

Technical Advice Note#1

Bat Surveys:



The Bat Conservation Trust (BCT) has published new guidelines for bat surveys¹, which set the standard required by NatureScot in relation to development. This Technical Advice Note summarises key aspects of the new guidelines, to ensure developers understand what information must be provided to the Planning Authority (Scottish Borders Council), prior to a planning determination being made.

Before considering whether or not to approve a planning application, Planning Authorities must establish whether European Protected Species (EPS)², such as bats, are present on development sites and what the implications of this might be³. It is **not** possible for the Planning Authority To use planning conditions to set out survey requirements⁴. Applications for planning permission without adequate information, including relevant surveys may be recommended for withdrawal or refusal.

Planning Authorities require adequate survey information to determine whether bat roosts are present, likely to be affected by the development and to fully consider potential impacts on bats prior to the determination of an application³. Planning permission will only be granted when the Planning Authority has satisfied itself that the proposed development either will not impact adversely on an EPS

or that, in its opinion, three tests necessary for the eventual approval of an EPS licence are likely to be satisfied⁵.

These three tests are:

- 1: The development is in the interest of public health/ safety or other over-riding interests (e.g. Social/ economic
- 2: There is no satisfactory alternative
- 3: Actions relating to the development will not be detrimental to the maintenance of an EPS (e.g. bats) at favourable conservation status in its natural range⁶

This Technical Advice Note provides a summary of information on local bat species; the types of development requiring bat surveys; survey requirements; reports and Species Protection Plans.

The full BCT guidelines should be consulted and professional advice from a specialist bat surveyor sought.

1. Local Bat Species

The bat species occurring in the Scottish Borders are: common and soprano pipistrelle; brown long-eared; Daubenton's and Natterer's bats and rarer species such as Noctule, whiskered bat and Nathusius' pipistrelle.

Bats use structures and trees for roosting, depending on whether they are hibernating, feeding, mating, or raising young, the time of year and seasonal changes. They also use a variety of feeding and foraging habitats, (e.g. Woodland, hedgerows, aquatic habitats, grassland, parkland and gardens). The preferred roost locations and habitat types differ amongst species; Brown long-eared bats may roost in trees, voids of large, old buildings and against wooden beams in attics and farm buildings. Pipistrelle species may roost under lead flashing, roof tiles, in soffits and crevices in trees or buildings.

Some Common Bat Species



Brown long-eared bat



Common pipistrelle bat



Natterer's bats in crevice
(Picture: Dougie McKenna)

¹ Collins, J. (ed.) (2023) Bat Surveys for Professional ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.

² There is no change to the protection of European Protected Species as a result of EU Exit.

³ Scottish Government (2022) National Planning Framework 4, policy 4 (Natural Places) and SBC (2024) Local Development Plan 2, policies EP1 and EP2

⁴ Interim guidance for local authorities on licensing arrangements. Scottish Executive Environment and Rural Affairs Department (2001).

European Protected Species, Development Sites and the Planning System:




⁵ This is in accordance with The Conservation (Natural Habitats &c.) Regulations 1994 (as amended).

⁶ See definition in SNH (2015) Native Range Guidance Note. Available at:

<https://web.archive.org/Eb/20211103021044/https://www.nature.scot/sites/default/files/2017-07/A1464519%20-%20Guidance%20Notice%20059%20-%20Native%20Range.pdf>

2. Types of Development Requiring Bat Surveys

Development impacts on bats may include physical disturbance; injury or mortality; disturbance by noise or light; modification/loss of roost or foraging habitats. The types of development that are likely to impact on bats and require bat surveys are summarised in the table below (for full details, refer to the BCT website⁷). **This is not an exhaustive list. A specialist bat surveyor will apply professional judgement and consult the full BCT guidelines to decide where bat surveys are/are not appropriate.**

Development likely to affect bat roosts	Development likely to affect bats' feeding/foraging habitat
<p>Conversion, alteration, demolition or removal of buildings and any works impacting roof structures (including dwelling houses; hotels; schools; hospitals; churches; commercial premises; derelict buildings) which are:</p> <ul style="list-style-type: none"> • agricultural buildings of traditional brick/stone construction and/or with wooden beams; • buildings with weather boarding and/or hanging tiles; • buildings/structures within 200m of woodland, water, parkland or gardens • pre-1914 buildings within 400m of woodland and/or water; or with gable ends/slate roofs (regardless of location) • Dutch barns/livestock buildings with single skin roof and board-and-gap or Yorkshire boarding, if the site is particularly suited to bats 	<p>Floodlighting (e.g. of churches and listed buildings; green spaces within 50m of or with connectivity to woodland/ water/ field hedgerows; or any building listed under conversion, alteration, demolition or removal – see opposite column). Security lighting can also cause bats to desert roosts, e.g. when entrance points are illuminated.</p> 
<p>Development affecting built structures such as bridges/aqueducts/viaducts (especially over water or wet ground); cellars; kilns; ice-houses; military fortifications; air-raid shelters; underground ducts/structures; unused industrial chimneys (unlined and of brick/stone construction); tunnels; mines</p> 	<p>Felling, removal or lopping (e.g. woodland, field hedgerows and/or lines of trees with connectivity to woodland/water bodies)</p> 
<p>Felling, removal or lopping (e.g. of trees over 100 years old, and mature or dead trees with holes, cracks, cavities, or which are ivy-covered)</p>	<p>Proposals for wind farm developments of multiple/single wind turbines (depending on size and location)</p>
<p>Proposals located in/adjacent to quarries, gravel pits, natural cliff faces, or rock outcrops with crevices, caves</p>	<p>Proposals affecting water bodies (in or within 200m of rivers, streams, canals, lakes, reed beds or other aquatic habitats, where bats are likely to be present)</p>
<p>All proposals in sites where bats are known to be present (e.g. any type of building, structure, feature or location)</p>	

3. Bat Survey Requirements

The table overleaf summarises key types of bat survey⁸. The process for bat surveys of buildings, structures and trees⁹ is iterative: each stage of survey informs the next before likely impacts on bats are assessed. **In most circumstances the minimum requirement will be a Preliminary Roost Assessment including a proportionate Preliminary Ecological Appraisal.** Phased or lengthy developments may require repeated surveys to ensure survey data remains valid. Surveys are generally considered invalid if more than 18 months old.

It is essential that bat surveys are undertaken by an experienced bat specialist, particularly if a survey may result in disturbance to bats, in which case the bat specialist must be licensed to carry out surveys. References and evidence of experience should be sought. We would expect all consultants to adhere to the Chartered Institute of Ecology and Environmental Management's (CIEEM) professional code of conduct irrespective of their membership status. The CIEEM Code of Professional Conduct is publicly accessible on the CIEEM website¹⁰.

⁷ For full details visit the Bat Conservation Trust website: <https://www.bats.org.uk/about-bats/where-do-bats-live>

⁸ For full details refer to Collins, J. (ed.) (2023) Chapters 2-9

⁹ Separate guidance is available in relation to road/railway infrastructure

¹⁰ www.cieem.net

Survey Type	Purpose and Method	Optimal Timing†
Preliminary Ecological Appraisal (PEA)*	Assess potential impacts on bats and whether further surveys are required, by surveying potential roosting, foraging or commuting habitat for bats. Also requires desk study. (A full PEA may not be required for small projects)	Any time of year
Preliminary Roost Assessment (PRA)	Detailed internal/external survey that aims to confirm actual or potential bat presence. The development is categorised as having <i>no</i> , <i>low</i> , <i>moderate</i> or <i>high</i> suitability for bats. (No suitability means no further surveys required). Also assesses hibernation potential of development.	Buildings: Any time Trees: December to March for ground level survey ‡
Presence/Absence	Verify bat presence/roost type (if not confirmed by PRA). Several dusk surveys undertaken, depending whether there is <i>low</i> , <i>moderate</i> or <i>high</i> suitability for bats. As a minimum: Low suitability = 1 dusk survey Moderate suitability = 2 dusk surveys High suitability = 3 dusk surveys	May to August (one survey may be in September for roost features with moderate or high suitability) Surveys to be at least 3 weeks apart
Roost Characterisation	Undertaken in certain circumstances if bats are present but it has not been possible to determine the species or type of roost(s) in previous surveys	Generally May to September
Hibernation Survey	Winter survey to confirm presence/likely absence of hibernating bats/their roosts (if not previously confirmed by PRA)	December to February

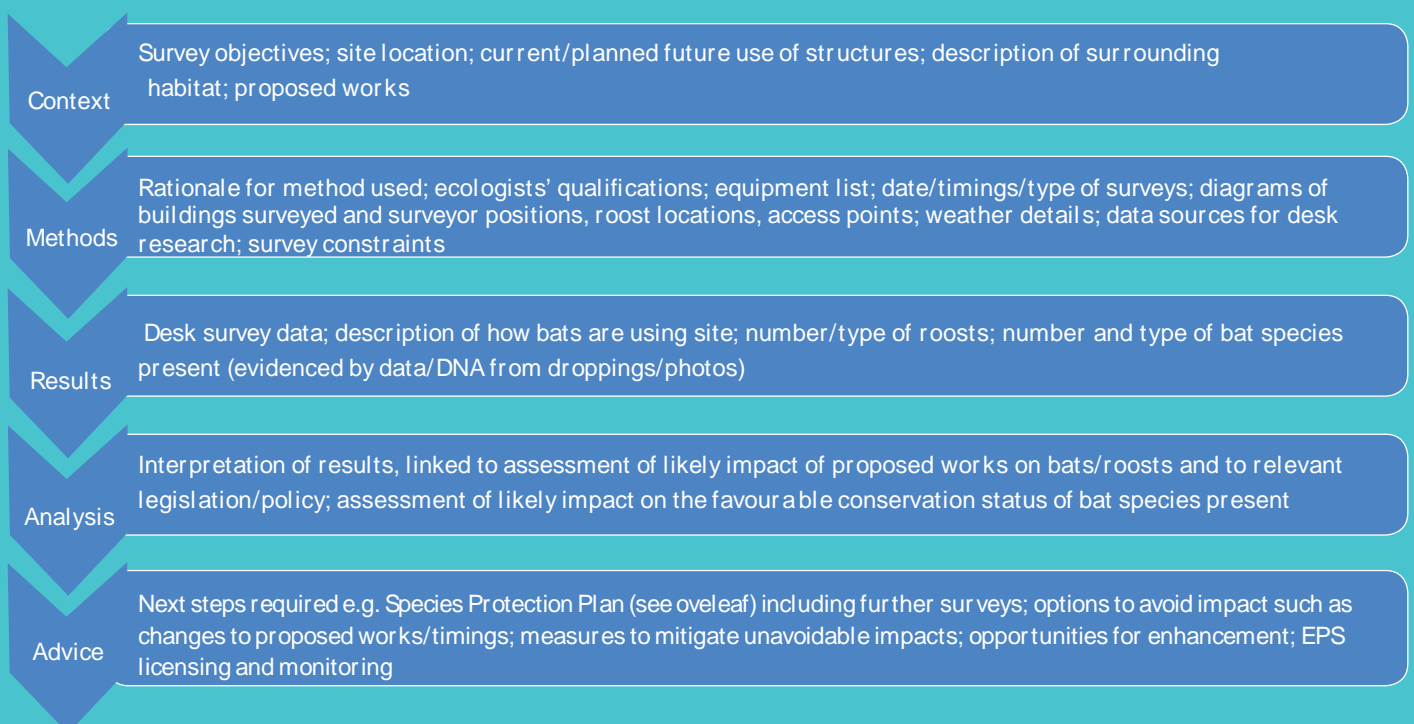
*A PEA report alone is inadequate for submission to the Planning Authority, if further bat survey/mitigation is required

‡Aerial inspection of potential tree roost features can be undertaken at any time to confirm presence/absence of bat species

4. Bat Survey Reports

Following surveys, the bat specialist should produce a formal report detailing results, including any bats/roosts present, their value and significance and how they are likely to be impacted by the proposed development. In addition, the report should advise on how any likely impacts can be avoided or mitigated in order to result in no net loss (and if possible a net gain) to the favourable conservation status of the bat species concerned. **This formal report needs to be submitted to the Planning Authority, before the application can be determined.**

The diagram below summarises key information bat surveyors should include in their report¹¹. Reports should also include supporting material in appendices, evidencing results and advice provided, e.g. photos; maps; background data on local designated statutory/non-statutory sites; bat species; or other protected species present. If the report contains sensitive ecological information, it should be clearly marked as confidential.



5. Species Protection Plan

If bats are present, provision of a Species Protection Plan in the *Advice* section of the report can recommend approaches that may enable development to go ahead whilst safeguarding bats and their roosts. The plan must be informed by the results and analysis of surveys. **A Species Protection Plan can also minimise the risk of delays to the processing of any planning consent or EPS licencing.**

The Species Protection Plan should:

- Outline methods to avoid impacts or disturbance to bats or their roosts. This is the plan's primary purpose. Avoidance of impact may be achieved by changing the design, timing or location of proposed works.
- Include details of mitigation and/or compensation where impacts are unavoidable
- Identify whether or not a licence is necessary (by showing where an offence would otherwise be committed).
- Outline how development works (including licensed works) will be undertaken in relation to bats, through a detailed method statement
- Outline monitoring methods for the Species Protection Plan, once implemented.

As stated at the beginning of this document, providing adequate survey information, in addition to plans for mitigating impacts on EPS such as bats may help streamline the decision-making process for planning applications.



Contact the address below for additional copies, or for an officer to explain any areas of the publication that you would like clarified.

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