



## Blocking potential roost features in trees in advance of clearance felling (non-forestry)

### BCT Position Statement

At BCT we are concerned at reports of potential roost features (PRFs) in trees being blocked in advance of non-forestry operations to remove trees, which could have impacts on bats and other wildlife.

The main areas of concern are:

- Where PRFs have been identified for bats they should be subject to an appropriate level of further survey work to establish presence or likely absence of bats as per published guidance (Chapters 6 & 7 of Bat Surveys for Professional Ecologists: Good Practice Guidelines, found here: <https://www.bats.org.uk/resources/guidance-for-professionals/bat-surveys-for-professional-ecologists-good-practice-guidelines-3rd-edition>).
- A licence is required if confirmed roosts are to be blocked or destroyed. **If bats are prevented from entering or exiting a roost without a licence in place or if bats were killed by being entombed this would be unlawful and could be a criminal offence.**
- The range of features that are available and used by bats for roosting varies between tree species present, species and the time of year. Many are difficult to locate due to their height and the cluttered nature of growth around some trees. Others may be difficult or risky to access. Additionally, even without the constraints noted above, the features used by crevice-dwelling bats can be very hard to locate and are also transient in nature. **It is highly likely that a significant proportion of PRFs would be missed or inaccessible.**
- PRFs in trees are by their nature transient. For instance features such as flaking bark (popular as a roosting site for some of our bat species) change in a relatively short period of time. Some of these relatively delicate and short-lived roost types are lost and others appear; hence tree roosting bats move between a number of roosts in the general roosting area. Even if PRFs were blocked in an area, unless felling operations were carried out within a short period of time, new PRFs could arise. **Therefore, pre-emptive blocking of PRF's when carried out significantly in advance of confirmed operations is poor**

**practice and on a case-by-case should be scrutinised for the appropriateness of the approach.**

With significant and permanent losses of PRFs over an area, appropriate compensation should be secured in advance of any works.

We have compiled advice to help concerned members of the public to protect bats by bringing matters to the attention of planning authorities and/or the police when bats or their roosts are threatened. This advice is available from:

<https://www.bats.org.uk/advice/development-concerns-1>

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