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Managing the presence of bats – White Horse Housing Association

Case Study

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Introduction

One of the main ecological constraints in delivering retrofit is **the presence of protected species**, such as **bats**. There are 18 species of bats in the UK, and all are protected under UK law.

A protected species is any plant or animal safeguarded by UK law to prevent population decline and habitat loss. Receiving strict legal protection meaning it is a criminal offence to:

- Damage, destroy or obstruct access to areas they roost
- Disturb them in a way that impairs their survival
- Deliberately harm

Over millennia, wildlife has adapted to the built environment, meaning many species now depend on human build structures for shelter and foraging. Bats in particular use human dwellings as roosting habitat, and are often found in eaves, soffits and cellars, **making retrofit projects a common point of interaction between decarbonisation objectives and biodiversity protection.**

White Horse Housing Association – Kilmersdon, Radstock

During White Horse Housing Association's **£600,000 Sustainable Homes Fund retrofit programme** in Kilmersdon, near Radstock, a protected bat colony was identified within the roof spaces of a row of 150-year-old terraced homes scheduled for refurbishment. The programme aimed to improve the energy performance of 32 properties through measures including roof replacements, insulation upgrades, double glazing, improved heating systems and solar photovoltaic panels. The presence of bats presented a significant ecological constraint, requiring the housing association to balance its decarbonisation objectives with its legal responsibilities for species protection.

Managing the Discovery

The bat colony was discovered during pre-construction surveys undertaken before roof replacement works commenced. Given the age and construction of the properties, the roof voids provided suitable roosting habitat for bats.

Following the discovery, White Horse Housing Association paused works affecting the roof spaces and appointed specialist ecologists to assess the extent of the roost. DNA testing confirmed the presence of several protected species, including brown long-eared, pipistrelle and serotine bats.

To enable the project to proceed lawfully, the housing association obtained the necessary licence from Natural England and incorporated ecological mitigation measures into the delivery programme. The project team worked closely with ecological specialists to ensure the refurbishment proposals complied with wildlife legislation while allowing the wider decarbonisation programme to continue.

The impact on the scheme

The presence of the bat colony required changes to the project programme and sequencing of works. Activities affecting the roof spaces could not take place during the bats' hibernation period between mid-November and March, resulting in delays to parts of the refurbishment programme. In addition to this, measures included:

- Additional ecological surveys
- Specialist advice
- Licensing requirements
- Extra project management considerations.

Despite these constraints, White Horse Housing Association successfully adapted the programme to protect the bat colony while continuing to deliver energy-efficiency improvements. Tenants were kept informed throughout the process, helping to minimise disruption and maintain engagement with the works.

"It is going to be lovely. I'm looking forward to having the solar panels and the double glazing and I'll be really glad when it's all done. White Horse Housing are looking after us very well."

Maggy Large, White Horse Housing Association resident



Figure 1 Maggy Large, White Horse Housing Association resident

Key information: Licensing

In England, it is an offence to damage or destroy a bat roost, whether bats are present at the time or not, or to disturb bats in a way that affects their ability to survive, breed or rear their young. These protections are provided through the **Conservation of Habitats and Species Regulations 2017** and the **Wildlife and Countryside Act 1981**.

Potential ecological constraints should be identified as part of the retrofit assessment process. Evidence to look out for includes:

- bat droppings
- feeding remains
- staining around access points
- sightings of bats entering and leaving a building

All of these points may indicate the presence of a roost. Where evidence is found, specialist ecological advice should be sought and works that could affect the roost should be paused until the appropriate surveys have been completed.

The **Bat Conservation Trust** guidance recommends early engagement with **Natural England** through its **Discretionary Advice Service** to agree an appropriate survey and mitigation strategy. Where required, a licence must be obtained before works affecting a bat roost can proceed. Early engagement with regulators and ecologists can help avoid delays, ensure legal compliance and enable mitigation measures to be incorporated into the project programme from the outset

Wider knowledge: Bat mitigation

Bat mitigation is a strategy used during building developments or works, to protect bat populations.

As a minimum, bat mitigation should include the following:

Properties should incorporate integrated bat roosting provisions, that include diverse features such as bat tiles, slates and bricks and spaces within eaves for roosting, to provide a suitable mitigation for bats.

With the following considerations planned:

- A continued provision for all existing roosts in the relevant buildings.
- Provisions should be available where they are most likely to be used by bats.
- Provisions should reflect the type of features available to bats pre-works
- Where only minimal survey efforts have been possible or the level of risk is higher, then the proportion of properties fitted with provisions should be increased
- When re-roofing, a roofing felt suitable for bats should be used.

An example of effective mitigation controls can be seen in by **Cura Terrae in partnership with Sheffield City Council**. The project ensured the retention of open eaves access for wildlife on all properties. All roofs were lined with **bitumen 1F felt**,



and bespoke bat access tiles were fitted on 25% of the roofs. The use of one type of felt also reduced the procurement and logistical complexity for the contractor undertaking works.

The guidance for bat mitigation and working practices recommend a precautionary approach where bats may be present and include the following measures:

1. Provide training and clear communication for contractors and project staff, including appointing a trained on-site “bat champion” and ensuring refresher training is provided when personnel change.
2. Implement precautionary measures before works begin, including ecological pre-commencement checks, a Precautionary Working Method Statement, and installation of temporary bat roosting features such as bat boxes.
3. Manage risks during construction, with contractors trained to identify bats and bat droppings, an ecologist available on-call, and direct supervision or regular site inspections provided where required.
4. Protect bats and respond appropriately to discoveries, including stopping works where bats are found, providing welfare arrangements for injured bats, and reviewing mitigation measures with the Ecological Clerk of Works (ECoW).
5. Monitor, record and adapt mitigation measures throughout the project, maintaining photographic records, implementing contingency plans where needed, and incorporating opportunities to protect and enhance habitats for both bats and nesting birds.

Overall: The guidance promotes a precautionary, risk-based approach combining training, ecological oversight, temporary roost provision, monitoring, and contingency planning to protect bats and nesting birds throughout the works programme.

Key Takeaways

- Engage an ecologist early to identify potential constraints and agree mitigation measures before works begin.
- Undertake proportionate surveys based on the level of ecological risk and the nature of the proposed works.
- Train contractors to recognise signs of bats and understand their legal responsibilities.
- Implement stop-work procedures so that any discovery of bats or evidence of roosts can be managed appropriately.
- Retain or replace roosting features wherever possible, incorporating bat-friendly design measures into refurbishment works.

- Seek specialist advice and licences where required, ensuring works remain compliant with wildlife legislation.
- Keep clear records of surveys, mitigation measures and findings throughout the project.
- Review and adapt approaches as works progress, using lessons learned to improve future delivery.

Summary

The White Horse Housing Association case study demonstrates how ecological constraints can be successfully managed within retrofit and decarbonisation programmes. Through early ecological assessment, engagement with specialist ecologists and Natural England, and the implementation of appropriate mitigation measures, the project was able to protect a legally protected bat colony while continuing to deliver essential energy-efficiency improvements. Ultimately, the case shows that with the right planning and support, retrofit projects can simultaneously create warmer, more efficient homes and safeguard local wildlife.

Resources

Relevant resources:

[White Horse Housing Association](#)

[Bat Conservation Trust](#)

[Natural England](#)

[Conservation of Habitats and Species Regulations 2017](#)

[Wildlife and Countryside Act 1981](#)

[Bats protected by White Horse Housing Association](#)

[Bats and Large-Scale Housing Maintenance Projects Guidance for England](#)



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