraging bats. The surveyors then walked a pre-defined transect route across the site, taking acoustic recordings and noting observations of bat behaviour.

The starting point for the Night-time Bat Walkover was situated to the west of the site adjacent to a parking area parallel to the treeline that surrounded the site.

The manual bat activity surveys were undertaken by the following personnel:

- Richard Sainsbury (Senior Ecological Consultant); and,
- Matthew Fletcher (Field Ecologist).

The weather conditions recorded at the time of each survey are detailed in Table 2.1.

Survey Date	Dusk/ Dawn Survey	Sunset/ Sunrise Time	Temperature (°C)		Cloud (%)		Cover		Precipitation		Wind Speed (Beaufort)	
			Start	End	Start	End	Start	End	Start	End	Start	End
Spring (27/05/2025)	Dusk	21:00	16	15	100	100	Nil	Nil	F1	F3		
Summer (25/06/2025)	Dusk	21:19	23	20	50	30	Nil	Nil	F1	F1		

Table 2.1: Weather Conditions During Manual Bat Activity Surveys

³ Collins, J. (ed). (2023). *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Ed.)*. The Bat Conservation Trust, London.

Automated Bat Activity Survey: Static Bat Detector

Spring and summer automated surveys were used to supplement the data collected from the walked transect surveys, as recommended in Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2023)³. Two static bat detectors (Song Meter SM4) were installed at points located across the site and were left in place for a total of 5 consecutive nights. Detectors were deployed on site in May and June 2025. The detectors were set to record from 20 minutes before sunset to 20 minutes after sunrise.

Equipment and Analysis

Subsequent computer analysis of sound recordings was used to facilitate the identification of bat species/families present during the surveys. Some species of bats echolocate at similar frequencies and the characteristics of their calls can overlap, i.e. *Myotis* species, and calls can vary dependant on the environment that the bats are in. It is widely accepted that if there is any doubt identifying a bat to species level then identification to family level is satisfactory (Russ, 1999)⁴. If echolocation calls more closely resemble one species than another, then they will be assigned to species level based on the parameters set out in Russ (2012)⁵ for guidance. Identification of overlapping species should, however, be interpreted with caution.

Grey long-eared bats *Plecotus austriacus* are very rare and found only in a few places in southern England (Matthews, et al. 2018)⁶. It can be very difficult to distinguish this species from the more common brown long-eared bat *Plecotus auritus*. Therefore, based on the location of the site it is presumed that any calls by *Plecotus* species are brown long-eared bat.

It should be noted that bat passes refer to the number of times that bats were detected by the bat detectors. They do not necessarily represent separate bats and may be repeat recordings of the same bat if, for example, it was foraging in a loop.

2.3 Constraints

No significant constraints were experienced during the surveys.

⁴ Russ, J. (1999). *The Bats of Britain and Ireland. Echolocation calls, sound analysis, and species identification* (1st Ed.). Alana Ecology Ltd, London.

⁵ Russ, J. (2012) *British Bat Calls: A Guide to Species Identification*. Pelagic Publishing, Exeter.

⁶ Matthews, F., Kubasiewicz, L.M., Gurnell, J., Harrower, C.A., McDonald, R.A., Shore, R.F. (2018) *A Review of the Population and Conservation Status of British Mammals: Technical Summary*. A report by the Mammal Society under contract to Natural England, Natural Resources Wales and Scottish Natural Heritage. Natural England, Peterborough.

3. Desk Study

3.1 Species Records

Records of bat species within a 1 km radius of the survey area provided by the consultee are summarised in Table 3.1. It should be noted that the absence of records should not be taken as confirmation that a species is absent from the search area.

Species	No. of Records	Date of nearest record*	Proximity of Nearest Record to Survey Area**	Species of Principal Importance?	Legislation / Conservation Status
Serotine <i>Eptesicus serotinus</i>	4	2011	3650 m east	-	ECH 4, WCA 5, WCA 6
Daubenton's bat <i>Myotis daubentonii</i>	7	2015	1220 m west	-	ECH 4, WCA 5, WCA 6
Natterer's bat <i>Myotis nattereri</i>	5	2015	1220 m west	-	ECH 4, WCA 5, WCA 6
Leisler's bat <i>Nyctalus leisleri</i>	11	2015	1220 m west	-	ECH 4, WCA 5, WCA 6
Noctule <i>Nyctalus noctula</i>	11	2015	1220 m west	✓	ECH 4, WCA 5, WCA 6
Nathusius' pipistrelle <i>Pipistrellus nathusii</i>	2	2013	3630 m west	-	ECH 4, WCA 5, WCA 6
Common pipistrelle <i>Pipistrellus pipistrellus</i>	66	2008	Potentially on site*	-	ECH 4, WCA 5, WCA 6
Soprano pipistrelle <i>Pipistrellus pygmaeus</i>	18	2008	Potentially on site*	✓	ECH 4, WCA 5, WCA 6
Brown long-eared bat <i>Plecotus auritus</i>	18	2012	1030 m south	✓	ECH 4, WCA 5, WCA 6
Key: * The nearest record fell within a 6-figure (i.e. 100 m x 100 m) OS grid square overlapping the site. ECH 4: Annex IV of the European Communities Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora. Animal and plant species of community interest in need of strict protection. WCA 5: Schedule 5 of Wildlife and Countryside Act 1981 (as amended). Protected animals (other than birds). WCA 6: Schedule 6 of Wildlife and Countryside Act 1981 (as amended). Animals which may not be killed or taken by certain methods. Species of Principal Importance: Species of Principal Importance for Nature Conservation in England.					

Table 3.1: Bat Species Records Within 1 km of Survey Area

4. Survey Results

4.1 Manual Bat Activity Survey: Night-time Bat Walkover

Tables 4.1 and 4.2 details the bat species and number of passes observed during the manual transect surveys.

Location and Activity	Time	Bat Species Detected		
		Common Pipistrelle	Noctule	Leisler's bat
Southern corner of site - foraging	22:04 – 22:24	2	-	-
Total		2	0	0

Table 4.1: First Night-time Bat Walkover Survey Results

During the first manual bat activity survey, a total of one species of bat were observed: common pipistrelle. Two bats were observed foraging within the southern corner of the site.

Location and Activity	Time	Bat Species Detected		
		Common Pipistrelle	Noctule	Leisler's bat
Northwestern corner of site, foraging north along treeline	21:47-21:56	1	-	-
Northwestern corner of site, foraging along treeline	21:54	1	-	-
Foraging in northern corner of site	21:59-22:28	2	-	-
Northern corner of site, foraging to the southwest along treeline	22:02	-	1	-
Eastern corner of site – heard not seen	22:33 – 22:35	1	-	-
In the south of the site – heard not seen	22:39	1	-	-
Western site boundary – heard not seen	22:48-23:01	1	-	-
Western site boundary – heard not seen	22:53	-	1	-
Northwestern corner – foraging along treeline	23:03 – 23:10	1	-	-
Northwestern corner – heard not seen	23:10	-	-	1
Western site boundary – heard not seen	23:25 – 23:30	1	-	-
Total		9	2	1

Table 4.2: Second Night-time Bat Walkover Survey Results

During the second manual bat activity survey, a total of three species of bat were observed: common pipistrelle, noctule and Leisler's bat. Low levels of commuting and foraging behaviour was observed around the vegetation associated with site boundaries.

4.2 Automated Bat Activity Survey

A total of three species of bat were recorded during the automated bat surveys. These species were common pipistrelle, noctule and Leisler's bat.

The two static bat detectors recorded total of 948 bat calls on or adjacent to the site, a breakdown of these by species, date and static recorder location is detailed in Tables 4.3 to 4.4 below.

		Noctule	Leisler's Bat	Common Pipistrelle	Nyctalus Species
May (27/05/25 – 01/06/25)	Night 1	-	-	10	-
	Night 2	12	2	7	-
	Night 3	1	2	6	-
	Night 4	5	-	11	1
	Night 5	1	-	2	-
	Total	19	4	36	1
June (20/06/25 – 25/06/25)	Night 1	2	4	26	1
	Night 2	4	9	23	4
	Night 3	-	2	17	2
	Night 4	3	2	19	14
	Night 5	6	3	66	15
	Total	15	20	151	36

Table 4.3: Summary of Automated Bat Activity Survey – Static S1

		Noctule	Leisler's Bat	Common Pipistrelle	Nyctalus Species
May (27/05/25 – 01/06/25)	Night 1	-	-	18	-
	Night 2	8	-	27	-
	Night 3	2	-	8	2
	Night 4	3	3	28	1
	Night 5	-	-	6	-
	Total	13	3	87	3
June (20/06/25 – 25/06/25)	Night 1	-	-	43	7
	Night 2	2	1	73	7
	Night 3	10	-	76	-
	Night 4	48	-	139	5
	Night 5	23	14	100	11
	Total	83	15	431	30

Table 4.4: Summary of Automated Bat Activity Survey – Static S2

The vast majority of passes recorded on site during automated surveys were from common pipistrelle (74.4% of all passes), followed noctule (13.7%), *Nyctalus* sp. (7.3%), Leisler's bat (4.4%).

5. Impact Assessment

Table 5.1 below summarises the species recorded during the activity surveys and their activity status on site.

Species	Conservation Status	Activity Status on Site
Common pipistrelle	Common pipistrelle is one of the most common species of bat in England and Wales (Bat Conservation Trust, 2010 ⁵).	Common pipistrelle was the most frequently recorded bat species using the site during both the manual and automated activity surveys, with 74.4% of all passes recorded during the automated surveys. The survey evidence collected to date indicates that the site contains habitats that are suitable for common pipistrelles, with the boundary vegetation used frequently for foraging and commuting.
Noctule	Noctule is a Species of Principal Importance in England. It is still a relatively widespread species in much of England, Wales and to south-west Scotland, but has become scarce in some areas of intensive agriculture (Bat Conservation Trust, 2010 ⁵).	Noctule was recorded twice during the manual surveys. At least 130 detections of this species were recorded during the automated surveys. Due to the limited activity recorded on site, it is not considered that the survey area is likely to provide a key habitat resource for this species.
Leisler's bat	Leisler's bat is found throughout the British Isles, with the exception of northern Scotland (Bat Conservation Trust, 2010 ⁵).	Leisler's bat was recorded once during manual surveys. At least 42 detections of this species were recorded during the automated activity surveys. Due to the limited activity recorded on site, it is not considered that the survey area is likely to provide a key habitat resource for this species.

Table 5.1: Summary Activity Status of Bats on Site during the Bat Activity Surveys

5.1 Potential Impacts on Bats

There are no known roosts present on site; however, suitable roosting locations are present in the wider landscape. The survey data collected indicates that the site contains habitats that are suitable for a range of common bat species, with the habitats on site used for foraging and commuting. In addition, further suitable habitat resources are present in the area, and some have connectivity to the development site, with higher quality habitats abutting the site and present in the wider landscape.

In the absence of a sensitively designed operational lighting strategy, the new development has the potential to adversely impact local populations of bats by severing commuting routes and fragmenting potential foraging areas. Conversely, the proposed development presents the opportunity to enhance the value of the site for bats and other wildlife, and it is recommended to incorporate plant species which attract night flying insects to enhance the foraging resource for bats on site.

Full recommendations are made below.

6. Recommendations

All recommendations provided in this section are based on Middlemarch Environmental Ltd's current understanding of the site, correct at the time the report was compiled. In order to maintain and enhance the ecological value of the Northfleet School For Girls site for bat populations, the following recommendations have been made:

R1 Lighting: In accordance with best practice guidance relating to lighting and biodiversity (Bat Conservation Trust and Institute of Lighting Professionals, 2023⁷; Gunnell et al, 2012⁸), any new lighting should be carefully designed to minimise potential disturbance and fragmentation impacts on sensitive receptors, such as bat species. Examples of good practice include:

- Avoiding the installation of new lighting in proximity to key ecological features, such as dense scrub and woodland edges.
- Using modern LED fittings rather than metal halide or sodium fittings, as modern LEDs emit negligible UV radiation.
- The use of directional lighting to reduce light spill, e.g. by installing bespoke fittings or using hoods or shields. For example, downlighting can be used to illuminate features such as footpaths whilst reducing the horizontal and vertical spill of light.
- Where the use of bollard lighting is proposed, columns should be designed to reduce horizontal light spill.
- Implementing controls to ensure lighting is only active when needed, e.g. the use of timers or motion sensors.
- Use of floor surface materials with low reflective quality. This will ensure that bats using the site and surrounding area are not affected by reflected illumination.
- For internal lights, recessed light fittings cause significantly less glare than pendant type fittings. The use of low-glare glass may also be appropriate where internal lighting has the potential to influence sensitive ecological receptors.

R2 Scheme Design: The proposed development should be designed to minimise effects on bats in accordance with the ecological mitigation hierarchy as set out in the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG). The mitigation hierarchy requires all development schemes to apply the following principles:

- *Avoidance and Mitigation* – the proposed development should seek to avoid/minimise losses of features with bat potential, in the first instance and incorporate these features in the landscaping layout of the scheme accordingly. Similarly, protection measures for retained features and surrounding habitats should be considered to prevent incidental damage or disturbance during the construction phases. These measures will help to reduce the likelihood of impacting bats and minimise losses of suitable bat roosts and habitat. Where significant harm cannot be wholly or partially avoided, adverse impacts should be

⁷ Bat Conservation Trust and Institute of Lighting Professionals (2023) *Guidance Note 08/23: Bats and artificial lighting at night*. ILP, Rugby

⁸ Gunnell, K., Grant, G. and Williams, C. (2012) *Landscape and urban design for bats and biodiversity*. Bat Conservation Trust.

minimised by design or through the use of effective mitigation measures such as minimising light spill (see below).

- *Compensation* – where unavoidable losses occur and mitigation cannot be provided, compensation for significant residual harm will be required as a last resort or planning permission could be refused. Where there is a significant effect on a bat roost, a compensation strategy sufficient to obtain a development licence from Natural England may also be required.

Habitat enhancements including the planting of species which attract night flying insects is encouraged as this will be of value to foraging bats, for example: evening primrose *Oenothera biennis*, goldenrod *Solidago virgaurea*, honeysuckle *Lonicera periclymenum* and fleabane *Pulicaria dysenterica*.

Appendix 1

Relevant Legislation

Bats and the places they use for shelter or protection (i.e. roosts) receive legal protection under the Conservation of Habitats and Species Regulations 2017 (Habitats Regulations 2017) and the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) Regulations 2019 (Habitats Regulations 2019). They receive further legal protection under the Wildlife and Countryside Act (WCA) 1981, as amended. This protection means that bats, and the places they use for shelter or protection, are capable of being a material consideration in the planning process.

Regulation 41 of the Habitats Regulations 2017, states that a person commits an offence if they:

- deliberately capture, injure or kill a bat;
- deliberately disturb bats; or
- damage or destroy a bat roost (breeding site or resting place).

Disturbance of animals includes in particular any disturbance which is likely to impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or in the case of animals of a hibernating or migratory species, to hibernate or migrate; or to affect significantly the local distribution or abundance of the species to which they belong.

It is an offence under the Habitats Regulations 2017 for any person to have in his possession or control, to transport, to sell or exchange or to offer for sale, any live or dead bats, part of a bat or anything derived from bats, which has been unlawfully taken from the wild.

Changes have been made to parts of the Habitats Regulations 2017 so that they operate effectively from 1st January 2021. The changes are made by the Habitats Regulations 2019, which transfer functions from the European Commission to the appropriate authorities in England and Wales.

All other processes or terms in the 2017 Regulations remain unchanged and existing guidance is still relevant.

The obligations of a competent authority in the 2017 Regulations for the protection of species do not change. A competent authority is a public body, statutory undertaker, minister or department of government, or anyone holding public office.

Whilst broadly similar to the above legislation, the WCA 1981 (as amended) differs in the following ways:

- Section 9(1) of the WCA makes it an offence to *intentionally* kill, injure or take any protected species.
- Section 9(4)(a) of the WCA makes it an offence to *intentionally or recklessly** damage or destroy, *or obstruct access to*, any structure or place which a protected species uses for shelter or protection.
- Section 9(4)(b) of the WCA makes it an offence to *intentionally or recklessly** disturb any protected species *while it is occupying a structure or place which it uses for shelter or protection*.

*Reckless offences were added by the Countryside and Rights of Way (CROW) Act 2000.

As bats re-use the same roosts (breeding site or resting place) after periods of vacancy, legal opinion is that roosts are protected whether or not bats are present.

The reader should refer to the original legislation for the definitive interpretation.

The following bat species are Species of Principal Importance for Nature Conservation in England: barbastelle bat *Barbastella barbastellus*, Bechstein's bat *Myotis bechsteinii*, noctule *Nyctalus noctula*, soprano pipistrelle *Pipistrellus pygmaeus*, brown long-eared bat *Plecotus auritus*, greater horseshoe bat *Rhinolophus ferrumequinum* and lesser horseshoe bat *Rhinolophus hipposideros*. Species of Principal Importance for Nature Conservation in England are material considerations in the planning process. The list of species is derived from Section 41 list of the Natural Environmental and Rural Communities (NERC) Act 2006.