AEWC Ltd

Animal Ecology & Wildlife Consultants

Bat Survey Report

Frithknowle

Picts Lane
Cowfold
West Sussex
RH13 8AN

Thomas Wright

23-212
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Summary

- AEWC Ltd were commissioned by Batcheller Monkhouse on behalf of their client to undertake a Detailed Bat Survey at Frithknowle, Picts Lane, Cowfold, West Sussex, RH13 8AN at central grid reference TQ 21839 23981 to help inform the proposed development of the site.
- The proposed development plan involves the construction of two new residential buildings and landscaping of the area surrounding this new development. This will involve the demolition of the existing barns and carport, the forge will be retained.
- A daytime bat assessment carried out on the 23rd December 2025 identified the main barn had confirmed bat roosts, and the carport held high potential to support roosting bats; therefore, **sufficient surveys were required to confirm species and characterise all roosts to inform the licence application and associated mitigation strategy.** Three surveys are recommended within the Good Practice Guidelines.
- This report details the results of the survey, which was carried between 9th May and 8th July 2026 by Brigitte de Coriolis, a Natural England licensed bat ecologist.
- The surveys across the site have identified the presence of day roosts for barbastelle bat within the interior of the hay loft (*Barbastella barbastellus*) and common pipistrelle (*Pipistrellus pipistrellus*) within the batten space of the hay loft roof, day roosts for likely Natterer's bats (*Myotis nattereri*) within the interior of the main barn and within the hay loft, and a day roost for a brown long eared bat (*Plecotus auritus*) within the interior of the main barn.
- **A lack of any mitigation would result in a negative impact on bats through potential death, roost damage, destruction and modification as well as disturbance to bats present on the site.**
- The proposed work will have a detrimental effect on bats or disturb or damage their roost, therefore **a Natural England development licence will be required for works to proceed to ensure that an offence will not be committed**. This will encompass a Mitigation Strategy to ensure that the development is designed to protect bats and to minimise long term impacts upon the local bat population.
- **Species-specific mitigation and compensation measures for those species confirmed to be roosting on site will be required to ensure that there is no loss of roost availability, and the favourable conservation status of the species is maintained.**
- Under the currently proposed development plans the forge building, which held moderate potential to support roosting bats, will not be developed or impacted and therefore was not subject to further surveys. **Should plans change to include impacting the forge, which includes altering the interior or exterior of this building, further emergence surveys would then be required in order to confirm presence or increase confidence in a result of likely absence of bat roosts on site.**

This report has been prepared by AEWC Limited, with all reasonable skill, care and diligence within the terms of the Contract with the client. We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above. This report is confidential to the client, and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at their own risk.

The information and data which has been prepared and provided is true and has been prepared and provided in accordance with the Professional Guidance and 'Code of Professional Conduct' issued by the Chartered Institute of Ecology and Environmental Management (CIEEM). We confirm that the opinions expressed are our true and professional bona fide opinions.

1 Introduction

1.1 AEWC Ltd were commissioned by Batcheller Monkhouse on behalf of the client to undertake a Detailed Bat Survey at Frithknowle, Picts Lane, Cowfold, West Sussex RH13 8AN to help inform the proposed development of the site.

1.2 The bat surveys and report writing have been carried out in accordance with Bat Surveys: Good Practice Guidelines (Bat Conservation Trust, 2023).

1.3 A previous bat assessment was carried out by AEWC Ltd in February 2024 which identified the main barn, car port and forge as having high potential for bats, therefore, **sufficient surveys are required to confirm species and characterise all roosts to inform the licence application and associated mitigation strategy.**

1.4 An update daytime bat assessment was carried out on the 23rd December 2025 by AEWC Ltd which identified confirmed roosts within the main barn, high potential within the car port, with the forge being found to hold moderate potential to support roosting bats. The open-sided barn and collapsed building were once again found to hold negligible potential to support roosting bats.

1.5 Further surveys were therefore required for the buildings supporting confirmed roosts to confirm species and characterise roosts to determine whether bats represent a constraint to the proposed development and identify any mitigation, compensation, and licensing requirements for the development.

1.6 Under the current development proposals, the forge will not be impacted during the works and the open-sided barn and collapsed building were both found to hold negligible potential to support roosting bats. Therefore, none of these buildings were subject to further surveys.

1.7 This report details the results of the detailed bat survey and outlines recommendations in relation to bats and the proposed development.

Aims and Objectives

1.8 The aims and objectives of the survey were to:

- Identify the potential of the buildings on-site to support roosting bats;
- Identify whether bats are present using the buildings on-site;
- Estimate the size and status of any confirmed bat roost within the buildings;
- Determine the potential impacts on any bat roost from the proposals; and
- Provide information for use in the design and development of mitigation, compensation, and enhancement measures where appropriate.

Site Location and Description

1.9 The proposed development site is located at Frithknowle, Picts Lane, Cowfold, West Sussex, RH13 8AN at central grid reference TQ 21839 23981. The site is located to the north of the rural village of Cowfold. The surrounding landscape comprises a mosaic of woodland, wood pasture and farmland, High Wield AONB is positioned within 200m to the north-east of the site. See Figure 1. See Figure 1.

1.10 The detailed bat survey was for a complex of disused barn buildings within the centre of the site. See Figure 2.

Development Proposals

1.11 The proposed development plan involves the construction of two new residential buildings, and landscaping of the area surrounding this new development. This will involve the demolition of the existing barns and carport; the existing forge will be retained and is not proposed to be impacted during the proposed works. See Figure 3.

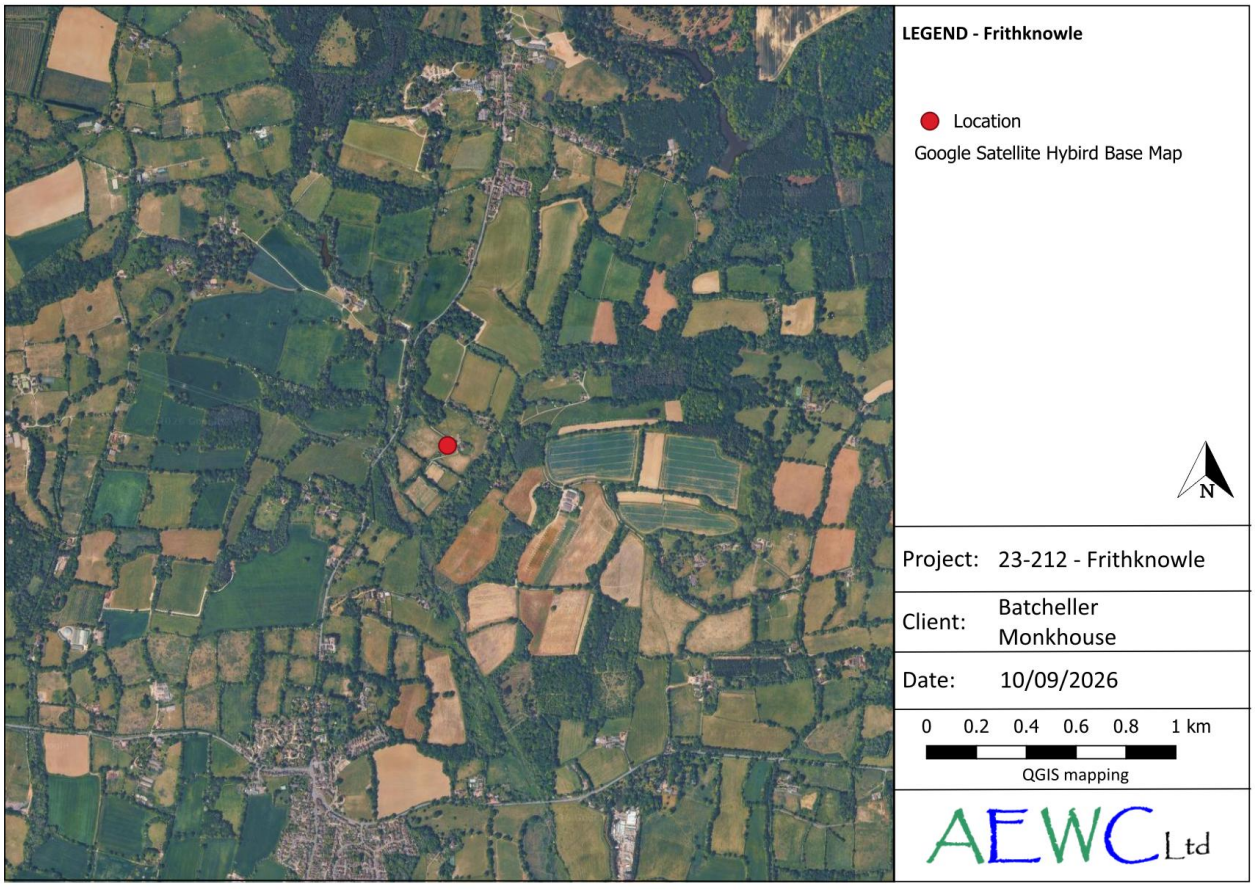


FIGURE 1: SHOWING THE LOCATION OF THE SITE



FIGURE 2: SHOWING THE BUILDINGS SUBJECT TO SURVEY

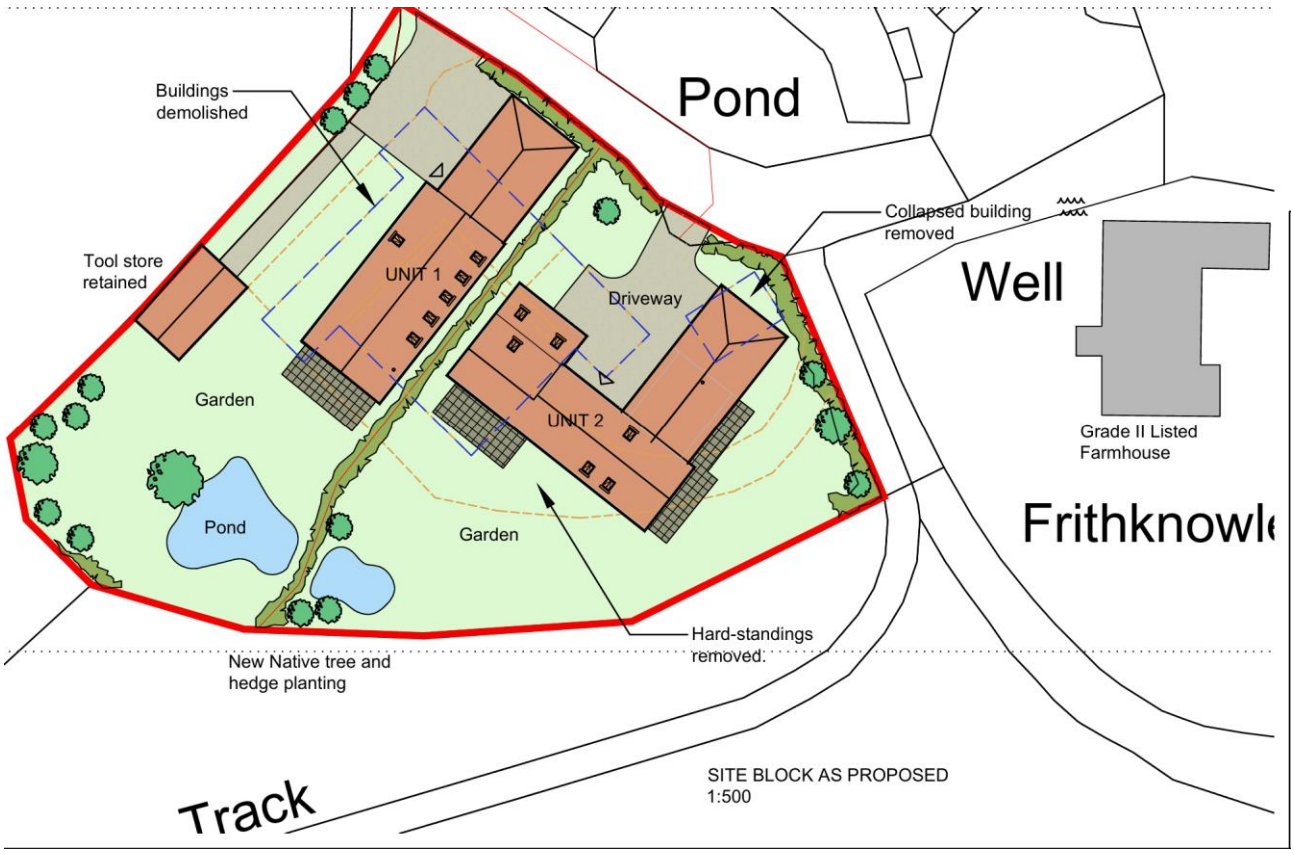


FIGURE 3: SHOWING THE PROPOSED PLANS

Legislation

1.12 All species of bats are listed on *Schedule 5* of the *Wildlife and Countryside Act 1981 (as amended)* which affords them protection under *Section 9*, as amended. They are also protected under the *Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019*. In combination, this makes it an offence to:

- intentionally kill, injure or take (capture etc.);
- possess;
- intentionally or recklessly damage, destroy, obstruct access to any structure or place used by a scheduled animal for shelter or protection, or disturb any animal occupying such a structure or place; and
- sell, offer for sale, possess or transport for the purpose of sale (live or dead animal, part or derivative) or advertise for buying or selling such things.

1.13 A roost is defined as “any structure or place which a bat uses for shelter or protection”. As bats tend to reuse the same roosts, legal opinion is that a roost is protected whether or not bats are present.

1.14 Any disturbance of a bat occupying a roost can lead to prosecution. Disturbance can be caused by noise, vibration, and artificial lighting. Penalties for breaking the law can include fines of £5,000 per bat, imprisonment, and the seizure of equipment.

1.15 Seven bat species (barbastelle, Bechstein’s, noctule, soprano pipistrelle, brown long-eared, lesser horseshoe, and greater horseshoe) are also Species of Principal Importance in England under *Section 41* of the *Natural Environment and Rural Communities Act 2006*.

1.16 Four bat species (greater horseshoe, lesser horseshoe, barbastelle, and Bechstein’s) are also listed on Annex II of the Habitats Directive (92/43/EEC). Special Areas of Conservation (SACs) are designated for Annex II bat species to provide site-level protection.

2 Methods

Desk Study

2.1 The Multi Agency Geographic Information for the Countryside (MAGIC) website provided by the Department for Environment, Food and Rural Affairs (Defra) was consulted to obtain information about any international or European level designated nature conservation sites within 2km of the site boundary, afforded protection either directly by the Conservation of Habitat and Species (Amendment)(EU Exit) Regulations 2019 or to the same level of protection through planning policy (the National Planning Policy Framework and Local Development Framework). Information regarding statutory designated sites, such as Sites of Special Scientific Interest (SSSI), within a 2km radius of the site were also obtained from MAGIC.

2.2 MAGIC was also used to assess the habitats surrounding the site and obtain records of granted European Protected Species (EPS) licences within 2km of the site, to infer species likely to be present and better assess in-combination impacts of the proposed works.

Daytime Assessment

2.3 A detailed bat building inspection was undertaken on the 23rd December 2025 by Ivana Murphy, a Natural England licensed bat ecologist and assisted by Thomas Wright.

2.4 A systematic internal inspection of the buildings was conducted using a high-powered torch to illuminate all areas thought to be suitable for roosting bats. Additionally, an external search around the perimeter of the buildings was conducted and any possible access points, such as gaps and crevices, were noted and inspected with a high-powered torch and ladder as appropriate.

2.5 The buildings' suitability for bat roosting was assessed by examining structural features that may influence the suitability of a building to support roosting bats. These include the presence of a roof void, the presence of access points into void or crevice spaces (including gaps beneath bargeboards, weatherboarding, soffits and facias, under lead flashing, within masonry, under loose tiles, between tenon and mortise joints), the complexity and size of any roof void, and daytime light levels in the roof void.

2.6 The buildings' suitability for roosting bats was also assessed by examining the surrounding habitat. Important habitat features surrounding the structure which may influence roost potential include whether the structure is in a semi-rural or parkland location, its proximity to significant linear habitat features, such as a watercourse, mature hedgerow, or wooded lanes, and its proximity to high quality habitat such as semi-natural woodland.

2.7 All surfaces were also surveyed for signs of bat presence, such as:

- bat droppings that are dry and do not putrefy, but can crumble away to dust;

- staining of access points used by bats to enter the structure; and
- feeding remains such as moth and butterfly wings.

2.8 Taking account of these architectural features, habitat features, and any signs of presence, the buildings were then assigned a level of roost suitability based the criteria given in the Bat Conservation Trust's Bat Surveys: Good Practice Guidelines (Collins, 2023) and professional judgement. The primary objective of this exercise was to identify the need for further detailed bat surveys, or alternatively to obtain sufficient information that would dismiss the need for further assessment.

Emergence Surveys

2.9 The evening emergence surveys were conducted on 9th of May, 7th of June and 8th of July 2026. These spanned a time of year when bats are regularly active, and maternity colonies should be present. Conditions were good for all emergence surveys, with warm, dry, and calm weather, and any roosting bats present were likely to be active. The emergence surveys began a minimum of 15 minutes before sunset and finished a minimum of 90 minutes after sunset.

2.10 Batlogger M bat detectors were used for taking time-expanded recordings of any bats that may emerge from the buildings and bats recorded foraging or commuting around the site. These recordings were analysed on Elekon bat analysis software that facilitates species identification.

2.11 Professional Canon XA night vision video cameras were used as night vision aids (NVAs) alongside surveyors to film areas of the buildings with the assistance of external infra-red lamps to ensure suitable lighting to accurately identify whether bats emerge from the buildings. Cameras were deployed on tripod stands to view areas with bat roosting potential. Footage was reviewed at an appropriate speed on a computer after the survey using VLC player software which does not skip frames at any review speed, to ensure any bat emergences were recorded. Where necessary footage was slowed down to ensure the exact emerge point could be identified.

2.12 Four surveyors and five professional night vision cameras were used for the first emergence survey (Figure 6). The surveyors and cameras were positioned to get a good all-round view of the building with a particular focus on the areas of impact and where potential roost features were identified present.

3 Constraints/Limitations

3.1 Bats are difficult to locate in large structures, with so many potential roosting areas and likely inaccessible areas. Finding the exact roosting site, particularly during a daytime assessment, can be difficult, especially male/single bat roosting sites. It should be noted that it is not always possible to identify bat presence by examining externally

around buildings as poor weather conditions may have washed away droppings deposited on exposed surfaces.

3.2 Bats can have seasonal use of buildings and being so mobile may arrive and start using a site after it has been surveyed, or roost somewhere else during the period it was surveyed. For this reason, bats may potentially be present but remain undetected, particularly during daytime assessment.

3.3 The update bat assessment was undertaken in December, outside of the active season for bats, therefore any external evidence of the presence of bats earlier in the season would likely have been destroyed by weathering.

4 Results

Desk Study

Statutory Designated Sites

4.1 There are three statutory designated sites located within 2km of the proposed development site. The nearest statutory designated site is High Weald Area of Outstanding Natural Beauty which is located 130m to the north. See Figure 4.

Granted EPS Bat Licences

4.2 There are granted EPS licences for bats within 2km of the site. These are detailed in Table 1 and shown in Figure 4.

TABLE 1: EPS LICENCES WITHIN 2KM OF THE SITE

Case reference of granted application	Species on the licence	Licence Start Date	Licence End Date	Impact breeding site	Damage breeding site	Damage resting place	Destroy breeding site	Destroy resting place
EPSM2012-4631	C-PIP; BLE; NATT	21/09/2012	30/09/2014	Y			Y	Y
EPSM2011-3480	C-PIP; BLE; NATT	01/10/2011	30/09/2013	Y			Y	Y
EPSM2010-1637	C-PIP; S-PIP; BLE	10/03/2010	30/11/2010	N			N	Y
2017-27797-EPS-MIT	BLE, C-PIP	21/03/2017	21/03/2018	N	N	Y	N	Y

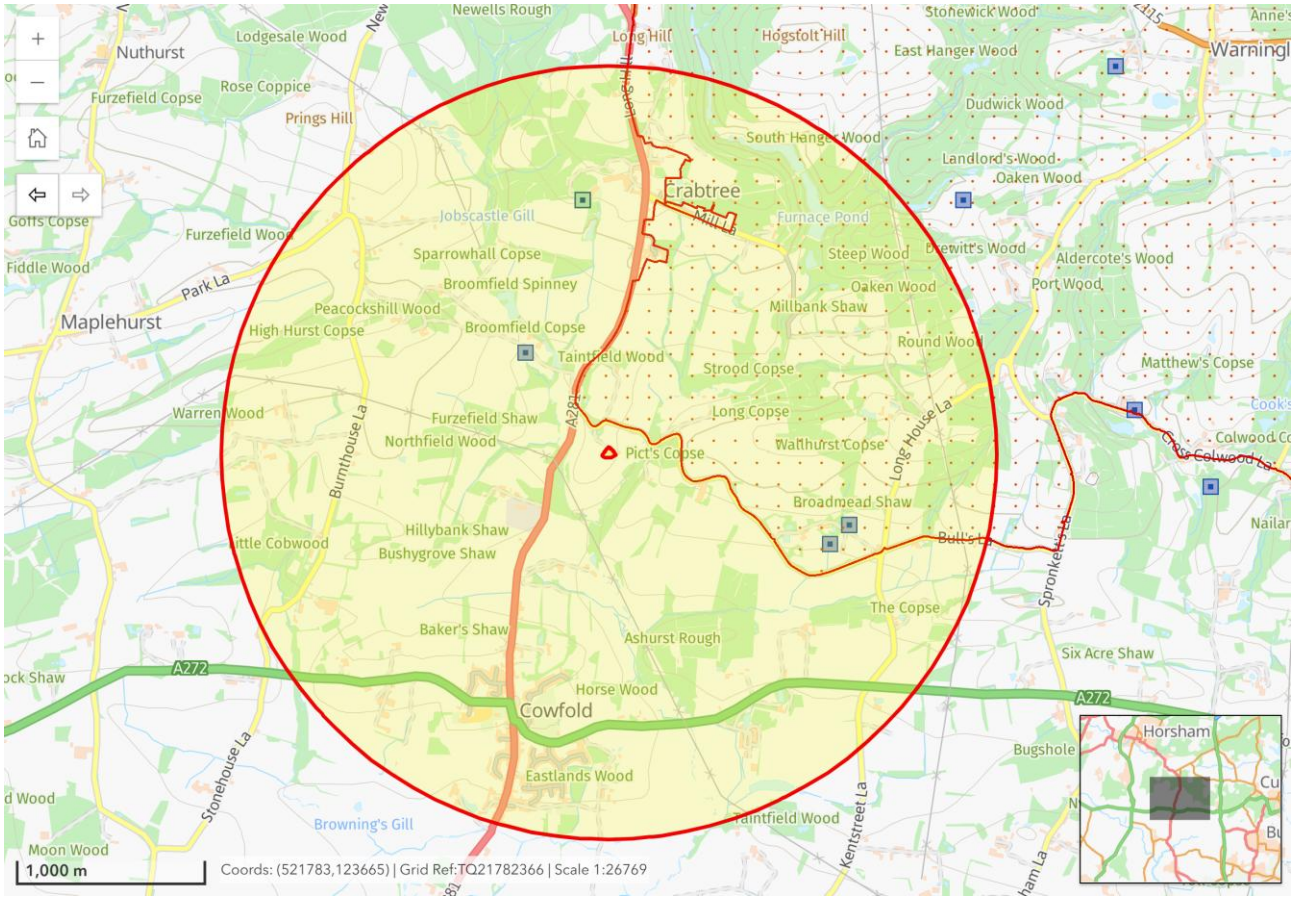


FIGURE 4: SHOWING STATUTORY DESIGNATED SITES AND GRANTED EPS LICENCES WITHIN 2KM OF THE SITE. BAT LICENCES SHOWN IN BLUE WITH GCN LICENCES IN GREEN.

Habitats of Principal Importance

4.3 Habitats data available via MAGIC was reviewed for the presence of Habitats of Principal Importance (HPI). There are no HPI mapped within or immediately adjacent to the site. See Figure 5.

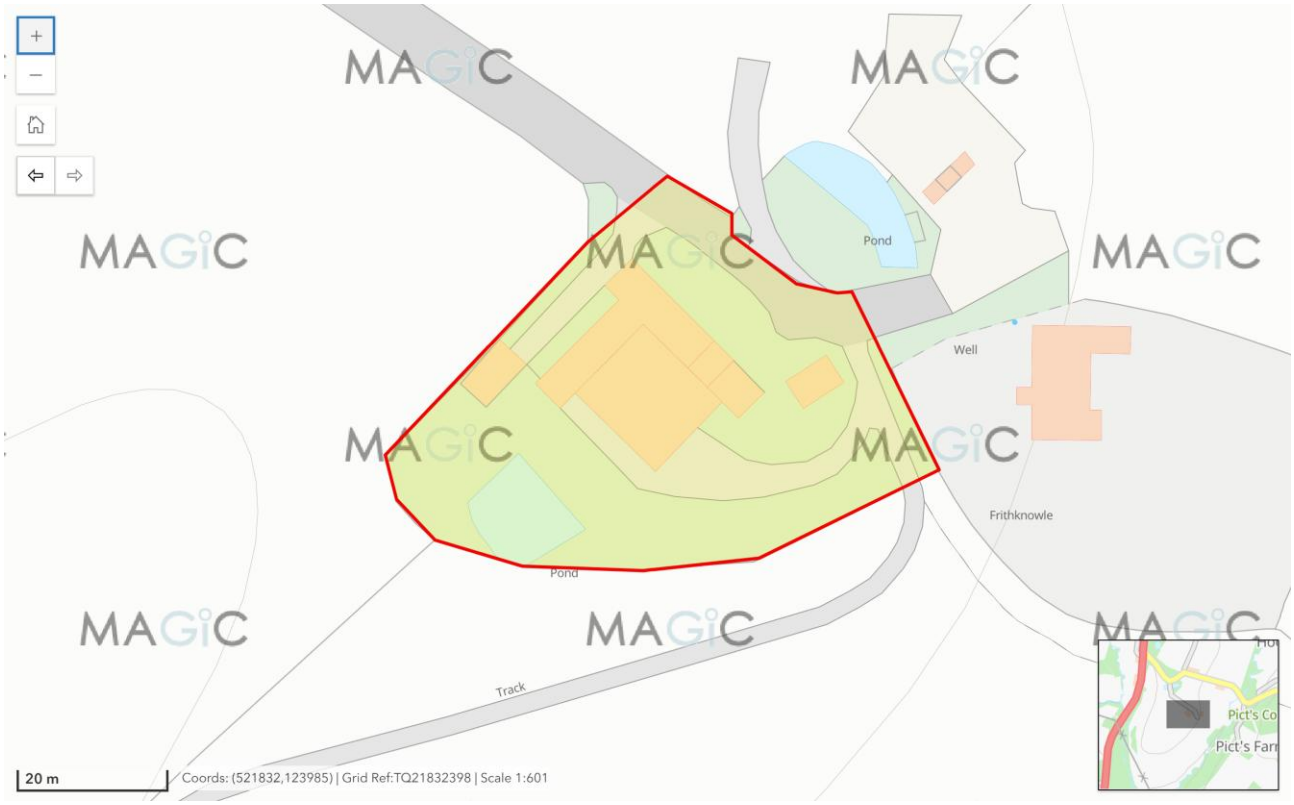


FIGURE 5: SHOWING LACK OF HABITATS OF PRINCIPAL IMPORTANCE IN PROXIMITY TO THE SITE.

Daytime Assessment

Main Barn

4.4 The main barn on site is a disused L-shaped single-storey agricultural building, constructed of brick with a pitched-roof supporting clay tiles. There is a two-storey extension at the south-east end of the barn, housing a carport with a hayloft above. The extension has a pitched roof supporting clay tiles and the north-east elevation is clad with timber weather boarding above the car port doorways.

4.5 The roof of the L-shaped building was found to be in poor condition with multiple gaps noted beneath uneven, lifted or cambered roof tiles on all elevations. Raised ventilation ridge tiles provide access into the ridge cavity; these together with roof tile gaps and several open windows, skylights and doors on the south-east and south-west elevations also provide potential access into the interior spaces of the building.

4.6 Internally, the barn had two separate sections present. The first of these runs north-east to south-west. The timber framed roof was unlined and open to the ridge. No separate roof void was present throughout this section. Multiple skylights, some of which were open, were observed on both the south-east roof pitch. A number of droppings were found, predominantly below the ridge.



Photograph 1 – North-west elevation of main barn with loose and damaged tiles present



Photograph 2 – South-east elevation of the main barn and open-sided barn



Photograph 3 – Interior of the unlined main barn



Photograph 4 – Droppings present scattered throughout the building

4.7 The section of the main barn which rans North-west to South-east was divided into two sections, a stable/wash room and the separate carport. The ceiling was raised and partially vaulted, creating a shallow roof void above, which could not be accessed during the bat assessment. Bat droppings were found scattered throughout this section of the main barn.





Photograph 5 – North-east elevation of the storage room with missing tiles and exposed batten	**Photograph 6 –** Inaccessible, shallow roof void within the stable section of barn.
	
Photograph 7 – Droppings present in northern section of the main barn	

Carport

4.8 The carport consists of two storeys and supports a clay tile roof, with numerous uneven, lifted or cambered tiles creating potential access points. The ground floor, used for parking, was open on the north-eastern elevation providing access into the interior space. Wooden weatherboarding on the north-eastern elevation was tight fitting with no suitable crevice roost features. The first-floor room of the carport, a hay loft, was timber framed with an unlined roof. An open doorway provided additional potential access into the first floor. No bats or evidence of bats was identified within the ground or first floor areas of the carport.

	
Photograph 8 – Open door allowing access to the void above the carport	**Photograph 9 –** North elevation of the car port

Forge

4.9 A disused forge is present in the north-west of the site, which is a small square single-storey building constructed of brick with a pitched roof supporting a corrugated

asbestos sheet roof. The upper section of the east elevation is clad with tightly fitting, timber weather boarding.

4.10 The forge does not contain a separate roof void. The roof is wooden framed and unlined internally. No droppings or other evidence of bats were found anywhere within or around this building.



Photograph 10 – Asbestos roof pitch of the forge



Photograph 11 – Tight, wooden cladding present on the northern elevation of the forge

Collapsed building

4.11 A third building at the east of the site is noted on the plans, which appears to have been a brick-built detached building with timber weatherboarding and a pitched roof supporting handmade clay tiles, however this has since collapsed and is therefore no longer considered a building.



Photograph 12 – Collapsed building

Open-sided Barn

4.12 A large open-sided barn is present in the centre of the site adjacent to the main barn. It has concrete beams supporting a corrugated asbestos sheet pitched roof with several inlaid skylights.

4.13 Although there is fly-in access into the internal space of the barn, the building was considered to have negligible potential to support roosting bats due to a lack of potential roosting features and bright and draughty internal conditions. No evidence of the presence of bats was identified within or around this building.



Photograph 13 – Open-sided barn

Emergence Surveys

4.14 **9th May 2026 –** Weather conditions were good for the survey (14°C and partially cloudy with a slight breeze) and any bats present were likely to be active. An update internal inspection was undertaken before the emergence survey. The survey recorded a barbastelle bat emerging from the hay loft section above the car port, although the exact internal roosting point was not identified.

4.15 Several passes of noctule (*Nyctalus noctula*) were recorded early on in the survey, with high levels of common pipistrelle (*Pipistrellus pipistrellus*) foraging activity around the building recorded throughout the survey. Frequent foraging passes of long-eared bat (*Plecotus* sp.) and myotis bats (*Myotis s*p.) were also recorded throughout the survey. Foraging activity was also noted within the shelter of the carport, open-sided barn and north-west portion of the main barn.

4.16 **7th June 2026 –** Weather conditions were good for the survey (15.2°C and overcast with a slight breeze) and any bats present were likely to be active. An update internal inspection was once again undertaken before the emergence survey, which identified a day roost for a single brown long-eared bat within the ridge of the north-western wing of the main barn. Additionally, the roosting location for the barbastelle bat was identified within the ridge of the hay loft above the car port.

4.17 In addition to the barbastelle seen within the hay loft during the update inspection, the emergence survey also recorded a single common pipistrelle emerging from under verge roof tiles on the north-eastern pitch of the hay loft, and a myotis species bat emerging from within the hay loft via the open doorway. A further myotis species was identified to have emerged from an open skylight on the south-east pitch of the north-west wing of the main barn. From the size of both myotis bats and calls recorded at the time, these were considered most likely to be Natterer's bats (*Myotis nattereri).* Once again, foraging activity of common pipistrelle, myotis bats and brown long-eared bat, in addition to soprano pipistrelle (*Pipistrellus pygmaeus*), were all recorded around the buildings and within the hay loft, carport and open-sided barn through most of the survey.

4.18 **8th July 2026** – Weather conditions were good for the survey (21°C and clear with a no breeze) and any bats present were likely to be active. An internal inspection prior to the emergence survey did not identify any bats visibly roosting within the buildings. The emergence survey identified a brown long-eared bat and a myotis bat, considered most likely to be a Natterer's bat, emerging from the skylight on the south-east pitch of the north-west wing of the building. A night roost for a myotis bat was also observed within the hay loft above the car port.

4.19 High levels of foraging for common pipistrelle, soprano pipistrelle, myotis bat and brown long-eared bat was recorded throughout the survey, partially within the hay loft and open-sided barn.

4.20 Diagrams showing the locations of the surveyors, night vision cameras, and emergence points during the emergence surveys can be seen in Figures 6-8 below.



FIGURE 6: SHOWING POSITIONS OF SURVEYORS, NIGHT VISION CAMERAS AND BAT EMERGENCE DURING THE MAY 2026 EMERGENCE SURVEY



FIGURE 7: SHOWING POSITIONS OF SURVEYORS, NIGHT VISION CAMERAS AND BAT EMERGENCE DURING THE JUNE 2026 EMERGENCE SURVEY.



FIGURE 8: SHOWING POSITIONS OF SURVEYORS, NIGHT VISION CAMERAS AND BAT EMERGENCE DURING THE JULY 2026 EMERGENCE SURVEY

5 Evaluation

5.1 Initial observations consider the local area to be suitable for bats. Extensive woodland and pasture in close proximity to the site with a network of connective tree and hedge lines provide excellent foraging and commuting habitat for a range of bat species. Buildings and trees within the local area additionally offer potential roosting opportunities.

5.2 Based on the findings of the December 2025 daytime assessment, the collapsed building and open-sided barn were considered to have negligible potential to support roosting bats. The forge building was assessed to have medium potential to support roosting bats; however, this building will not be impacted by the current proposals and was therefore not subject to further surveys.

5.3 The carport has been assessed as having high potential to support roosting bats, no droppings or signs of bats were identified during any of the internal inspections.

5.4 Confirmed bat roosting evidence was identified within the main barn with scattered droppings recorded within both sections of the building during the initial bat assessment. The droppings found throughout the building were considered

characteristic in size and morphology of medium-sized bats such as *Plecotus* species and some *Myotis* species.

5.5 Subsequent update internal inspections prior to each emergence survey confirmed the presence of an individual brown long-eared bat roosting at the ridge within the north-west wing of the main barn in June. In addition, an individual barbastelle bat was identified roosting within the hay loft above the car port in May and June; the roost location was confirmed in June to be at the ridge near the darker rear end of the hay loft, with a low number of droppings found on the floor below.

5.6 The emergence surveys additionally recorded a common pipistrelle emerging from the hay loft verge in June, a brown long-eared bat from the north-west wing of the main barn in July, and individual myotis bats emerging from the north-west wing of the main barn in June and July and the hay loft in June, as well as night-roosting activity within the hay loft in July. The myotis bats were medium-sized and considered unlikely to be one of the three small myotis species. Natterer's bats are more commonly found roosting within buildings than Daubenton's (*Myotis daubentonii*) or Bechstein's bats (*Myotis bechsteinii*); based on calls recorded during emergence and night-roosting activity, the myotis bats present were considered most likely to be Natterer's bats.

5.7 The emergence surveys were well spread across the maturity period. In the absence of any large accumulations of droppings within any of the buildings, and with only individual bats of each species recorded emerging, maternity roosts for any of the species identified are considered likely absent from the buildings.

5.8 Overall, the combined surveys have recorded day roosts for common pipistrelle and barbastelle in the hay loft, likely Natterer's bat within the hayloft and main barn, and brown long-eared bat within the main barn. Foraging activity around the buildings was high, with multiple species of bats utilising the main barn, carport, hay loft and open-sided barns as covered flight and foraging spaces, with night-roosting additionally observed within the hay loft.

5.9 **A barbastelle bat roost has been identified on site, this is one of the UK's rarest mammal species** listed on Annex II of the EC Habitats and Species Directive (JNCC, 2007) is a Species of Principal Importance in England under Section 41 of the Natural Environment and Rural Communities Act 2006. Barbastelle is also listed as vulnerable on the IUCN global red list (IUCN, 2016).

6 Conclusions & Recommendations

<u>Collapsed Building and Open-sided Barn</u>

6.1 The collapsed building is considered to have negligible potential to support roosting bats and, as such, there are no known constraints regarding these species, and the proposed removal of this building.

6.2 While the open-sided barn was observed to be frequently used as a covered foraging area during all three emergence surveys, no emergences, feeding perches or night roosts were observed within this building. As such the open-sided barn is considered to have negligible potential to support roosting bats and, as such, there are no known constraints regarding these species, and the proposed demolition of this building.

6.3 Bats are highly mobile species and therefore may turn up on sites at any time. Should bats, or evidence of bats, be identified during the works to either the Collapsed Building or the Open-sided Barn the procedure in Section 7 of this report must be followed.

The Forge

6.4 The Forge was considered to hold moderate potential to support roosting bats within the crevices present in the interior of the forge, therefore, **should plans change to include impacting the forge which includes altering the interior or exterior of this building, further emergence surveys would then be required in order to confirm presence or increase confidence in a result of likely absence of bat roosts on site.**

Main Barn, Carport and Hay Loft

6.5 The surveys of the main barn and carport have identified day roosts for multiple species of bat. Day roosts for an individual barbastelle bat and Natterer's bat have been confirmed within the interior of the hay loft, and an individual common pipistrelle within the batten space on the north-eastern pitch of the hay loft. The interior of the main barn, both north-west and north-east wings, has been confirmed as a day roost for an individual or low number of brown long eared bats and Natterer's bats.

6.6 The proposed works are to demolish all buildings present on site, with the exception of the forge building which will not be impacted throughout these works. These works will therefore destroy day roosts for barbastelle, common pipistrelle, brown long-eared bat and Natterer's bat.

6.7 **A lack of any mitigation would result in a negative impact on bats through potential death, roost damage, destruction and modification as well as disturbance to bats present on the site.**

6.8 The proposed work will have a detrimental effect on bats or disturb or damage their roost, therefore **a Natural England development licence will be required for works to proceed to ensure that an offence will not be committed**. This will encompass a Mitigation Strategy to ensure that the development is designed to protect bats and to minimise long term impacts upon the local bat population.

6.9 **Species-specific mitigation and compensation measures for those species confirmed to be roosting on site will be required to ensure that there is no loss**

of roost availability, and the favourable conservation status of the species is maintained.

6.10 There are three tests detailed in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 which must be satisfied before a Natural England licence can be issued to permit otherwise prohibited acts:

1 Regulation 53(2)(e) states that licences may be granted for "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 53(9)(a) states that a licence may not be granted unless the licensing authority (Natural England) is satisfied that "there is no satisfactory alternative".
3 Regulation 52(9)(b) states that a licence cannot be issued unless the licensing authority (Natural England) is satisfied that the action proposed "will not be detrimental to the maintenance of the species concerned at a favourable conservation status in their natural range".

6.11 For Natural England to be able to issue such a licence, full planning permission must first be obtained as this will satisfy tests 1 and 2, described above. Test 3 can be satisfied by measures to ensure that minimal disturbance to bats is caused by the works to be carried out on the site and that the plans include the adequate replacement of any roosts that are lost.

- The site will need to be licenced under a full EPS licence, or registered under the Bat Earned Recognition (BER) Class Licence Pilot Scheme under which it fits into Accreditation Level 2. Under this licence a full plan of compensation is required in addition to confirmation of adherence to suitable mitigation strategies. Under the BER scheme the licensee and joint licensee are jointly responsible for adherence to the mitigation and compensation requirements for the site. For this site the mitigation would include the following measures.
- Works directly impacting the identified roosting areas and roof of the main barn and carport will need to be carried out whilst temperatures are consistently above 8°C. Any such works must therefore not be conducted during the hibernation period (November to February).
- Scaffolding can interfere with bat roosts depending on the setup, and therefore this must be discussed with a licensed ecologist prior to installation to avoid impacts. It may be necessary to install scaffolding after the licence is granted.
- Prior to works commencing, the main barn and carport must be fully inspected by a licensed bat ecologist. All known roost areas and areas with potential for bats will be soft-stripped under direct supervision of the licensed ecologist, able to handle and check any bats found and move them to a safe place.
- Bat boxes will be erected near the building to act as a safe place to move any bats found into.
- The roof of any replacement buildings or linings added to existing buildings must not be lined with a modern breathable roofing membrane, it must have a

traditional Bitumen Type 1F (with a hessian Matrix) roofing felt. Polypropylene filaments used in the manufacture of modern breathable underlays are known to entangle and kill bats and their warranty can be invalidated; therefore, they must not be used in known or potential bat roosts and cannot be used at sites with EPS licences for replacement bat roosts. This applies to newly constructed roofs and existing roof areas to be fitted with a lining, as well as lining behind cladding such as tile hangings or weatherboarding.

- Species specific compensation will be required to enable bats to roost in as similar an area, aspect and microclimate to the existing roosts as possible.
- **Lighting should be designed in accordance with the Institute of Lighting Professionals Guidance note 8: '*Bats and Artificial lighting in the UK'* which can be downloaded for free from the ILP website.**

6.12 A Reasoned Statement (which sets out the planning background to the site and includes a copy of the planning permission) is not required in this instance. The exception in this instance is because Natural England guidance states a reasoned statement is not required where:

- where bats and their roosts will be affected by:
  - repairs and maintenance
  - roof replacements, loft conversions and extensions
  - renovations of existing domestic dwellings and associated structures, such as garages
  - housing developments of less than 1 hectare, including:
  - existing buildings and associated structures that may need to be demolished before redevelopment takes place (whether domestic dwellings or other types of buildings)
  - barn conversions for domestic dwellings (this doesn't include conversions for commercial use, such as holiday lets)

6.13 Natural England licenses are usually completed by an ecological consultant who must be suitably qualified to carry out the mitigation (for example, holds a licence to survey for bats) or by a consultant registered under the Bat Mitigation Class Licence and Bat Earned Recognition Licence schemes.

6.14 The licence application will require surveys to be no more than two seasons old prior to works commencing, therefore if works do not take place before May 2028, top up surveys will be required.

7 Procedure to follow in the event a bat is found within the collapsed building or open sided barn.

7.1 Bats are present within the vicinity of the site and may be found at any location on, in or around the buildings / trees. Bats are protected species, and these procedures must be followed to avoid committing an offence.

7.2 If a bat is found at any location on the site, DO NOT TOUCH unless necessary for the safety of the bat.

7.3 If the bat was uncovered in a roosting location, carefully replace covering ensuring the bat is not crushed or harmed. If this is not possible, cover the animal with a loose covering.

7.4 Stop all work in that area and the immediate vicinity. Work may continue in other areas around the site.

7.5 Call the AEWC Ltd bat licensed project ecologist Daniel Whitby 07764 813002, call the office on 08452 505585, or licensed ecologists Brigitte de Coriolis 07545 130203 or Ivana Murphy 07492 0577720.

8 References

BCT (2022) *Interim Guidance Note: Use of Night Vision Aids for Bat Emergence Surveys and Further Comment on Dawn Surveys*. Bat Conservation Trust, London.

BCT (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)*. Bat Conservation Trust, London.

BCT and ILP (2023) *Bats and Artificial Lighting in the UK: Guidance Note 8 – Bats and the Built Environment*. Bat Conservation Trust and Institution of Lighting Professionals, London.

CIEEM (2013) *Competencies for Species Survey Guidance Documents*. Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM (2017) *Guidelines on Ecological Report Writing*. Chartered Institute of Ecology and Environmental Management, Winchester.

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Natural England (2010) *WML-A14-2 Method Statement*. Available at: GOV.UK.

Natural England (2023) *Licensing protected species: survey, mitigation and licensing guidance*. Natural England, London. Available at: GOV.UK.

Natural England (2025) *Bats: advice for making planning decisions.* Natural England, London. Available at: GOV.UK.