



## Preliminary Roost Assessment Survey

Sheen Lawn Tennis and Squash Club, 1 Parklands Close, Sheen, London, SW14 7EH

Mandip Sahota

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## Executive summary

Arbtech Consulting Limited was commissioned by Mandip Sahota to undertake a Preliminary Roost Assessment (PRA) at Sheen Lawn Tennis and Squash Club, 1 Parklands Close, Sheen, London, SW14 7EH. The survey was completed on 27/07/2021. The assessment was undertaken in line with current guidelines: Bat Conservation Trust publication, *Bat Surveys for Professional Ecologists – Good Practice Guidelines* (Collins, J. (Ed) 2016).

The site has been subject to historic ecological assessment undertaken by Arbtech. Specifically, the site was subject to a PRA in October 2016 which was submitted in support of a previous planning application (ref: 16/2877/FUL). Following a review of the planning application by the Local Planning Authority (LPA), it was requested that a bat activity survey was undertaken. An emergence survey of T1 and combined bat activity survey was therefore undertaken by Arbtech in May 2017 to determine the use of the site by bats.

It is understood that the client is preparing a new planning application for the site; given the time elapsed since the previous surveys (>2 years), update ecological assessment is required to inform the upcoming planning application.

Proposals for the site comprise the installation of 10No. flood lights. All flood lights will be column mounted at a height of 6m and be of LED box type.

### **Recommendations - This is work you will need to commission (if any) to obtain planning permission and comply with legislation**

**This Preliminary Roost Assessment confirms that the baseline ecological condition with regards to the site's value for bats has not significantly changed since 2016. It is therefore recommended that a combine bat activity survey and emergence survey of T1 is undertaken to inform the new planning application as to update all survey information requested for the previous planning application by the Local Planning Authority.**

**Two surveyors are recommended to provide full coverage of the site.**

See section 4.2 for full evaluation.

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## 1.0 Introduction and Context

### 1.1 Background

Arbtech Consulting Limited was commissioned by Mandip Sahota to undertake a Preliminary Roost Assessment (PRA) at Sheen Lawn Tennis and Squash Club, 1 Parklands Close, Sheen, London, SW14 7EH. The survey was completed on 27/07/2021. The assessment was undertaken in line with current guidelines: Bat Conservation Trust publication, *Bat Surveys for Professional Ecologists – Good Practice Guidelines* (Collins, J. (Ed) 2016).

The site has been subject to historic ecological assessment undertaken by Arbtech. Specifically, the site was subject to a PRA in October 2016 which was submitted in support of a previous planning application (ref: 16/2877/FUL). Following a review of the planning application by the Local Planning Authority (LPA), it was requested that a bat activity was undertaken. An emergence survey of T1 and combined bat activity survey was therefore undertaken by Arbtech in May 2017 to determine the use of the site by bats.

It is understood that the client is preparing a new planning application for the site; given the time elapsed since the previous surveys (>2 years), update ecological assessment is required to inform the upcoming planning application.

### 1.2 Site Context

The site is located at National Grid Reference TQ 2018 7465 and comprises an area of approximately 0.1ha. The site is dominated by five hardstanding tennis courts. As a result, there are no buildings or trees within the site boundary. However, the site is located directly adjacent to buildings associated with the tennis and squash club in addition to peripheral vegetation associated with adjacent residential properties.

### 1.3 Scope of the report

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

The aim of the assessment was to determine the presence or evaluate the likelihood of the presence of roosting bats, and to gain an understanding of how they could use the site. To achieve this, the following steps have been taken:

- A desk study has been undertaken.
- A field survey has been undertaken, including an external survey and internal inspection where possible.
- An outline of likely impacts on any known roosts has been provided, based on current development proposals.
- Recommendations for further survey and assessment have been made, along with advice on the requirements of a European protected species mitigation licence (EPSML) application if appropriate.

A survey plan is presented in **Appendix 1**, the proposed development is shown in **Appendix 2**, desk study results in **Appendix 3** and a summary of relevant legislation is presented in **Appendix 4**.

## 1.4 Project Description

Proposals for the site comprise the installation of 10No. flood lights. All flood lights will be column mounted at a height of 6m and be of LED box type. The locations of the proposed new flood lights are shown in **Appendix 2**.

## 2.0 Methodology

### 2.1 Desk Study

The desk study included a 2km radius review of statutory designated sites, Priority Habitats Listed under Section 41 of the NERC Act (see **Appendix 3**) and granted European Protected Species Mitigation License (EPSML) records for bats held on magic.gov.uk database. An assessment of the surrounding landscape structure was also completed using aerial images from Google Earth and OS maps. Furthermore, additional ecological data with regards to bat species recorded historically within 1km of the site was also ordered through the London Bat Group in July 2021.

### 2.2 Site Survey

The survey was undertaken by Jonathan Stuttard (Senior Consultant) on 27/07/2021. Jonathan Stuttard is accredited on Natural England Bat License **2017-32515-CLS-CLS**.

All features that will be impacted by the project proposals were assessed for their bat roosting and commuting habitat. The surveyor systematically surveyed all features suitable for bats and signs of bat activity.

### 2.3 Breeding birds and other incidental observations

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

### 2.4 Suitability Assessment

The PRA comprised an external assessment of any buildings and trees to be impacted by the proposed works on site for their potential to support roosting bats. The surveys were led by an experienced ecologist and were based on current best practice guidelines (Collins, 2016)<sup>1</sup>. All features that are likely to be impacted by the proposed development were assessed for their potential to support roosting bats. The surveyor systematically surveyed all features suitable for-bats and signs of bat activity.

The PRA of buildings and trees included a visual inspection (including the use of binoculars and torches where required) of the exterior of the building for evidence of bat use (e.g. droppings, scratch marks, staining and sightings). Factors considered whilst undertaking the PRA comprised internal conditions, presence of features suitable for use by roosting bats, proximity to

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<sup>1</sup> Collins, J. (ed) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3<sup>rd</sup> edn). The Bat Conservation Trust, London. ISBN-13 978-1-872745-96-1

foraging habitats or cover and potential for disturbance. Notes were made relating to relevant characteristics of features providing potential access points and roosting opportunities for bats.

**Table 1** below details the rationale for determining bat roost potential of buildings and trees subject to the PRA.

*Table 1: Rationale for assigning bat roost potential*

Assigned Bat Roosting Potential	Description/ rationale
Confirmed roost	Evidence of roosting bats within the building or tree.
High	A building or tree with one or more Potential Roost Features (PRFs) that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
Medium	A building or tree with one or more PRFs that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only).
Low	A building or tree with one or more PRF that could be used by individual bats opportunistically. However, these PRFs do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation).
Negligible	Negligible features on site likely to be used by roosting bats.

## 2.5 Limitations

It should be noted that whilst every effort has been made to describe the features on site in the context of their suitability for roosting bats, this does not provide a complete characterisation of the site. This survey provides a preliminary view of the likelihood of bats being present. This is based on suitability of the habitats on site and in the local area, the ecology and biology of bats as currently understood, and the known distribution of bats as recovered during the desk study.

There were no specific limitations to the survey.

### 3.0 Results and Evaluation

#### 3.1 Desk Study

A summary of desk study results is provided below, full details are presented in **Appendix 3**.

#### 3.2 Designated sites

The Site is not located within any Statutory Designated Sites. However, four statutory designated sites are located within 2km of the site comprising a combined Special Area of Conservation (SAC), Site of Special Scientific Interest (SSSI) and National Nature Reserve (NNR), in addition to a Local Nature Reserve (LNR).

Table 2: Designated sites within 1km radius of the site

Designated Site Name	Distance from Site (approx.)	Reasons for Notification from Natural England
<b>Statutory Sites</b>		
Richmond Park SAC, SSSI and NNR	0.2km south	Richmond Park includes areas of lowland acid grassland, parkland and deciduous woodland habitats. Richmond Park has been managed as a royal deer park since the seventeenth century, producing a range of habitats of value to wildlife. In particular, Richmond Park is of importance for its diverse deadwood beetle fauna associated with the ancient trees found throughout the parkland. In addition the Park supports the most extensive area of dry acid grassland in Greater London.
Barnes Common LNR	1.8km north-east	Barnes Common comprises valuable habitats including acid grassland and woodland.

#### 3.4 Historical records

Historical records of bats within 2km of the site as requested from the London Bat Group are summarised in **Table 3** below.

Table 3: Historical records of bats within 2km of the site

Common name	Scientific binomial	Number of records	Approximate distance of nearest record
Brown long-eared	<i>Plecotus auritus</i>	10	1km
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	31	0.5km
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>	75	0.5km
Serotine	<i>Eptesicus serotinus</i>	3	1.3km
Noctule	<i>Nyctalus noctula</i>	38	1.1km
Natterer's	<i>Myotis nattereri</i>	7	1km



Leisler's	<i>Nyctalus leisleri</i>	16	0.5km
Brandt's	<i>Myotis brandtii</i>	1	1.1km
Whiskered	<i>Myotis mystacinus</i>	1	1.1km
Nathusis pipistrelle	<i>Pipistrellus nathusii</i>	5	0.5

A search of the magic.gov.uk database for granted EPSMLs within a 2km radius of the site has been completed. Displaced bats from licenced sites >1km away from the survey site will find alternative habitat either within the mitigation measures implemented as part of the licence or will relocate to other known roosts sites in close proximity to the licenced site. A number of ESPMLs have been granted within 2km and two ESPMLs have been granted within 1km of the Site. The ESPMLs within 1km of the site are detailed in **Table 4** below.

Table 4: Granted EPSMLs (bats) within 1km of the site

Case reference of granted application	Approx. distance from site	Bat Species Effected	Licence Start Date:	Licence End Date:	Impacts allowed by licence
2014-2304-EPS-MIT	0.95km south-west	Soprano pipistrelle	15/08/14	31/07/19	Impacts to a resting place

### 3.3 Landscape

A review of the designated sites, aerial photographs (**Figure 1**), the MAGIC database and OS maps has been undertaken. Collated together, the site's local bat habitat is described below:

The site is located directly adjacent to residential dwellings and their associated gardens on all sides. Beyond the residential dwellings, the landscape to the north is dominated by urban infrastructure and the landscape to the south is dominated by habitats associated with Richmond Park.

The area surrounding the site within 2km contains a number of priority habitats that are likely to be of value to bats. Specifically, priority habitats located within 2km are characterised by deciduous woodland, wood pasture and parkland and lowland dry acidic grassland. The majority of these habitats are located within Richmond Park to the south. The priority habitats located within 2km of the site are likely to be connected to the site and the wider landscape through continuous green infrastructure typically utilised by commuting and foraging bats such as woodland edge, urban tree lines, and residential gardens. It is noted however that there are limited habitats of value to commuting and foraging bats within the site boundary. Priority habitats within 2km of the site are listed in **Table 5** below and shown in **Appendix 3**.

Table 5: Priority Habitat Inventory within 2km (Magic.gov.uk)

Habitat	Closest distance from site
Deciduous woodland	0.2km south
Wood pasture and parklands	0.2km south-west
Lowland Dry Acidic Grassland	0.3km south



Figure 1: Site Location within the wider landscape

### 3.5 Field Survey Results

The site is dominated by five tennis courts and their associated infrastructure only. However, buildings and peripheral vegetation are present directly adjacent to the site; these features have therefore also been considered. Site features are mapped in **Appendix 1**. The weather conditions recorded at the time of the survey are shown in **Table 6**.

Table 6: Weather conditions during the survey

Date: 27/07/2021	
Temperature	22°C
Cloud cover	30%
Wind	2 mph
Rain	None

### 3.6 Site Feature descriptions and photos

#### Buildings

No buildings are present within the site boundary and thus no buildings will be directly impacted by the proposed development. Three buildings are located directly adjacent to the eastern site boundary. These buildings comprise the squash courts, the coach's office and the clubhouse. Relevant to this assessment, all buildings are located adjacent to multiple existing floodlights. As a result, all buildings located adjacent to the site are likely to be subject to significant light pollution associated with the existing light infrastructure.



**Photograph 1** – The building located directly adjacent to the north-east site boundary. Note two large flood lights fixed onto the wall.



**Photograph 2** – The two buildings location adjacent to the south-east site boundary. Note that these buildings are located adjacent to large floodlights.

### Trees and other vegetated habitats

No trees or other vegetation are located within the Site boundary and thus no trees or vegetated habitats will be directly impacted by the proposed development.

However, a single tree located directly adjacent to the north-west site boundary (see **Appendix 1; T1**) is assessed to provide low potential to support roosting bats. Furthermore, peripheral vegetation located adjacent to the north, west and south site boundaries are considered to offer some potential to support foraging and commuting bats, albeit limited.

### T1

T1 is a mature false acacia *Robinia pseudoacacia* tree. A hole is located upon the main trunk at approximately 4m on a south facing aspect. The hole has formed as a result of epicormic growth resulting from the removal of a tree limb. Epicormic growth can rot internally forming a small cavity. As a result, the hole upon the trunk of **T1** may provide roosting opportunities for a small number of crevice-dwelling bats in the short term. As such, **T1** is assessed to provide low potential to support roosting bats.

It is noted that T1 was subject to an emergence survey in combination with the bat activity survey in May 2017 to confirm the presence/ likely absence of bats; no bats were recorded roosting within T1.

### Peripheral vegetation


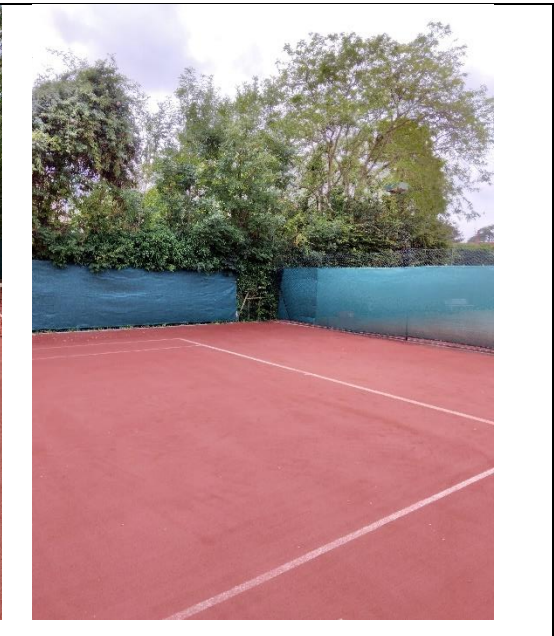
Peripheral vegetation located outside of the site adjacent to the north, west and south site boundaries comprise a number of trees, introduced shrubs and small hedges associated with residential gardens. Species recorded include false acacia, blackthorn *Prunus spinosa*, ivy *Hedera spp.*, beech *Fagus sylvatica*, ash *Fraxinus excelsior*, pear *Pyrus spp.*, Hawthorn *Crataegus monogyna*, Portuguese laurel *Prunus lucitanica*, downy birch *Betula pubescens*, hazel *Corylus avellana*, elder *Sambucus nigra*, and Leyland cypress *Cupressus leylandii*. These habitats are small in extent and are enclosed and prevented from extending into the site significantly by the peripheral tennis court fencing.



**Photograph 3 –**  
South aspect of T1. The location of the branch wound hole is denoted by the red arrow.



**Photograph 4 –** A general view of peripheral vegetation located adjacent to the west site boundary.

<p><b>Context of the entire site</b></p> <p>The site is dominated by five tennis courts and their associated infrastructure. As a result, the site contains no habitats of potential value to roosting, foraging or commuting bats. Although some peripheral vegetation which includes T1 provide some value to bats, it is assessed to be limited.</p> <p>It is noted that the site was subject to a bat activity survey to determine the use of the site by bats in May 2017; a low level of activity by common pipistrelle bats was recorded only. Common pipistrelles are common in urban environments and are typically less light sensitive in comparison to other bat species.</p>		
	<p><b>Photograph 5</b> – A general view of the site facing west.</p>	<p><b>Photograph 6</b> – A general view of the site facing north.</p>
<p><b>Evidence of bats</b></p> <p>No evidence of the presence of bats was recorded during the site survey.</p>	<p>n/a</p>	
<p><b>B1 Breeding birds and other incidental observations</b></p> <p>There was no evidence of nesting birds located internally or externally on the survey building.</p>	<p>n/a</p>	

## 4.0 Conclusions, Impacts and Recommendations

### 4.1 Informative guidelines

Bats are protected under the Wildlife and Countryside Act and Conservation Regulations (see Appendix 4 for a summary of legislation protecting bats in the UK). Legislation protects all wild birds whilst they are breeding, and prohibits the killing, injuring or taking of any wild bird or their nests and eggs. Certain species of bird, including the barn owl, are subject to special provisions; it is an offence to disturb any bird or their young during the breeding season.

There are three potential outcomes of this survey, each with specific recommendations. These are outlined below:

#### **Confirmed bat roost**

Best practice survey guidelines (Collins, 2016) recommend additional surveys for confirmed roosts. Three further surveys are required to characterise the bat roost present including species, roost type and access points to inform a European protected species mitigation licence (EPSML) application with Natural England. Surveys must be completed during the active bat season (May – September). At least two of the surveys should be completed during the optimal survey period mid-May to August, and at least one of the surveys should be a dawn re-entry survey (Collins, J. 2016).

#### **Low, moderate or high likelihood of a bat roost present**

Best practice survey guidelines (Collins, 2016) recommend additional surveys for features assessed as having low to high suitability for roosting bats. One, two or three further surveys are required to confirm presence/likely absence of a bat roost, based on a low, medium or high roost likelihood evaluation. Surveys must be completed during the active bat season (May – September). If more than one survey is recommended, at least one of them should be completed during the optimal survey period mid-May to August, and at least one of the surveys should be a dawn re-entry survey (Collins, J. 2016). If two or one further survey is recommended these surveys must be completed during the optimal survey period (mid-May to August). For low and moderate roost likelihood evaluation the survey effort recommended at this stage is iterative and if bats roosts are confirmed in the building, a further survey will be required to provide sufficient information to inform an EPSML application to Natural England.

#### **Negligible likelihood of a bat roost present**

Buildings assessed as comprising negligible suitability for roosting bats do not normally require further surveys. However, if bats are found during any stage of the development, work should stop immediately and a suitably qualified ecologist should be contacted for further advice.

#### 4.2 Evaluation

Considering the results of the desk-based assessment and site survey results, the potential of the building to support roosting bats and the recommended further survey requirements are detailed in **Table 6** below.

Table 6: Evaluation of building on site

Ref	Survey assessment conclusions (with justification)	Foreseen impacts	Recommendations	Enhancements and mitigation The Local Planning Authority has a duty to ask for enhancements under the NPPF (July 2018)
Entire Site and T1	<p>There are no habitats present within the site boundary that may provide roosting opportunities for bats.</p> <p>T1, located directly adjacent to the north-west of the site, is assessed to provide low potential to support roosting bats. Furthermore, peripheral vegetated habitats are assessed to provide some potential to support foraging and commuting bats, albeit limited. Given the small extent of this vegetation located adjacent to the site, they are not considered to provide a significant resource to foraging or commuting bats.</p> <p><b>It is noted that the baseline ecological conditions with regards to the site's value to bats has not significantly changed since the previous Preliminary Roost Assessment undertaken in October 2016.</b></p>	<p>No direct impacts to roosting, commuting or foraging bats are anticipated as a result of the development.</p> <p>Indirect impacts as a result of additional lighting at the site may occur, but these are considered insignificant given the low value of habitats on-site to bats.</p> <p>Furthermore, an emergence survey of T1 and bat activity survey of the entire site in May 2017 did not record any significant bat activity.</p>	<p>In response to the Preliminary Roost Assessment undertaken in November 2016, the Local Planning Authority requested that a single bat activity survey was undertaken to inform the planning application. An emergence survey of T1 and combined bat activity survey was therefore undertaken by Arbtech in May 2017 to determine the use of the site by bats.</p> <p>Given that this Preliminary Roost Assessment confirms that the baseline ecological conditions with regards to the site's value to bats has not significantly changed since 2016, it is recommended that an update emergence survey of T1 and combined bat activity survey is undertaken to inform the new planning application as to update the survey information requested and collated in 2016.</p> <p>The survey should be undertaken during the active bat season between May and September inclusive.</p> <p>Two surveyors are required to provide full coverage of the site.</p>	<p>Mitigation and enhancement will be confirmed following the results of the above survey.</p>

#### 5.0 Bibliography

- British Trust for Ornithology (2016) [www.bto.org/about-birds/nbw/putting-up-a-nest-box](http://www.bto.org/about-birds/nbw/putting-up-a-nest-box)
- Collins, J. (ed.) (2016). Bat Surveys for Professional Ecologists — Good Practice Guidelines, 3<sup>rd</sup> edition, Bat Conservation Trust, London.

- Garland & Markham (2008) Is important bat foraging and commuting habitat legally protected?
- Google Earth (2021).
- MAGIC database (2021) <http://www.magic.gov.uk/MagicMap.aspx>.
- Mitchell-Jones, A.J. (2004). Bat Mitigation Guidelines. English Nature, Peterborough.



### Appendix 1: Survey Plan



Appendix 2: Proposed development

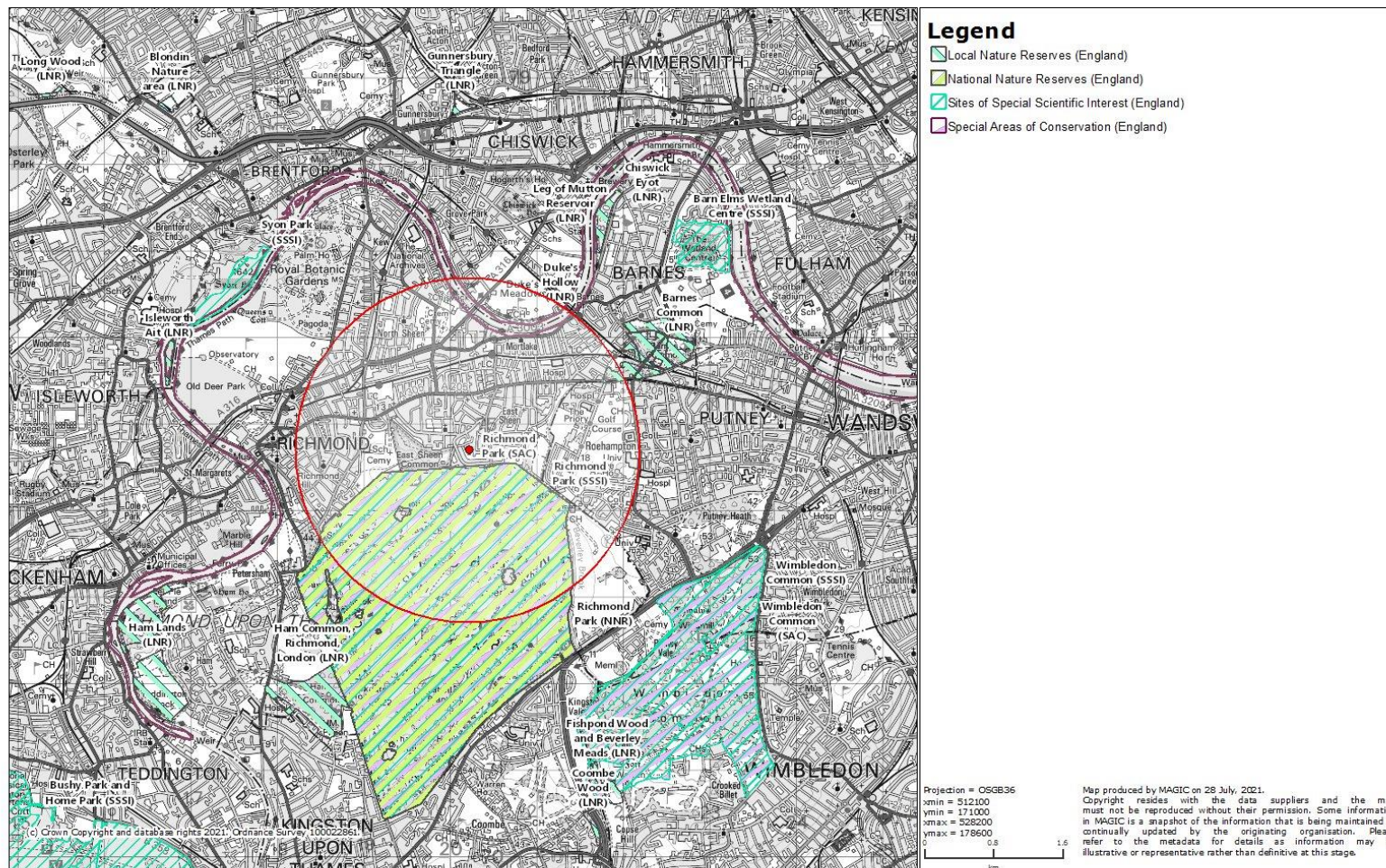


### Appendix 3: Desk Study Information

Full historical records can be provided on request.

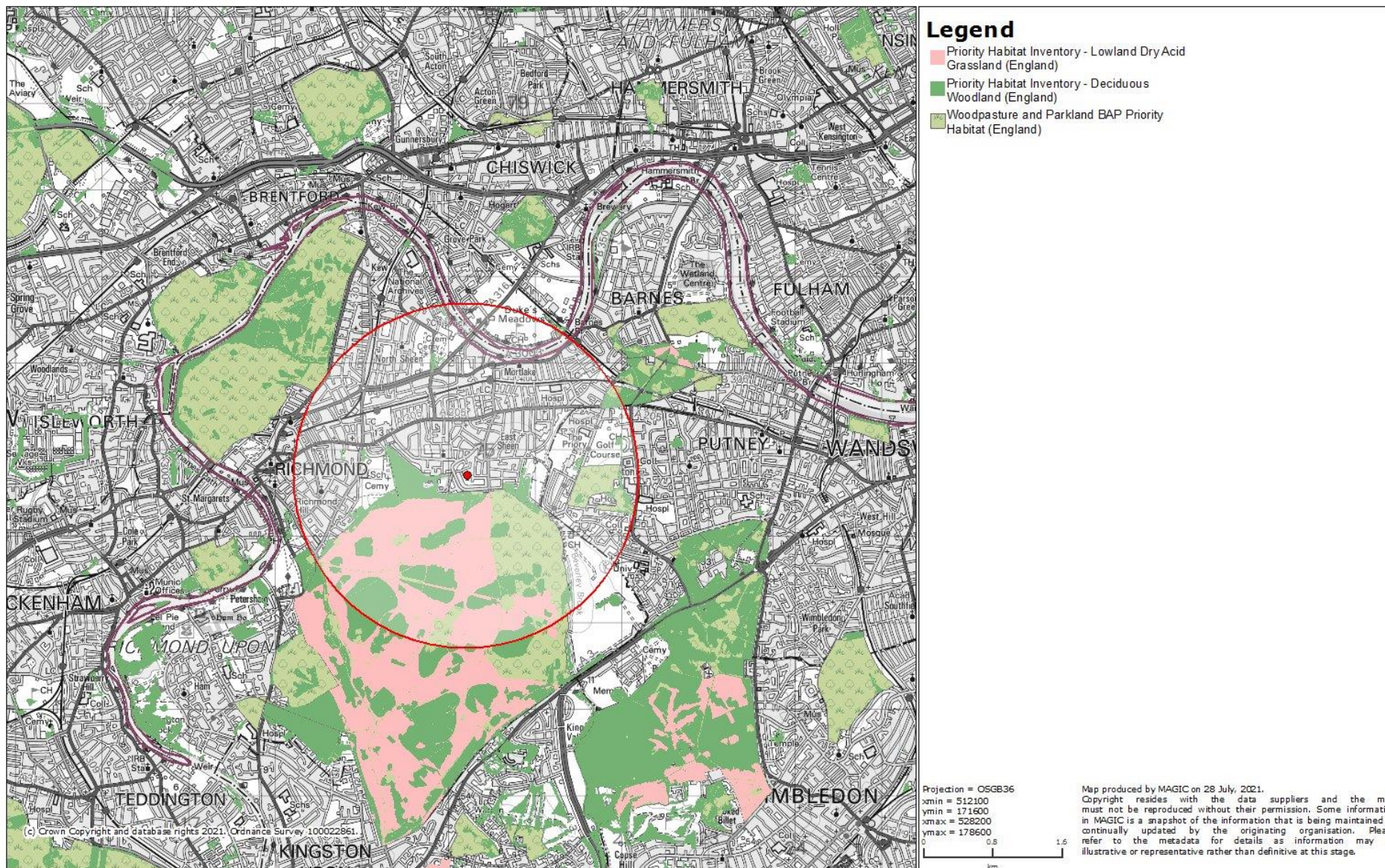
MAGiC

#### Designated Sites



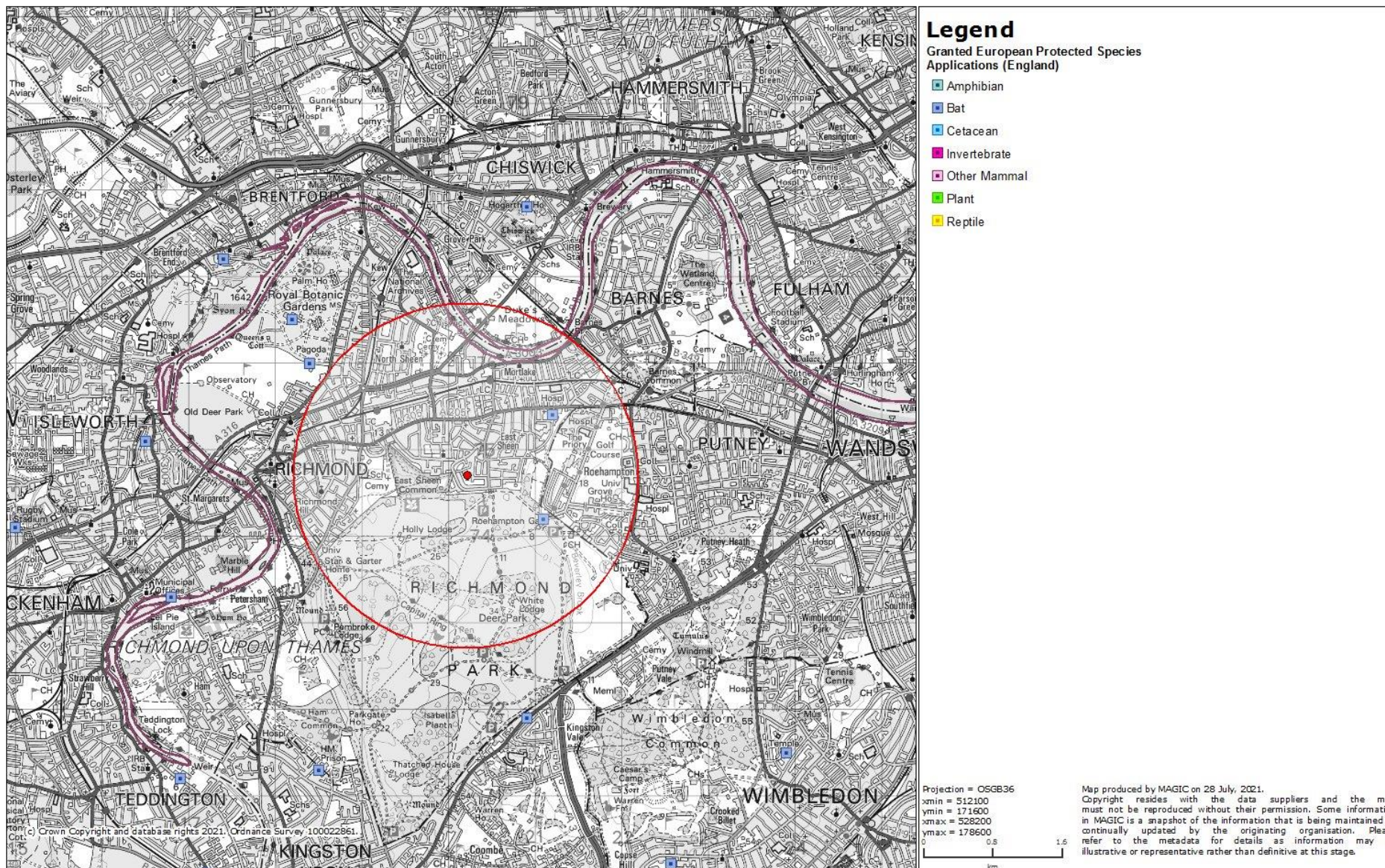


### Priority Habitats





### Granted EPSML



## Appendix 4: Legislation and Planning Policy related to bats

### New legislation (2020)

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 came into force when Britain left the European Union on 31st January 2020. It covered amendments relevant to this survey to:

Wildlife and Countryside Act 1981: England and Wales (x1 amendment)

Conservation of Habitats and Species Regulations 2017 (x29 amendments)

### LEGAL PROTECTION

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

#### **Regulation 43: Protection of certain wild animals - offences**

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

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

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

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

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

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

### NATIONAL PLANNING POLICY (ENGLAND)

#### National Planning Policy Framework 2017

The National Planning Policy Framework promotes sustainable development. The Framework specifies the need for protection of designated sites and priority habitats and species. An emphasis is also made on the need for ecological infrastructure through protection, restoration and re-creation. The protection and recovery of priority species (considered likely to be those listed as UK Biodiversity Action Plan priority species) is also listed as a requirement of planning policy.

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

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

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

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

#### **Effect on development works:**

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

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

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

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

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

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

3. ringing or marking
4. conserving wild animals

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