

# Bats in Churches: a management guide

This leaflet is to help those who look after church buildings that are used by bats to understand their legal obligations. It will be of help to architects, surveyors, local authority conservation officers, ecologists and Natural England and English Heritage staff and volunteers.

This publication supersedes the previous English Heritage and English Nature document *Bats in Churches* and brings readers up to date with the current legal protection for both bats and buildings. Anecdotal accounts suggest that bat roosts have increased since the Second World War, possibly as a result of loss of other habitats. This means that church buildings are becoming increasingly important as roost sites. This can occasionally cause tension where local congregations and communities are also seeking to use church buildings for a wide range of community/social events as well as worship.

Bats and church buildings have a long association and many of the 16,000 parish churches in England are used by bats to a greater or lesser degree. Although bats originally roosted in trees and caves, they have taken advantage of the built environment to such an extent that at least one species, the serotine, is rarely found roosting anywhere else. Britain is now one of the least forested countries in Europe, so the alternatives available to bats are limited. This means that, as a group, they are uniquely dependent on buildings for roosting. Inevitably, this brings them into occasional conflict with the human users of the building, either because the bats are not welcome or because they constrain the maintenance, use or conservation of the church and its treasures.

This guide gives a brief introduction to bats, explains how, why and when they use buildings, and provides advice on how to manage bats in a variety of situations. It covers both the practical

and legal aspects of bat management. However, it is important to remember that churches are important as repositories of important fixtures and fittings, as places of worship and as community buildings.

## The importance of churches to bats

Churches play an important role in helping to protect our native bats. A survey by the Bat Conservation Trust estimated that almost 6400 churches and chapels in England may be occupied by bats. Eight species are known to use churches for roosting, including some of our less common species, such as Natterer's bat, the serotine and greater and lesser horseshoe bats. In a changing landscape, churches can represent one of the few remaining constant resources for bats. The age of many of the buildings means that bats may have been associated with particular churches for decades, perhaps even hundreds of years. Fortunately, bats coexist in harmony with clergy and congregation in most cases; 75% of respondents to the BCT survey welcomed bats, with only 12% expressing concerns about their presence. In some situations, however, this coexistence is not harmonious and specialist advice about both the bats and the fabric of the building should be sought through Natural England and English Heritage.

## About bats

There are 17 species of bats in Great Britain. All are protected because many species, nationally and internationally, are rare or threatened, even if some local

# Bats in Churches: a management guide

areas can boast large colonies. Although, to non-experts, the species look rather similar, they are all distinct and have particular lifestyles and roosting requirements. Shared characteristics are that:

- Bats are mammals, like us, so they give birth to live young (normally one baby per year), which is suckled for several weeks before it becomes independent.
- Bats are warm-blooded, but they have great control over their body temperature, so they can become cold and torpid when they are inactive at any time of the year and of course they can hibernate for long periods.
- Bats are highly manoeuvrable fliers, with wings made from soft skin stretched over modified front limbs. Because their forelimbs are modified for flight, bats often roost clinging on to vertical surfaces with their hind limbs and, perhaps, thumbs. Only the two distinctive species of horseshoe bats habitually hang free by their hind feet, looking like small hanging fruit.
- Bats are nocturnal. Although they have perfectly adequate eyesight, they also use echolocation to navigate in darkness. Flying bats emit a stream of complex high pitched cries through their mouth or nose and process the echoes to build up a picture of their surroundings. Whilst most effective at short-range, this system is good enough for them to catch small flying insects in complete darkness.

Although the details vary between species, all bats are social and colonial animals for at least part of the year. After hibernating in sheltered places, such as caves, buildings or tree holes, female bats gather in maternity colonies during late spring to give birth and rear their young. Once the young are independent, these maternity colonies tend to disperse in late summer or autumn. At this time males, which lead more solitary lives, attract females for mating, often forming small harems. After this, bats move back to their hibernation roosts, though they can be seen flying and hunting during the winter if the weather is mild. A typical bat year is shown in Figure 1 on page 11, though it should be emphasised that there are

species-specific differences and that the timings vary with the weather conditions.

Some species of bats are rare and are restricted to certain areas of England whilst others are widespread and more frequently encountered. However all are equally protected by law.

## How bats use churches

When bats adopted buildings for roosting, they chose places that mimicked their natural roosts. During the winter, bats look for places that are protected from frost and from large and sudden changes in temperature. Churches, with their large size and massive construction can provide those conditions. During the summer period when they are active, bats may perceive the interior of a church as a large space under the tree canopy, so they may fly around inside it before roosting in cracks and crevices in the timbers, just as they do in woodland. At this time, males tend to look for cool roosts, where they can allow their body temperature to cool down to save energy, whilst, during June and July, breeding females gather in warmer places, which help their young grow more quickly. In many cases, churches seem to be used during the autumn, in the period between breeding and hibernation. The pattern of bat usage of each church depends on the types of roost available and the types of bats that are using it, but the presence of bats is generally more obvious during the warmer months (June to September).

Because bats are small (most can go through a 2 cm (  $\frac{3}{4}$  inch) crack), they are able to enter large old buildings like churches in many places. Typical entrance points include gaps around doors and windows, through broken or missing panes of glass, through open eaves and ventilation slits, under loose slates or around lead flashings. In some cases, bats have been found using quite complicated ways of getting into a church, such as flying through louvres in a tower and then through the holes for the bell-ropes. In other cases, it has simply been impossible to find their access points.

Bats can be found roosting in many places in churches, though towers tend not to provide the conditions they are looking for. More usual roosting sites include the chancel arch, where there is often a gap between the stone arch and

# Bats in Churches: a management guide

the first rafter, splits, joints and crevices in roof timbers, along the eaves, in cracks in stonework, in voids between the ceiling and roof and even behind wall hangings or commemorative plaques. In many instances, where small numbers are involved, the presence of bats may be completely undetected.

Although most churches with bats have small numbers that don't cause any significant problems, in some cases bat urine or faeces can damage artefacts or furnishings or cause a nuisance to users of the building. The legal protection afforded to bats must be taken into account when deciding on the best course of action to address these problems. Similarly, the presence of bats, and its legal implications, must be taken into account when maintenance, repair or renovation works are planned. These two situations are considered in more detail in the sections below.

## Bats causing problems

It is important to realise that:

- bats are not a serious threat to human health providing sensible precautions are taken;
- bat droppings and urine may cause damage to historically significant fabric;
- bats may have an impact on the interior of buildings that causes practical problems, whether or not historic artefacts are at risk;
- there are ways of managing the situation to minimise the impact of bats on the church building and people who use it. It is essential that every possible effort is made to mitigate the impact of the bats before drastic measures, requiring the granting of a licence, are pursued.

## Nuisance and human health

Where there is significant bat activity in a church, the cleaning required to make the building usable regularly as a place of worship may be beyond the resources of the congregation. Similarly, where the smell of bat urine and droppings permeates the entire building, action may need to be taken. The presence of grounded (crawling) bats is occasionally a problem in houses, but only very rarely in churches. If your church suffers from

either of these unusual problems, seek advice from Natural England.

The risk to human health through exposure to bats or their debris in the UK is small. The hazards are infection from a bite or scratch from an infected bat or from exposure to bat droppings or urine.

Bats are potential carriers of a rabies-like virus called European Bat Lyssavirus (EBL), though these seem to be rare in Britain. EBLs are transmitted by a bite or scratch from an infected bat, or if saliva or nerve tissue from an infected bat gets into a patient's eye, or comes into contact with mucous membranes, such as the lining of the mouth or nose, or with broken skin. People are not at any risk from EBLs unless they have been in close contact with an infected bat and bitten or scratched by it. Therefore bats should only be handled by experts. If a sick or injured bat is found, advice should be sought from Natural England or the BCT. Gloves should be worn if it is necessary to handle and dispose of a dead bat.

Exposure to bat droppings and urine present a risk of gastro-intestinal infection through accidental hand-to-mouth transfer. However, the small size of the droppings, and the speed with which they dry up, means that they do not generally provide a good growth or maintenance substrate for organisms that could cause disease in humans. Nevertheless, the presence of quantities of bats droppings in areas used by a church congregation, particularly children, is undesirable and needs attention. Hands should be washed after exposure to bat droppings and urine.

As a general precaution, it is best to prevent exposure to dust from deposits of bird or bat droppings by avoiding it becoming aerosolised and subsequently inhaled. Work practices and dust control measures that eliminate or reduce dust generation should be used. For example, instead of shovelling or sweeping dry, dusty material, carefully wetting it with a water spray can reduce the amount of dust aerosolised. An alternative method is the use of an industrial vacuum cleaner with a high-efficiency filter to bag contaminated material.

# Bats in Churches: a management guide

## Damage to artefacts and furnishings

Many churches contain objects of historical and artistic interest that are vulnerable to damage from bat excreta. These may include wall paintings, tombs and screens, monumental brasses, textiles and paintings. In addition, organ pipes and furnishings, such as lecterns and pews may also be vulnerable to damage, which typically appears as spotting of polished surfaces.

Bats, particularly pipistrelles, the most common species, tend to urinate and produce droppings (faeces) when entering or leaving their roost, so it is around these areas that the greatest concentration of excreta, and hence the most damage will tend to occur. However, other species, such as Natterer's bat, appear to spend time flying around in the body of the church, leading to a more widespread, but less concentrated, distribution of excreta.

Droppings, perhaps the most obvious indicator of the presence of bats, are largely made up of the indigestible parts of insects together with small amounts of other compounds such as fats or oils. Droppings can provide a source of nutrients for the growth of bacteria and fungi, but because they are small, they usually dry up very quickly, thus halting the growth of these organisms, unless they are in very damp places. Old bat droppings generally crumble to a fine powder. Bat urine is a solution of urea, which decays to form dilute ammonia, which is alkaline. Both droppings and urine can cause pitting, staining or etching of porous or polished materials, including paintings, varnished surfaces, brass or polished stone. However, damage caused by urine may be more significant as it is chemically more aggressive than the compounds found in faeces.

## Managing the problem

Before deciding on what action may be appropriate and effective, it is very helpful to gather some information about the nature and extent of the problem. This should include information about the type, pattern and extent of any damage to objects or furnishings as well as information about the pattern of bat usage. For the latter, the most helpful information is the location of concentrations of droppings, the

seasonal pattern of bat usage and the location of bat roosts and access points. It is also helpful to know which species of bats are present, as some are particularly rare, though this requires specialist knowledge. Much of this sort of information can be collected by the parochial church council, incumbent or volunteers, but some specialist advice will certainly be helpful. We recommend that you contact your local Natural England office or the Bat Conservation Trust national helpline (see end for details) for advice. In most cases, a Natural England specialist volunteer or Wildlife Adviser will be able to visit the church to provide on the spot advice and help identify bat roosts and which species of bats are present. They may also be able to suggest which bat management techniques, described later, are most likely to be helpful in ameliorating the problem.

It is also helpful to obtain advice about the historic, artistic and cultural value of all works of art, and other objects, in the church and also some assessment of their vulnerability to damage from bat excreta. For this, advice may be sought from the Diocesan Advisory Committee, the Council for the Care of Churches or English Heritage.

## Assessing bat usage

A good starting point is to ask those responsible for the routine maintenance (e.g. cleaning) of the church. This should identify the areas with the most evidence of bats and also give some indication of the rate of deposition of excreta. For a more accurate assessment, it would be helpful to record the distribution of excreta onto a scale plan of the church. Divide the plan up into one metre square sections and count or estimate the number of droppings or urine spots in a sample of these, focusing particularly on those areas of the church that show the most evidence. If this technique is repeated on a fortnightly or monthly basis, this will give a good indication of the rate of deposition of excreta. An alternative way of achieving this is to lay out light coloured sample cards of known size in selected areas of the church and count the number of excreta that accumulate over a period of time. It is also helpful to inspect the walls of the church and record any areas that show significant

# Bats in Churches: a management guide

concentrations of droppings stuck to vertical surfaces. This can help to identify bat roosts.

## Ways of managing problems

A range of techniques is available to help manage or reduce problems of damage or nuisance caused by bat excreta. These vary in cost, convenience, effectiveness and achievability and range from amending the cleaning rota right through to exclusion of the bats. The choice of management technique will be influenced by the scale of the problem, its impact on the church as a place of worship and community use, the historic, artistic or cultural value of the items vulnerable to damage, the conservation significance of the bats involved, the seasonality of the problem and the cost and achievability of the proposed action. For the majority of churches, simple low-cost techniques are most likely to be appropriate, with a more interventionist approach reserved for those with more significant problems. Regardless of the legal requirements, the size and construction of most churches means that excluding bats can be a difficult and expensive operation with no guarantee of success, so it is unlikely to be the best solution in the great majority of cases.

**Cleaning** Arranging the cleaning rota so that the church is cleaned in the mornings before it is used may be a solution to ensuring bat droppings are not a source of concern to the congregation, where bat activity is limited. Cleaning of fragile surfaces that may be seriously damaged by inappropriate techniques should only be carried out by professional conservators. Droppings should only be removed from robust and historically insignificant objects by brushing or dusting. If this is unsatisfactory, seek further advice. Cleaning objects such as monuments with water should generally be avoided as it can remove protective patination, dissolve surface layers of the object and risk initiating harmful salt activity and microbial growth.

**Moving objects** If a free-standing object is exposed to bat excreta, it may be possible to move it to an area where surveys have shown that the deposition rate of droppings is low. This may require faculty permission if the original position has liturgical or historical significance.

**Covers** Covers may be appropriate where deposition is minor, localised or where there are only a few vulnerable objects. They are less suitable where deposition occurs throughout the church or where the aesthetic impact would be significant. Porous materials, such as linen or natural carpet, are suitable, but impermeable materials, such as most plastics and synthetic fibres, should be avoided for significant objects as they can cause problems with condensation or high humidity. Covers should be suitable for easy cleaning. For brasses or polished stone on the floor, natural fibre carpet or underfelt would be suitable, but care should be taken to remove any grit, so as to avoid damage to the surface.

**Vertically-hanging screens** Vertically-hanging screens could also be used to protect wall-paintings or other items on walls. This technique has been little tested as there are concerns about its aesthetic impact. Any protection such as this would require the authority of a faculty. Possible materials could include fine netting (as used to keep birds off buildings) or clear plastic. If screens can be mounted so they hang some distance from the object they are designed to protect, they could prevent bats from flying close to the objects and thus provide protection from excreta. Netting screens would be almost invisible if hung carefully.

**Coatings** Before any attempt is made to coat any fabric, fixture or fitting, those responsible for the care of the church are strongly advised to seek professional advice. Synthetic lacquers may give some protection against bat damage, but should only be used for historically and artistically insignificant metal and wooden objects. Waxes may give some protection to furniture, but provide limited protection against bat urine. Further information about the care of wooden surfaces is given at [www.churchcare.co.uk/contents.php?DK](http://www.churchcare.co.uk/contents.php?DK)

**Deflector boards** Carefully positioned boards beneath areas used by bats can provide some protection against urine and droppings, either by catching the excreta or deflecting it to harmless areas. Such boards are most effective when bat activity is largely restricted to clearly-defined areas, such as favoured roosting places, and where a single item such as a monument can be protected. Widespread use of boards in a

# Bats in Churches: a management guide

building would not be feasible. Boards can be erected during the summer, when bats are active, and removed at other times or for cleaning. The consequences of attaching boards to historic plaster, stone or woodwork must be considered and faculty permission will be needed.

**Deterrents** Many deterrents, including stuffed owls, burning incense and ultrasonic pest-scaring have been suggested or tried, but there is no evidence that any of these are effective in modifying the behaviour of bats. There is some evidence that lighting may affect bats behaviour, with some species, such as Natterer's bat, appearing reluctant to fly around the body of the church if the lights are on. It is possible, therefore, that the careful use of internal lighting, perhaps controlled by a time switch, could reduce bat usage of a church. As this use of lighting is a deliberate attempt to disturb the bats, perhaps adversely affecting their ability to breed or raise their young, advice should be sought from Natural England as to the legality of any proposal. In some cases, a licence may be required for the work to be carried out legally.

**Relocation of roosts or access points** Bats may roost in a wide variety of places inside churches, moving from site to site seasonally or as the weather changes. If roosts are located above particularly sensitive areas, such as objects of historic or cultural significance, it may be possible to manage the roosting behaviour of the bats by excluding them from one or more of their roosting sites. The object of such management would be to move the bats to more acceptable roost areas, not exclude them from the church completely. Such management may be legally acceptable provided that the continued ecological functionality of the roost is maintained. This means that from the bats point of view the church continues to offer them the same variety of roosting places as it did before the work. To avoid breaking the law, it would be best to seek advice from Natural England before embarking on such a course of action.

**Exclusion** In cases where damage to important items is severe, or there are significant public health concerns, exclusion of bats from the church may be considered. In this context, exclusion includes both the complete exclusion

of bats from the church and the exclusion of bats from all their roosting sites within the church. As might be expected, sealing a large building against animals that can pass through a 2 cm gap is not a simple exercise and the difficulties and expense of such an operation should not be underestimated. In addition, care needs to be taken to maintain ventilation, so advice from the church's inspecting architect or surveyor will be necessary. Success can certainly not be guaranteed, no matter who carries out the work.

Exclusion results in the destruction of bat roosts and so would be illegal as well as potentially harmful to bat populations. Because of this, it should be seen as a last resort in cases where other less harmful solutions have failed to help. Licences to permit what would otherwise be illegal activities are obtainable from Natural England, who should be consulted at an early stage. Details of the legislation are given below.

## Application for a licence

Applications for licences involve time and expense and should be considered as an absolutely last resort, when none of the other management options is feasible.

Before applying for a licence to damage or destroy bat roosts, it will be necessary to gather sufficient information to demonstrate that the requirements of a licence application are met. Natural England will be unable to make a decision unless the right information is available and the applicant can demonstrate that the necessary tests have been met. These are described below:

## Is the purpose of the work appropriate?

Licences are available only for purposes specified in the legislation. The most likely ones for churches are:

**Preventing serious damage to property** For this purpose, it would be necessary to show that the bats are causing, and will continue to cause, serious damage to the fabric of the church and/or items within it. To demonstrate this, it would be helpful to have:

- Information about the scale of damage and the value of those items. It may be helpful to seek advice from the Diocesan Advisory Committee,

# Bats in Churches: a management guide

the Church Buildings Council or English Heritage about the heritage value of objects and fittings.

- Information about the distribution and frequency of bat excreta. This can come from the assessment described above.

**Preserving public health or public safety or other imperative reasons of overriding public interest** The presence of significant quantities of bat droppings on pews or other places where people may come into contact with them could be grounds for a licence application, even though the risk to public health is considered low. To justify this purpose, it would be helpful to have:

- Information on whether the use of the church by bats conflicts with the primary use of the building as a centre of worship and mission.
- Information about the frequency of services in the church, the average size of the congregation, and whether the services are attended by children.
- Information on the feasibility of cleaning the building to a satisfactory standard.
- Information about the distribution and frequency of bat excreta. This can come from the assessment described above.

## Is there a satisfactory alternative?

The UK is obliged to implement a system of strict protection for all bats. Licensing what would otherwise be illegal acts should thus be seen as a last resort and licences cannot be issued where a satisfactory alternative way of achieving the desired outcome exists. It will thus be necessary for the applicant to demonstrate that all reasonable alternative ways of solving the problem have either been tried or are unsuitable.

## Will the action authorised be detrimental to the maintenance of the population of the species concerned at a favourable status in their natural range?

This is probably the most complex of the three tests to be addressed and one where expert advice will be required in order to show that the test has been met. In determining this test, Natural England will take into consideration the species and number of bats likely to be affected,

the usage of the site (maternity, hibernation etc.) and proposals for mitigation to reduce the impact. Overall, the objective should be to ensure there is no net loss of resources available to the bats, so, except for minor roosts of widespread species, we would expect to see appropriate mitigation for any loss of roosts. Mitigation can take many forms, but alternative roosts are often provided in the form of adapted areas in buildings, bat-boxes or, in some circumstances, purpose-built bat houses. Details and examples are given in the Bat Mitigation Guidelines published by Natural England and ecological consultants should be familiar with these.

## Maintenance, repairs and alterations

In some cases, plans to maintain or repair churches can be affected by the presence of bats or bat roosts in the area. For the work to be accomplished with the minimum of delays and interruptions, the following process is recommended.

**Avoid surprises** It is well known that bats like to use church buildings and the simplest option is to assume that they will be present, unless it is definitely known that they are not, and carry out a bat survey, focusing on the areas to be repaired or maintained. This should be carried out before grants and faculties are applied for, programmes of work are agreed or works commissioned. This will minimise the possibility of having contractors or expensive equipment on site and then having to stop work while problems are resolved. Understanding how bats use the church should also ensure that any extra costs of taking the bats into account will be minimal. Integrating a bat survey into periodic condition surveys is a good way of ensuring that up to date information about bats is always available. Always ask the architect to ensure that bats are taken into account when planning work and developing method statements.

**Plan the work** Once the presence of bats or the location of bat roosts is known, the works can be planned to take the bats into account. The basic principle is to plan the work so as to avoid committing offences under the wildlife legislation and thus avoid the need for a licence. Only consider applying for a licence if avoidance is virtually impossible.

# Bats in Churches: a management guide

In most cases, avoidance will involve adjusting the timing of any works so they are carried out at a time of year when fewest bats are present, thus avoiding significant disturbance to bats. Similarly, the methodology may need to be amended so as to avoid damaging or destroying bat roosts, for example by ensuring the entrances are maintained. Natural England may be able to advise on the planning of minor works, but for major works in churches with significant numbers of bats, professional advice from a consultant is likely to be required.

Once a suitable methodology for the works has been agreed, it is recommended that this is written down in the form of a detailed instruction (or method statement) for the contractors. This has two important benefits. First, it will show that the church authorities are aware of the bats and have taken all reasonable steps to avoid committing offences. This could be important if a minor offence is inadvertently committed, as prosecuting those who can show they followed good practice is unlikely to be in the public interest. Second, a written instruction can reduce the possibility of misunderstandings between the church authorities and the contractors and can clarify who is responsible for looking after the bats.

If the work cannot be carried out in a way that avoids offences, the only other way of working within the law is to apply for a licence on the grounds that the works are for imperative reasons of overriding public interest. Such applications would also need to pass the tests of whether there was a satisfactory alternative and whether the work would adversely affect the conservation status of the bats concerned. Details of how the latter tests are applied is given in the section on exclusions. We anticipate that licence applications to allow repairs or maintenance to be carried out without breaking the law will be rare as there will generally be a satisfactory alternative way of carrying out the work that avoids committing offences.

**Carry out the work** Once a satisfactory plan of action has been agreed and a written method statement prepared, the works can be commissioned as normal. Contractors should be given a copy of the method statement as part of the commissioning process, so any particular

constraints can be taken into account throughout the contracting process. Where particular care is required, it may be advisable to have contractors briefed on-site by someone familiar with the method statement. Our experience is that communication failures between client and contractor are the most frequent cause of offences being committed.

English Heritage and EH/HLF grant programmes can be adjusted in order to fulfil legal obligations about bats, although it is preferable to anticipate their presence to ensure these are built into the works programmes from the outset, not added in at a later date.

## Legal protection for bats

All species of bats are protected by the Conservation (Natural Habitats &c.) Regulations 1994 (the Habitats Regulations) and, to some extent, by the Wildlife and Countryside Act 1981 (the WCA). Both these pieces of legislation have been amended since they were passed, most recently in 2007. This results in a complex legal situation; the following description has been considerably simplified and is not comprehensive.

### It is an offence to:

- deliberately kill, injure or capture a bat;
- deliberately disturb bats in such a way as to be likely significantly to affect the ability of any significant group of bats to survive, breed, or rear or nurture their young or the local distribution or abundance of that species.
- damage or destroy any breeding or resting place used by bats;
- intentionally or recklessly obstruct access to any place used by bats for shelter or protection.

The words deliberately and intentionally include actions where a court can infer that the defendant knew that the action taken would almost inevitably result in an offence, even if that was not the primary purpose of the act.

Notably, the offence of damaging or destroying a breeding site or resting place (which can be interpreted as making it worse for the bat) is an absolute offence. This means that such actions

# Bats in Churches: a management guide

do not have to be deliberate for an offence to be committed.

The wording of the offence of disturbing bats in the Habitats Regulations is complex, but in essence this means that it is not an offence to disturb single bats, or perhaps even a few bats, outside the breeding or hibernation period, and that any disturbance must have some measurable impact on the species concerned before it is considered an offence. Because of this complexity, and because there is still a disturbance offence under the Wildlife & Countryside Act, we recommend that advice is sought from Natural England or from a professional wildlife consultant where works are planned that are likely to disturb bats. A fuller interpretation of the disturbance offence, including its application to bats, is available from Natural England and can be found at [www.naturalengland.org.uk/conservation/wildlife-management-licensing/docs/Disturbance of protected species.pdf](http://www.naturalengland.org.uk/conservation/wildlife-management-licensing/docs/Disturbance%20of%20protected%20species.pdf)

To summarise, if works are being planned or actions considered that would be likely to affect bats (i.e. likely to result in an offence), you should consider either:

- Amending the proposed works or actions so as to avoid committing offences, for example, by rescheduling works to a time when bats are not present or ensuring roost features are not affected. Or, if this is not possible,
- Obtaining a licence to permit work that would otherwise be an offence to go ahead.

Licences are issued by Natural England, on behalf of the Secretary of State, to permit what would otherwise be offences under the Habitats Regulations. Before issuing a licence, Natural England must apply three tests;

## **Is the purpose of the work appropriate?**

Natural England can issue licences for a number of purposes, but the most likely ones for churches are:

- 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.

- Preventing serious damage to livestock, foodstuffs for livestock, crops, vegetables, fruit, growing timber or any other form of property or to fisheries.

If the proposed work does not fit one of these purposes, then it cannot be licensed.

## **Is there a satisfactory alternative?**

If there is a satisfactory way of carrying out the proposed work or achieving the desired outcome without committing an offence then a licence cannot be granted.

Will the action authorised be detrimental to the maintenance of the population of the species concerned at a favourable status in their natural range?

If the action authorised would have such an effect than a licence cannot be granted.

Advice on appropriate courses of action is given in this publication.

This is not a comprehensive guide to the law and readers may wish to consult the original legislation or obtain their own legal advice. Updated versions of the Habitats Regulations and the Wildlife & Countryside Act can be found on the Statute Law Database at [www.statutelaw.gov.uk/](http://www.statutelaw.gov.uk/) (although at the time of writing this had not been completely updated). Further information and application forms for licences can be found at [www.naturalengland.org.uk/conservation/wildlife-management-licensing/habsregs.htm](http://www.naturalengland.org.uk/conservation/wildlife-management-licensing/habsregs.htm).

The form required is WML-A13, parts 1-4. Natural England does not charge for issuing licences.

## **Choosing a consultant**

Although Natural England may be able to provide advice, often via volunteers, about many sorts of problems, there are situations where the services of an ecological consultant are required. As a government agency, Natural England is unable to recommend or endorse individuals or companies, but our local teams may be able to provide an unselective list of specialist bat consultants known to be active in the area. Listing consultants in this way should not be taken as any sort of endorsement or

# Bats in Churches: a management guide

recommendation, but is intended to help those unfamiliar with the topic to locate a suitable company or individual.

Probably the best way of finding a suitable consultant is by personal recommendation, so it may be best to contact other churches that have employed consultants in the recent past. If this is not possible, contact details for environmental consultants can be obtained from a number of sources, including their professional bodies and published directories. Two such directories are: the Directory of Ecologists and Environmental Managers (IEEM; [www.ieem.co.uk](http://www.ieem.co.uk)), and the ENDS Environmental Consultancy Directory (Environmental Data Services; [www.endsdirectory.com](http://www.endsdirectory.com)). Some consultants are also members of local bat groups which may be contacted via the Bat Conservation Trust (0207 627 2629; [www.bats.org.uk](http://www.bats.org.uk)).

Before appointing a consultant, it would be prudent to make enquiries about their abilities and experience. You may wish to ask about the following:

- Possession of a Natural England licence for bat surveys. Although not essential for all consultancy work, surveys of known bat roosts should be carried out under licence.
- Previous experience. Consultants should be asked for examples of recent work. You may wish to check whether previous clients were satisfied with the standard of work and value for money.
- History of licence applications. You may wish to enquire about the consultant's success rate in applying for licences of the type required, particularly the proportion of applications that have been successful without amendment.
- Costs. These vary widely between consultancies, so you may wish to seek more than one quotation. As with any sort of professional service, it is helpful to be as clear as possible about what is required and what will be included in the quoted price.

## Legal protection for buildings

Buildings of special architectural and historical interest are a finite resource and an irreplaceable asset. Listing of such church buildings presumes that they will be conserved

for future generations as part of the national heritage.

## Getting permission to undertake any work in church buildings

The Ecclesiastical Exemption (Listed Buildings and Conservation Areas) Order 1994 means that The Church of England, The Church in Wales, The Roman Catholic Church, The Methodist Church, The United Reformed Church and the Baptist Union of Great Britain and Wales operate systems of control over listed church buildings which comply with a Government Code of Practice.

This means that these denominations should consult their respective advisory bodies before undertaking any works, repairs or alterations in places of worship.

All other denominations and faiths may require Listed Building Consent from the local planning authority before undertaking works to a listed church building.

## Further information

Natural England Technical Information Notes are available to download from the Natural England website: [www.naturalengland.org.uk](http://www.naturalengland.org.uk). For further information contact the Natural England Enquiry Service on 0845 600 3078 or e-mail [enquiries@naturalengland.org.uk](mailto:enquiries@naturalengland.org.uk).

In England, further advice on managing wildlife problems and applying for licences can be obtained by contacting Natural England's Wildlife Licensing Unit at:

Natural England, Wildlife Licensing Unit, First Floor, Temple Quay House, 2 The Square, Bristol, BS1 6EB  
Telephone: 0845 601 4523 (local rate)  
E-mail: [wildlife@naturalengland.org.uk](mailto:wildlife@naturalengland.org.uk)  
A range of leaflets on wildlife topics is available at:  
[www.naturalengland.org.uk/ourwork/regulation/wildlife/default.aspx](http://www.naturalengland.org.uk/ourwork/regulation/wildlife/default.aspx)

Bat Conservation Trust 15 Cloisters House, 8 Battersea Park Road, London SW8 4BG.  
National helpline: 0845 1300 228 (local rate) or [www.bats.org.uk](http://www.bats.org.uk).

# Bats in Churches: a management guide

Church Buildings Council (formerly the CCC)  
 Cathedral and Church Buildings Division  
 Church House  
 Great Smith Street  
 London  
 SW1P 3AZ  
 Tel: 020 7898 1866  
 Fax: 020 7898 1881  
 e-mail: [enquiries.ccb@c-of-e.org.uk](mailto:enquiries.ccb@c-of-e.org.uk)  
 website: [www.churchcare.co.uk](http://www.churchcare.co.uk)

## English Heritage

### Regional Offices

North East; 0191 269 1227  
[Northeast@english-heritage.org.uk](mailto:Northeast@english-heritage.org.uk)

North West: 0161 242 1400  
[Northwest@english-heritage.org.uk](mailto:Northwest@english-heritage.org.uk)

Yorkshire: 01904 601 901  
[Yorkshire@english-heritage.org.uk](mailto:Yorkshire@english-heritage.org.uk)

West Midlands: 0121 625 6820  
[Westmidlands@enlish-heritage.org.uk](mailto:Westmidlands@enlish-heritage.org.uk)

East Midlands: 01604 735 400  
[Eastmidlands@english-heritage.org.uk](mailto:Eastmidlands@english-heritage.org.uk)

East of England: 01223 582 700  
[Eastofengland@english-heritage.org.uk](mailto:Eastofengland@english-heritage.org.uk)

London: 020 7973 3000  
[London@english-heritage.org.uk](mailto:London@english-heritage.org.uk)

South East: 01482 252 000  
[Southeast@english-heritage.org.uk](mailto:Southeast@english-heritage.org.uk)

South West: 0117 975 0701  
[Southwest@english-heritage.org.uk](mailto:Southwest@english-heritage.org.uk)

Historic Environment - Local Management  
 website [www.helm.org.uk](http://www.helm.org.uk)



ENGLISH HERITAGE

## The bat year

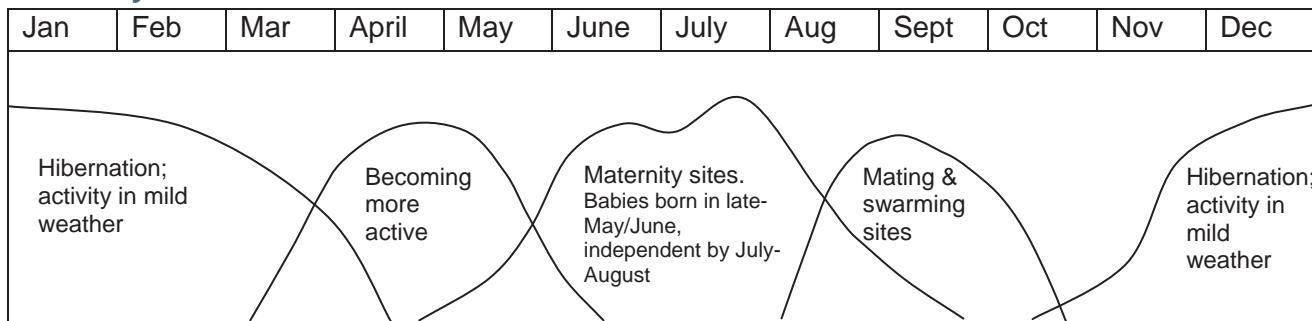


Figure 1

Although there are species-specific differences, the bat year can be divided into the two major phases of breeding and hibernation, with other activities interspersed.