

Bat Conservation Trust



How to apply for a Habitats Regulations Licence – Rebecca Barrett

An exploration, drawing upon the experience of those attending, of the common problems and some potential solutions to applying for a Habitats Regulations licence.

RB: I'm a wildlife adviser and one of the jobs I do at the moment is assess method statements for bat licences. So you could say I'm in a good position to comment on how to make the perfect application. Can I ask before we start how many of you have started making bat applications? And how many of you make successful first time applications? So what are you doing in here then?

It's all changing on the 21st.

RB: Yes, it has changed a bit but not dramatically as far as the contents go. You're being taped. That doesn't mean that you're not supposed to say anything. I just should probably warn you under some sort of legislation or other. It's probably illegal to tape you without first warning you. Yes, the legislation has now changed. I'll just do another quick poll. The number of people who are here at the moment who currently apply for licences? And the rest of you are in training or thinking about it?

Yeah.

RB: So the rest of you have survey licences do you?

I'm just training for this one which I've been forward for roof insulations.

RB: So the licensing procedure has been tweaked a little bit. It's not changed dramatically. I hope you'll think, when we've gone through it that you'll think it's changed for the better. It makes you do a bit more work I'm afraid. But basically we have changed the application form, which is up here at the moment. I seem to have been given an amended one so it's got some changes in it. And then we've changed the actual method statement so it's now in two parts. So the first part comprises all the background data. All your survey data and all that sort of thing. It's in the interpretation. And the second part is the actual mitigation of compensation. And it will only be the latter part that will be attached to the licence. So we hope that in doing that the builder and architect or whoever is on site will use it as a working document rather than perhaps filing it in a bottom drawer somewhere. And then there's a reason statement which I think has been tweaked a bit as well. And the actual form that the local authority planners will complete, which we used to send to them, is now your responsibility to get done. Which is probably the biggest headache for you because planners aren't always terribly cooperative I don't think. But it does mean that you won't be in this situation where the method statement has been given the okay and we can't issue you the licence because the local authority have binned the relevant forms. So you'll be able to chase them up instead. How you go about doing that I don't know but I wish you luck. But at least you'll know that once you've got that completed you're only waiting for the method statement to be assessed by us. So that will make it different. Unfortunately irrespective of whether your application requires planning consent or not you still have to get the checklist seen by the local planning authority so that we have their acknowledgement that planning consent isn't actually required. So you have to do this regardless. For every application you're going to have to find out who the local planning authority is and find yourself a planner, basically. I'm not quite sure how that's going to work. So this is the actual application form, which is very, very similar to the previous one. It just explains what can be

licensed and what can't. Our processing times. Sorry about the changes. In the not too distant future we are going to accept applications on either CD or the pendrives that you can get. Because the price has come down so dramatically. We're going to encourage applications either on CD or pendrive but prior to actually deciding what format we're going to accept them in there will be sort of like a trial run and consultants will be able to give their ten pennyworth as to what will be the desired format. But this obviously will be fantastic because it will save you having to copy everything three times. It means you have to have three CDs or three pendrives. And there might be situations, especially with the newts, whereby we still need some paper copies of plans. Because this is the laptop I use to make my assessments and obviously that size of screen an A3 sheet, the detail isn't anything really much. So the significant change with respect to the application form is the layout. You will still be applying for the licence but the licence will be in the developer's name. So the applicant is the developer or the landowner, which hopefully will take the pressure off you somewhat. If everything goes AWOL on site we will be after them first rather than after you.

Does that mean a transfer of liabilities?

RB: Well, yes, it does.

So the liability will be on the landowner first and foremost?

RB: Exactly, yes. They are obliged under the licence to attract a suitably qualified ecologist and retain them for the duration of the work. So they can't use you to get the licence and then say go away and I don't want to have anything to do with you. Or if they do we would like to hear from you please. Because I haven't actually looked at the standard conditions but I suspect there will be a standard condition to that, you know, that they have to retain you. But it will mean that you won't be in the firing line as the first port of call. And also we're extending; I'm not sure if we've finally decided or not but we are talking about or thinking about extending the licence to include all the monitoring periods as well. So the licence will be very onus for the developer. I'm sure they're not going to enjoy it. You know, once they've developed a site they'll be wanting to get rid of it and that will be it then. So just the standard information. What we have added is how you prefer your application to be acknowledged. And then the details of the ecologist and details of yourself. We're asking a bit more information about previous applications. This hasn't changed. This information has always been sought but we're just asking it in a more direct way I guess. But if you read the current application form or the previous application form it does specifically say that we will issue licences for people with experience and people with experience of similar sites and similar species. So if you've only ever done pip roosts and you suddenly want to do a natterer's roost then the onus is for you to demonstrate to us that you've got that experience. So that might be by references again or explaining where you've worked as an accredited agent for another licence. It's going to be quite difficult for us to keep track of that initially but in the long term that's what we propose. And here we're going to ask a bit more detail. I mean we've always asked for accredited agents. Some people tick the box, some people provide names and a lot of information. But we are going to encourage people to actually name them on this occasion.

By accredited agent you mean someone else within your company or group?

RB: Who will be doing the work under your licence. Because being an accredited agent on a site is a stepping stone, basically, to having a licence in your own name. The situation with regard to accredited agents hasn't actually changed but, as I say, we're just really making sure that we have the names. And it's purely because people have tried to pull the wool over our eyes on various occasions so we're trying to do away with that. And applications. As you will all be aware we only licence bats of known species and where you know that roosts are present. We won't issue licences speculatively. And that still stands. So if you pick up a myotis bat on a heterodyne and don't know what it is please do not list all six myotis species on your licence form. Because you all get questioned, especially if you put Bechstein's down. So you do need to identify the species. No species, no roost, don't get a licence. That's always been the case.

Is that as far as Whiskered/Brandt's as well?

RB: No. I mean obviously you can tell the difference but it's a bit tricky. I'm not sure about this at the moment but we've had a lot of applications in the past that survey work has been done over the winter time and they've identified the presence of pipistrelle bats but of course don't know what species. Could be Whiskered of course as well. But just identified the presence purely on droppings. And I suspect that we will be saying we're not going to do that in future. Because there's supposed to be internal wrangling at the moment. At the moment we have to licence both common pipistrelle and soprano pipistrelle if you just say pipistrelle. But of course that twists the statistics as far as us recording how many roosts have been destroyed or mitigation undertaken for which species. So you perhaps need to bear that in mind. Because obviously there's a lead-in time with all this. But we have had problems with people dropping identification where it's possible. The licence hasn't changed obviously. Possibly the box here as to the status of the planning. So you need to be able to tick those boxes. And then why the work is being undertaken. Really these bits haven't changed at all. We've just got tick boxes here. So there isn't a lot there. And then the declarations at the end. So I think from the liability point of view that would definitely be of benefit. So then the method statement. And, again, it comes with a front page of what should be in each section. But this will be expanded a little bit. Hopefully we've simplified some of the requirements because the way the information was asked for in the past, it was often very repetitive. You didn't quite know what to put in what box and so people did their own thing really, which sort of worked out. It's not very conclusive to people just starting out filling in their first application forms. It's not very descriptive. So this hopefully will be better. It just gives you examples of what we want in there. And we're also going to put on our website examples of ideal method statements. So that will hopefully help as well. What's really important with this is that we want it as factual as possible. We don't need, when we ask for status of species what's most important is the local and county level. What we don't really need is Phil Richardson's Bat Atlas repeated back to us. Because I think we all have a copy. I mean we get pages photocopied and all sorts. Thank you but it's that extra cost and we just put it in the bin. And also don't bind them either. I don't know if you've heard but what we want is just your method statement, loose leafed. You can print back-to-back if you want. Treasury tags. Are you all familiar with treasury tags? Hole punch a hole in the corner, treasury tag through it. That's how we'd like them, please, all the time we're getting paper copies. Because those in Bristol just rip it all apart. As soon as we open the envelopes the spine comes off, the front cover and it just goes in the bin. So you might as well save yourself some money. Because they get posted out to us so we're trying to reduce the cost all the time. And occasionally we have to photocopy. I know you send three copies but we sometimes even have to photocopy them so we don't need spines on for that. What some people do, which is really handy actually, is we've been asking for OS maps, you know, sort of Landranger type, so we can see your site in relation to the surrounding area. But some people also include aerial photos off Google which are dead good actually. They give a perspective. Obviously we don't know how old the photograph is but it is quite handy to have that overall picture. And the more information you can put on plans and the less information you have to have as text the better. But don't clutter a plan. Put in an extra drawing if you can. It's so much easier to gain that information quickly from photographs and from drawings than it is reading loads of text. And the big problem we often get is that people can contradict themselves in the text. And especially things like the standard paragraphs. Everybody has to keep standard paragraphs. One of the most obvious standard paragraphs is for exclusion and then you find that there's some other means of exclusion stated in the professionally written text. So we're trying to avoid you making those mistakes, us having to phone you up and then you having to send it all back to us again. Because even very basic mistakes, because this is supposed to be a legal document we have to make sure that we iron out as much of the errors as possible. Although I have to admit that the errors in the survey side of things, because it's going to be two separate documents, isn't quite as critical. It needs to be accurate but, you know, spelling mistakes and stuff like that we're not going to be quite so worried about. Because that will really be for our purposes. Whereas the second bit, so the impact assessment. We're just trying to give an indication as to what we're actually looking for with the impact assessment. Hopefully we've changed it slightly. There were some bits that were, when we had a standard document which dealt with newts and bats, the habitat bit didn't really tie in with the bat side. Obviously the habitat is basically the newts. Land ownership. We just want to know who owns the

site and who's going to own the site in the long term because of the long term protection of the bats. And that's really quite critical. We do try and encourage, if you're going to have a bat roost in a house, putting in a covenant in the deeds. Although there are mixed blessings because they're not really very enforceable. But at least people are thinking about what's going to happen to the roost at the end of the day. If you've got roosts in public places, either bin sheds or over garages or something like that, it's a bit easier. Mitigation and compensation. You cannot provide enough detail in this section. I know we've been saying please don't provide extraneous information but by that we mean we're not interested in the bird survey, the bat survey or the phase one habitat survey. All we're interested in is the bats. Unless there is something very significant which is going to impact on the bats. If you're doing newts and bats and you're putting in some ponds for the newts you might say, you know, in ten years' time these ponds might provide a food source for bats or something like that. But on the whole just keep it to the species that you're dealing with. But the detail on mitigation is absolutely critical. Drawings: fantastic. If there's an architect involved get the architect to do some drawings for you showing the bat roost. What's very common at the moment is buy a house, knock it down and build a new one in its place. Or more than one but it's often just one in the original footprint. But if it isn't in the original footprint it's really handy if you can show us a map with where the roost was and where the roost is going to be so we've got a fairly good idea whether the bats are likely to find it or not. And the orientation, you know, is the road going to have the same sort of pitch? Is it going to have the same sort of temperature? All those sort of things are really handy. This is pretty much as it was before. How will the site be managed in the future? Population monitoring. Mechanisms for delivery. [] agreements and things like that. And then the timetable of works. This is very variable. We get things from work that will be undertaken between March 2007 and March 2008 and that's it. What we're not looking for is when the urinals will be fitted and the bathroom suites will go in either. Because the builders sometimes provide that and it just gets shoved in. What we're looking for is when the bats are likely to be excluded. When the demolition is going to start. When the new roost will be provided. That's the information. If the new roost is going to be provided hopefully it will be provided before the old one is demolished. If it's not obviously it's really, really critical that you can be confident that it's going to be fitted in time for the next season. If it's going to be a maternity roost it's really, really important. And those are the things that slip. We're trying to look for realistic timetables. I mean we're getting quite good now at working out what's realistic and what's not. And it really is important at this stage that you're talking to the builder, if the builder has been appointed. If not at least the architect to work out what is really going to happen. Most houses nowadays have to have breathable membrane under whatever roof it is. What sort of breathable membrane are they going to use? How rough is it going to be? Is that going to be critical to the species that you're mitigating for? What's the underside colour going to be? And somebody is going to think that that's being pedantic but obviously it isn't. If you've got light coming into the loft space and it's white underside that light is going to be reflected and bounced about all over the place. So those are the sort of critical things. Where the access points are going to be. What we don't like is options. You could say we are going to provide at least three access points at the ridge but don't say we will provide access points at the ridge. If you've got at least three then we know that when we go out on site we're going to find three at the very least and possibly more. More than three might be detrimental. What we don't like on the timetable is the demolition will take place either before the breeding season starts or after. So either April or September. We need to know exactly when. And not very keen on the work will start when the licence arrives. That doesn't go down too well either, especially if it's a local authority. At the moment the local authority is setting us up. That is a problem. What we tend to look at too, going back to the survey, interpretation of the results. That can be quite variable. If you have minimal data and you decide that you're going to assume it's a maternity roost then it really is important that everything thereafter addresses a maternity roost of that species and you don't get to the tail end of the method statement and the implication is, well, it's only a couple of bats. You've said you're going to treat it as a maternity roost so that whole process must address that. The timing and everything must follow on that it is a maternity roost of that species.

So is that acceptable given that you don't want to have a speculative?

RB: Say you've got six brown long eared bats. Is it a maternity roost or isn't it a maternity roost? I mean that's probably the most critical thing. And I suppose the other thing too is identification of species. When I was talking about the two pips the other thing is brown and grey long eared bats. We often get both those listed. And then we get told, you know, obviously an emergence can't pick up which species it is but there's been no effort to catch a bat but then when it comes to exclusion they're going to be excluded by static hand net. And you think that's interesting. You couldn't catch one to identify them but you're going to catch them to take them out of the roost. Why can't you try and identify the species? I mean it really is important. Because obviously if you've got a significant roost of grey long eared we're going to look at that quite differently to brown long eared. And other species that are quite important to obviously get right with respect to their breeding status are things like Serotine. I don't think from knowledge at the moment that we've had one successful mitigation for a maternity roost for Serotine. So we're all a bit edgy. If you applied for a maternity roost for Serotine we'd want a bloody good mitigation. We're not going to send them down the bottom of the garden where it's all shady. I'll just quickly show you. This is our revised what we call FCS form which is what you get back if your licence hasn't been successful. And we've changed it quite a lot. The assessors have done it themselves. We've been actually allowed to do something, which is quite nice. But people were finding that we were getting contradictions between the licence application form and the method statement with respect to numbers of bats and species of bats and in particular where we were getting speculative applications. So we might have three or four myotis species listed on the application form but there's only evidence perhaps of a natterer's roost. And we were saying on this form natterers only and we were finding our admin staff were filling in the licence from the original application. So you were still getting the whole suite of bats when there was no demonstrable evidence that they were all there. So we've changed it so that we actually now dictate what species gets licensed and the numbers and the period of the licence.

You were saying that you stipulate the numbers?

RB: Based on what you've said, yes. So if you've got a contradiction between your application form and the method statement. If you've said myotis species in your licence application form but you've perhaps only just picked up a natterer's roost. So we would say you can only have a licence for natterers. The only exception to that would be Whiskered/Brandt's which we would lump together.

I'm more concerned about talking about the numbers.

RB: Well, again, we get contradictions you see.

Well, I was going to say when you're estimating numbers within a maternity roost.

RB: Well, it would be your estimate.

What you're saying is if you've estimated that there's 35 plus within that particular roost.

RB: You would probably get 50 or something like that.

So what you're saying is you give a margin?

RB: Yes, if you put plus in. I mean we've always given a margin but what we've found is that sometimes on the application form it's had, say, 0 to 5 and then in the method statement it said 10, 15, 20. You're thinking this bat roost is increasing as I'm reading through the method statement. And that's the sort of variability we get in applications. So, no, you'll get your largest number unless it's really unrealistic and then we'll phone you up and say what's all this about and we'll discuss it. But this is really for our internal staff. Sometimes people tick transport but they won't tick capture. So we'll sort that out because obviously you can't have one without the other. And then if you don't meet the licensing criteria you'll get this back with all the little bits that you are failing on. And we've just changed this slightly. We used to have a box that we used to write in what we were wanting to see in the application that was lacking at the moment and now we've tried to do it with

tick boxes. Because a lot of this is fairly standard especially with respect to experience. You know, people when they're first applying, they forget to put references in or the references don't relate to the experience.

Is that still the same under the new licence application for a first licence, two referees and one licence in the last three years?

RB: Yes.

[] had licences.

RB: No, you're right but one needs to be familiar with your work and know that you have done mitigation work. So the best way to do it, basically, is to be an accredited agent on somebody else's licence, preferably more than once really. And on as complicated a site as possible so that you have that broad base of knowledge. And then that licence holder can then give you your technical reference, if you like, and then you can get another licence and another reference from somebody else. And some people use bat groups and that sort of thing. But what isn't considered sufficient experience is if you're just putting survey, you know, this person has done ten years' surveying of the bat group or something like that. It's mitigation we're after. You should be well into knowing what species require and be able to demonstrate that. And have a fairly good understanding of how buildings are put together and why bats are using them the way they are so that you can then persuade your architect and your builder why you want them to do what you want them to do and why it's critical to get the timing right and all this sort of thing. We really do feel that you should be liaising with the other parties in the application, whether it's the developer and preferably the builder. Because at the end of the day most builders don't get on with the architect for starters do they? They'll say, God, he doesn't understand this, that and the other. We don't see you as somebody who is getting a licence for the developer, disappearing off site for a year, coming back and then checking that all the work has been done. Because if you do that and you find something drastically wrong like, you know, a bat roost with no entrances and things like that, something that requires building work to be taken apart and redone, it's going to be very hard to persuade your developer to do that. But we would expect you to do that. We still expect you to tell us that it hasn't been done. It does happen. There are a lot of developers out there, I'm afraid, who pick. And we see it all the time. They'll pick consultants that they know they can get into their pocket. They use them to get the licence and some of them are even told to get off site at that point. And if they're sensible they come to us and tell us. But some method statements, you know, it's even said in the method statements that it's not a particularly detailed method statement. I'll come back in six months' time when all the work is done and check it. You're in a very dodgy position if something is very wrong in getting them to rectify it. Because all they're going to want to do is sell the house, get the site off their hands. It's at the end of the project and they're not going to start pulling things apart for you.

So maybe the problem there is actually trying to have some sort of independent selection of consultant rather than the builder or the developer picking the consultant who he thinks he can bend?

RB: Well, yes.

That is a burden.

RB: Yes, it is difficult. I see you guys as representing the bats. That is why you're there, to get the best for the bats, basically. It is going to be difficult. You are going to run up against some developers which you just don't want to ever see again I suspect. You may even have cases where you just decide to write the job off and walk away from it if it's going to compromise your professional standing. We do invite people in that situation to contact us and we'll come out and do a visit and just tell the developer what the score is. Because if we withdraw his licence then he isn't doing anything on that site. So he's got to tow the line. And we can do it. Sometimes we arrange to do a site visit and we'll call it a routine visit and we come out and you know it's going to happen. On

other occasions we'll make out that it's been a complaint from somebody else, we never let on who it is, so the pressure is taken off you. But we'll do that many a time so it's not a problem.

In that sort of situation you're talking about where licences have been applied for and the developer has been found to be at fault you'd inform Natural England then you wouldn't be refused a licence in the future. Because I think we do feel the liability is quite even though you said it's changing do you feel the liability is very key?

RB: No, no. You're looked upon more favourably I can tell you. If we know that you're prepared to kick up a fuss if something goes wrong rather than trying to gloss over it you'll have our support all the way. But remember in this instance the licence is not going to be in your name so it's not going to.

It'll make a big difference.

RB: It will make a difference. But we still expect that quality from you with regard to how the method statement is put together. And really watch the wording in the mitigation bit. No shoulds but it must be done or it will be done. And specify things like lighting. Not the minimum lighting will be erected. All the vague things trip off the tongue. You want to read it and think I need to tie this guy down. I need to make it as specific as possible. And do watch out for contradictions.

Can your department provide templates?

RB: We are going to put on our website some sort of ideal method statements so hopefully there will be none of these glaring errors. They're going to be based actually on method statements that we've had in from people but obviously we'll remove any reference to previous sites or anything like that. We do get some really, really cracking method statements. The range is quite amazing.

Have you got a timescale of when those will be available?

RB: Well, I don't think they're on there now but I would have thought in the next month.

Oh, as soon as that?

RB: Yes. I know they're working on them but obviously we've got to keep proof reading them to make sure we don't leave anything that could identify the site.

Because those would be really helpful.

RB: There's going to be something like demolition and rebuild and a barn conversion, an industrial site. Just standard ones. I mean they will be quite bog-standard. They're not going to be devilishly complicated. And obviously if you're doing a really big development for one of the big housing companies. We seem to be getting a run of hospital sites being redeveloped at the moment, things like that, which obviously are exceedingly complicated. Or worse still very, very large site where there's been a single developer and they've started parcelling off the land and so you've probably got a little bit of the site with some old buildings but unfortunately you don't have the knowledge of what's going on next door. We're hoping that we'll iron those sort of problems out eventually by dealing with the planners direct in trying to get the initial owner of the site, the initial developer. To tie him down with a 106 agreement and then he is thereafter responsible for the entire site, whether he sells it off or not. To make sure that when he sells a lot of it off to Joe Bloggs it goes with the package of all the mitigation for that site. All the green corridors and this sort of thing. Because we're seeing sites. There's a big development down in Cornwall where this sort of thing has been picked up on quite quickly and James Squirrel has been involved in having a meeting with the planners and getting two or three of Natural England staff involved in looking at it. But I come from North Hants and we've got a town in north North Hants where the planners have just let people pick at different areas of the site. When you look at a global view of this town now it is all the

mitigation that's been provided, for great crested newts in particular, because it's a huge great crested newt area, it's all fragmented. Because Joe Bloggs has had this site developed and somebody else has done this site and there's no corridors between the sites. What was once a huge population probably in about, I don't know, 20 years' time there won't be hardly a newt there. But as I said, we're hoping to tackle that by really attacking the planners on it and making them be more aware of their obligations. So the survey. These are the sort of things that we might pick you up on. Lack of a scale plan for the site and the surrounding area. And as much information you can put in as possible. If you do a Google aerial photograph you get a fairly good idea of where the likely foraging corridors are going to be and that sort of thing. And of course you can draw on these things as well, which is great. I have no problems with handwritten plans or anything like that. I'm not sure you could get the information on the plan. I mean we do get some very nice posh ones but as long as the information is there and it's legible handwritten is fine by me. Cross referencing photographs with maps and that sort of thing. Survey methods. If you can possibly give us the equipment that's used. I would hate to ask you this but we've discovered that there's an awful lot of people that are surveying quite big buildings from the ground without using ladders. And it was thrown back at me when I asked why. I mean how can you [], especially as there's so much you can't see, if you're not on the ladder? It was thrown back at me, Oh, we can't use ladders because they're not safe. I mean a ladder is perfectly safe if you use them properly. I know there's sites where they say ladders are for access not for working from. In which case you do have a problem. But you're going to have to go back to your client and say, well, if that's the policy we're going to have to have a scaffold tower and you're going to have to pay for it. Or a cherry picker or something like that. But you're very restricted as to how much you can see with binoculars from the ground. And also, while I'm on my hobby horse, you have to remember that endoscopes or fibre scopes are great but they don't see round corners. You can't bend the end. Those are the limitations in surveying. Surveyors' names. We've had a run of surveyors without licences so we're cracking down a bit. Please provide your surveyor's name and current licence number. Or if they're assistants make sure that they are accompanied by somebody with a licence. And it's certainly useful to have the experience. I mean obviously we know a lot of the regular people who apply for licences. It's, Oh, it's Joe Bloggs again and either they're a cracking one or a lousy one, you know. It is, especially if it's perhaps somebody you've got under you that you're training up. If their name is mentioned regularly and we get to think, Oh, it's so and so, you know. When they come to have a licence in their own name we think, Oh yeah, they've got a track record.

Are we saying a licence applying to a surveyor? Obviously some surveyors do not need a licence. For doing an emergence survey you don't need a licence.

RB: No, no, which is where the experience comes in, in a way, really. Because a lot of people when they're doing an emergence survey will get the local bat group in to help, which is great. I'm a bat group member as well and I know their experience varies enormously. Some people say you've got a bat. You won't be able to identify the species. We're just trying to get a better handle on the quality of the survey data. And obviously, as the workshops here have demonstrated, people are getting more and more enthusiastic about Anabats. If you've got some sort of static monitoring device on site as well it's great because it ties in all your other data as well to a certain extent. And I think there's nothing better than being stuck next door to an Anabat with a heterodyne recorder and recording the times of what you've heard and then checking it back with the Anabat and seeing how good you actually are. So it's that sort of thing. And when you're doing your survey plan do make sure that you highlight where people have stood to do the emergence count. And please make it an emergence count and not, we just walked up and down the site a bit. Because if you do that it would be luck of the draw as to whether you know where a bat has come out of what building.

Do you ever insist on dawn surveys?

RB: Well, I don't think we've ever really insisted on them but they are obviously very good.

Well, I've just found that some species, without doing a dawn survey you just can't get the full identification of the species.

RB: I think it's your experience telling you that. I've never received a method statement with a dawn survey that hasn't been worthwhile doing. But saying that, don't forget negative results. Don't just forget things, especially if you're arguing the case for doing something a bit different. Maybe you haven't done all the emergence counts or there might be a reason why you didn't cover the back of a particular building. We'll see it and we'll want to know why you didn't do it. If there's a genuine reason, say it. We can't question that. You are the professional and you've made that decision. If you justify something sufficiently well we'll say, okay, that's fine. You've made that point and we'll accept that. But if you just sort of forget it we will pick up on it. Any more questions? We're very short of time.

One quick question. Especially a few years ago I thought there'd be a danger of developers getting a little bit fed up with the amount of time it took to get a licence and risking prosecution rather than the cost of the delay. We had some licences that took in excess of 12 weeks to get.

RB: It's planners. I can tell you it's the planners. On the whole if we get a good method. We've got quality assurance checks. When we receive method statements we have to turn them round in 20 working days. And for the most part we do that, unless there's a burning problem with it. And in that 20 days that's 20 days from when Bristol post them to us, so they might take two or three days to arrive, we also have to consult with the local team and they might want to see the method statement as well. So we pack quite a lot in that time period. But frequently I get asked about a method statement by a consultant and I'm going I'm sure I did that. I did it ages ago. The numbers don't mean anything to me but the names do. And I phone up Bristol and say I've just been chased for this and they'll say we're waiting to hear from the planners. But that situation is going to stop. The sooner you get on to this new method of working and you're consulting with the planners. It's going to be a headache for you in some respects but it should drive the time down.