

Bat Mitigation Report

Manor Farm
Church Raod
Catworth
Cambridgeshire

August 2025

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Declaration

This report has been produced following the guidelines published by The Bat Conservation Trust in Bat Surveys for Professional Ecologists Good Practice Guidelines 4th Edition 2023

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Special Note

Whilst every effort has been taken to ensure this report accurately identifies *potential ecological constraints to development or the likely presence or absence of species and the spatial and temporal use of the site by such species, it must only be viewed as a snap shot in time and reflects the ecological status of the site at the time of survey.*
No liability can be assumed for ecological changes that may or may not occur on the surveyed site after the production of this report. The author of this report must be consulted as to the current applicability of the report if there are any seasonal delays in the use of this report.
This report can only be used for the purposes for which it was instructed and agreed at the time of commission.

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Executive Summary

It is proposed to construct an extension to an existing elevation of Manor Farm, Church Road, Catworth, in Cambridgeshire, as well as the installation of a roof light and the conversion of a brick outbuilding. The proposed works are subject to both planning and listed building consent and, as such, bat surveys have been carried out, firstly by Arbtech Limited, in 2024 and then by licensed bat ecologists ELMAW Consulting in 2025, to inform the planning decision.

Two bat roosts have been confirmed and located within Manor Farm, a day roost of common pipistrelle *(Pipistrellus pipistrellus)* and a day roost of brown long-eared bats *(Plecotus auritus)*. Whilst the common pipistrelle roost is not predicted to be directly or indirectly affected by the construction proposals, the brown long-eared bat roost is predicted to be lost, due to the predicted interference to the bats' roost entrance during construction and post-development. The potential loss of the roost is not considered likely to significantly adversely affect the brown long-eared bat population, nor affect the maintenance of the favourable conservation status. However, in compliance with Local Plan Policy LP30, it is proposed to create a new bat roost access point which would provide an alternative access, therefore minimising the impact of the lost currently-used roost entrance and allowing the existing brown long-eared bat roost to functionally continue.

The loss of the existing roost entrance and disturbance to bats, whilst predicted to be minimal, is considered to require a derogation of the Habitats Regulations and, as such, a licence from Natural England will be required for the modification of the roost. Therefore, it is proposed that, as the roost type (day roost) and species concerned meet the threshold for the site, Manor Farm, it is to be registered under the Bat Mitigation Class Licence - Low Impact, to allow the disturbance and modification of the existing brown long eared bat roost, once planning and listed building consent have been granted.

1.0 Introduction

1.1.1 It is proposed to build a two-storey (ground and first floor) extension onto the north-western facing gable end of the side of Manor Farm. The proposals also include the installation of a new conservation roof light, fitted into the existing north-western elevation (side) of the roof, over Bedroom One. In addition, the small, single-storey brick-built outbuilding and wood store is to be refurbished and made habitable.

1.1.2 In support of applications for planning and listed building consent for the proposed conversion, extension and refurbishment works, a Preliminary Ecological Appraisal and Roosting Assessment of Manor Farm, with specific attention paid to potential proposed building works impacts on roosting bats, was completed by Arbtech Consulting Limited. The resulting report was published as *Preliminary Ecological Appraisal and Roosting Assessment 27th August 2024*, written by Mr Nicholas Smith and bat surveying as an accredited agent on an unspecified third party's bat disturbance licence.

1.1.3 The completed 2024 bat roosting assessment found evidence of brown long-eared bats and a high habitat value was concluded. Four bats were discovered roosting against the rafters in Loft 2 (south-eastern facing roof void) as well as >100 bat droppings, in August 2024. No DNA analysis was carried out on the droppings and therefore the species of bat or bats responsible for the droppings was not established. Nevertheless, the report recommended that emergence and or re-entry surveys of B1a (central north- eastern part of Manor Farm) and B1b (Outbuilding), to establish roost characterisation, were required.

1.2 Background

1.2.1 In June 2025, ELMAW Consulting, Chartered Biologists and Natural England licensed bat ecologists, were engaged to carry out the aforementioned recommended evening emergence surveys of Manor Farm, to establish the roosting status of the brown long-eared bats and additionally, in accordance with best practice, determine whether other species of bat are roosting within Manor Farm. On the basis that bats could be roosting in other parts of Manor Farm that may be adversely affected by the refurbishment and extension proposals, the evening emergence surveys were expanded to include Manor

Farm in its entirety, as well as the outbuilding, beyond the aforementioned recommended Buildings B1a and B1b.

1.2.2 Consequently, three evening emergence surveys were competed by ELMAW Consulting in July and August 2025, during the optimum period for identifying important summer bat roosts. In addition to the completed evening emergence surveys, an internal inspection of the three loft areas of Manor Farm (Lofts 1, 2 & 3) was carried out, in August 2025. The specified and adopted methodology for these surveys followed the guidelines published by The Bat Conservation Trust.

1.2.3 It must be acknowledged however, that whilst we endeavour to follow the guidelines, we reserve the right to adapt the survey methodology, where appropriate, as the aforementioned guidelines state that they should be interpreted and adapted on a case-by-case basis, according to site-specific conditions and professional judgement and examples given are not prescriptive but descriptive.

1.2.4 Upon the completion of the surveys and loft space inspections, an impact assessment of the refurbishment and extension proposals was completed by Keith Seaman BSc. Principal Ecologist - Level 2 Class bat licence holder and registered to use the Bat Mitigation Class Licence (Low Impact) WML-CL21, assisted by Assistant Ecologist Ms Jasmine Stephenson BSc. Drawings by The English Listed Building Company September 2024, as used to support planning and Listed Building consent applications, have been used in this bat roosting impact assessment process.

2.0 Methodology

2.1 *Internal and External Building Assessment*

2.1.1 The potential for a building to support roosting bats and how high or low that potential is, is based on a number of factors which, when taken cumulatively, result in a subjectively *low*, *moderate* or *high* bat roosting potential valuation. This relative potential valuation grade is used to determine the number of activity surveys considered necessary to establish the extent of bat roosting and importantly the type and conservation status of that roost with confidence, thus enabling an informed impact assessment of the proposed building works. Table 1 below illustrates the subjective assessment used to determine the relative potential value a feature or habitat may have for a local population of roosting bats.

Table 1 Potential Bat Roosting Features (PRFs)

Suitability Potential	Features considered important in the bat roosting assessment
Negligible	No obvious PRFs, often found in areas of negligible or very low bat feeding, foraging and roosting habitat
Low	One or more PRF(s) which are more likely to be used by single or low numbers of opportunist or transient bats at any time of the year - due to lack of space, shelter or appropriate conditions. Highly unlikely to be suitable for breeding or classic hibernation but may be used by non-classic hibernating individual bats.
Moderate	Numerous PRFs that could be used by bats due to the size, space, shelter and conditions but unlikely to support a roost of high conservation status such as maternity or classic hibernation.
High	Numerous PRFs that support conditions that potentially favour higher numbers of bats, habitual roosting, breeding or classic hibernation of high conservation status, often found in association with high quality surrounding habitat.

2.1.2 The entire exterior and, where access could be gained, the loft spaces of the building were searched for PRFs, which are often found as gaps, cracks or crevices between timbers, between masonry, behind bargeboards and soffits or and under lifted lead flashing, lifted or missing roof tiles.

2.1.3 The exterior inspection and PRF assessments were carried out by the report's author Keith Seaman and Jasmine Stephenson, on the evening of the 1st of July

2025. The internal inspection of the loft spaces was undertaken on the 7th of August 2025.

2.2 *Evening Bat Activity Surveys*

2.2.1 As a result of these 2025 building inspections, a high potential value was concluded, concurring with the conclusions reached in the 2024 Arbtech report. However, it has been considered appropriate to carry out emergence surveys of the entire Manor Farm, as PRFs had been found throughout and are not restricted to B1a and B1b. This approach is particularly pertinent as brown long-eared bats are known to roost-switch and could be roosting in any other part of Manor Farm at the time of survey and assessment. Evening emergence surveys were carried out on the 1st of July 2025, the 5th of August 2025 and the 21st of August 2025.

2.2.2 In accordance with The Bat Conservation Trust's *Best Practice Guidelines 4th Edition* (Ref. 1), evening emergence surveys were commenced fifteen minutes before sunset and continued for one and three quarter hours after sunset, during the typical bat roosting emergence period. All elevations of Manor Farm were surveyed with infrared video and thermal imaging camera Night Vision Aids (NVAs), maintained by two surveyors.

2.2.3 The equipment used included Canon XA series infrared video cameras (XA10, XA20, XA25, XA30) and Guide TK612 Thermal Imaging Cameras, mounted on tripods. Additional Ward Optimal Extreme Limited Dark Sun Infrared torches and Nightfox XB5 Pro Infrared LED Torches were used for better vision in the darkest period. Each camera was paired with an Echo Meter Touch 2 PRO (EMT2PRO) full-spectrum detector, to record bat echolocation. All cameras and EMT2PROs were time-synced at the start of recording. Each surveyor also carried their own EMT2PRO detector, as well as two-way radios to liaise with other surveyors during the survey. Surveyors were patrolling the site during the survey, to ensure all technology was running and recording correctly and to maintain the security of the equipment. A selection of still-shots from the infrared cameras are appended. Analysis of the bat echolocation recordings were undertaken using BatSound software and all recorded films were reviewed in the days following the surveys.

2.2.4 With regard to establishing the presence of roosting bats, it must be further acknowledged that surveys carried out in accordance with industry standards endeavour to establish the presence of bat roosts appropriate to the time of year when the surveys have been carried out. Surveys completed within the optimum period, as required by Natural England, endeavour to establish the presence of non-breeding summer roosts or important summer maternity roosts. Surveys carried out at this time of the year cannot, with any certainty, establish the presence of spring transitory or winter roosts, or seasonally occupied opportunist roosts by single or low numbers of bats.

2.3 *Assessment & Mitigation*

2.3.1 The resulting assessment and evaluation of the survey findings and subsequent mitigation and compensatory strategy are informed by the advice and guidance published by The Bat Conservation Trust and Natural England in *Bat Surveys for Professional Ecologists - Good Practice Guidelines 4th Edition 2023*), *Bat Workers' Manual 2004* and *Bat Mitigation Guidelines* 2004.

2.4 *Limitations of the Bat Activity Surveys*

2.4.1 The surveys were completed in ideal weather conditions and in temperatures above 10°C. Therefore, the environmental conditions of the surveys did not constrain or limit the results. Survey methods, timings and equipment used were in line with industry standards as advocated by Natural England and the Bat Conservation Trust.

3.0 Survey Results & Discussion

3.1 Loft Inspections





Figure 1 & Photograph 1: Surveyed loft spaces in Manor Farm

3.1.1 Manor Farm supports three separate, but cojoined roof spaces; lofts/attic - Loft spaces 1, 2 and 3. Loft 3 sits above the proposed north-western elevation, which is proposed to be extended. Due to access restrictions in Loft 2 which joins Loft 3, Loft 3 could not be physically inspected.

3.1.2 Lofts 1 & 2 were found to be approximately 10m - 11m in length and 3m - 4m in width, with a height from floor to apex of 2.5m and both were found to support optimum roosting and flying conditions for brown long-eared bats. Other than the south-western elevation roof pitch on Loft 2 (which has a breatherable roof liner), the roofs are lined with bitumastic felt. There are no ridge beams in either Lofts 1 or 2 and presumably Loft 3, which provides open accessible bat access into and out of the ridge tiles above. Roof-supporting timbers are old but lack the typical open mortice joints often found in traditional roofs and barns, greatly limiting the potential roosting opportunities for crevice/recess roosting bats.

3.1.3 Scattered bat droppings, shaped and sized to indicate long-eared bats, were found on the floors of both Lofts 1 & 2, indicating bat flight areas and small (<200 droppings) isolated piles were also found in both lofts, indicative of roosting in both lofts, typically for brown long-eared bats, against the timber rafters. Because of the limitations in access to Loft 3, no definitive assessment of this roof space can be provided as to evidence of roosting bats. Both Lofts 1 & 2 and presumably 3 were found to be of an optimal size and area, with appropriate warm and dry conditions, to potentially support large number of bats and potentially could be used for maternity roosting. However, the limited number

of bat droppings suggests that the loft spaces are not currently, or in recent seasons, supporting large number of bats. The bat droppings also suggest that only a single species - brown long-eared - is currently roosting within the roof voids.

3.1.4 Both Lofts 1 & 2 were found to be warm and dry and with their southern, south-eastern and south-western orientations, roof insulations and a centrally heated building, the roof spaces are unlikely to provide hibernating conditions; either classic or non-classic.

3.1.5 Three brown long-eared bats were found roosting against a rafter in Loft 2, inside the south-eastern roof pitch. One of the three bats was caught and examined and found to be a male and not in breeding condition. Phalanges ossification was found to be complete, indicating that this bat was not a pup/juvenile of this season, but an adult.

3.2 Evening Bat Emergence Surveys

3.2.1 Three bat emergence surveys were completed on the evenings of on the 1st of July 2025, the 5th of August and the 21st of August 2025.

1st July 2025 - Survey Summary Results

- 51 minutes after sunset, one unidentified bat observed leaving the ridge above Loft 3.
- Between 51 minutes and one hour and 13 minutes after sunset, four brown long-eared bats observed leaving the north-western gable end apex (below the barge boards), from Loft 3.
- Single short contacts of both common and soprano pipistrelles were registered throughout the survey

5th August 2025 Survey Summary Results

- Three common pipistrelle bats observed emerging from the roof/ridge on the south-eastern pitch above Loft 2, five minutes after sunset.
- Three brown long-eared bats observed leaving the north-western gable end apex of Loft 3 between 45 minutes and one hour after sunset.

- Single short contacts of both common and soprano pipistrelles were registered throughout the survey

21st August 2025 Survey Summary Results

- Three brown long-eared bats observed leaving the north-western gable end apex of Loft 3, between 45 minutes and one hour after sunset.
- No common pipistrelle bats were observed or recorded from the roof/ridge on the south-eastern pitch above Loft 2 or any other part of Manor Farm.
- Very limited common pipistrelle activity around the site throughout the survey period.





Photographs 2 & 3: Brown long-eared bat roost exit/entry point

3.3 Discussion

3.3.1 In August 2024, Arbtech Limited reported finding four brown long-eared bats within Loft 2. In August 2025, three brown long-eared bats, including an adult male, were found, again in Loft 2. Emergence surveys found four brown long-eared bats emerging in July, but only three in August and with only three found in Loft 2, one bat is likely to have left the roost and not returned between the two surveys. Dr Swift suggests (Swift M.S. 1998) that brown long-eared bats typically form maternity roosts of between 10 - 20 females including the odd male; atypically, they can form colonies as low as four or five. However, with roosting and emerging bat counts at Manor Farm consisting of four in July and three in August, if this was a small maternity roost, then in August, when pups are volant (flying), this number should have at least doubled, allowing for typically one pup per adult female. Therefore, the brown long-eared bat roost at Manor Farm is not considered likely to be a maternity roost but a non-

breeding summer day roost. Day roosts of common species such as brown long-eared bats are considered to be of 'site value' only and of low conservation significance.

3.3.2 These bats are roosting throughout the three lofts and are entering and exiting the loft spaces via a small gap at the apex of the north-west facing side elevation gable end below the bargeboards, above Bedroom 1.



Figure 2 & Photograph 4: Brown long-eared bat roost exit/entry point

3.3.3 During the survey of the 5th of August 2025, in addition to the brown long-eared bat emergence, three common pipistrelles were observed emerging from either the ridge tiles or the tile batten void, but unlikely from inside the loft itself. This emergence occurred on the south-eastern facing roof pitch, above Loft 2. These emerging bats were not recorded in July or late August, but this is not unsurprising as this species of bat typically roost switches throughout the season. Common pipistrelle bats typically form maternity roosts of between 50 and 100 and therefore three roosting bats in August would indicate the presence of a non-breeding day roost. As with the day roosts of brown long-eared bats, day roosts of common pipistrelles are of 'site value' only and therefore of low conservation significance.

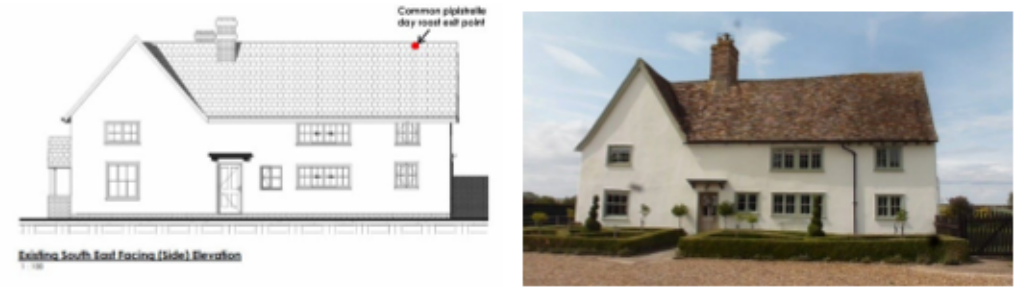


Figure 3 & Photograph 5: Common pipistrelle day roost location

3.3.4 Only on one survey occasion, the 1st of July 2025, did a single unidentified bat emerged from the ridge tiles above Bedroom I of the north-west facing elevation. This bat emerged late after sunset (51m), suggesting likely one of three typically late-emerging bats; brown long-eared, Daubenton's or Natterer's bats. When emerging, this bat exited in a southerly direction, away from the closest static bat detector and therefore a positive identification was not obtained.

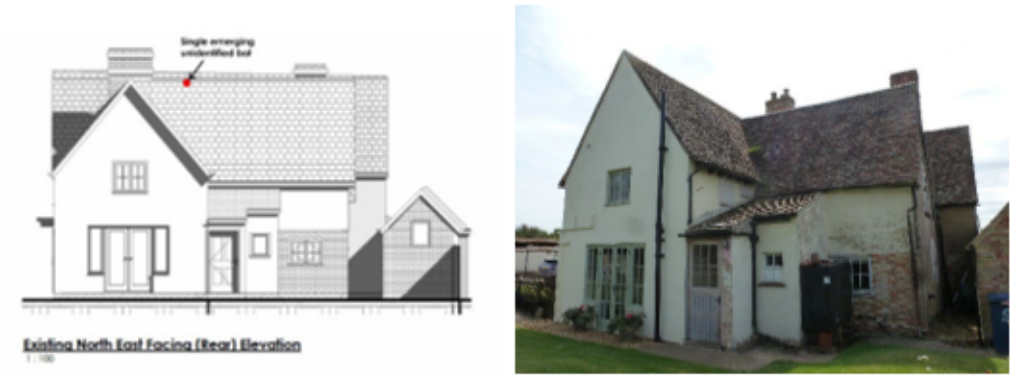


Figure 4 & Photograph 6: Unidentified bat exit point

4.0 Impact Assessment

4.1 Building Proposals

4.1.1 It is proposed to build a two-storey (ground and first floor) extension on to the gable end of the north-west facing elevation of Manor Farm. The extension is to be built slightly (approx. 50cm) lower than the existing gable end. The proposal will include the removal of the gable end, whilst retaining the first floor timber framework of Bedroom 1 and Loft 3 above. Some removal of the timber frame is required to facilitate the construction of a door into the new en-suite bathroom of the extension.

4.1.2 In addition to the proposed extension, a new conservation roof light is proposed in the existing Bedroom 1 south-western roof pitch of the north-western elevation part of Manor Farm, to allow light into the existing bedroom, as the existing bedroom window is being removed to allow access into the new en-suite bathroom. This proposed window is to be located in the roof, below the floor of Loft 3.

4.1.3 There are no building proposals for Lofts 1 or 2 but additional proposals include the outbuilding - which has no bat impact implications at this time.

4.2 Assessment of Proposed Building Works on Roosting Bats

4.2.1 The brown long-eared bats were found to be roosting in two, likely three, loft spaces, Lofts 1, 2 and likely 3 and it appears these bats are accessing their roost via the south-western gable end of Loft 3. There are no building works proposed for Lofts 1 or 2 and therefore these roosting locations will remain directly unaffected by the building proposals.

4.2.2 The extension is proposed to be built approximately 50cm below the existing ridge of Loft 3 and, as such, does not result in the loss of the bat access gap in the gable end wall apex which currently provides the existing bat exit and entry point into Loft 3.

4.2.3 There is no additional lighting proposed and there is no increased lighting from the loss of the existing Bedroom 1 window and replacement of a roof light.

Therefore, lighting is not considered a potential constraint to the proposed extension and associated works, with regard to roosting bats.

4.2.4 During the construction of the extension however the use of scaffolding could potentially block or interrupt the bats' free flight into and out of the entry/exit point in the gable end. Therefore, without mitigation and, depending on the position of the scaffolding, the scaffolding could temporarily obstruct the roost entrance during construction, temporarily denying bat's access to their roost for the entire construction period.

4.2.5 The proposed conservation roof light is to be installed into the roof of Bedroom 1 - this will lie below the Loft 3 floor and Bedroom 1 ceiling and therefore there is no direct constructional impact predicted on the bat roost. Some disturbance arising from installation may be encountered however whilst the roosting status inside Loft 3 is not known, surveys in 2024 and 2025 have shown the brown long-eared bats habitually use both Lofts 1 & 2 and can move comfortably to avoid any noise disturbance which may arise from the roof light installation and/or extension construction.

4.2.6 However, post-extension construction, whilst a clear entry and exit point into and out of Loft 3 could be retained, the drop of approximately 30cm from the bat roost exit/entry point to the top of the proposed new extension ridge is considered too shallow, too limiting for the bats to use or to become accustomed to. There is therefore the possibility that the bats may choose, once the extension has been built, to cease using this entry/exit point, resulting in the possible permeant loss of the roost, as this access point appears to be the only one used by the bats.

4.2.7 If the brown long-eared bat roost is lost, for a non-breeding roost of a widespread species of 'site value' and of low conservation significance, this is predicted to likely result in an insignificant impact on the local bat population. Whilst there is a paucity of woodland in the local area, negating the presence of alternative woodland roosting locations, there are considerable numbers of trees and old, large houses and farm buildings that potentially would provide alternative non-breeding brown long-eared roosting opportunities.

4.2.8 The day roost of common pipistrelle bats is located under a roof or ridge tile above Loft 1. Loft 1 is not proposed to be directly affected by the proposals

and is considered too far away to be adversely affected by construction noise and or disturbance; therefore, no significant adverse impacts of the proposed extension and associated works are predicted on the common pipistrelle day roost, at this time.

5.0 Avoidance & Mitigation Proposals

5.1 Brown Long-Eared Bat Day Roost

5.1.1 It is predicted that the brown long-eared bat day roost is likely to be lost due to the proposed extension obstructing the bats' entry and exit into the three loft spaces. Both the installation of scaffolding and the resulting closeness of the new extension's ridge with the existing bat roost entrance suggests that the bats would likely avoid utilising this entrance. With this being their only known roost entrance, this will likely result in the abandonment of the roost.

5.1.2 This potential loss of a low conservation significance bat roost, whilst regrettable, would be unavoidable with the current design of the extension but is not predicted to have a significant adverse impact on the local bat population. Nevertheless, irrespective as to the maintenance of the favourable conservation status of the local bat population, the damage/destruction of a bats' place of shelter (roosts) is unlawful under the Conservation of Habitats & Species Regulations 2017, without a derogation of the Regulations. Under the conditions of a Bat Mitigation Class Licence - Low Impact, it is possible to register Manor Farm, which would permit the destruction of this roost with minimal obligatory mitigation. Whilst appropriate mitigation measures to ensure bats are not killed or injured is mandatory, compensation for the loss of a day roost supporting low numbers of one species of common bats, does not require the provision of an alternative roosting provision. However Policy LP30 – Biodiversity & Geodiversity, Huntingdonshire's Local Plan to 2036, states '*all possible efforts must be taken to avoid adverse impacts. If it is demonstrated that adverse impacts are unavoidable, they must be minimised as far as possible and then mitigated*'. Therefore, in order to comply with this Local Plan Policy, it is proposed that an alternative entry/access point be created so that the brown long-eared bat roost can be retained, with access via another entry point. It is therefore proposed to create a small bat access in the apex of the adjacent gable end, replicating the one that is to be lost, giving the bats an alternative access point into Lofts 1, 2 & 3.



Figure 5: Brown long-eared bat entry and exit point to be lost and created

6.0 Conclusion

6.1.1 Surveys completed of Manor Farm, in 2024 by Arbtech Limited and then updated and expanded upon by ELMAW Consulting, licensed bat ecologists, in 2025, confirmed the presence of two bat roosts; a small common pipistrelle day roost above Loft 2 and a small brown long-eared day roost inside Lofts 1, 2 and likely 3. Both these roosts are likely occupied by males/non-breeding bats, bats which are considered common and widespread and therefore of low conservation significance.

6.1.2 The current building proposals are not considered likely to have a direct impact on either the roosting location of the common pipistrelle bats or the brown long-eared bats roosting locations in Lofts 1, 2 or 3. However, whilst the common pipistrelle roost would remain unaffected by the proposals or residential occupation of the new proposed extension or refurbishment of the outbuilding, some construction and residential occupation of the new extension related disturbance of the brown long-eared bat roost is considered likely. Specifically, scaffolding used during construction is likely to disrupt the bats' access in and out of their roost via Loft 3 and the resulting extension is considered too close to the Loft 3 roost entrance to be likely used by the bats post-construction. This being the only roost access point identified, the proposed extension is considered likely to result in the abandonment of the roost by the brown long-eared bats.

6.1.3 Without mitigation, this potential loss of a low conservation significance day roost of a common and widespread species of bat is not considered likely to have a significant adverse impact on the favourable conservation status of the local brown long-eared bat population. However, Local Plan policies indicate a need to minimise and mitigate impacts on important (protected) ecology. As such, it is proposed to mitigate the potential loss of this brown long-eared bat roost by taking steps to retain the roost in-situ, by providing an alternative roost access point. This proposed new access point, close to the original access point, can easily be found by the bats as surveys have shown that bats leaving the current exit route fly past the proposed new entrance gap. The proposed new access point into their currently-used roost in Lofts1, 2 and likely 3 would be created before the commencement of construction and erection of scaffolding and would remain unobstructed from both construction works and

post-construction occupation of the new extension. This mitigation proposal will demonstrate compliance with both legislation that protects protected species' places of shelter and Local Plan Policy LP30.

6.2 *Further Considerations*

6.2.1 The author of this report, Mr Keith Seaman of ELMAW Consulting, is a holder of the Natural England Bat Mitigation Class Licence – Low Impact and, as such, confirms that the brown long-eared bat day roost at Manor Farm currently meets the minimum threshold to be included in this Mitigation Licence and therefore meets the requirements for registration, once planning and listed building consents have been approved.

6.2.2 All species of bat, to a greater or lesser degree, use their places of shelter in a temporal and spatial way, which may affect the status of a site or building at any given time. Roost sites which may appear temporarily vacated or abandoned could be re-occupied at any time in the future.

6.2.3 Therefore, following the production of this report, should the redevelopment of the application site be delayed for 12 months from the date of these surveys, the building will need to be re-assessed and re-surveyed, if considered necessary, to ensure the current status of roosting bats on site is known and fully considered in the redevelopment of the site and subsequent EPSM licensing considerations. To obtain a derogation of the Habitats Regulations, a Bat Mitigation Class Licence will be required and, as such, the bat status of the current season of redevelopment will be required to support a licence application to Natural England.

7.0 References & Bibliography

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8.0 Appendix 1

8.1 Legislation Relating to Bats

8.1.1 All bats and their roosts in the UK are protected by the Wildlife & Countryside Act 1981 (as amended), and under Schedule 2 of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

8.1.2 In England the legislation makes it illegal to;

- Deliberately capture, injure or kill a bat,
- Deliberately disturb a bat which is likely to impair their ability to survive, breed or reproduce, rear or nurture their young, hibernate, migrate or affect significantly their local distribution or abundance
- Damage or destroy a breeding site or resting place of a bat
- Possess, control, transport, sell, exchange or offer for sale or exchange any live or dead bat or any part of a bat

8.1.3 Bats' roosts (including resting places) are protected whether or not bats are present at the time. The Wildlife & Countryside Act 1981(as amended) additionally makes it an offence to;

- Intentionally or recklessly disturb a bat at a roost
- Intentionally or recklessly obstruct access to a roost

8.1.4 Finally, under the Natural Environment and Rural Communities Act (NERC) 2006, a duty is placed on all public bodies to promote and enhance biodiversity in all its functions. There is a general biodiversity duty in the NERC Act (Section 40) which requires every public body in the exercising of its functions to 'have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 41 draws up lists of species of principal importance to which special attention must be given and a number of bats are included in this list.

9.0 Appendix 2

9.1 *Example still-shots from the infrared cameras during the darkest part of the surveys:*







