Bat Surveys

Former Fire Station, Huntingdon

A Report To: McCarthy & Stone
Report Number: RT-MME-181092-01
Date: September 2025



Middlemarch Environmental Ltd, Triumph House, Birmingham Road, Allesley, Coventry, CV5 9AZ

www.middlemarch.eco

Tel: 01676 525880

Quality Assurance

Date	Version	Author	Checked and Approved by
29/09/2025	Final	Sophie Elliott ACIEEM (Senior Ecological Consultant) Caitlin Nightingale (Ecological Consultant)	Sarah Howe MCIEEM (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

The contents of this report are the responsibility of Middlemarch Environmental Ltd. It should be noted that, whilst every effort is made to meet the client's brief, no site investigation can ensure complete assessment or prediction of the natural environment. Middlemarch Environmental Ltd accepts no responsibility or liability for any use that is made of this document other than by the client for the purposes for which it was originally commissioned and prepared.

Validity of Data

The findings of this study are valid for a period of 12 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 was commissioned by McCarthy and Stone to undertake a suite of Dusk Bat Emergence Surveys, Hibernation surveys and updated Ground Level Tree Assessment at the site of the former Huntingdon Fire Station, Cambridgeshire. The requirement for these surveys was realised following a Preliminary Roost Assessment carried out in September 2024.

Scope of Survey

To fulfil the above scope, a suite of three dusk emergence surveys with the assistance of night vision aids (NVAs) were carried out between 2nd September 2024 and 26th August 2025. The surveys were led by Caitlin Nightingale (Ecological Consultant).

Hibernation surveys were carried out and included a deployed static detectors for 2 weeks between 18th February and 4th March 2025 and two internal inspections during the static deployment and on the 10th March, in building B2.

An updated Ground Level Tree Assessment, which was required following the initial survey in April 2024, was carried out on 18th February 2025.

Summary of Key Bat Features

Roosting Bats

The updated GLTA survey found all trees onsite to be of negligible suitability with no PRFs' suitable for bats identified.

During the first dusk emergence survey in September 2024, one soprano pipistrelle bat emerged from behind the wooden window boarding on the southern elevation of building B1. During this survey, a single common pipistrelle bat entered and re-emerged an unseen feature on the eastern elevation of building B2. These locations have been identified as a day roost and night roost respectively.

During the second dusk emergence survey in August 2025, a single soprano pipistrelle was recorded prospecting in a similar location as the common pipistrelle bat was seen entering and re-emerging on B2 during the first survey, however, this bat did not enter the building.

No further bats were recorded emerging or re-entering the onsite buildings during the surveys or the night vision aid analysis.

Commuting/Foraging Bats

Four bat species were recorded during the dusk surveys: noctule, common pipistrelle, brown long-eared bat and soprano pipistrelle. Soprano pipistrelle were detected shortly after sunset within the gardens of the empty residential properties to the east of the application site boundary. It is possible that these properties support roosts. Soprano pipistrelle and common pipistrelle bats were observed frequently passing along Barracks Brook which lies opposite the northern boundary of the site and through the courtyard onsite, which are likely to be key foraging sites for bats commuting through the site.

Hibernating bats

During the hibernation survey conducted on B2, no evidence was noted of roosting bats. During the static deployment, a single call from a soprano pipistrelle was recorded on the 22nd February 2025 approximately 1 hour before sunrise. This call was very faint and typical of an uncluttered environment; it was concluded that this call originated from outside of the building. No other bat calls were recorded during the static deployment. It has been concluded that bats are not using this building for hibernating.

Potential Impacts on Bats

The site proposals will involve the demolition of all buildings on site. One tree (T9) within the southern hedgerow will be removed to facilitate a new access road. All other trees on site, associated with the northern boundary along Barracks Brook, will be retained within the site's landscaping.

Bats have been found roosting in buildings B1 and B2 and these locations have been identified as a day roost and night roost respectively. The proposed demolition of all the onsite buildings for the development will therefore result in the loss of 2 no. of bat roosts. Bats and the places they use for shelter or protection (i.e. roosts) receive legal protection, as such, no works can be undertaken on these building until a licence has been acquired.

Recommendations

- **Bat Licence:** As a bat roost/resting place has been identified in the former office building (B1) and the old smoke house (B2), no unlicensed work can be undertaken which will contravene the legislation outlined in Appendix 1. Prior to any works being undertaken which are likely to result in a breach of the legislation, a development licence must be obtained from Natural England. Further detail can be found in Chapter 6.
- **Scheme Design:** The proposed development should be designed to minimise effects on bats in accordance with the ecological mitigation hierarchy s set out in the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG).
- **Lighting:** 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 are provided in Chapter 6.

Contents

1. Introduction 6
   1.1 Project Background 6
   1.2 Site Description and Context 7
   1.3 Documentation Provided 7
2. Methods 8
   2.1 Desk study 8
   2.2 Field Survey 8
   2.5 Constraints 11
3. Desk Study 12
   3.1 Statutory Nature Conservation Sites 12
   3.2 Species Records 12
4. Survey Results 13
   4.1 Updated Ground Level Tree Assessment 13
   4.2 Hibernation Survey 13
   4.3 First Dusk Emergence Survey 13
   4.4 Second Dusk Emergence Survey 14
   4.5 Third Dusk Emergence Survey 15
5. Impact Assessment 18
   5.1 Summary of Proposals 18
   5.2 Summary of Key Bat Features 18
   5.3 Potential Impacts on Bats 19
6. Recommendations 20
7. Drawings 23
8. Figures 24
   8.1 First Dusk Emergence Survey 24
   8.2 Second Dusk Emergence Survey 26
   8.3 Third Dusk Emergence Survey 28

Appendix 1 30
   Relevant Legislation 30

1. Introduction

1.1 Project Background

Middlemarch was commissioned by McCarthy Stone to undertake dusk emergence bat surveys, an updated Ground Level Tree Assessment (GLTA) and hibernation surveys at the former Huntingdon Fire Station, Cambridgeshire. These surveys are required to inform a planning application associated with the redevelopment of the site into Retirement Living apartments with associated access road, car parking and soft and hard landscaping.

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

- Preliminary Ecological Survey (PEA; Report RT-MME-162708-01);
- Biodiversity Statement and Metric Assessment (BS-MA; Report RT-MME-162708-02); and,
- Preliminary Bat Roost Assessment (PRA; Report RT-MME-180964-01).

The PRA survey identified potential bat roosting features associated with buildings B1, B1a, B2, and B3 including lifted lead flashing, holes in external brickwork, lifted bitumen felt on flat roofs, broken windows allowing internal access to unoccupied buildings, dislodged roof tiles, and gaps above doors, under fascia boards, along the roof ridge and under the roof. Building B3a was assessed as having negligible potential for roosting bats. No evidence of bats was recorded during the PRA. The locations of the buildings within the site are shown on Drawing C180964-01. Report RT-MME-180964-01 describes in more detail, the buildings and their roosting features.

Therefore, dusk emergence bat surveys and hibernation bat surveys were recommended. This report details the results of the surveys undertaken between 2nd September 2024 and 26th August 2025.

In line with Good Practice Guidelines published by the Bat Conservation Trust (Collins, 2023)[1], one dusk emergence survey is required for the low potential buildings B1, B1a and B3, and three dusk emergence surveys were required for high potential building B2. All buildings were subject to three surveys.

As building B3a was assessed as having negligible potential for roosting bats, no further surveys are required for this building. The trees on site were subject to a ground level tree assessment (GLTA) in April 2024 and no potential roosting features were identified. No further surveys were therefore recommended for the trees, however an updated GLTA was carried out in February 2025, to confirm the roosting potential of the trees.

All UK bat species are legally protected species and they are capable of being material considerations in the planning process. A summary of the legislation protecting bats is included within Appendix 1.

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

1.2 Site Description and Context

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

Attribute	Description
Location	Town of Huntingdon, Cambridgeshire
National Grid Reference	TL 24253 71865
Site Area (ha)	0.47
Topography	Flat
Land Cover (on site)	The site is dominated by the built environment, with a hardstanding concrete yard and tarmac parking area. Buildings take up most of the area. The remaining land consists of ornamental introduced and native shrub planting, lines of trees and a small parcel of amenity grassland.
Land Cover (site surrounds)	Barracks Brook forms the northern site boundary, falling just outside the development area. The surrounding area is urban, with supermarkets and residential housing within the immediate vicinity. The B1514 runs parallel to the northern boundary, Hartford Road forms the western boundary and Montagu Road forms the southern boundary. The River Great Ouse flows northeast c. 200 m parallel to the eastern boundary. Habitats of interest within a 1 km radius comprise, running water, tree and hedge-lined agricultural fields, cemeteries, allotments and vegetated railway embankments.

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
MI-2986-03-LA-001	DAC Landscape Architecture Ltd

Table 1.2: Documentation Provided by Client

2. Methods

2.1 Desk study

As part of the Preliminary Ecological Appraisal (Report RT-MME-162708-01) an ecological desk study was undertaken. The consultees for the desk study were:

- Natural England - MAGIC website for statutory conservation sites;
- Cambridgeshire & Peterborough Environmental Records Centre; and,
- Cambridgeshire Bat Group.

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 are not provided within this report.

The desk study included a search for statutory nature conservation sites designated for bats within a 10 km radius of the site.

2.2 Field Survey

Updated Ground Level Tree Assessment

A Ground Level Tree Assessment for bats was carried out on site in line with the specifications detailed in Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2023)[2]. The assessment was conducted on 18th February 2025 by Sophie Elliott ACIEEM (Senior Ecological Consultant). Weather conditions were recorded and are presented in Table 2.1.

Parameter	Condition
Temperature (ºC)	0
Cloud (%)	0
Wind (Beaufort)	F1
Precipitation	Nil

Table 2.1: Weather Conditions During Field Survey

A visual assessment was conducted during daylight hours of the trees to determine the presence of any Potential Roost Features (PRFs), together with a general appraisal of the suitability of the site for foraging and commuting bats. Please refer to Appendix 2 for a list of example PRFs. Any accessible PRFs were inspected from ground level using binoculars and a torch.

Based on the tree PRF's present, the survey area was assessed using the suitability classes detailed within Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2023). Trees with features present which appear from the ground as suitable to support roosting bats (PRF-M, PRF-I and FAR) are discussed more fully in the report.

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

Assessment of the trees' potential to support roosting bats. Following the guidance the trees will be categorised (Collins 2023) into.

- PRF – M: "*The PRF is suitable for multiple bats and may therefore be used by a maternity colony*".
- PRF – I: "*Potential Roosting Feature is only suitable for individual bats or very small number of bats ether due to size or lack of suitable surrounding habitats*".
- Further Assessment Required (FAR): The GLTA has identified a PRF which cannot be assessed from the ground, or a tree likely to have PRFs' not visible from the ground and requires further assessment to determine its suitability for bats.
- Negligible; no PRFs' suitable for bats identified and no further survey work required.

A summary of the trees within the survey area without suitable features to support roosting bats (negligible suitability) is provided within the report. Due to their negligible potential to support roosting bats, the Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2023) recommend no further survey work is required for this tree class.

Hibernation Survey

The daytime inspections involved 'a close and systematic inspection of all cracks, crevices and voids for hibernating bats' in accordance with the best practice guidance described by the Bat Conservation Trust (Collin 2023). Equipment employed included endoscopes, torches, bat detectors and mirrors.

The site was subject to two winter hibernation surveys, completed in accordance with the best practice guidance described by the Bat Conservation Trust (Collin, 2023). This guidance states that 'a minimum of two visits is recommended, one in mid-January and one in mid-February. Automated/static surveys for winter activity within structures with a moderate to high likelihood of bats being present should be undertaken for a minimum of two weeks in each month from December to February.' Due to late instruction only one static deployment was undertaken for two weeks from 18th February 2025 to 4th March 2025, although two internal inspections were undertaken.

These surveys were carried out in line with Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2023).

The surveys were undertaken by the following personnel:

- Sarah Howe (Principal Ecological Consultant; bat licences CL18, CL19 and CL20);
- Sophie Elliott (Senior Ecological Consultant);

Dusk Emergence Bat Surveys

The old smoke house (B2) was classed as having high potential to support roosting bats. Buildings B1, B1a and B3 were classed as having low potential to support roosting bats and B3a was classed as having negligible potential to support roosting bats.

As such, three dusk emergence bat surveys were carried out on B1, B1a, B2 and B3. The aim of these surveys was to detect whether bats are roosting within the building and to enable a profile of site utilisation by bats to be compiled.

These surveys were carried out in line with Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2023)[3] and commenced 20 minutes prior to sunset and continued until 90-120 minutes after sunset.

The surveys were undertaken by the following personnel:

- Marie Steggall (Principal Ecological Consultant; bat licences CL18, CL19 and CL20);
- Sarah Howe (Principal Ecological Consultant; bat licences CL18, CL19 and CL20);
- Sophie Elliott (Senior Ecological Consultant);
- Amy Finnegan (Senior Ecological Consultant);
- Rowell Bingham (Senior Ecological Consultant);
- Caitlin Nightingale (Ecological Consultant);
- Gemma Retallick (Ecological Consultant);
- Joseph Graham (Ecological Consultant);
- Holly Harris (Ecological Project Officer);
- Viktoriya Armstrong (Field Ecologist);
- Ken Howman (Field Ecologist); and
- James Kennedy (Field Ecologist)

The weather conditions were recorded on each survey and are presented in Table 2.1.

Type of Survey	Date	Time	Parameter			
			Temperature °C	Cloud %	Precipitation	Wind (Beaufort Scale)
Dusk	02-09-24	Start	21	60	Nil	F1
		End	19	0	Nil	F1
Dusk	04-08-25	Start	20	0	Nil	F1
		End	17	0	Nil	F3
Dusk	26-08-25	Start	21	30	Nil	F1
		End	19	40	Nil	F2

Table 2.1: Weather Conditions During Field Surveys

Equipment and Analysis

The dusk emergence surveys were conducted using electronic bat detectors (Echometer Touch 2) and night vision aids (Cannon XA60 with associated infrared illuminators and Echometer Touch 2 bat detectors) to facilitate the detection of bats and to aid in the determination of species of bat using the site.

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,

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

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 (Mathews, *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.

2.5 Constraints

No constraints were noted during the updated GLTA or the dusk emergence bat surveys.

Due to late instruction for the hibernation bat surveys, only one static deployment was undertaken, although two internal inspections were conducted. Although the hibernation surveys were carried out late, the temperatures remained low and bats should still have been in hibernation at this time.

[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 Statutory Nature Conservation Sites

The site is not located within 10 km of any statutory nature conservation sites designated for the presence of bats.

3.2 Species Records

The data search was carried out in April 2024 by Cambridgeshire & Peterborough Environmental Records Centre. Records of bat species within a 1 km radius of the survey area provided by the consultees 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	Most Recent Record	Proximity of Nearest Record to Survey Area	Species of Principal Importance?	Legislation / Conservation Status
Pipistrelle *Pipistrellus* sp.	6	2016	209 m northeast	#	ECH 4, WCA 5, WCA 6
Soprano pipistrelle *Pipistrellus pygmaeus*	9	2022	222 m south	✓	ECH 4, WCA 5, WCA 6
Noctule *Nyctalus noctula*	2	2020	223 m southwest	✓	ECH 4, WCA 5, WCA 6
Common pipistrelle *Pipistrellus pipistrellus*	5	2022	248 m northeast	-	ECH 4, WCA 5, WCA 6
Brown long-eared bat *Plecotus auritus*	3	2014	518 m northeast	✓	ECH 4, WCA 5, WCA 6
Daubenton's bat *Myotis daubentonii*	1	2015	612 m southwest	-	ECH 4, WCA 5, WCA 6
Unidentified myotis *Myotis* sp.	1	2013	686 m northeast	#	ECH 2 #, ECH 4, WCA 5, WCA 6

Key:

#: Dependent on species.

ECH 2: Annex II of the European Communities Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora. Animal and plant species of community interest whose conservation requires the designation of Special Areas of Conservation.

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.

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

4. Survey Results

The bat activity recorded on site during each dusk emergence survey is detailed in Sections 4.3 to 4.5 below and illustrated on Drawings C181092-01 to C181092-03 in Chapter 7.

The locations of the bat roosts identified within the buildings are summarised in Table 4.1.

4.1 Updated Ground Level Tree Assessment

An updated ground level tree assessment was carried out on the trees on site on 18th February 2025, when the trees were devoid of leaves and therefore roosting features present could be more easily identified from the ground. The onsite trees include eight trees (T1 – T8) along the northern site boundary comprising young and semi-mature ash (*Fraxinus excelsior*) and a single mature sycamore (*Acer psuedoplatanus*) and a single semi-mature sycamore (T9) located within the hedgerow along the southern boundary. No features suitable for roosting bats were identified in these trees; for full details of the onsite trees, please see the PRA report (RT-MME-180964-01).

4.2 Hibernation Survey

A hibernation survey was undertaken on building B2 which had been assessed as having high bat roosting potential during the PRA. The internal inspections, undertaken on 18th February 2025 and 10th March 2025 did not identify any bats or evidence of bats. A static detector was deployed for two weeks between 18th February and 4th March 2025 within B2 to record bat calls.

A single call from a soprano pipistrelle was recorded on the 22nd February 2025 approximately 1 hour before sunrise. This call was very faint and typical of one in an uncluttered environment. A call from inside the building would have been louder and the individual pulses within the call would have been closer together, it has therefore been concluded that this call originated outside of the building. No other bat calls were recorded during the static deployment and it has been concluded that bats are not using this building for hibernating.

Temperatures during the time of the static deployment remained low with an average temperature of 7.7C. between the 20th -25th February, maximum temperatures rose to between 10 and 11C with the 21st reaching 15C in the afternoon. From the 26th onwards, the maximum temperature fell to 8C with cooler overnight temperatures.

4.3 First Dusk Emergence Survey

This dusk emergence survey covered buildings B1, B1a, B2 and B3. It commenced 15 minutes prior to sunset and continued until 120 minutes after sunset. Sunset was sat 19:45 hrs (BBC Weather Centre Data for Huntingdon). Three species of bat were recorded during the survey: noctule, common pipistrelle and soprano pipistrelle. Survey results are plotted on Drawing C181092-01 in Chapter 7.

Soprano pipistrelle

The first bat species recorded during this survey was soprano pipistrelle, first detected, although not observed, commuting along the eastern site boundary at 19:59 (14 minutes after sunset). Considering the time of this pass and the location, it is likely that this bat could have emerged from the empty residential properties to the east of the application site boundary.

Video analysis revealed that at 20:02 (17 minutes after sunset), a soprano pipistrelle bat emerged from behind the wooden boarding at the front of building B1, from the southern elevation on the western side of the building. This bat crawls from behind the loose board and flies south towards Montagu Road.

Soprano pipistrelle bats were detected throughout the survey, with an individual seen flying away from the residential properties to the east at 20:05 (20 minutes after sunset) and passes detected along the northern boundary, adjacent to Barracks Brook and foraging activity detected intermittently between 20:12 and 20:45 within the courtyard and along the western elevation of building B1.

Noctule

The first noctule was detected at 20:04 (19 minutes after sunset) at the eastern site boundary. Video analysis identified a noctule flying over building B3 towards the west at 20:09 (24 minutes after sunset). It did not appear to emerge from the building. Further passes were detected along the northern site boundary along the Barracks Brook and near the western site boundary. These passes were picked up by detectors only and not seen, as noctules typically fly high above the ground (usually feeding at 40 m above the ground and scouting flights to 100 m and a maximum of 300 m[7]).

Common pipistrelle

The first common pipistrelle was detected at 20:02 (17 minutes after sunset) along the eastern site boundary. The bat was foraging around the gardens of the empty residential properties to the east of the site and it is possible that roosts are present in these uninhabited buildings. Foraging and commuting activity was detected by surveyor detectors and infrared cameras throughout the survey. Common pipistrelle were detected commuting north-south across the site. Foraging activity was detected around the yard, the old smoke house (B2), and near the brook.

A re-entry and emergence from the east side of the old smoke house (B2) was detected by an infrared camera at 20:32 (47 minutes after sunset) and 20:36 (51 minutes after sunset).

No other species of bat were detected or observed during this survey. Analysis of the sound recordings did not identify any further species of bat.

4.4 Second Dusk Emergence Survey

This dusk emergence survey covered Buildings B1, B1a, B2 and B3. It commenced 15 minutes prior to sunset and continued until 120 minutes after sunset. Sunset was at 20:46hrs (BBC Weather Centre Data for Huntingdon). Four species of bat were recorded during the survey: soprano pipistrelle, common pipistrelle, noctule and brown long-eared bat. Survey results are plotted on Drawing C181092-02 in Chapter 7.

Noctule

The first bat species recorded during this survey was noctule, first detected, although not observed, at 20:53 (7 minutes after sunset) and again at 20:57 (11 minutes after sunset). Video and sound analysis did not record any further noctule passes and no emergences by this species.

[7] Russ, J. (2021). *Bat Calls of Britain and Europe: A Guide to Species Identification*. Pelagic Publishing. Exeter.

Soprano pipistrelle

The first soprano pipistrelle detected was observed continuously foraging alongside the northern elevation of B1a adjacent to Barracks Brook at 21:02 (16 minutes after sunset). Considering the time and following on from previous observations during the first bat dusk survey, this bat may have emerged from the empty residential properties to the east of the site boundary. Between 21:10 and 21:13 foraging continued before the bat flew in a southerly direction through the courtyard. A soprano pipistrelle bat was further observed circling the eastern elevation of the old smoke house (B2) with the surveyor and video analysis revealing a bat prospecting under the guttering around 20:30, although no emergences/re-entries were noted. Commuting activity was also detected intermittently between 21:28 and 21:40 within the courtyard and along the brook.

No soprano pipistrelle bats were recorded emerging or re-entering the surveyed buildings during the survey or during the review of the NVA footage.

Common pipistrelle

The first common pipistrelle was detected at 21:26 (40 minutes after sunset) however was heard and not seen. Foraging and commuting activity was detected by surveyor detectors and infrared camera detectors intermittently throughout the survey with the last common pipistrelle pass detected at 21:50. No notable activity was observed.

No common pipistrelle bats were recorded emerging or re-entering the surveyed buildings during the survey or during the review of the NVA footage.

Brown long-eared bat

Sound analysis from the survey revealed that between 21.09 - 22:16, intermittent calls from brown long-eared bats were detected within the courtyard and to the east of building B2 (old smoke house). Video analysis recorded passes by two bats from the north/east the B2 flying back and forth across the courtyard at the same time to the sound recordings. No emergences of this species were noted during video analysis.

No other species of bat were detected or observed during this survey. Analysis of the sound recordings did not identify any further species of bat.

4.5 Third Dusk Emergence Survey

This dusk emergence survey covered Buildings B1, B1a, B2 and B3. It commenced 15 minutes prior to sunset and continued until 120 minutes after sunset. Sunset was at 20:01hrs (BBC Weather Centre Data for Huntingdon). Four species of bat were recorded during the survey: soprano pipistrelle, common pipistrelle, brown long-eared bat and noctule (by sound analysis only). Survey results are plotted on Drawing C181092-03 in Chapter 7.

Soprano pipistrelle

The first soprano pipistrelle detected was observed by surveyors approaching from an easterly direction, continuously foraging along Barracks Brook to the north of the site at 20:14 (13 minutes after sunset) and passing occasionally between B1a and B2 until 20:33. Given the time and direction, it is possible the bat emerged offsite from the empty residential properties located to the east. Sound analysis from cameras confirmed between this time, a total of 57 passes were made by soprano pipistrelle with feeding buzzes and social calls present. Soprano pipistrelle bats were also observed commuting through the courtyard and passing between the smoke house (B2) and

B3, travelling towards an easterly direction. No emergences were noted on the surveyed buildings during the survey or during the review of the NVA footage.

Common pipistrelle

The first common pipistrelle was detected at 20:28 (40 minutes after sunset) however this was heard and not seen, review of the NVA showed that this bat did not emerge. Foraging and commuting activity was detected by surveyor detectors and infrared camera detectors occasionally throughout the survey with passes noted along B1 towards the brook. No emergences or re-entries were recorded during the survey or the review of the NVA footage.

Brown long-eared bat

Brown long-eared bat passes were recorded by camera detectors initially at 20:58, (57 minutes after sunset) with video analysis detecting a bat at this time flying back and forth across the courtyard between B1 and B3. Sound analysis also detected occasional calls and a social call from a brown-long eared bat at 21:24 where it was captured by video analysis flying near B1a and towards the camera. No further activity was detected nor emergences or re-entries noted during the survey or NVA review.

Noctule

Sound analysis from the survey revealed that a noctule was detected between 21.06 - 21:07 however, this was not observed from surveyor locations potentially due to the typical nature of noctule flight. No other notable activity was observed by noctule bats.

No other species of bat were detected or observed during this survey. Analysis of the sound recordings did not identify any further species of bat.

Building Number	First Dusk Survey		Second DuskSurvey		Third Dusk Survey	
	Date	Bats Emerging or Returning	Date	Bats Emerging or Returning	Date	Bats Emerging or Returning
B1	02/09/2024	1 no. soprano pipistrelle bat emerged from gap between the OSB wooden boarding at the front of the building covering the windows on the southern aspect and flew east.	04/08/2025	-	26/08/2025	-
B1a	02/09/2024	-	04/08/2025	-	26/08/2025	-
B2	02/09/2024	1 no. common pipistrelle bat re-entered and emerged four minutes later from an unseen feature on the eastern aspect.	04/08/2025	1 no. soprano pipistrelle was seen prospecting in a similar location as the previous surveys re-entry/emergence but the bat did not re-enter.	26/08/2025	-
B3	02/09/2024	-	04/08/2025	-	26/08/2025	-
B3a	02/09/2024	-	04/08/2025	-	26/08/2025	-

Table 4.1: Summary of Results of Dusk Emergence Bat Surveys

5. Impact Assessment

5.1 Summary of Proposals

It is understood that the proposals relate to the development of the site into Retirement Living apartments with associated access road, car parking and soft and hard landscaping. The buildings on site will be demolished to facilitate the new development. No proposed site layout plans have been provided at this stage.

The proposed development has the potential to adversely impact ecological features, such as the adjacent Barracks Brook and tree line, and the hedgerow on site, but also presents opportunities to deliver new or enhanced habitats and benefits to biodiversity, as demonstrated by the Biodiversity Statement and Metric Assessment report RT-MME-162708-02.

5.2 Summary of Key Bat Features

Roosting Bats

The updated GLTA survey found all trees onsite to be of negligible suitability with no PRFs' suitable for bats identified.

During the hibernation survey conducted on B2, no evidence was noted of roosting bats. During the static deployment, a single call from a soprano pipistrelle was recorded on the 22nd February 2025 approximately 1 hour before sunrise. This call was very faint and typical of an uncluttered environment; it was concluded that this call originated from outside of the building. No other bat calls were recorded during the static deployment. It has been concluded that bats are not using this building for hibernating.

During the first dusk emergence survey, one soprano pipistrelle bat emerged from behind the wooden window boarding on the southern elevation of building B1. During this survey, a single common pipistrelle bat entered and re-emerged an unseen feature on the eastern elevation of building B2.

During the second dusk emergence survey, a single soprano pipistrelle was recorded prospecting at the same location as the unknown bat was seen entering and re-emerging on B2 during the first survey, however, this bat did not enter the building.

No bats were recorded emerging or re-entering the onsite building during the third dusk emergence survey.

Commuting/Foraging Bats

Four bat species were recorded during the dusk surveys: noctule, common pipistrelle, brown long-eared bat and soprano pipistrelle were detected shortly after sunset within the gardens of the empty residential properties to the east of the application site boundary. It is possible that these properties support roosts. Soprano pipistrelle and common pipistrelle bats were observed frequently passing along Barracks Brook which lies opposite the northern boundary of the site and through the courtyard onsite, which are likely to be key foraging sites for bats commuting through the site.

5.3 Potential Impacts on Bats

During the suite of surveys completed onsite, a total of four bat species were detected: noctule, brown long-eared, common pipistrelle and soprano pipistrelle. Three of these species (noctule, brown long-eared and soprano pipistrelle) are Annex II species within the Habitats Directive or Species of Principle Importance for Nature Conservation in England. All bat species are legally protected species and are capable of being material considerations in the planning process.

Bats have been found roosting in buildings B1 and B2 during the dusk emergence surveys and these locations have been identified as a day roost and night roost respectively. Although night roosts are not provided the same protections as day roosts, building B2 contains multiple suitable potential roost features, which due to the moderate level of bat activity recorded on site and mobile nature of bats, are likely to be used for roosting by bats. As such, no works can be undertaken on these building until a licence has been acquired. The proposed demolition of all the onsite buildings for the development will therefore result in the loss of 2 no. of bat roosts.

No roosting features were recorded in any of the onsite trees. During the hibernation survey, conducted on B2, no evidence was noted of roosting bats. During the static deployment, a single faint call from a soprano pipistrelle was recorded; it was concluded that this call originated from outside of the building and that bat were not using the site for hibernation.

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.

A total of four bat species were recorded using the site for foraging and commuting purposes during the suite of surveys. Watercourse, riparian habitats, amenity grassland, hedgerows, scattered trees and introduced shrub such as that present on or immediately adjacent to the site are located within the core sustenance zones of all four species recorded within the site. As such, there should be no net loss of these habitats. It is understood that all these areas are to be retained and/or enhanced, and additional habitats such as species-rich grassland and additional hedgerows, trees and shrubs are proposed. Therefore, the impact to the key foraging habitats and the bats utilising them is likely to be negligible.

Brown long-eared bats are generally a light averse species, and as such, the aim of the lighting proposals should be to maintain “complete darkness” along the bat foraging and commuting features (northern site boundary) and a buffer zone should be present between the edge of the lighting and the key features. Guidance note 8/10, “*Bats and artificial lighting in the UK”* Bats and the Built Environment Series, produced by the Institute of Lighting Professionals in association with the Bat Conservation Trust notes the following, *“Consequently, where ‘complete darkness’ on a feature or buffer is required, it may be appropriate to consider this to be where illuminance is below 0.2 Lux on the horizontal plane and below 0.4 Lux on the vertical plane. These figures are still lower than what may be expected on a moonlit night and are in line with research findings for the illuminance found at hedgerows used by lesser horseshoe bats, a species well known for its light averse behaviour (Stone, 2012).”*

Recommendations are therefore provided in Chapter 6.

6. Recommendations

All recommendations provided in this section are based on Middlemarch's current understanding of the site proposals (MI-2986-03-LA-001), correct at the time the report was compiled. Should the proposals alter, the conclusions and recommendations made in the report should be reviewed to ensure that they remain appropriate.

R1 **Building B1 and B2:** As a bat roost/resting place has been identified in the former office building (B1) and the old smoke house (B2), no unlicensed work can be undertaken which will contravene the legislation outlined in Appendix 1. Examples of works which will breach this legislation include:

- Demolition
- Roof modifications/repairs/removal;
- Timber treatment;
- Noise, vibrations and storage of odorous and dangerous chemicals;
- Alterations to bat entrance/exit points;
- Investigations works in the roof as this can cause bats to abort their young/awake from hibernation and can alter the roof temperature/humidity; and,
- Works in the main body of the building.

N.B. This is not an exhaustive list and a bat worker should be consulted to determine if the works are likely to breach any legislation.

Prior to any works being undertaken which are likely to result in a breach of the legislation, a development licence must be obtained from Natural England. The licence application process will include the submission of a method statement detailing the current status of bats on site and how the favourable conservation status of the bat population will be maintained. Prior to a licence being issued, planning permission must be granted and relevant conditions relating to protected species and habitat issues must be discharged.

Dusk emergence and dawn re-entry survey data, in line with Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2023)[3], is required to inform the licence application. To ensure that the data submitted is current and appropriate for assessment by Natural England, surveys need to be carried out during the peak bat activity season closest to the start date of the proposed development. The peak bat activity season extends from May to August. An appropriate level of survey work has been undertaken within this study; however, should any delays occur in the planning process which results in a delay in the bat licence application beyond August 2026, the bat activity surveys may have to be updated.

R2 **Building 1a, B3 and B3a:** Buildings B1a, B3 and B3a have been subject to a full suite of activity surveys in line with Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2023)[3], and no bat were identified. The survey data obtained for the site is valid for 12 months from the survey date. If development works to the surveyed building have not commenced within this timeframe it will be essential to update the survey effort to establish if bats have colonised the buildings in the interim. Updated Preliminary Bat Roost Assessments can be undertaken at any time of year. Updated surveys requiring nocturnal or dawn assessment will need to adhere to the Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2023)[3], with the surveys undertaken

between April and September inclusive. In the unlikely event that a bat is found during site works all works in that area must immediately cease and a suitably qualified ecologist should be contacted.

R3 **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 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.

R4 **Lighting:** In accordance with best practice guidance relating to lighting and biodiversity (Bat Conservation Trust and Institute of Lighting Professionals, 2023[8]; Gunnell et al, 2012[9]), 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 hedgerows and the adjacent Barracks Brook.
- 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.

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

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

- 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.

7. Drawings

Drawing C180964-01 – Preliminary Roost Assessment

Drawing C181092-01 – First Dusk Emergence Survey

Drawing C181092-02 – Second Dusk Emergence Survey

Drawing C181092-03 – Third Dusk Emergence Survey

MI-2986-03-LA-001 DAC Landscape Architecture Ltd – Landscape Layout



C180964-01

Legend

- Site boundary
- Tree without PRF(s)
- Open doors/ louvre panels/ hatches
- Lifting felt/ missing brickwork/ damaged brickwork/ crevices
- Broken/ missing windows
- Gaps around doors and wooden panels
- Plant room on roof of B1
- Not accessed internally
- Building with high bat roosting potential
- Building with low bat roosting potential
- Building with negligable bat roosting potential

N

Project	Former Huntingdon Fire Station
Drawing	Preliminary Roost Assessment
Client	McCarthy & Stone
Drawing Number	C180964-01
Revision	00
Scale @ A4	1:750
Date	October 2024
Approved By	SE
Drawn By	BD

MIDDLEMARCH

Triumph House, Birmingham Road, Allesley, Coventry CV5 9AZ
T:01676 525880
E:admin@middlemarch-environmental.com

This map is reproduced from the Ordnance Survey material with the permission of Ordnance Survey on behalf of The Controller of Her Majesty's Stationary Office. © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution of civil proceedings.
Licence Number: 100040519



C181092-01

Legend

- Site boundary
- Building surveyed
- Camera location
- Surveyor location

Bat activity

- Common pipistrelle emergence/re-entry (potential)
- Unidentified bat emergence (confirmed)
- Common pipistrelle activity
- Noctule activity
- Soprano pipistrelle activity
- Unidentified bat activity

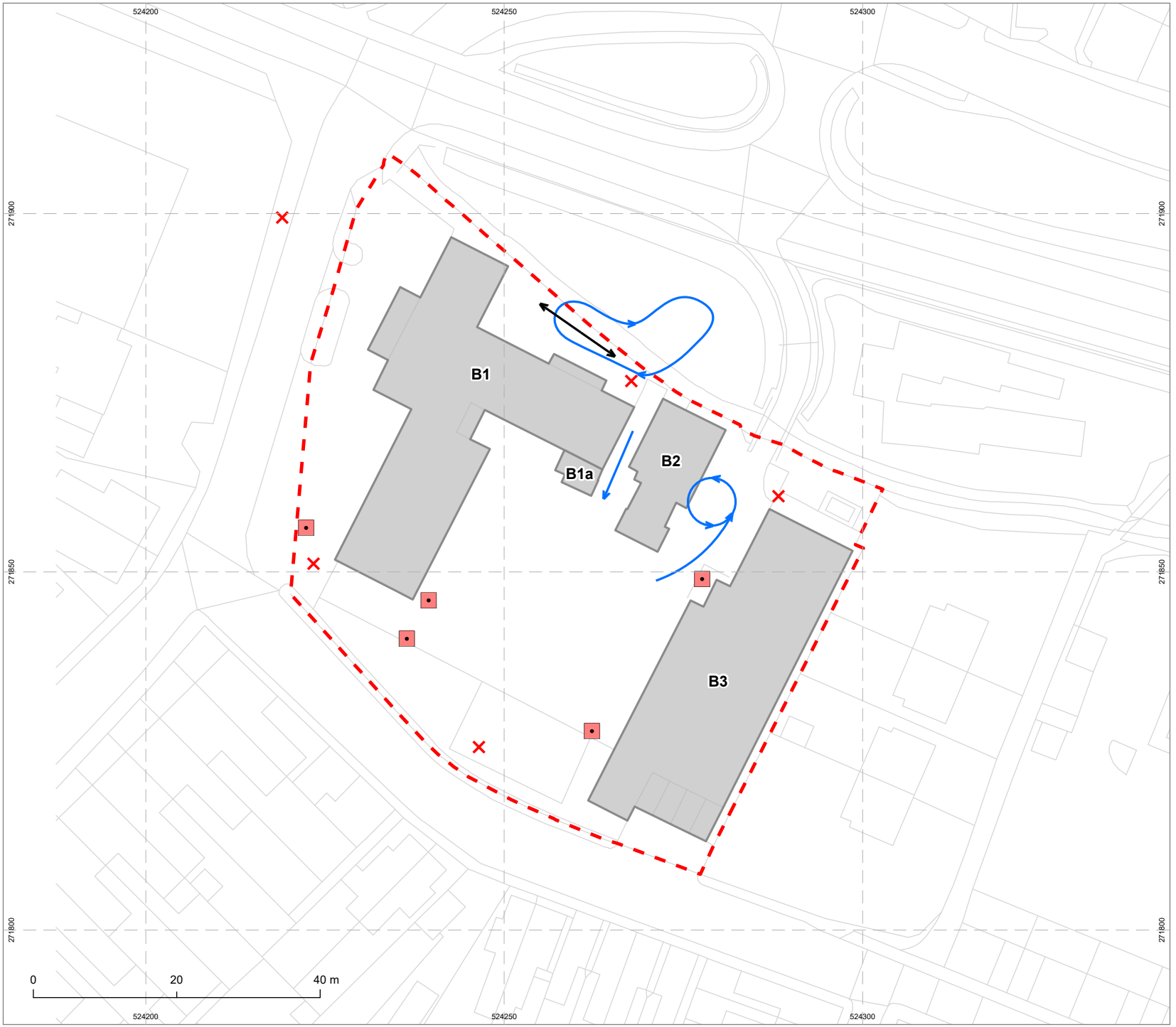
N

Project	Former Fire Station Huntingdon
Drawing	First Dusk Emergence (02/09/24)
Client	McCarthy & Stone
Drawing Number	C181092-01
Revision	00
Scale @ A4	1:750
Date	March 2025
Approved By	SE
Drawn By	VO

MIDDLEMARCH

Triumph House, Birmingham Road, Allesley, Coventry CV5 9AZ
T:01676 525880
E:admin@middlemarch-environmental.com

This map is reproduced from the Ordnance Survey material with the permission of Ordnance Survey on behalf of The Controller of Her Majesty's Stationary Office. © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution of civil proceedings.
Licence Number: 100040519



C181092-02

Legend

- Site boundary
- Building surveyed
- Camera location
- Surveyor location

Bat activity

- Soprano pipistrelle activity
- Unidentified bat activity

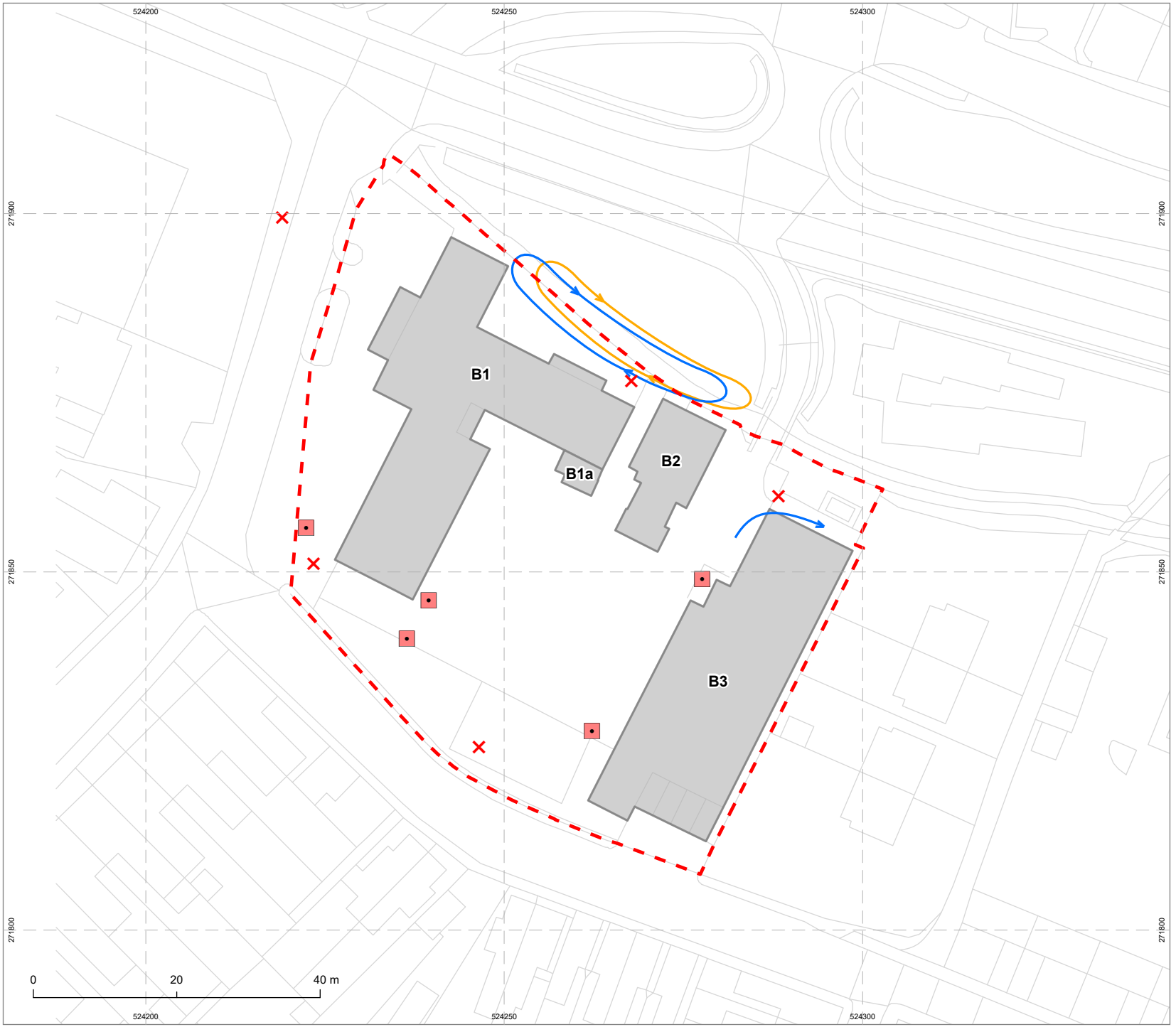
N

Project	Former Fire Station Huntingdon
Drawing	Second Dusk Emergence (04/08/25)
Client	McCarthy & Stone
Drawing Number	C181092-02
Revision	00
Scale @ A4	1:750
Date	September 2025
Approved By	KC
Drawn By	AW

MIDDLEMARCH

Triumph House, Birmingham Road, Allesley, Coventry CV5 9AZ
T:01676 525880
E:admin@middlemarch-environmental.com

This map is reproduced from the Ordnance Survey material with the permission of Ordnance Survey on behalf of The Controller of Her Majesty's Stationary Office. © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution of civil proceedings.
Licence Number: 100040519



C181092-03

Legend

- Site boundary
- Building surveyed
- Camera location
- Surveyor location

Bat activity

- Common pipistrelle activity
- Soprano pipistrelle activity

N

Project	Former Fire Station Huntingdon
Drawing	Third Dusk Emergence (27/08/25)
Client	McCarthy & Stone
Drawing Number	C181092-03
Revision	00
Scale @ A4	1:750
Date	September 2025
Approved By	KC
Drawn By	AW

MIDDLEMARCH

Triumph House, Birmingham Road, Allesley, Coventry CV5 9AZ
T:01676 525880
E:admin@middlemarch-environmental.com

This map is reproduced from the Ordnance Survey material with the permission of Ordnance Survey on behalf of The Controller of Her Majesty's Stationary Office. © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution of civil proceedings.
Licence Number: 100040519

Legend:

SOFT

Existing Trees Retained

Existing Trees Removed

Proposed Large Ornamental Trees
Girth: 14-16cm/ Extra Heavy Standard
Height: 4.5-5.5m high
Form: 2m clear stem
Fixings: Double tree stake and rubber ties

Proposed Native Trees
Girth: 12-14cm/ Heavy Standard
Height: 3.5-4.5m high
Fixings: Single tree stake and rubber tie

Proposed Small Ornamental Trees
Girth: 10-12cm or 75L container/ Select Standard or Multi-stem
Height: 2-3m high
Fixings: Single tree stake and rubber tie

Proposed Feature Specimen
Stock: 50L container
Species: Acer palmatum 'Bloodgood' or similar

Proposed Shrub Planting
Stock size: 3-5L containers
Feature specimens: 10-12L
Density: 3-5p/m2
Mulch: 75mm depth bark mulch

Proposed Evergreen Hedgerow
Size: 10L containers
Height: 100-120cm
Density: 3-4 per linear metre

Proposed Grass

Proposed Wildflower Seed
To be EM2 Standard General Purpose Meadow Mixture

Proposed Species Rich Grass Seed
To be Emorsgate EL1 Flowering Lawn Mix

HARD

Proposed Flag Paving
Size: 450 x 450 x 50mm

Proposed Permeable Block Paving
Size: 240 x 160 x 80mm

Proposed Gravel Margin

Proposed Tarmac (pedestrian areas)

Proposed Tarmac (vehicle areas)

Proposed Timber Bench
With back and armrests

Proposed Timber Pergola

BOUNDARY TREATMENTS TO ARCHITECTS DETAILS



Notes:

Please do not scale from this drawing, either paper or electronic copies.

All final measurements must be checked on site by the contractor.

If there are any discrepencies noted in relation to dimensions or scale, please notify the Landscape Architect.

All works are to be carried out in accordance with the latest British Standards and/ or Codes of Practice unless otherwise stated.

This drawing is the property of DAC Landscape Architecture Ltd and must not be copied or reproduced in any way, whole or in part without the permission of the client or DAC Landscape Architecture Ltd. Copyright © of DAC Landscape Architecture Ltd.

0 10m
SCALE 1:200

NORTH

Revision Notes:

Rev	Initials	Description	Date
P3	DC	Updated in line with the pink file site layout	21/08/24
P2	DC	Updated in line with the revised site layout aa	25/04/24
P1	DC	First issue	15/04/24

Client:
McCarthy & Stone Retirement Lifestyles

Project:
Hartford Road, Huntingdon

Title:
Landscape Layout

Status:	Date:	
For Approval	15-04-2024	
Drawing No:	**Revision:**	**DAC Job No:**
MI-2986-03-LA-001	P3	054
Scale:	**Paper Size:**	**Drawn by:**
1:200	A1	DC

LANDSCAPE ARCHITECTURE
Email: info@dacla.co.uk
Tel: 07973823834
Website: www.dacla.co.uk

8. Figures

8.1 First Dusk Emergence Survey

Figures 8.1 to 8.8 demonstrate the illumination levels at the start and end of the first dusk emergence survey.



Figure 8.1: Camera P1 Start of Survey



Figure 8.2: Camera P1 End of Survey



Figure 8.3: Camera P3 Start of Survey



Figure 8.4: Camera P3 End of Survey



Figure 8.5: Camera R3 Start of Survey



Figure 8.6: Camera R3 End of Survey



Figure 8.7: Camera R4 Start of Survey



Figure 8.8: Camera R4 End of Survey

8.2 Second Dusk Emergence Survey

Figures 8.9 to 8.18 demonstrate the illumination levels at the start and end of the second dusk emergence survey.



Figure 8.9: Camera G4 Start of Survey



Figure 8.10: Camera G4 End of Survey



Figure 8.11: Camera O5 Start of Survey



Figure 8.12: Camera O5 End of Survey



Figure 8.13: Camera O6 Start of Survey



Figure 8.14: Camera O6 Endof Survey



Figure 8.15: Camera P1 Start of Survey



Figure 8.16: Camera P1 End of Survey



Figure 8.17: Camera R1 Start of Survey



Figure 8.18: Camera R1 End of Survey

8.3 Third Dusk Emergence Survey

Figures 8.19 to 8.28 demonstrate the illumination levels at the start and end of the third dusk emergence survey.



Figure 8.19: Camera G4 Start of Survey



Figure 8.20: Camera G4 End of Survey



Figure 8.21: Camera O5 Start of Survey



Figure 8.22: Camera O5 End of Survey



Figure 8.23: Camera O6 Start of Survey



Figure 8.24: Camera O6 End of Survey



Figure 8.25: Camera R3 Start of Survey



Figure 8.26: Camera R3 End of Survey



Figure 8.27: Camera R4 Start of Survey



Figure 8.28: Camera R4 End of Survey

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.