

BATS, BUILDINGS AND DEVELOPMENT

An advice note on how to ensure that bats are conserved during development affecting barns, other agricultural outbuildings and derelict or disused structures

This advice note does not relate to dwelling houses. Where bats are found or known to roost within a dwelling house, you should contact the Countryside Council for Wales (CCW) to seek appropriate advice.

This advice note should not be used as a substitute for seeking expert advice from a licensed bat specialist. Whether or not a space is occupied by bats can only be verified by such a specialist.

Bats and your planning application

1. Bats roost in buildings because their natural roosts (tree holes, tree bark and caves) have become more scarce or disturbed as a result of human activities. All buildings in particular the walls, wall cavities and crevices, attics, cellars, eaves, soffits, and roof coverings are potential roost sites. In addition some species may require space to fly within the building before departing to feed each evening.
2. Bats or bat roosts are a material consideration in determining planning applications. Therefore for all planning applications affecting barns, other agricultural outbuildings and derelict or disused structures the planning advisor will advise that you may need to commission an ecological survey to find out if bats are present and if so, how to accommodate them within the development.
3. So that it is easier to provide this advice, when you send in your application form you should also provide photographs of the interior and exterior of the building/part of building affected by your development proposal. The photographs should include detail of roof structures (for example roof covering, roof insulation if visible, and timbers), entrances (doors, windows, other openings) and proximity of trees, shrubs, ivy, hedgerows etc.
4. This structural information will normally be sufficient for the planning advisor to determine the likelihood or not of bats being present. For example, a stone-built barn with roof timbers and an intact roof is likely to be used by some species of bat at some time during the year, whether for roosting, feeding, resting or even hibernating.
5. An ecological survey (see **Appendices 1 and 2**) would report on what species of bat is present, numbers of bats, entrance points and roost area(s). The survey report would also provide recommendations for accommodating the bats within the development, for example how to maintain appropriate entrance points, roost spaces, use

of suitable materials to provide the right environment, avoiding disturbance by exterior lighting and the monitoring required after development is completed to ensure that the mitigation has been successful.

6. Where bats have been found, it would be helpful to provide a copy of the report not only to the planning advisor but also to the local offices of the Countryside Council for Wales (CCW). This will help to speed up the consultation between the BBNPA and CCW.
7. Following receipt of the survey report, planning conditions may control the development design, materials used, timetable of certain works, management of the site after development and monitoring the effectiveness of the works as they affect bats.
8. Any works affecting bats can only be carried out under licence from The Welsh Assembly Government (WAG). So it again makes sense to commission the ecological survey early in the planning process in order to increase your chances of complying with the WAG's conditions of the licence. The WAG will not issue the licence without first obtaining evidence from the local planning authority that bats, where present, have formed a material planning consideration in determining your application.
9. The law still applies even where conditions are not attached to a planning permission.
10. If you do have bats, it would be helpful if you were to inform your local bat group (see contact details below), giving you the opportunity to become involved with local

activities to conserve and learn more about bats.

11. Where bats have not been found, this advice note offers suggestions on how you might design-in features to accommodate them (see **Appendix 3. [Planning Advice Note 18](#)** is available for accommodating barn owls within a development.)

Additional information

12. In order to learn how you might know whether or not bats are present, The Bat Conservation Trust provides an information leaflet on Bats and Buildings in the UK. The Countryside Council for Wales (CCW) publishes "Bats in Roofs - A guide for building professionals".
13. Contact details are provided below and further information is provided in the appendices.

Contact details

Countryside Council for Wales:

Cantref Court, Brecon Road,
Abergavenny NP7 7AX,
01873 737 000

Beechwood Office, Talu Road,
Llandeilo SA19 7HR, 01558 825
800

Unit 4, Castleton Court, St.
Mellon's, Cardiff CF3 0LT, 02920
772400.

www.ccw.gov.uk

For information on bat conservation activities in your area:

Local Bat Groups:

Brecknock Bat Group, Brecknock
Wildlife Trust, Lion House, Bethel
Square, Brecon LD3 7AY
01874 625 708

Carmarthen Bat Group - Neil
Matthew, Countryside Council for
Wales, Beechwood Office, Talu
Road, Llandeilo SA19 7HR, 01558
825 800

Gwent Bat Group - Ian Rabjohns,
Millbank, Penallt, Monmouthshire
NP25 4AJ, 01600 713 968

Glamorgan Bat Group - John
Galvin, 32 Primrose Road,
Pencaerau, Neath SA11 2AP,
01639 638 658.

For help with dealing with injured bats
or bats in your living space, contact
the Countryside Council for Wales or
the **Bat Helpline** number: 0845 1300
228 (local rate).

For information on bat ecology,
conservation and research:

The Bat Conservation Trust, 15
Cloister House, 8 Battersea Park
Road, London SW8 4BG, 0845 1300
228, enquiries@bats.org.uk,
www.bats.org.uk.

For information on wildlife in your
area:

The Biodiversity Information Service,
1st Floor Office, 7 Wheat Street,
Brecon LD3 7DG, 01874 610 881,
info@b-i-s.org, www.b-i-s.org.

For further information on planning contact:
Brecon Beacons National Park Authority
Plas y Ffynnon, Cambrian Way, Brecon LD3
7HP
Tel: (01874) 624437

Email: planning.enquiries@beacons-mpa.gov.uk

APPENDIX 1 BRECON BEACONS NATIONAL PARK AUTHORITY BAT SURVEY - Suggestions for the minimum survey requirements for developments affecting bat roosts in barns, other agricultural buildings, disused or derelict structures.

Note to bat surveyors:

Following amendments to the Habitats Regulations (in the Conservation (Natural Habitats &c.) (Amendment) Regulations 2007) and according to “Bat Surveys: Good practice guidelines” (Bat Conservation Trust 2007), it is best practice for surveys of potential roosts to be done by licensed surveyors. If a roost is discovered and might be or needs to be disturbed, the surveyor requires a licence issued by the Countryside Council for Wales to carry out the roost survey. On discovering a roost in a previously unknown location, an unlicensed bat worker must withdraw.

On establishing that a roost is present in a structure, any works that have the potential to disturb this roost must be carried out under a separate Habitats Regulations licence (a ‘development licence’) issued by the Welsh Assembly Government, who will also impose their own conditions of licence.

What to look for in a survey

Summer surveys¹ of all buildings² affected by planning applications should ideally provide the following information about the use of the buildings by bats:

- Bat species present (different species occupy different spaces and have different internal micro-climate and flying space requirements (for example lesser horseshoe bats) which will influence final design)
- Type and size of roost(s) (breeding/transition/hibernation; size of colonies – approximate numbers of bats per species)
- Precise location of roost(s)
- Precise location of roost access point(s)
- Periods during the year that are especially sensitive for the bat species present
- Activities to which the bats are especially sensitive
- Features and structures that are essential to the bat roost(s)
- Essential habitat features in the area surrounding the proposed development (landscape features to be retained and enhanced in order to provide cover and bat navigation routes to and from the roosts that are appropriate to the flight behaviour of each species present)
- A clear indication of whether or not the building(s) or other structures are [also] likely to be used as a winter hibernation roost or other type of roost (e.g., mating roost, transition roost)
- The location of any winter hibernation roost within the building(s) or other structures

¹ It is possible that a building or buildings might also be used by different bat species as a winter hibernation roost, which would not be recorded during summer surveys. Therefore the survey results should also specify whether or not additional winter survey work (requiring different techniques) is required, giving the reasons why.

² If works affect one or more mature trees, it is possible that bats might also roost within one or more of them, in which case additional survey and mitigation/compensation advice should be provided.

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- Detailed information on how the proposed development would affect the bat roost(s) and clear, unambiguous recommendations on how to avoid this
- A clear indication of what additional survey work (if any) is required.

To obtain this sort of information requires detailed internal and external inspections of all structures and surfaces of all the buildings, including at least 2 evening observations for each building during a period beginning half an hour before dusk until one hour after dusk.

If the surveyor considers that further information is still required, then additional evening observations and/or dawn observations can be carried out for each building. In order to maximise the effectiveness of these surveys they should be carried out during mild or warm, calm and dry weather, during the bat breeding season, one month apart during late April – end August inclusive (when a maternity roost is most likely to be active in any one year).³ This survey season also complies with current good practice for bat surveys associated with development.

To obtain useful information will require more than one surveyor in a team. In order to ensure that sufficient observation effort is deployed during evening surveys, at least 2 observers should be deployed on each occasion for each building observed. Observations should also record bat movements via important landscape features (trees, hedges, walls, fences, ponds etc) in order that these can be retained and enhanced in the associated landscape and planting measures.

The level of survey detail will be determined by the complexity of the structure(s) and area affected by the development proposal. For example a solid stone barn with a tiled or slate or corrugated roof might be more straightforward to survey than a building with cavity walls or cellars or additional outhouses or chimneys etc. On the other hand the solid stone barn might be equally complex if it possesses a loft, adjoining milking shed, multiple timbers and cavities etc. If the roost(s) is in a tree then this adds a different level of complexity.

The level of survey detail will also depend upon the species of bat present because different species have different space requirements based upon their flight styles and behaviour patterns.

Therefore the survey report should also include evidence of the methods used in carrying out the survey, i.e., that the methods were appropriate for the type of structure(s) affected, the species involved and that they conform to best practice current at the time.

Ladders might be required to inspect roost locations, inspect timbers and stonework (internal and external), an endoscope might be required to examine hidden spaces (such as cavities) and in addition to heterodyne bat detectors, time expansion or

³ Please note that bats might arrive earlier (i.e., March) and leave later (i.e., October) than had been anticipated, therefore the survey season might need to be extended accordingly. This might increasingly become the case with milder winters and prolonged summers.

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frequency division bat detectors should be used to confirm the identity of different species.

The survey report should provide details of the aftercare and monitoring required to demonstrate success or failure of mitigation/compensation measures and new features for bats within the structure(s) affected. In nearly all cases, works affecting bats will require a Habitats Regulations licence to be issued by the Welsh Assembly Government, for which monitoring is also required. Specifying the monitoring required will assist the planning department and building control inspectors.

Any open buildings affected by the development might also provide feeding perches for bats therefore these should be checked for too. It is possible that the final designs might need to include open-fronted storage or covered areas to maintain suitable spaces for swallows or other birds that might nest here, which would also be suitable for feeding bats.

If the surrounding landscape is suitable for barn owl and there is sufficient space in the complex of buildings shown to accommodate them, additional provision can be made for this species; see planning advice note 21.

Details of mitigation/compensation required

Based upon the survey information included in the report, the report should provide a detailed plan for mitigating the effects of the development on the roost(s) and accommodating the bats within the development. In the rare or unlikely event that a bat roost is to be destroyed under licence, the report must provide a detailed compensation plan for new roost spaces, timetable for providing this and appropriate landscaping to ensure that these new roost spaces are successfully occupied.

The suitability of this advice will depend to some extent on the competence of the ecological contractor providing the information. Suitable information is available from the Institute of Ecology and Environmental Management, see www.ieem.org.uk.

Natural England (formerly English Nature) has published "Bat Mitigation Guidelines", providing some guidance on limiting the effects of development on bats, see <http://publications.naturalengland.org.uk/publication/69046?category=31008>. This guidance is not definitive and the mitigation chosen for any development should be designed specifically for that development and the species involved, based upon advice provided by your ecological contractor, in discussion with the planning department.

As far as possible, the mitigation/compensation should reproduce the structures and environmental conditions that the bats had relied upon prior to the onset of development. For example access points, roost space(s), flying space(s), temperature regimes, relative humidity within the building and habitat features such as trees, shrubs, hedgerows and any clinging vegetation (such as ivy) outside it, are all relevant.

APPENDIX 2 BRECON BEACONS NATIONAL PARK AUTHORITY BAT SURVEY VALIDATION FORM

This form has been produced to provide a check list for the planning applicant and the bat ecologist in relation to Planning Advice Note 17, Bats, Buildings and Development.

To bat ecologists employed to carry out a bat survey: In order to help us to assess the survey findings, please provide the following summary information at the beginning of any bat survey report commissioned in regard to a planning application within the Brecon Beacons National Park.

To Developers/Applicants: Please read, sign and date section 4.

1. SURVEYOR(S)

1.1 Name of Company, Organisation or individual producing this report:

1.2 Name(s) of additional surveyors:

1.3 Dates of emergence survey(s):

1.4 Date(s) of interior and exterior inspections:

2. RESULTS

2.1 Was evidence found for bats using the structure(s) in question during the survey? **YES** **NO**

2.2 In order to find evidence of bats, did you need to carry out activities that required a licence^{4, 5}? **YES** **NO**

2.2.1 Name(s) of licensed surveyor(s):

2.2.2 Number & expiry date of licence(s):

2.3 If evidence of bats was found, for which species was this?

⁴ Licences to disturb bats (and other (European) protected species) are issued under the Conservation (Natural Habitats &c.) (Amendment) Regulations 2007 and the Wildlife and Countryside Act 1981 (as amended).

⁵ It is best practice for surveys of potential roosts to be done by licensed surveyors because if a roost is discovered and needs to be entered, a licence issued by the Countryside Council for Wales (to bat surveyors) is required as bats may be deliberately disturbed (after section 3.4 of "Bat Surveys: Good practice guidelines," Bat Conservation Trust 2007). On discovering a roost in a previously unknown location, an unlicensed bat worker must withdraw.

**PLEASE INCLUDE THIS FORM IN ALL BAT SURVEYS COMPLETED IN RELATION TO
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- 2.4 Does the survey report explain what type of roost was present? **YES** **NO**
Pages: -
- 2.5 Is there potential for this roost also to be used during winter? **YES** **NO**
- 2.6 Is a Habitats Regulations Licence required in order for the development to proceed? **YES** **NO**

3. THE SURVEY REPORT

Please indicate which section(s) of the report describe:

- 3.1 The precise location of roost(s)
- 3.2 The location of roost access point(s)
- 3.3 The period of the year that is especially sensitive for the species found:
- 3.4 Activities to which the species found are particularly sensitive:
- 3.5 Features and structures essential to the roost:
- 3.6 Essential habitat features in the surrounding area (e.g. trees, flight-lines):
- 3.7 Information on the effect of the proposed development on bats:
- 3.8 Clear and detailed recommendations on how disturbance/impact on bats can be avoided:
- 3.9 Clear indication on any additional survey work either required or already carried out:
- 3.10 Clear indication of the follow up monitoring work required to assess the success or failure of mitigation and/or compensatory works:

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4. FOR THE DEVELOPER/ PLANNING APPLICANT

I have read and understood this survey. Any necessary mitigation or compensation measures identified within the survey have been integrated into the proposed design. I am aware of the protection afforded to bats within UK and European law and I understand that disturbance of bats, damage or destruction of bat roosts either deliberately or through negligence may constitute an offence for which criminal proceedings may follow.

I also understand that, in the event that following the completion of adequate survey work no evidence of bats were found and planning permission is granted and work commences, any bats that may be found subsequently during construction, renovation or other development activity will require all works to stop immediately and that I will inform CCW of this occurrence. In these circumstances, I understand that works can only commence following advice from CCW and this may require further consultation with a licensed bat worker. For works to continue under these circumstances I might also require a Habitats Regulations Licence.

Signed:

Date:

APPENDIX 3 BRECON BEACONS NATIONAL PARK AUTHORITY VOLUNTEERING TO PROVIDE SPACE FOR BATS IN YOUR DEVELOPMENT

Even though bats may not be present in your building, you may wish to consider how you might help bats through incorporating features into your development. For instance, at the outset of the development you might provide details of the features you wish to incorporate to allow bats to continue to use the building from a selection of the following:

- Provide bat-friendly access to part of the loft or roof void via soffits, bargeboards or ridge tiles or even via custom-made bat grilles
- Include open-fronted storage areas akin to machine sheds
- Use bitumen-based roof lining, with the rough side down, to allow bats to 'cling on'
- Incorporate specially made bat slates or tiles or modify part of the roof lead to provide bat access
- Build commercially made concrete bat boxes into the walls
- Leave some vertical joints sound but unpointed in external surfaces
- Use only permethrin or cypermethrin-based timber treatment and pest control chemicals
- Avoid excessive external lighting, which might deter bats from flying.

In addition, increase the amount of tree and shrub cover in the surrounding gardens in order to improve the area's navigability for bats.

You might wish to contact your local bat group to assist you with your ideas.

APPENDIX 4 BRECON BEACONS NATIONAL PARK AUTHORITY BAT FACTS

Bats and the law

Bats and their roosts are protected by law, making it a criminal offence to kill, injure or disturb bats, obstruct access to bat roosts or to damage or disturb bat roosts. You may gently catch and release a bat found in the living area of a house, and tend a disabled bat in order to release it when it recovers. If you are unsure how to tend an injured bat you can seek advice from CCW. (N.B. The Bat Conservation Trust advises that gloves should be worn when handling any wild mammal.)

The Wildlife and Countryside Act 1981 (as amended) protects all bats and their roosts and requires consultation with CCW before carrying out any activities (development or other) that might harm or disturb them. Amendments to this act (under **The Countryside and Rights of Way Act 2000**) mean that bats are also protected from reckless and/or intentional disturbance or damage.

The Conservation (Natural Habitats etc) Regulations 1994 (as amended) make it an offence to damage or destroy a roost or to deliberately capture, kill or disturb a bat. The Welsh Assembly Government issues licences under these regulations. (It is not an offence to gently remove a bat from your living space or to tend an injured bat, though you may wish to seek further advice about how to do this from the Countryside Council for Wales (01873 737 000) or the Bat Helpline (0845 1300 228).)

A roost is any structure or place used by bats for shelter or protection. Bats re-use the same roosts each year, so the roost is protected at all times, whether or not bats are present at the time.

Damage to a roost can include treatment with some chemicals found in wood preservatives. Controlling wasps, bees, hornets, cluster flies and rodents with pesticides might affect bats or their roosts, so care should be taken to avoid this. CCW can provide you with appropriate advice as well as a list of suitable products that have been proven to have a less severe impact on bat roosts.

Bat lifecycle

Most bats are colonial. They roost in groups or singly in trees, buildings, caves, mines and other structures that provide the right environmental conditions for them. They may use different sites at different times of the year, sometimes within the same building/structure or several kilometres apart. They hibernate in winter hibernacula to conserve energy.

In late spring females gather to give birth. People frequently encounter these maternity roosts in development situations, although the majority of roosts are far less conspicuous than these. By the end of summer these maternity roosts are generally vacated (with some exceptions to this), with the mothers and juveniles finding alternative roosts. Sometimes this will occur within the same building.

Other roosts include mating roosts where males and females gather during the autumn or early spring, feeding perches, overnight roosts and transition roosts between summer and winter roosts. Hence even where a building or other structure does not support a maternity roost or winter hibernaculum it might still be

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important to bats for other reasons at other times in the year and during different weather conditions.

Myths and misunderstandings

Britain supports 16 species of bat. Together with their roosts (places of rest and social activity) bats are protected under both UK and European legislation. In Britain, bats are generally seen only at dusk. There are many myths and misunderstandings about these wild animals, whereas in fact:

- Bats are not blind, indeed their eyesight is similar to that of humans but they can also 'see' in the dark by using their ultra-sonic sonar systems, listening to the 'pictures' made by the echoes from their high frequency calls
- Bats are excellent fliers and won't get caught in your hair
- Bats do not build nests; most species hang up or roost in cracks and crannies; for most species you won't even see them if you search for them
- Bats rarely live in belfries. They prefer somewhere quiet with constant temperature, high humidity (in hibernacula) and free from draughts
- As well as old or traditional buildings, bats often choose modern houses as roost sites - about half of all known pipistrelle bat roosts recorded in the 1980s were in houses less than 25 years old
- In winter when insects are scarce, bats hibernate in cool parts of buildings, caves and hollow trees
- Bats can live for up to 30 years
- Of about 4,500 different mammal species around the world, nearly 1,000 are bats
- About 750 bat species eat insects, as do all the species found in Britain. So bats provide us with an essential pest control service, eating midges and mosquitoes, as well as moths, flies, beetles and bugs
- Bat droppings are not corrosive and do not present any known health hazard. They consist largely of insect remains and crumble easily to a powder between your fingers
- Unlike rats and mice, bats do not gnaw through electricity cables or floor boards etc
- Britain's commonest bat, the pipistrelle, is only 4cm long and weighs about 5 grams - less than a 2p coin!
- Of the 16 species left in Britain, 6 are Endangered or Rare and 6 others are Vulnerable.