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PRELIMINARY ECOLOGICAL APPRAISAL & PRELIMINARY BAT ROOST ASSESSMENT OF:

DRACAENA
CHURCH ROAD
HUGH TOWN
ST MARY'S
TR21 0NA

RECEIVED BY THE
PLANNING DEPARTMENT

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Non-Technical Summary

- On 8th September 2018, the Isles of Scilly Wildlife Trust (IoSWT) conducted a Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) of Dracaena, Church Road, Hugh Town, St Mary's, Isles of Scilly (BS1-2018), for which there is a proposal to remove all of the existing fibre cement roof tiles and replacement with natural slate. This report outlines the findings of the PEA and PRA assessment and provides advice based upon the surveys' conclusions.
- During the PRA an external/internal inspection of the building was undertaken (where accessible). Access to all areas was possible.
- No evidence of nesting birds was found in/on the property.
- No evidence of bats was found during the PRA and the characteristics of the building suggested a negligible roost potential. However, the garden and the immediate surrounding habitat could provide suitable foraging habitat
- The recommendations of this PEA and PRA suggest that no further surveys are required and that there is no requirement to obtain an EPS license. This report recommends that there are no constraints to the planning proposal if the following are adhered to; avoidance measures during demolition and construction phase and enhancement in the form of provision of new potential roost sites.

1.0 Introduction

1.1 Survey and reporting

This report details the results of a preliminary ecological appraisal and a preliminary bat roost assessment of Dracaena, Church Road, Hugh Town, St Mary's, TR21 0NA. The survey, carried out on the 8th September 2018, was undertaken in order to inform proposals to remove the all the existing fibre cement roof tiles and replace with natural slate.

1.2 The application site

The house is located off Church Road, St Mary's (National Grid Reference SV9075310418, Figure 1.). The application site comprises of a detached single-storey bungalow, which has been extended to the south west and south-east (Photos 1). The total area of the application site is approximately 486m² (red area, Figure 1).

1.3 Details of proposed works

It is proposed to remove all the existing fibre cement roof tiles and replace with natural slate.



Figure 1. Site location plan



Photo 1. North-west elevation of Dracaena

2.0 Methodology

2.1 Preliminary Ecological Appraisal - Desk Study

A desk study data search was undertaken. This involved carrying out a review of the Local Records Centres (LRC) available records for bat species and publicly available datasets and citations of statutory designated sites of importance for nature conservation for sites within the zone of influence (ZOI) of the survey area (considered to be a maximum of 2km in this case). The desk study was also undertaken to identify habitats and features that are likely to be important for bats and assess their connectivity through the use of aerial photographs.

2.2 Preliminary Bat Roost Assessment

The Preliminary Bat Roost Assessment comprised a survey of the building for bats, signs of bats and features potentially suitable for use by roosting bats, and an assessment of the surrounding habitat in terms of its suitability for commuting and foraging bats.

The survey consisted of a ground based inspection and a detailed search of the interior and exterior of the buildings (from ground level), looking for bats and/or evidence of bats including droppings (on walls and windowsills and in roof and loft spaces), rub or scratch marks, staining at potential roosts and exit holes, live or dead bats and features, such as raised or missing tiles, potentially suitable for use by roosting bats. Binoculars, a ladder and a high-powered torch were used as required.

2.3 Classification of building

The building was classified according to its suitability for use by roosting bats. The classification was dependent on a number of factors including:

- Bats and/or signs of bats;
- External and internal features potentially suitable for use by roosting bats (e.g. raised or missing tiles, gaps behind fascia boards etc);
- Setting;
- Night time light levels;
- Disturbance levels;
- Proximity of suitable foraging habitat and commuting routes (e.g. ponds, streams, woodland, large gardens, hedgerows).

The categories used to classify buildings and the survey effort required to determine the presence or absence of bats (as per the Bat Conservation Trust's Bat Survey Guidelines¹, referred to by Natural England in their standing advice to planning officers) are described in Table 1.

2.4 Surveyor details

The survey was undertaken by Darren Mason BSc of the Isles of Scilly Wildlife Trust. Darren has undertaken professional Bat Licence Training to permit him to undertake professional surveys. He is currently gathering sufficient 'working hours' to achieve a Natural England Class Level 1 licence.

1. Collins, J. (ed.) (2016). Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). The Bat Conservation Trust

Table 1 – Description of the categories used to classify a building’s bat roost potential and the survey effort required to determine the likely presence or absence of bats

Roost status	Description	Survey effort required to determine the likely presence or absence of bats
High	Numerous features potentially suitable for use by roosting bats, optimal or good quality bat foraging habitat nearby and good habitat connectivity. Alternatively, a building with fewer features potentially suitable for use by roosting bats and optimal foraging habitat nearby.	Three dusk emergence and/or pre-dawn re-entry surveys between May and September. Optimum period May – August. Two surveys should be undertaken during the optimal period and at least one survey should be a pre-dawn survey.
Moderate	More than a few features potentially suitable for use by roosting bats, good foraging habitat nearby and limited habitat connectivity. Alternatively, a building with a few features potentially suitable for use by roosting bats but optimal foraging habitat nearby.	Two or three dusk emergence and/or pre-dawn re-entry surveys between May and September (but only if features will be affected by the proposals).
Low	Only a few features potentially suitable for use by roosting bats but good bat foraging habitat nearby. Alternatively, a building with more than a few features potentially suitable for use by roosting bats but sub-optimal foraging habitat nearby and limited habitat connectivity.	One or two dusk emergence and/or pre-dawn re-entry surveys between May and September (but only if features will be affected by the proposals).
Negligible	Very few features potentially suitable for use by roosting bats and / or in an area (such as a densely populated urban area) which has limited habitat connectivity and poor foraging habitat.	No further surveys required.

Bat Roost Potential

3.0 Results

Primary Ecological Appraisal

3.1 Pre-existing information on bat species

The desk study showed that no species of bat have previously been recorded within the building. A data search of LRC records for bats revealed information on 3 species of bat recorded within the 2km ZOI of the site. Species conclusively identified were Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*) and Brown Long-eared Bat (*Plecotus auritus*). Several bat roosts are known to exist within 2km of the proposed development, but only 1 known roost within 1km.

3.2 Statutory and non-statutory sites

In addition, the desk study revealed the presence of the following statutory designated sites within the 2Km ZOI of the site:

- i.) **Peninnis Head SSSI** – The SSSI designation is primarily for its maritime heathland, maritime grassland and scrub habitats together with populations of a number of rare plant and lichen species, in addition to its significant quaternary geomorphology.
- ii.) **Porthloo SSSI** – The SSSI designation of Porthloo is for its geology, particularly for the Quaternary sediments in the cliffs that show changes in the climates and environments of the Quaternary period.
- iii.) **Lower Moors SSSI** – The SSSI is a topogenous mire that has a range of wetland habitats supporting a diverse range of wetland wildflower species, including the Nationally Scarce Tubular Water-dropwort (*Oenanthe fistulosa*). The site also holds locally important populations of Royal Fern (*Osmunda regalis*) and Southern Marsh Orchid (*Dactylorhiza praetermissa*) and is particularly important feeding for passage and wintering birds including Corncrake (*Crex crex*) and Spotted Crake (*Porzana porzana*).
- iv.) **Higher Moors & Porth Hellick Pool SSSI** – A topogenous mire designated for several rare and notable plant species including; Bog pimpernel (*Anagallis tenella*), Star Sedge (*Carex echinata*) and Marsh St John's-wort (*Hypericum elodes*).

3.3 Habitats surrounding the application site

Dracaena lies within the Built-up Areas Boundaries² (2011) published by the Office for National Statistics (Geography). Immediately to the west of the property is a small industrial area that holds the power-station for St Mary's, which is now only used in times of emergency. Further to the west lies the main conurbation of Hugh Town. To the west of the property lies Buzza Hill, an area of open grassland and scrub. To the south-east are Porthcressa allotments with their mature hedgerows and cultivated plots. To the north is the old school site at Carn Thomas, which still has open field areas bounded primarily by Elm copse. The application site is therefore located in optimal foraging habitat for bats very locally; however habitat connectivity to larger tracts of woodland and open fields on the Garrison to the west and the large wetland of Lower Moors SSSI to the east remains limited.

3.4 Habitats within the application site

Dracaena is a detached property that is bounded to the rear by a well maintained hedgerow of Escallonia (*Escallonia macrantha*), to the north-east by a low lying open hedgerow of Coprosma (*Coprosma repens*), with the occasional standard of Elm (*Ulmus sp.*) trees and to the south-west by a similar mixture of hedge plants, as well as Pittosporum (*Pittosporum tenuifolium*). The front north-west facing garden has a wooden decking area that extends out onto a part lawned area which holds several mature shrubs including; Hydrangeas (*Hydrangea macrophylla*), Fuchsia (*Fuchsia sp.*), Yucca (*Yucca sp.*) and well-clipped individual specimens of Escallonia and Coprosma. The small garden to the south west is laid mainly to lawn, with the occasional specimen of apple (*Malus sp.*). This garden backs on to a small area of Elm trees. The rear garden is laid to patio. There are two outbuildings in both the south west and south east corners of the garden.

² Citation: COMMISSION REGULATION (EU) No 1089/2010 of 23 November 2010 implementing Directive 2007/2/EC of the European Parliament and of the Council as regards interoperability of spatial data sets and services

Primary Roost Assessment

3.5 External

Dracaena is a single-storey, detached bungalow, block built with timber cladding for three-quarters of its height, with the remaining quarter rendered. The bungalow sits at the top of Church Road and is fully exposed to the weather from the north-west. The south-east elevation of the bungalow is more sheltered, lying very close to the adjacent property's hedgerow. The bungalow has been extended to the south west and to the south east. The timber cladding sits flush on top of each other with no gaps. The main building and the two extensions are open gable-ended with an equal pitch of an approximate angle of 25°. The roofs of the two extensions are laid with natural slate and capped with clay ridge tiles. Throughout, these tiles are laid flush, with limited potential for roost space. The south west extension has a small canopy at the rear. The roof of original building is laid with fibre cement tiles and capped with clay ridge tiles, which sit flush and offer limited potential for access to bats. Centrally there is a rendered chimney that has been capped-off and is bound into the roof with 'flashing'. The windows and doors are modern UPVC, as is the guttering, soffit boards and fascia. The soffit boards contain small vents to permit ventilation. On inspection these showed no signs of grease or claw marks and most had cobwebs across them. Inspection of the floor and the wall below these vents revealed no urine staining and no evidence of droppings. The soffit boards throughout sit flush with the walls, with no gaps present. The building overall offers very limited features that are potentially suitable for roosting bats, these include:

- On the north-west roof the flashing which ties the chimney into the ridge and roof tiles is raised particularly on its south-west corner (see photo 1).
- At the north-east gable end of the original building the tile immediately below the final ridge tile is raised (see photo 2).
- At the base of the north-east facing roof of the rear extension adjacent to the valley with the existing building, several tiles are raised (see photo 3).
- Where the original building and the south-west extension meet there is a gap in the fascia board of the new extension where it has been cut to accept the fascia from the original building. Here on the original building there are several small gaps at the base of the fascia also (see photo 4).
- Several gaps in the flashing where the south-west extension ties into the original building, particularly on the south-east aspect (see photo 5).

- There is a raised roof tile adjacent to the flashing at the base of chimney (south east corner) where on the south-east elevation (see photo 6.)



Photo 1. Gap in flashing and raised roof tile

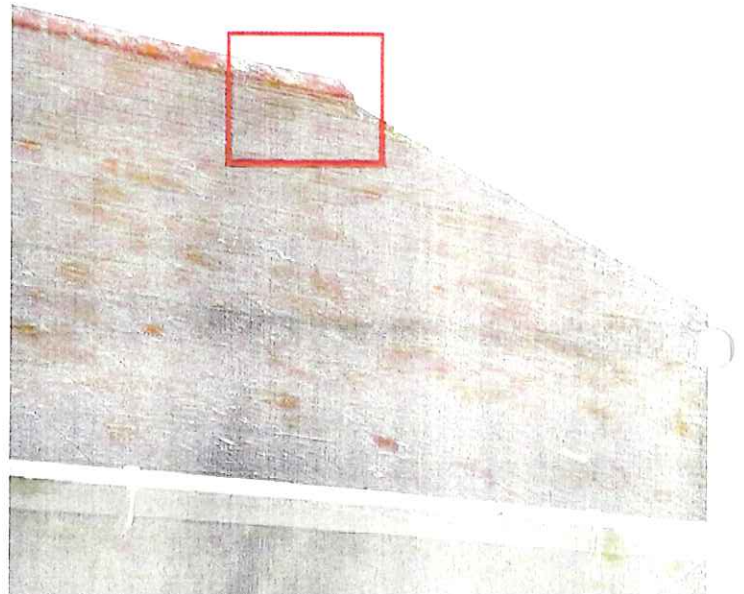


Photo 2. Raised roof tile at north east gable end (south east aspect)

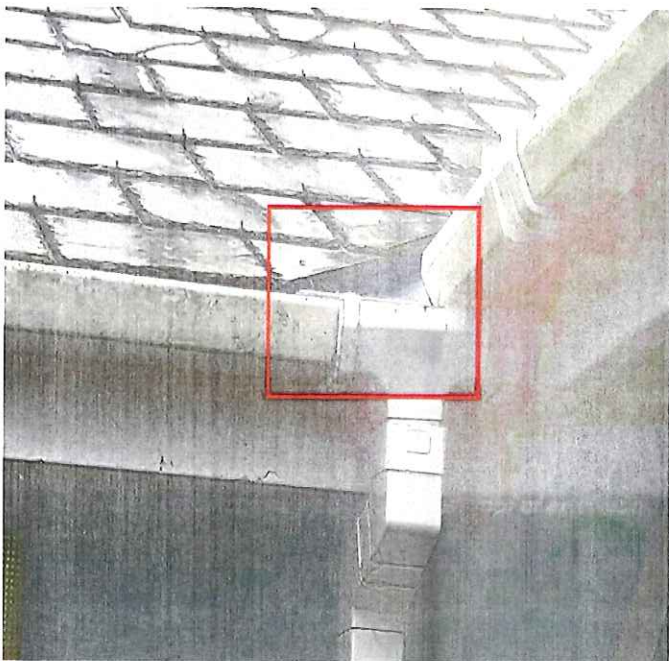


Photo 3. Gap at base of valley on north-east roof of extension

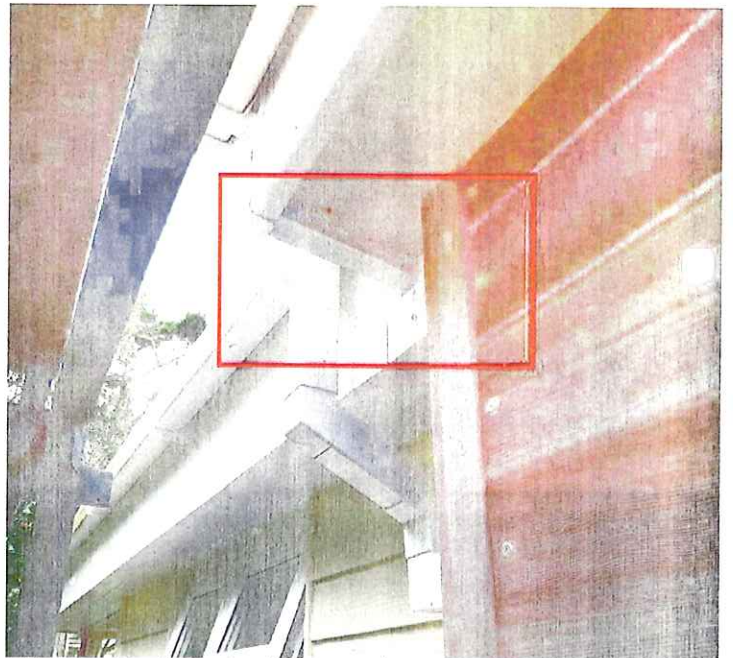


Photo 4. Gap in fascia where extension and original building meet

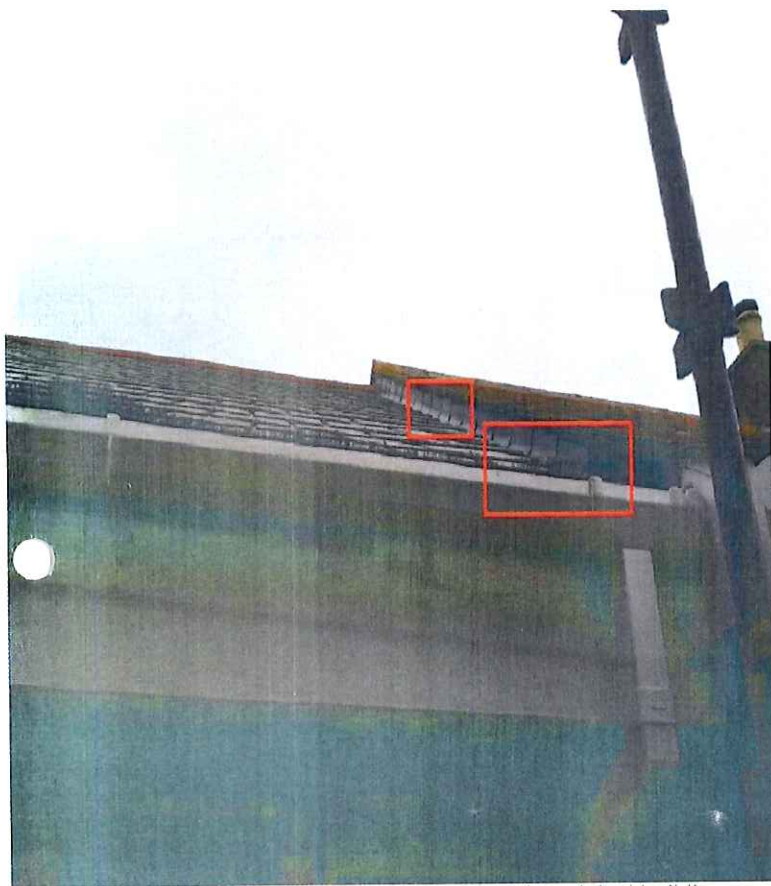


Photo 5. Gaps in flashing where extension meets the original building



Photo 6. Raised roof tile at junction with south east facing chimney

3.6 Internal

Dracaena has one main loft space encompassing only the original dwelling. The roof is non-trussed, but has collar beams, with queen posts which the purlings sit on (see photo 7.). The roof is still lined with the original fibre/felt which has many tears in it. The loft was only part boarded (centrally), where the water tank sat adjacent to the chimney stack. The loft was insulated throughout. Inspection of the top of the water tank and the boxes in the loft space revealed no evidence of bat droppings. Inspection of the insulation, boarding and chimney stack revealed no evidence of bat droppings. Inspection of the joints where the collar beam met the purling and queen posts revealed no evidence of grease or scratch marks, likewise with the joints between the ridge board and rafters. Inspection behind the tears in the fibre revealed many cobwebs and no evidence of roosting bats.

With the lights off there were three small gaps at the eaves of the south-east aspect roof, which could permit access into the loft space. But, on inspection no evidence of bats was recorded.



Photo 7. Loft space showing collar beams and ridge board joints and tears in the lining.

4. Evaluation of Results

To identify which ecological features are important and which could potentially be affected by the proposed project, an evaluation of their importance for example; in a geographical context, degree of scarcity or level of protected status needs to be undertaken³. The table below (Table 1.) outlines those features identified as important, the nature conservation legislation relevant to those features and an assessment of the level of impact from the proposed development on those features.

4.1 Survey constraints

The survey was undertaken at a time of year suitable for undertaking preliminary bat roost assessments, so no constraints are applicable to this survey.

4.2 Protected sites

The proposed development falls into the SSSI Impact Risk Zones of Porthloo, Peninnis Head Lower and Higher Moors SSSI respectively. Impact zones are used in the assessment of planning applications for likely impacts on SSSI's, Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar Sites (England). However, the impact in these zones is for large-scale residential developments and therefore the site is not likely to impact on the surrounding SSSIs.

Ecological Feature	Relevant Legislation	Evaluation (of importance)	Mitigation Hierarchy	Impact Level
Habitats:				
Building (roost sites)	CHSR, W&CA	Negligible	A, E	Low
Impacts: Demolition: – None predicted as long as Reasonable Avoidance Measures (RAM) are followed (see section 5) Construction: – None. Positive impact may result through enhancement by creating/incorporating new roosts in the building ⁴ Operational impact: - None predicted, however please note a summary of criminal offences with respect to bats and their roosts. This can be found at: http://www.bats.org.uk/pages/bats_and_the_law.html				
Species:				
Bats	CHSR, W&CA	International	A, E	Low
Impacts: Demolition – None predicted as long as Reasonable Avoidance Measures (RAM) are followed (see section 5) Construction/post-construction – None. Positive impact may result through enhancement by increased roost availability ⁴ Operational impact: - None predicted, however please note a summary of criminal offences with respect to bats and roosts. This can be found at: http://www.bats.org.uk/pages/bats_and_the_law.html				
Key to Legislation and Mitigation Hierarchy				
CHSR – Conservation of Habitats and Species Regulations 2017 ⁵ - http://www.legislation.gov.uk/ukxi/2017/1012/made W&CA – Wildlife & Countryside Act 1981 (as amended) ⁶ - http://www.legislation.gov.uk/ukpga/1981/69/contents A – Avoid, M – Mitigate, C – Compensate, E - Enhancement				

Table 1.

5. Recommendations and Mitigation

The recommendations in this section are provided as information only and are the professional opinions of the author. Note; if building works are delayed for more than one year, then re-assessment may be required.

5.1 Further survey requirements

In the professional opinion of the author **no further surveys are required**. BCT guidance suggests that for buildings with negligible roost potential no further surveys are required. The survey carried out to date follows this guidance, is proportionate to the scale of the development and the information provided is believed to be sufficient to inform the planning decision.

5.2 EPS Licence requirement

For any development that is likely to commit an offence (or offences) in respect to a European Protected Species (EPS) i.e. bat, or their habitat, a licence will be required. In this instance based on sufficient survey work **no EPS licence is required**. If in the unlikely event a bat were found during the demolition phase of the project, Reasonable Avoidance Measures (RAM) must be followed and will determine any further action, such as licensing.

5.3 Mitigation – Further Action

As there is a low risk that bats may roost within the building, prior to demolition, precautions should be taken to reduce the probability of committing an offence. If affected RAM should include:

Avoidance (A) - Bats

- i. Ensure all workers on site (including sub-contractors) are made familiar with bat legislation and agree to work in accordance with and fully follow best practice measures
- ii. Carry out careful checks of any cracks/crevices and cavities in or on the building prior to demolition. Signs of usage include; bat droppings, dis-colouration or polishing of access points where bats rub against them, urine stains and a lack of cobwebs, particularly if other crevices around them have plenty.
- iii. Individual bats may be found in/under; cladding, between timber boards, between corrugated sheeting, in soffit boxes, behind lead flashing and sometimes just clinging to timber beams around joins as well as others areas. When any of these are removed, please do so carefully, lifting outwardly, and checking for bats continually. If in doubt, consult a licensed bat worker.

iv. In the unlikely event that a bat is found please see below:

1. At no point should a worker handle a bat. Untrained handling may cause undue stress and injury to the bat, and if bitten may expose the worker to rabies-related European Bat Lyssavirus
2. Where possible replace any covering without damaging the bat, then halt works and contact **Natural England** (Tel: 0845 601 4523), or the **Bat Conservation Trust Helpline** (0845 1300 228), or **IoSWT** (01720 422153) for advice.
3. Any bats that go to ground should be covered with a box and left alone until a licensed bat worker arrives to assess the condition of the bat
4. If the bat attempts to fly at any point allow it to do so. Preventing natural behavior will cause unnecessary stress and may cause injury. Attempt to see where bat goes. If the bat returns to the building, halt works and report the escaped bat to the local bat worker

v. Try to minimise any dust generated from demolition works from entering off-site buildings and gardens

Enhancement (E) – Bats

The Isles of Scilly have the most southern population of Common Pipistrelle (*Pipistrellus pipistrellus*) bats in the United Kingdom. Any loss of roosting, commuting or foraging sites could have a detrimental effect on this species distribution as a whole and cause a net loss in biodiversity on the islands. As the results of this survey have shown that the garden and the surrounding habitat provides optimal foraging habitat for bats, there is an opportunity for this development to provide additional roosting habitat and an opportunity to strengthen the population of this locally important species.

Each local planning authority in England and Wales has a statutory obligation under Part 3 Section 40 of the Natural Environment & Rural Communities Act 2006⁷ (NERC 2006) to have due regard for biodiversity when carrying out their functions and must pursue sustainable development and a net gain in biodiversity set out under the guidelines in the National Planning Policy Framework 2018⁸. Therefore, this planning application should be permitted with the following being undertaken:

- i. All new roofing felt laid to be traditional Type 2 bitumen felt, as modern breathable membranes have been shown to kill bats⁹.
- ii. Select 6 tiles on each roof aspect (12 in total) and raise their leading edge by 25mm (using mortar) to create a wedge shaped crevice that provides access to the underlying felt, to provide potential roost space
- iii. Alternatively, Erect two free-standing bat boxes developed for crevice-dwelling species (see figure 1 for examples and Appendix D for supplier details) 1 under the canopy at the rear of the south-west extension and one at the top of the open gable end of the north-east elevation on the main house.
- iv. Retain all vents and existing gaps in soffit boards as potential roost sites.

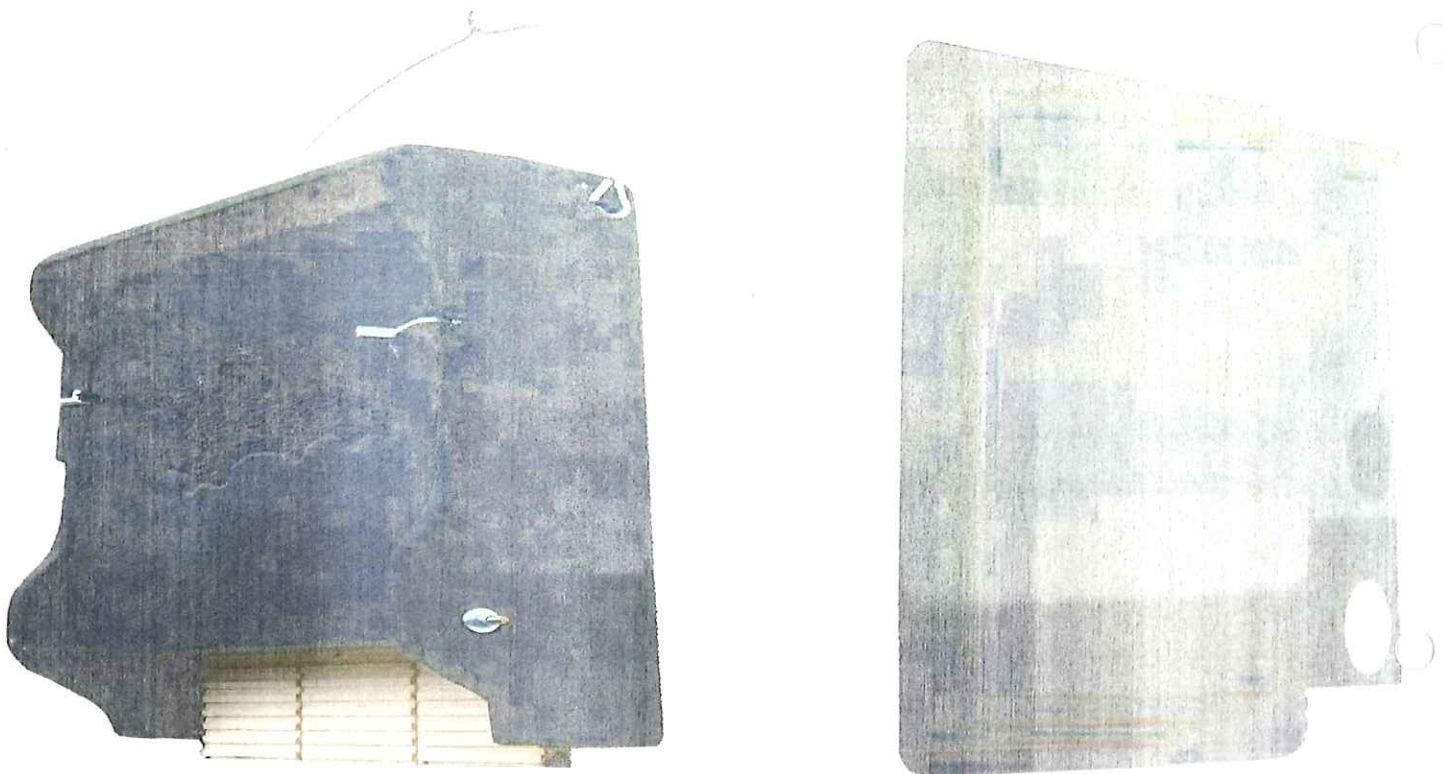


Figure 4. free-standing bat box examples

https://www.nhbs.com/browse/search?q=bat%20boxes&hPP=30&idx=titles&p=0&is_v=1&qtview=158636

<https://www.nhbs.com/browse/search?q=bat+boxes&qtview=176916>

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3. CIEEM. (2016). *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal (2nd edition)*. Chartered Institute of Ecology and Environmental Management, Winchester.
4. Mitchell-Jones, A.J. (2004). *Bat mitigation guidelines*. English Nature.
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6. H.M.S.O. (1981). *The Wildlife and Countryside Act 1981* (as amended). London.
7. H.M.S.O. (2006). *The Natural Environment and Rural Communities Act 2006*. London
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APPENDIX A – LEGISLATION AND LICENSING

a) Legislation

All species of bats receive special protection under UK law making it a criminal offence under Schedule 5 section 9 (4) (b) and (c) of the Wildlife and Countryside Act 1981 (as amended) to *"intentionally or recklessly disturb a bat at a roost"* or *"intentionally or recklessly obstruct access to a roost"* and under Regulations 43 (1) and (2) of the Conservation of Habitats and Species Regulations 2017 (The Habitat Regulations) to *"deliberately disturb a bat in a way that would affect its ability to survive, breed or rear young or, affect the local distribution or abundance of the species; or to "damage or destroy a roost"* without first having obtained the relevant licence for derogation from The Habitat Regulations from the Statutory Nature Conservation Organisation (the SNCO – Natural England in England).

The word 'roost' is not used in the legislation, but is used here for simplicity. The actual wording in law is 'any structure or place which any wild animal...uses for shelter or protection' or 'breeding site or resting place'. Because bats tend to re-use the same roosts after periods of vacancy, legal opinion is that the roost is protected whether or not the bats are present at the time.

Penalties on conviction of a bat-related crime - the maximum fine is £5,000 per incident or per bat, up to six months in prison, and forfeiture of items used to commit the offence, e.g. vehicles, plant, machinery.

b) Licensing

In order to obtain such a licence (as set out above) the SNCO must apply the requirements of the Regulations and, in particular, the three tests set out in sub-paragraphs 55(2)(e), (9)(a) and (9)(b). These are as follows:

(1) Regulation 55 (2)(e) states that a licence can be granted for the purposes of *"preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment"*.

(2) Regulation 55 (9)(a) states that the appropriate authority (the SNCO) shall not grant a licence unless they are satisfied *"that there is no satisfactory alternative"*.

(3) Regulation 55 (9)(b) states that the appropriate authority (the SNCO) shall not grant a licence unless they are satisfied "*that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.*"

The licence would permit an otherwise unlawful activity to take place, and it requires of the licensee measures to ensure that negative impacts are prevented, reduced or offset, and that the favourable conservation status of the bats is maintained. **Once a licence is granted, failure to comply with its contents, including its attached Method Statement is a Criminal Offence with fines of a maximum of £5,000 per infringement.** A licensed bat consultant must be appointed to assist in the preparation and the delivery of the mitigation proposals that ensure the species protection requirements (Favourable Conservation Status 'FCS' test) can be met.

Additional information on the tests is available from the Natural England website.

<http://publications.naturalengland.org.uk/publication/4727870517673984?category=12002>

The ecologist is responsible for providing evidence to meet Test 3. The evidence to satisfy tests 2 and 3 is submitted on a part of the licence application called the Reasoned Statement. The Reasoned Statement must be filled in by the client or their agent. Applicants often approach planning consultants, architects or similar for advice regarding completion of the Reasoned Statement.

- **Permissions**

The development must have **full permission** before the licence application will be registered including any ecology-related conditions or reserved matters that can be discharged before the date of application.

- **Further bat surveys**

If a full active bat season is going to pass between the granting of planning permission and the licence application period, Natural England will require **update survey(s)** (March-Aug) prior to application submission. The number of surveys required will vary by site depending on the size and complexity of the site as well as the species and roost types present.

- **Land ownership**

If mitigation, compensation or monitoring is anticipated to be on land not owned by the applicant, then written consent from the landowner will be required by Natural England. Responsibility for management and maintenance must also be agreed.

- **Commitments**

Applications should not give any commitments to undertake licensed works (or actions relating to the licence) that cannot be delivered.

- **Multi-phased projects**

If a plan is phased, Natural England will require a Master Plan with all mitigation and timetables included on it.

c) Licence timescales:

- **Licensing decision**

The licence application pack can take anywhere from **2 to 3 weeks** to produce and Natural England allow themselves **30 working days** from the date of receipt to respond to applications, a window which can be extended if further information is requested by themselves. It is important that clients, developers, contractors, agents, etc. keep this in mind when designing work timetables. Occasionally, further information will be requested by NE, which can result in additional delays; therefore application as soon as possible is advised.

- **Timing of works**

In most cases, the works most likely to affect bats (bat exclusion work, soft strip, re-roofing, ecologist-advised timber treatment, etc.) will normally be timed to avoid the hibernation and maternity periods. Thus, these works tend to be timed for either the **September-October period** or the **March-April period**. This means licence application is normally completed 3 months prior to these periods, and cannot be submitted any earlier.

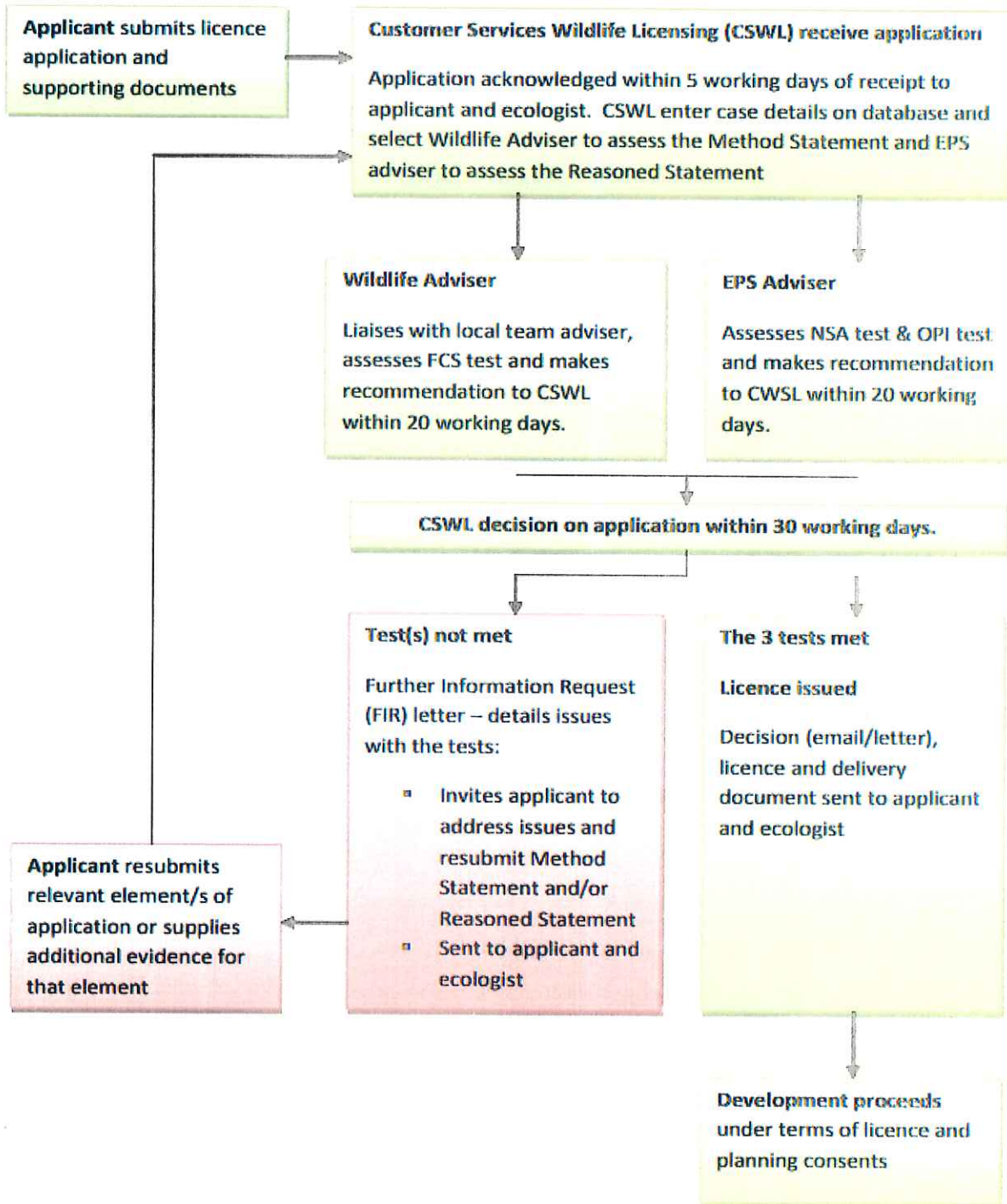
- **Other Timing**

All timescales are weather-dependent (e.g. 5 days post-exclusion period extended due to inclement weather) and also may be impacted by other aspects of the project not related to ecology. In some situations license periods can be extended, but this involves more work and is not guaranteed as they must ensure that Test 3 is still met.

d) Scale of work involved:

- **Mitigation** Production and submission of the license application pack as well as the completion of the licensed works themselves are time intensive and involve inspections, exclusions, site induction and other works requiring onsite supervision such as bat roost creation, soft strip and other necessary checks under the terms of the license. Costs for materials and equipment including bat boxes, exclusion materials, lifts/scaffolding to carry out soft strips, roost construction materials, etc. needs to be considered. Costs can vary considerably by project, but the applicant should ensure provision for all aspects of the licensed works is well-budgeted.
- **Monitoring** Most mitigation schemes require some sort of post-development monitoring, the type and extent of which would be confirmed in the license method statement. A contract with the ecologist for all survey, mitigation and post-development monitoring surveys needs to be agreed for this at the application stage.

EPS Process



EPS application procedure flowchart (updated December 2011). Taken from WML-G12-EPS Mitigation Licensing – How to get a licence Version December 2013

APPENDIX D – SUPPLIERS

- .1 Natural History Book Service
1-6 The Stables
Ford Road
Totnes
Devon
TQ9 5LE
Tel: 01803 865913
Email: customer.services@nhbs.com
Website: <https://www.nhbs.com/>

2. Dreadnought Tiles
Dreadnought Works
Brierley Hilly
West Midlands
DY5 4TH
Tel: 01384 77405
Email: sales@dreadnought-tiles.co.uk
Website: www.dreadnought-tiles.co.uk

3. Wildlife & Countryside Services
Covert Cottage
Pentre Lane
Rhuddlan
North Wales
LL18 6LA
Tel: 0333 9000927
Email: support@wildlifeservices.co.uk
Website: www.wildlifeservices.co.uk

4. Wildcare
Eastgate House
Moreton Road
Longborough
Gloucestershire
GL56 0QJ
Tel: 01451 833181
Email: sales@wildcare.co.uk
Website: www.wildcare.co.uk

