

Does my application need a Reasoned Statement?

Natural England no longer requires a 'Reasoned Statement', for certain licensed activities, to form part of your mitigation licence application pack. If your application proposal fits one of the categories in the table below you do **not** need to submit a Reasoned Statement with your licence application. If no Reasoned Statement is required you must indicate which category your application corresponds to and declare this is correct within CWMS or your application form.

Categories:

Applications for home improvements and small scale housing developments	
Bats	<p>The following categories of work for all bat species and their roosts*:</p> <ul style="list-style-type: none"> i. repairs and maintenance, roof replacements, loft conversions, extensions and renovations of existing domestic dwellings and associated structures (eg garages). ii. small-scale¹ housing developments, including those that may require the demolition of existing buildings (whether domestic dwellings or other types of building). <p>*Unless the population is of regional or national importance – in which case please contact Natural England (see below) to discuss whether a Reasoned Statement is required.</p>
Great crested news	<p>The following categories of works:</p> <ul style="list-style-type: none"> i. repairs and maintenance, extensions and renovations of existing domestic dwellings and associated structures (e.g. garages). ii. small-scale² housing developments within the curtilage³ of developed or previously developed (brownfield⁴) sites, including those that may require the demolition of existing buildings (whether domestic dwellings or other types of building).
Applications to conserve and protect Listed Buildings, Scheduled Monuments and places of worship	
Bats	<p>The following categories of works to buildings or human-made structures for all bat species and their roosts*:</p> <ul style="list-style-type: none"> i. Repairs and maintenance (including roof repairs and re-roofing) ii. Restoration, or iii. Essential works to: <ul style="list-style-type: none"> ○ prevent serious damage (including to the contents of buildings or structures)

¹ 'Small-scale' for **bat** applications means development sites that are no greater than 1.0 hectare in total area.

² 'Small-scale' for **GCN** applications this means development sites that are no greater than 0.5 hectare in total area (for comparisons sake, the average plot size for a modern new build (4-bedroom) dwelling is approximately 500m² or 0.05 ha).

³ Curtilage: here defined as the area of land attached to a house or building and forming a single enclosure with it.

⁴ For a definition of 'brownfield' land see Planning Policy Statement 3: Housing [published June 2011] page 26

	<ul style="list-style-type: none"> ○ preserve public health and safety, or ○ enable continued appropriate use of the building or structure⁵. <p>Where the building or structure is either:</p> <ul style="list-style-type: none"> i. A Listed Building⁶ ii. A Scheduled Monument⁷, or iii. A registered place of worship⁸ or a place of worship belonging to the Church of England. <p>* Unless the population is of regional or national importance – in which case please contact Natural England (see below) to discuss whether a Reasoned Statement is required.</p>
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A regionally important population of bats typically include mating sites (rarer/rarest species) including well-used swarming sites; maternity sites of the rarer species; hibernation sites of the rarest species and significant hibernation site for rarer/rarest species or all species assemblages.

A nationally important population of bats includes maternity sites (rarest species) and sites meeting SSSI guidelines. Rarer bat species in England – lesser horseshoe, whiskered, Brandt's, Daubenton's, Natterer's, Leisler's, noctule, Nathusius pipistrelle, serotine

Rarest bat species in England - greater horseshoe, Bechstein's, Alcaethoe. greater mouse eared, barbastelle, grey long-eared.

Wray S; Wells D, Long E and Mitchell-Jones T (2010). In Practice December 2010, 23-25; *Valuing Bats in Ecological Impact Assessment*.

Contact Natural England at EPS.Mitigation@naturalengland.org.uk or 0845 6014523.

⁵ For example, excluding bats from part of a church may be necessary to enable its continued use as a place of worship.

⁶ Listed a place of 'special architectural or historic interest' under the [Planning \(Listed Buildings and Conservation Areas\) Act 1990](#) (or previous legislation)

⁷ Scheduled as a 'nationally important archaeological site or built structure' under the [Ancient Monuments and Archaeological Areas Act 1979](#) (or previous legislation)

⁸ For the purposes of this scenario places of worship must be registered under the Places of Worship Registration Act 1855, or belong to the Church of England (which is exempt from the Act)