

## Why Bat Surveys Are Important

Bat surveys are usually needed prior to the determination of a planning application.

All bats and their roosts are legally protected in the UK. Bats can use buildings, trees and other structures as roosts.

Works that damage or disturb a bat roost - or disturb bats using it - are unlawful unless surveys, mitigation and (where required) a licence are in place before works begin.



## Types of Bat Surveys

### Preliminary Roost Assessment (PRA)

- An initial inspection to assess roosting value and the likely impacts of a proposed development.
- Conducted in line with The Bat Conservation Trust (BCT) and CIEEM guidelines.
- Confirms that no further surveys are required or identifies the need for additional surveys.
- Required prior to a Bat Emergence and Re-Entry Survey (BERS).
- Comprises an internal and external site visit, as well as a desk study.
- An assessment of the building's value is based on habitat suitability (negligible to high) and the presence/absence of evidence within accessible areas.
- A consultant will consider the on-site and surrounding habitat, and the presence of historical licences for impacts on bat roosts.

### Bat Emergence and Re-Entry Surveys (BERS)

- With low, moderate or high roosting value, dusk and/or dawn surveys are done to confirm the bat use and roost type.
- Spaced at least three weeks apart and only in the summer months, in accordance with BCT guidelines.
- Builds more information about roost types, species and the number of bats present.
- Involves multiple consultants over several visits to the site.
- Consultants use highly specialised survey equipment to record vital data about the bats present.

### When Bat Surveys are Needed

Bat surveys are required whenever a building, tree or structure has the value to support roosting bats and the proposed works could affect roosting features, such as roof works, extensions, demolition, lighting or tree removal.

Survey requirements are based on the level of risk that bats are utilising the structure and the potential extent of impact from the proposed works.

### Bat Survey Timing

PRAs can be undertaken at any time of year, whereas BERS are seasonal and undertaken at certain times under suitable weather conditions.

BERS can be undertaken between May and September, or at least partly between Mid-May and July if there's a threat to maternity roosts.

Missing the survey window can cause significant delays to projects, so it is crucial to arrange them as early into the process as possible.

### Survey Validity and Ecological Currency

Under CIEEM guidance - assuming no changes to site conditions and planning proposals - bat surveys are generally valid for up to 18 months for planning purposes.

A survey could become invalid, however, if there's a material change, such as partial demolition, roof deterioration, tree works or prolonged vacancy.

## Bat Licensing: EPSL and BMCL

If works will damage, modify, block, obstruct or destroy a confirmed bat roost or disturb bats in a way that cannot be avoided, a licence may be required.

For development projects in England, a European Protected Species Licence (EPSL) from Natural England is needed. For roosts of lower conservation value - a Bat Mitigation Class Licence (BMCL) is needed.

For both EPSLs and BMCLs, Natural England require bat survey data to be from the most recent survey season. Even if it's less than 18 months old, survey data may not be accepted. The licence must be applied for by the 1<sup>st</sup> of May, the year after surveys were conducted. If not, new surveys may be needed, and missing the application window can cause delay. Licences cover mitigation measures, such as supervision of destructive works and bat boxes as compensation.

## Material Change Checks (MCCs)

A roost must be visited within 3 months prior to the licence submission. If the last visit to the roost was more than 3 months before the licence application, a Material Change Check is required to ensure no shifts in roost conditions.

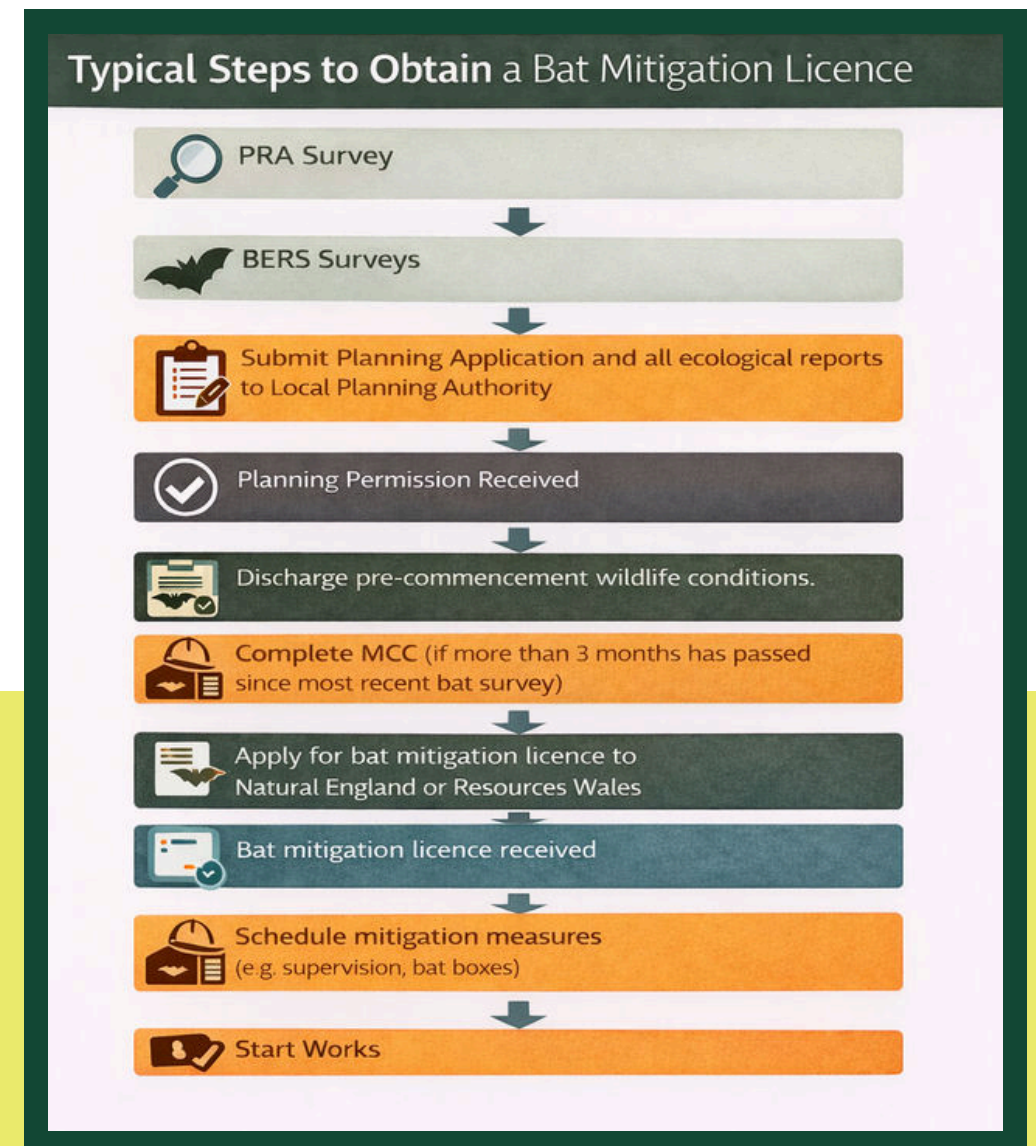
Pre-commencement conditions need to be discharged before a licence application, because once the licence has been granted, the work has a limited time to start before the licence expires.

## Seasonal Restrictions on Works

Even when a licence is granted, works may be seasonally restricted.

For example, works affecting maternity roosts may only be permitted outside of the breeding season (avoiding May-September).

A licence does not automatically allow works to proceed at any time of year.



## Common Misconceptions

*“I already have planning permission/don’t need planning permission. Why do I need a bat survey or bat licence?”*

**Planning and wildlife laws are separate legal requirements. Whether or not you have planning permission, conducting works that disturb bats or bat roosts is an offence.**

*“No evidence of bats or bat roosts was found, so why do we need further surveys?”*

**As a PRA assesses the risk of works impacting roosting bats based on habitat suitability and certain evidence, it isn’t always easy to completely rule out bats on the site.**

*“We had a survey last year!”*

**Surveys may no longer be valid due to time, seasonality or site changes.**

*“We have a licence so we can start any time”*

**Licences often include timing restrictions and pre-work checks.**

*“The works are on a different part of the site and shouldn’t affect any bats.”*

**Due to functional connectivity, a bat could enter on one side of a building but roost on another. Bats are tiny and can crawl far across, for example, a roof membrane.**

## Why Early Advice Matters

Early advice allows surveys to be correctly timed, risks to be avoided, and licensing to be planned rather than reactive. It can then reduce delays, unexpected costs and legal risk.  
<https://www.bats.org.uk/advice>

