



Bat Emergence and Re-entry Surveys

Former Grove Lawn Tennis Club, The Chine, Cascade Avenue, London, N10 3PY

ROK Enterprises One Ltd

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Industry Guidelines and Standards

This report has been written with due consideration to:

- Chartered Institute of Ecology and Environmental Management (2017). Guidelines for Preliminary Ecological Appraisal. 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.1. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2017). Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2020). Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- British Standard 42020 (2013). Biodiversity – Code of Practice for Planning and Development.
- British Standard 8683:2021 (2021). Process for Designing and Implementing Biodiversity Net Gain.

Proportionality

The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate.

The desk studies and field surveys undertaken to provide a Preliminary Ecological Appraisal (PEA) might in some cases be all that is necessary.

(BS 42020, 2013)

Executive Summary

Arbtech Consulting Ltd was instructed by ROK Enterprises One Ltd to undertake Bat Emergence and Re-entry Surveys (BERS) at Former Grove Lawn Tennis Club, The Chine, Cascade Avenue, London, N10 3PY (hereafter referred to as “the site”). The survey was required to inform a planning application for the construction of eight new dwellings on the former tennis club site and conversion of the former pavilion building into a 9th dwelling (hereafter referred to as “the proposed development”).

The following is work you will need to commission to comply with planning policy and legislation. Further information, along with opportunities for biodiversity enhancement, are outlined in Table 4 of this report.

Feature	Survey Results Summary	Impact Assessment	Recommendations
B1 (Roosting Bats)	A likely absence of roosting bats is concluded from B1. However, roosts could have been missed due to the unobserved roof structure of the northern elevation. A moderate level of bat foraging activity was detected throughout the suite of three surveys. Despite the moderate levels of bat activity on site, no more than a peak count of 3no. bats were observed at once. Coupled with all surveys taking place during the optimal timeframe to detect maternity roosts, the likelihood of the building B1 containing a maternity roost is acceptably low. During both of the two dusk emergence surveys, pipistrelles were seen within 5 minutes of sunset. This suggests there are common and soprano pipistrelle roosts in close proximity to the site whose inhabitants have dispersed onto site for foraging purposes.	Bats are unlikely to be roosting in the three elevations/roof structures observed. The proposed development will result in the renovation of the building, including repairs to the roof structure. Roosts, if present on the unobserved northern elevation, would be destroyed by reroofing works. In addition, bats are highly mobile creatures that switch roosts regularly and therefore the usage of a site by bats can change over a short period of time. Any bats that begin using the building during the intervening period between the surveys being undertaken and works commencing could be injured or killed and their roosts destroyed.	A precautionary working method will be implemented during and post-development. This will include the following measures: • Works will be scheduled during the winter months (November to March) when bats are least likely to be present, insofar as is possible. • Reroofing works on the unobserved northern elevation to be done by hand. • In the unlikely event that a bat or evidence of bats is discovered during the development all work must stop and a bat licensed ecologist contacted for further advice.

Contents

1.0 Introduction and Context 6

 1.1 Background 6

 1.2 Site Location and Landscape Context..... 6

 1.3 Scope of the Report..... 6

2.0 Methodology..... 7

 2.1 BERS 7

 2.2 Surveyors 7

 2.3 Bat Roost Characterisation..... 7

 2.4 Limitations 8

3.0 Results and Evaluation..... 9

 3.1 Survey Results 9

4.0 Conclusions, Impacts and Recommendations 13

5.0 Bibliography 14

 Appendix 1: Proposed Development Plan 15

 Appendix 2: Site Location Plan 16

 Appendix 3: BERS Plan 17

 Appendix 4: Legislation and Planning Policy Related to Bats..... 18

1.0 Introduction and Context

1.1 Background

Arbtech Consulting Ltd was instructed by ROK Enterprises One Ltd to undertake Bat Emergence and Re-entry Surveys (BERS) at Former Grove Lawn Tennis Club, The Chine, Cascade Avenue, London, N10 3PY (hereafter referred to as “the site”). The survey was required to inform a planning application for the construction of eight new dwellings on the former tennis club site and conversion of the former pavilion building into a 9th dwelling (hereafter referred to as “the proposed development”). A plan showing the proposed development is provided in Appendix 1.

The aim of the BERS was to determine the presence or likely absence of roosting bats and to characterise any roosts present. This has been undertaken with due consideration to the “Bat Surveys for Professional Ecologists —Good Practice Guidelines” publication (Collins, 2016). The BERS have been informed by a Preliminary Roost Assessment (PRA) which was completed by Arbtech Consulting Ltd on 11th January 2023 (Arbtech Consulting Ltd., 2023).

1.2 Site Location and Landscape Context

The site is located at National Grid Reference TQ 2906 8919 and has an area of approximately 0.2ha. There is one building on the site, a former tennis pavilion (hereafter referred to as B1), which was subject to survey. The site contains mature trees and vegetation form the site boundaries, with Queen’s wood ~350m to the southwest and Alexandra Palace ~800m to the northeast. A site location plan is provided in Appendix 2.

1.3 Scope of the Report

This report provides a description of the bat activity observed and recorded during BERS. The aim of the surveys was to determine the presence or likely absence of bats and to characterise any roosts present including species, number of individuals, number and location of roost access points, and to gain an understanding of how bats use the site. The report provides information on possible constraints to the proposed development as a result of bats and summarises the requirements for any mitigation proposals, including a European Protected Species Licence (EPSL), where appropriate, to achieve planning or other statutory consent and to comply with wildlife legislation.

To achieve this, the following steps have been taken:

- BERS of the built structure has been undertaken to determine the presence or likely absence of bat roosts.
- An outline of potential impacts on any confirmed or unidentified roosts has been provided, based on the proposed development.
- Recommendations for mitigation have been made, along with advice on the requirements for a European Protected Species Licence (EPSL) application if appropriate.
- Opportunities for the enhancement of the site for roosting, foraging and commuting bats have been set out.

2.0 Methodology

2.1 BERS

Three BERS, comprising two dusk emergence and one dawn re-entry surveys, were undertaken of B1, as per the recommendations from the PRA. The surveys involved surveyors positioned around the building ensuring that elevations and roof sections with suitable roosting features could be clearly observed. Particular attention was paid to the areas of the building identified as providing suitable access points to bat roosts. Each surveyor was assigned an area of the building to observe for the duration of the survey.

Surveyors used heterodyne and frequency division bat detectors, and Echo Meter Touch detectors connected to iPads or Android tablets. Bat echolocation calls recorded during the surveys were analysed using Wildlife Acoustics sound analysis software Kaleidoscope V3.1.7 when required. The Echo Meter Touch includes an auto ID function for bat species, however this is not 100% accurate and further post-survey sound analysis is often required to confirm species that could not be identified by the auto ID software during the survey. Surveyors also used head torches, survey record sheets and pens/pencils for recording all activity observed during the surveys. Each surveyor was also provided with a handheld radio for communication between surveyors to assist with confirming ambiguous bat activity e.g. a bat emergence or a bat passing over the building.

One infrared recording kit was set up to monitor the building during the BERS. This comprised a Sionyx Sport infrared camera mounted on a tripod with a separate infrared lamp attached to the tripod to provide additional illumination. Analysis of the footage was subsequently undertaken to detect roosting activity.

Dusk emergence surveys commenced 15 minutes before sunset and continued for 1½ - 2 hours after sunset – depending upon bat activity and surveyor visibility. Dawn re-entry surveys commenced 2 hours before sunrise and continued until 15 minutes after sunrise. Surveys were a minimum of two weeks apart.

Surveys were completed during optimal weather conditions i.e., when temperatures were above 10°C, with no rain or strong winds (greater than 5m/s), as these adverse weather conditions can impact upon bat emergence and foraging behaviour.

2.2 Surveyors

A total of two surveyors were used to cover B1. The name, bat licence details or level of bat survey experience and the designated position of each surveyor during each survey is detailed in the tables in Section 3.1 below and shown on the plan in Appendix 3.

2.3 Bat Roost Characterisation

When bat roosts are present, the bat surveys undertaken at a site facilitate the characterisation of the roost type. This allows for appropriate mitigation and compensation to be designed to inform a European Protected Species Licence (EPSL) application to Natural England.

The definitions of bat roost types are provided below, taken from the *Bat Mitigation Guidelines* (English Nature, 2004) and the Bat Conservation Trust (BCT) publication *Bat Surveys for Professional Ecologists – Good Practice Guidelines* (Collins, 2016).

- **Day roost:** a place where individual bats, or small groups of males, rest or shelter in the day but are rarely found by night in the summer.
- **Night roost:** a place where bats rest or shelter in the night but are rarely found in the day. May be used by a single individual on occasion or it could be used regularly by the whole colony.
- **Feeding roost:** a place where individual bats or a few individuals rest or feed during the night but are rarely present by day.
- **Transitional / occasional roost:** used by a few individuals or occasionally small groups for generally short periods of time on waking from hibernation or in the period prior to hibernation.
- **Swarming site:** where large numbers of males and females gather during late summer to autumn. Appear to be important mating sites
- **Mating sites:** sites where mating takes place from later summer and can continue through winter.
- **Maternity roost:** where female bats give birth and raise their young to independence.
- **Hibernation roost:** where bats may be found individually or together during winter. They have a constant cool temperature and high humidity. Sites where hibernating bats have been confirmed by appropriate survey effort should be classed as 'hibernation confirmed'.
- **Satellite roost:** an alternative roost found in close proximity to the main nursery colony used by a few individual breeding females to small groups of breeding females throughout the breeding season.
- **Other:** roost types are interchangeable and not always easy to classify according to the nuances of certain species.

2.4 Limitations

These surveys follow best practice guidance to confirm presence or likely absence of roosting bats and where present, characterise the roost. However, this information is collected at finite dates and times, and provides an indication of the conditions on site only. The use of the building, and the site as a whole by bats, at all times cannot be established based on this information. Bats are highly mobile creatures that switch roosts regularly and therefore the usage of a site by bats can change over a short period of time.

Due to the structure of the site being surrounded by private residential properties in all directions, the northern elevation could not be observed.

Due to the unmanaged nature of the site, views of the remaining elevations, particularly roof structure, were somewhat obstructed by the overgrown vegetation.

The first survey experienced short bursts of intermittent rainfall. This is not considered a major limitation as bat activity (of similar levels during optimal surveying weather conditions) was detected on site during times when the rain had paused, therefore demonstrating the weather conditions did not overly impact bat usage of the site.

3.0 Results and Evaluation

3.1 Survey Results

The results of each survey are provided in the tables below and shown on the plan in Appendix 3.

Table 1: Survey results (first visit)

Date		18/07/23
Building inspection prior to survey		Suitable roosting features on the exterior were subject to a ground-based inspection prior to this BERS to check for evidence of roosting bats. Externally, the building had not undergone significant material changes and no droppings were identified (particularly around the damaged soffit box identified in the PRA). An internal inspection of the loft voids was not completed due to a lack of access.
Start and end times		20:55 – 22:30 Sunset: 21:09
Weather conditions		Start: Temp: 19.9°C Relative Humidity: 50% Cloud Cover: 80% Wind: BF2 Rain: None End: Temp: 16.4°C Relative Humidity: 90% Cloud Cover: 100% Wind: BF1 Rain: light (<1mm) NB. There were periods of light, intermittent rain, specifically 21:18 to 21:28, 21:47 to 22:04, and 22:15 to 22:22 where no bat activity was detected. Bat activity resumed immediately after rain throughout the survey. At 22:29 rain resumed and survey efforts ceased shortly after.
Surveyor (position) As shown in Appendix 3		Michelle Huang (Lead Surveyor) – Accredited Agent under Natural England Bat Licence Number: 2022-10404-CL18-BAT: Position 1 – observing the southern and western elevations and roof structure of B1 Andrew Lee – 1 year bat survey experience: Position 2 – observing the southern and eastern elevation and roof structure of B1
IR position As shown in Appendix 3		Position 1 – observing the southern elevation and roof structure of B1
Building reference	Surveyor position	Notes/observations:
B1	1	No bat roosting activity was observed. The first bat activity was a soprano pipistrelle passing east at 21:15. A common pipistrelle was seen passing to the west of the tennis court at 21:30. There was constant soprano pipistrelle passing and foraging activity from 21:28 until 21:47. The final bat activity was a passing common pipistrelle at 22:10.
B1	2	No bat roosting activity was observed. The first bat activity was a common pipistrelle seen passing north over B1 at 21:11. A soprano pipistrelle was seen foraging at 21:13 in the tennis court and a noctule was heard but not seen at 21:15. At 21:28, a soprano pipistrelle was seen foraging in the tennis court and there was constant activity until 21:47. From 21:41 to 21:43, a noctule was heard but not seen. At 22:04, a Nathusius's pipistrelle was heard but not seen, and again at 22:07. A noctule was heard but not seen at 22:07 and 22:11; this was the final bat activity.

Building reference	IR position	Notes/observations:
B1	1	No emergences were captured on camera.  Figure 1. Snapshot of the IR camera footage of southern elevation of B1.
Other observations		No bird activity associated with B1 throughout the survey.

Table 2: Survey results (second visit)

Date		01/08/23	
Start and end times		20:35 – 22:05 Sunset: 20:50	
Weather conditions		Start: Temp: 19.9°C Relative Humidity: 68% Cloud Cover: 100% Wind: BF2 Rain: None	End: Temp: 16.7°C Relative Humidity: 85% Cloud Cover: 100% Wind: BF1 Rain: light (<1mm; commenced at 22:00)
Surveyor (position) As shown in Appendix 3		Michelle Huang (Lead Surveyor) – Accredited Agent under Natural England Bat Licence Number: 2022-10404-CL18-BAT: Position 1 – observing the south and west elevations and roof structure of B1 Andrew Lee – 1 year bat survey experience: Position 2 – observing the south and east elevation and roof structure of B1	
IR position As shown in Appendix 3		Position 1 – observing the south elevation and roof structure of B1	
Building reference	Surveyor position	Notes/observations:	
B1	1	No bat roosting activity was recorded. The first bat activity was a soprano pipistrelle passing south over B1 at 20:53. Between 20:57 and 21:44, there was sporadic soprano pipistrelle passing and foraging activity along the boundary vegetation of the site. At 21:04, a common pipistrelle was seen foraging, passing north of B1 and two common pipistrelles were seen foraging in the tennis court at 21:08. There was sporadic common pipistrelle activity thereafter, until 21:58.	
B1	2	No bat roosting activity was recorded. The first bat activity was a soprano pipistrelle seen passing through the tennis court at 20:53, followed by a noctule which was heard but not seen at 20:58. Between 21:00 and 21:14, there was constant soprano pipistrelle passing and foraging activity, with two individuals often seen flying together. A soprano pipistrelle was seen foraging again at 21:20, with another individual flying north over B1 at 21:22. A common pipistrelle was heard but not seen at 21:24, and a final soprano pipistrelle was heard but not seen at 21:29; this was the final bat activity.	
Building reference	IR position	Notes/observations:	
B1	1	No emergencies were captured on camera.	
Other observations		No bird activity associated with B1 throughout the survey.	

Table 3: Survey results (third visit)

Date		16/08/23
Start and end times		04:30 – 06:00 Sunrise: 05:45
Weather conditions		Start: Temp: 14.8°C Relative Humidity: 65% Cloud Cover: 20% Wind: BF0 Rain: None End: Temp: 12.6°C Relative Humidity: 97% Cloud Cover: 30% Wind: BF0 Rain: None
Surveyor (position) As shown in Appendix 3		Michelle Huang (Lead Surveyor) – Accredited Agent under Natural England Bat Licence Number: 2022-10404-CL18-BAT: Position 1 – observing the south and west elevations and roof structure of B1 Andrew Lee – 1 year bat survey experience: Position 2 – observing the south and east elevation and roof structure of B1
IR position As shown in Appendix 3		Position 1 - observing the south elevation and roof structure of B1
Building/ reference	Surveyor position	Notes/observations:
B1	1	No bat roosting activity was recorded. The first bat activity was a common pipistrelle which was heard but not seen at 04:55. Soprano pipistrelles were seen passing and foraging along the southern elevation of B1 at 05:07. The final bat activity was a soprano pipistrelle passing along the western boundary of the tennis court at 05:25.
B1	2	No bat roosting activity was recorded. The first bat activity was a soprano pipistrelle passing west to east through the tennis court at 05:03. This was soon followed by a common pipistrelle at 05:04, circling the tennis court, and continued until 05:10, with two individuals seen at 05:08. Between 05:14 and 05:18, three soprano pipistrelles were seen circling along the southern elevation of the neighbouring house to the east of B1. There was constant common pipistrelles activity seen in the tennis court between 05:20 and 05:26. At 05:28, a noctule was heard but not seen; this was the final bat activity.
Building reference	IR position	Notes/observations:
B1	1	No emergences were captured on camera.
Other observations		No bird activity associated with B1 throughout the survey.

4.0 Conclusions, Impacts and Recommendations

Taking the field survey results into account, Table 4 presents an evaluation of the value of the buildings for roosting bats in relation to the proposed development which will comprise the construction of 8 new dwellings on the former tennis club site and conversion of the former pavilion building into a 9th dwelling.

Table 4: Evaluation of building on site for roosting bats

Building	Survey Results Summary	Impact Assessment	Recommendations	Biodiversity Enhancement Opportunities ¹
B1	A likely absence of roosting bats is concluded from B1. However, roosts could have been missed due to the unobserved roof structure of the northern elevation. A moderate level of bat foraging activity was detected throughout the suite of three surveys. Despite the moderate levels of bat activity on site, no more than a peak count of 3no. bats were observed at once. Coupled with all surveys taking place during the optimal timeframe to detect maternity roosts, the likelihood of the building B1 containing a maternity roost is acceptably low. During both of the two dusk emergence surveys, pipistrelles were seen within 5 minutes of sunset. This suggests there are common and soprano pipistrelle roosts in close proximity to the site whose inhabitants have dispersed onto site for foraging purposes.	Bats are unlikely to be roosting in the three elevations/roof structures observed. The proposed development will result in the renovation of the building, including repairs to the roof structure. Roosts, if present on the unobserved northern elevation, would be destroyed by reroofing works. In addition, bats are highly mobile creatures that switch roosts regularly and therefore the usage of a site by bats can change over a short period of time. Any bats that begin using the building during the intervening period between the surveys being undertaken and works commencing could be injured or killed and their roosts destroyed.	A precautionary working method will be implemented during and post-development. This will include the following measures: • Works will be scheduled during the winter months (November to March) when bats are least likely to be present, insofar as is possible. • Reroofing works on the unobserved northern elevation to be done by hand. • In the unlikely event that a bat or evidence of bats is discovered during the development all work must stop and a bat licensed ecologist contacted for further advice.	The installation of two bat boxes at the site will provide additional roosting habitat for bats. The bat boxes can be installed on retained trees around the site boundary, or on the façade of the retained building. Bat boxes should be positioned 3-5m above ground level facing in a south or south-westerly direction with a clear flight path to and from the entrance, away from artificial light. The bat boxes will be a specification suitable for crevice-dwelling species such as the Eco Crevice Bat Box (trees or building boxes), Bark Boxes (tree boxes) suitable for crevice-dwelling species, or a similar alternative brand.

¹ The Local Planning Authority has a duty to ask for enhancements under the NPPF (2021).

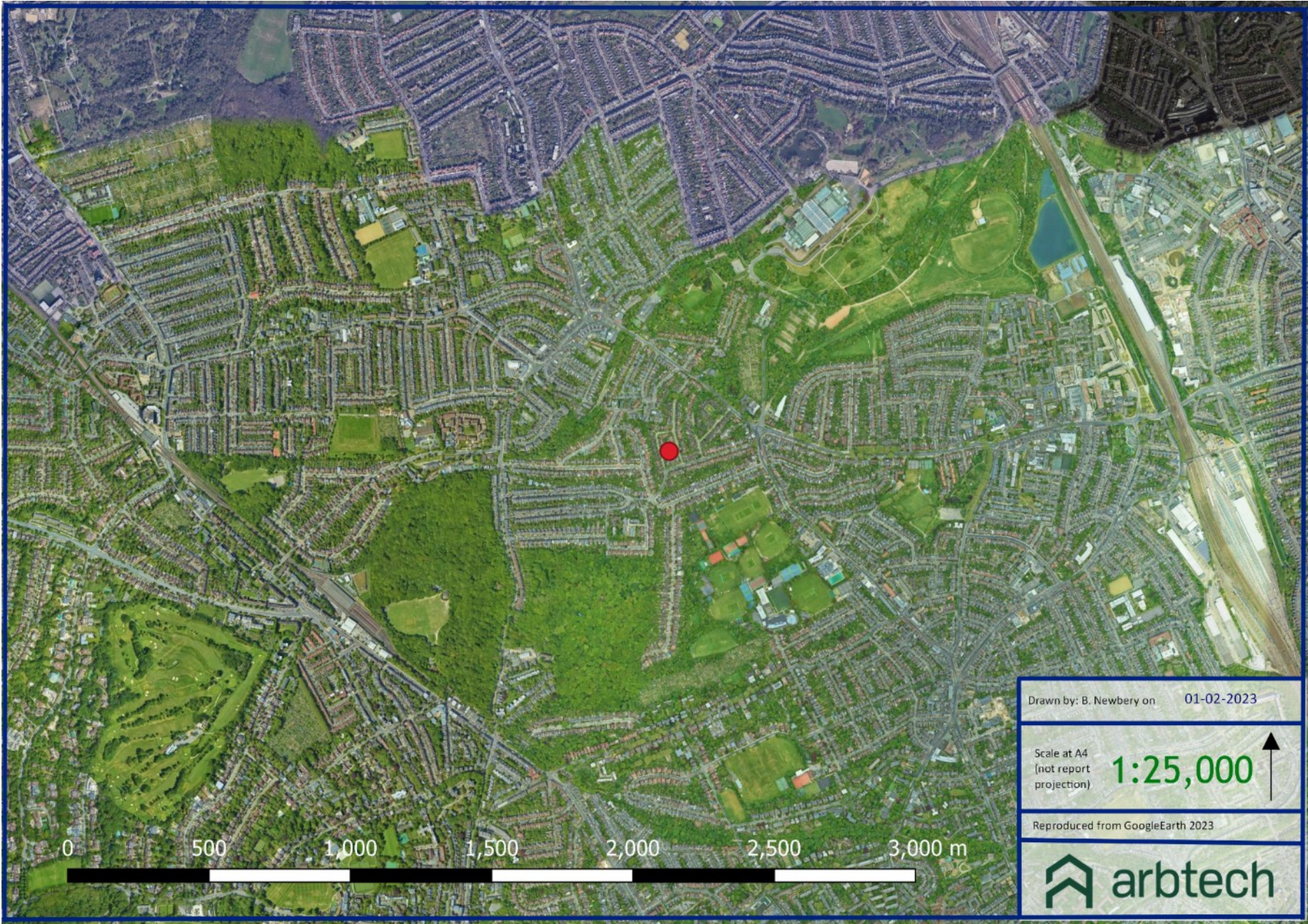
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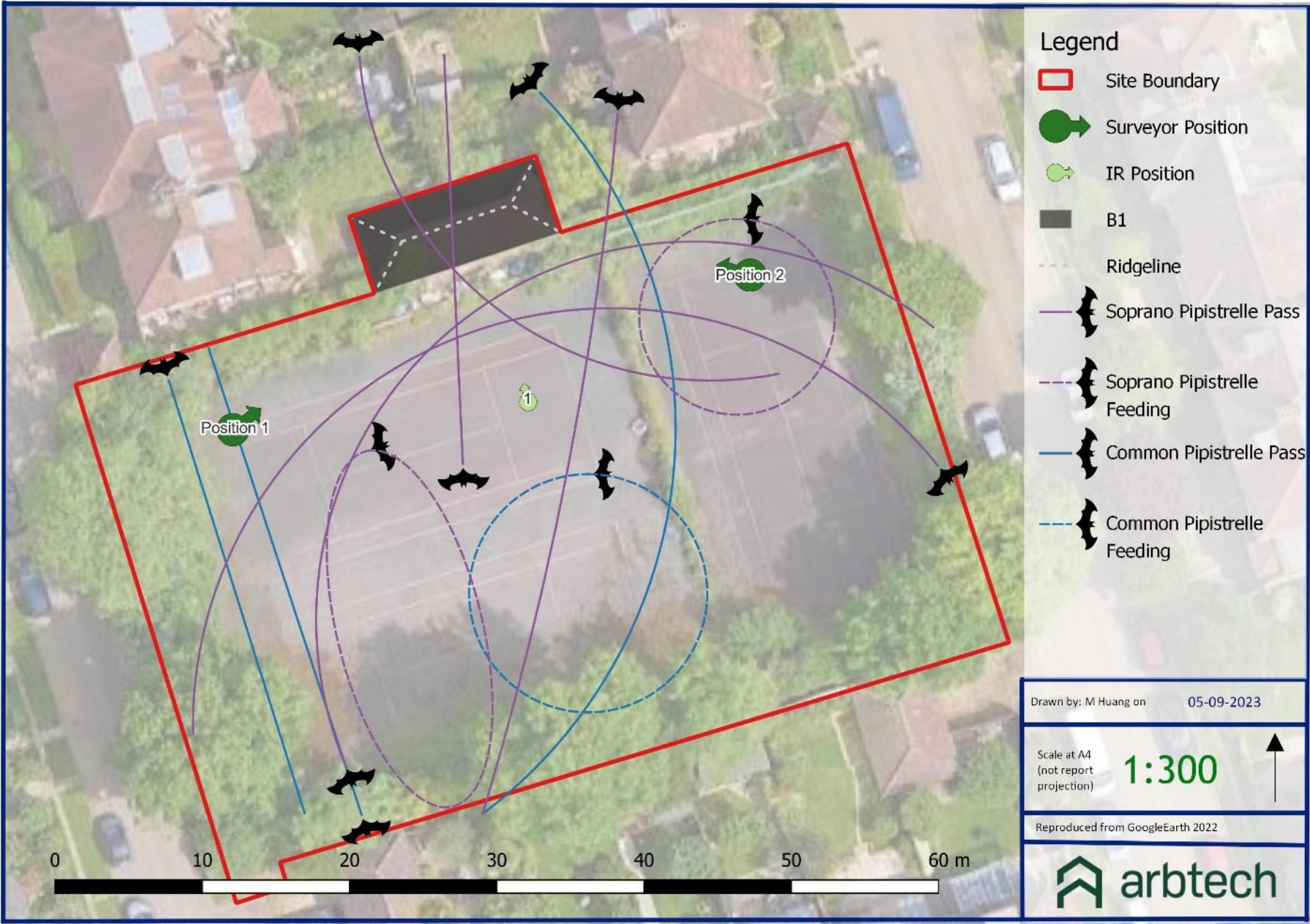
Appendix 1: Proposed Development Plan



Appendix 2: Site Location Plan



Appendix 3: BERS Plan



Appendix 4: Legislation and Planning Policy Related to Bats

LEGAL PROTECTION

All species of bat are fully protected under ***The Conservation of Habitats and Species Regulations 2017*** (as amended) 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

National Planning Policy Framework 2021

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 species of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006) 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; measurable gains in biodiversity in and around developments are incorporated; 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.

LOCAL PLANNING POLICY

The London Plan (March 2021)

The London Plan can be viewed here: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

The following planning policies have implications in relation to biodiversity and the proposed development:

- Policy G6 Biodiversity and access to nature – Key points:
 - Boroughs should support the protection and conservation of priority species and habitats that sit outside the SINCC network, and promote opportunities for enhancing them using Biodiversity Action Plans.
 - Boroughs should seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context.
 - Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- Policy G7 Trees and woodlands – Key points:
 - Development proposals should ensure that, wherever possible, existing trees of value are retained.

Haringey Biodiversity Action Plan

The Haringey Biodiversity Action Plan can be viewed here: https://www.haringey.gov.uk/sites/haringeygovuk/files/biodiversity_action_plan_2009-2.pdf

All bat species are included in the plan.

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A European Protected Species Licence (EPSL) 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:

- 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;
- scientific and educational purposes;
- ringing or marking; and,
- conserving wild animals.

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

EUROPEAN PROTECTED SPECIES POLICIES

In December 2016 Natural England officially introduced the four licensing policies throughout England. The four policies seek to achieve better outcomes for European Protected Species (EPS) and reduce unnecessary costs, delays and uncertainty that can be inherent in the current standard EPS licensing system. The policies are summarised as follows:

- Policy 1; provides greater flexibility in exclusion and relocation activities, where there is investment in habitat provision;
- Policy 2; provides greater flexibility in the location of compensatory habitat;
- Policy 3; provides greater flexibility on exclusion measures where this will allow EPS to use temporary habitat; and,

- Policy 4; provides a reduced survey effort in circumstances where the impacts of development can be confidently predicted.

The four policies have been designed to have a net benefit for EPS by improving populations overall and not just protecting individuals within development sites. Most notably Natural England now recognises that the Habitats Regulations legal framework now applies to 'local populations' of EPS and not individuals/site populations.