CASE OFFICER'S REPORT

Application Reference:	PL/2023/04920
Application Type:	Full planning permission
Site Inspection:	27th July 2023
Revised Consultation ends:	20th December 2023
Revised Target Date	26th January 2024
Case officer:	James Repper

Site Address:	The Fishing Lodge, West Walk, The Close, Salisbury, SP1 2EY
Proposal:	Ground floor extension to rear of Fishing Lodge (Water compatible use) (resubmission of PL/2023/02935)
Recommendation:	Approve with Conditions

SITE DESCRIPTION:

The application site is a single-storey detached building with a floor area of approx. 30.5m^2 comprising several small rooms including a kitchen area and a toilet which were noted on previous applications and visible on the site visit. The site is an established art studio but was originally a fishing lodge associated with Kings House. It is the position of the LPA, including its qualified conservation officer, that the building is curtilage listed as part of the listing of Kings House. The building is located within the original grounds of Kings House and the wider close of Salisbury Cathedral. Therefore, the site is located within the settlement boundary of the principal settlement of Salisbury and a designated conservation area, as defined by Wiltshire Core Strategy (WCS) core policies 1 (Settlement Strategy), 2 (Delivery Strategy), and 20 (Spatial Strategy for the Salisbury Community Area). The site is located within the communal grounds of Sarum St Michael which is a private apartment complex separate and unrelated to the application site itself. The site itself is confirmed as an art studio and associated office and is, therefore, a commercial building not a residential building. The building is surrounded by well-established foliage borders on three sides concealing the site almost totally from public view, the remaining side adjoins the River Avon upon which the site can be clearly seen, however, the proposed works will now be located on the far elevation making them significantly concealed.

PROPOSAL:

This is a full planning application proposing the addition of a single-storey extension on the East Elevation of the structure to provide storage space. Originally the proposal was to extend on the Southern elevation, however, during the application process the design has been revised in response to comments made by statutory consultees. The application also includes any and all works associated with the proposed plans.

RELEVANT PLANNING HISTORY:
None

POLICIES:
National Planning Policy Framework (NPPF)
National Planning Practice Guidance (NPPG)
National Design Guidance (Planning practice guidance for beautiful, enduring and successful places) 2019

Salisbury District Local Plan policies (Saved by Wiltshire Core Strategy):
S16 (Decisions on Application)
S66 (Special Considerations Affecting Planning Functions)

S72 (General Duties of Planning Authorities)

Wiltshire Core Strategy:
CP1 (Settlement Strategy)
CP2 (Delivery Strategy)
CP20 (Spatial Strategy for the Salisbury Community Area)
CP57 (Ensuring High Quality Design & Space Shaping)
CP58 (Ensuring the Conservation of the Historic Environment)

Supplementary Planning Documents:
Creating Places Design Guide SPG (April 2006)
City of Salisbury Conservation Area Appraisal & Management Plan (2012)

REPRESENTATIONS:

Conservation – No Objection to the Revised Plans

- 14th August 2023

The building was historically associated with Kings House, a grade I listed building. Although there was significant development between the two buildings in the mid-C20, it isn't clear that it was no longer in the same ownership or available for use for its original function, or other ancillary use. That said, it is C19 and has undergone much alteration. I am satisfied that the works would cause no harm to the character and setting of Kings House (or The Old Deanery or any other LBs on the W side of The Close), nor to that of the Salisbury City Conservation Area.

- 17th August 2023

For clarity, in the absence of conclusive evidence to the contrary, I consider the building to be curtilage listed as part of King's House. This does mean that Historic England and the National Amenity Socs should be consulted.

- 6th December 2023

The revisions raise no new heritage issues and are considered preferable to the original submission.

Canal & River Trust - No Comment

Ecology – No Objection Subject to Conditions

- Protected Species

The ecology report confirmed the building to support moderate bat roosting potential with possible evidence of bat droppings in a gap in the soffit and recommended additional surveys. In light of this, the application was amended and the proposed extension relocated to the eastern elevation. The proposals will now abut the existing large stone wall and will not require tie-in to the existing roof line or involve any alteration to the soffits and therefore any potential impacts upon bats significantly reduced.

There is a risk that bats may occur at the development site. The council considers it would be unreasonable to require the applicant to submit a bat survey because this could be considered disproportionate to the scale of development in light of the proposed amendments to the design.

Furthermore, given the nature of this development, the council considers that if bats were found, mitigation would probably not require further planning permission and a European Protected Species Licence would be forthcoming. Nevertheless, anyone undertaking this development should be aware that bats and their roosting places are protected at all times by the Conservation of Habitats and Species Regulations 2017 (as amended). Planning permission for development does not provide a defence against prosecution under this legislation or substitute for the need to obtain a bat licence if an offence is likely. Consideration should be given to obtaining a survey from a professional ecologist before commencing work. If bats or evidence of bats is found at any stage of development, the

applicant is advised to follow the advice of a professional ecologist or to contact Natural England's Batline through the internet.

- River Avon SAC

We welcome the Construction Environmental Master Plan submitted in support of the application which lies within 20m of the River Avon SAC. The detail outlined within the report is sufficient given the nature and scale of the development.

- River Avon SAC Hampshire Catchment

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. This concluded that given the scale and nature of the development that any temporary construction impacts and operational impacts would be de-minimus. The HRA has concluded that the application is not likely to have significant impacts on the SAC and Appropriate Assessment is not required.

- CONDITIONS:
  - 1. The development will be carried out in strict accordance with the following documents:
    - Proposed Elevations. 30/11/2023. Arcon;
    - Proposed Plan. 30/11/023. Arcon

  REASON: For the avoidance of doubt and for the protection, mitigation and enhancement of biodiversity.

  - 2. No new external artificial lighting shall be installed at the site unless otherwise agreed in writing by the local planning authority.

  REASON: In the interests of conserving biodiversity.

  - 3. Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of bat roosts and nesting opportunities for birds shall be submitted to the local authority for approval. The approved details shall be implemented before occupation of the final works. This condition will be discharged once photographic evidence of installed features has been submitted to and approved by the local planning authority.

  REASON: To provide mitigation /enhancement for biodiversity.

- INFORMATIVES:
  - Bats

  There is a low risk that bats may occur at the development site. Many species of bat depend on buildings for roosting, with each having its own preferred type of roost. Most species roost in crevices such as under ridge tiles, behind roofing felt or in cavity walls and are therefore not often seen in the roof space. Bat roosts are protected all times by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 even when bats are temporarily absent because, being creatures of habit, they usually return to the same roost site every year. Planning permission for development does not provide a defence against prosecution under this legislation or substitute for the need to obtain a bat licence if an offence is likely. If bats or evidence of bats is found during the works, the applicant is advised to stop work and follow advice from an independent ecologist or the applicant is advised to follow the advice of a professional ecologist or to contact Natural England's Batline through the internet.

  - Nesting Birds

  All British birds, their nests and eggs are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended) and the Countryside and Rights of Way Act 2000 while birds are nesting, building nests and sitting on eggs. The applicant is advised to check any structure or

vegetation capable of supporting breeding birds and delay removing or altering such features until after young birds have fledged. Damage to extensive areas that could contain nests/breeding birds should be undertaken outside the breeding season. This season is usually taken to be the period between 1st March and 31st August but some species are known to breed outside these limits.

o Protected Species General

The applicant should note that under the terms of the Wildlife and Countryside Act 1981 (as amended) and the Habitats Regulations 2017 (as amended) it is an offence to disturb or harm any protected species including for example, breeding birds and reptiles. The protection offered to some species such as bats, extends beyond the individual animals to the places they use for shelter or resting. Please note that this consent does not override the statutory protection afforded to any such species. In the event that your proposals could potentially affect a protected species you should seek the advice of a suitably qualified and experienced ecologist and consider the need for a licence from Natural England prior to commencing works. Please see Natural England's website for further information on protected species.

o Artificial Lighting

The habitat within the proposed development site and the surrounding area is suitable for roosting, foraging and commuting bats. An increase in artificial lux levels can deter bats which could result in roost abandonment and/or the severance of key foraging areas. This will likely result in a significant negative impact upon the health of bat populations across the region. Artificial light at night can have a substantial adverse effect on biodiversity. Any new lighting should be for the purposes for safe access and security and be in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, 'Guidance for the Reduction of Obtrusive Light' (ILP, 2021), and guidance note GN08-23 "Bats and artificial lighting in the UK", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

Environment Agency – No Objection subject to informatives

 INFORMATIVE

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

• on or within 8 metres of a main river (16 metres if tidal)

• on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)

• in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact blandford.frap@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with the Environment Agency at the earliest opportunity.

 INFORMATIVE

Safeguards should be implemented during the construction phase to minimise the risks of pollution from the development. Such safeguards should cover:

- the use of plant and machinery
- wheel washing and vehicle wash-down
- oils/chemicals and materials
- the use and routing of heavy plant and vehicles
- the location and form of work and storage areas and compounds
- the control and removal of spoil and wastes.

Natural England - Comment

- Natural England has previously commented on this proposal and made comments to the authority in our response dated 31 July 2023 reference number 440311.

The advice provided in our previous response applies equally to this amendment The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

- 31st July 2023

It is my understanding that the SAC/SSSI boundary is the edge of the river, ultimately the brick wall as per your photos. There should be no changes to the river bank and construction activity should not impede on the boundary of the designated site. The LPA must be satisfied that measures within the CEMP manage construction activity appropriately to address potential adverse impacts.

Salisbury City Council – No Comment

Letters – Two letters of response have been received during the elongated public consultation period. Both responses were to the original plans and no further responses have been received. The objections were from the Sarum St Michael Management Company and a member of the public residing within The Close, the objections are as follows;

- Keeping this old building maintained is good news but I am not sure whether extending it on this very flood-prone river bank is wise. We had serious flooding in 2014 and earlier this year in 2023. This is well documented. Two flood events don't represent long term data, but the annual risk must surely be higher than 3.3%. On the basis of the two events it would be 11%. Yes, there is engineering work being done on the river that might reduce the risk. We are also told that we are facing more extreme weather. The site could face more severe flooding in the future. Why would you extend the building?

- The Fishing Lodge is part of a residential complex known as Sarum St Michael (SSM). According to their sub-underleases, owners of properties within SSM cannot alter their structure. The Company can, however, make such alterations, according to its underlease, 'in accordance with plans … approved in writing by the Lessor (such approval not to be unreasonably withheld)'; the Lessor is the Dean & Chapter of Salisbury Cathedral.
We have not been consulted by the owners of the Fishing Lodge about this proposed development. Sadly this was also the case with the applicant's application 20/04875/PNCOU made in 2020.

SSM's Board objects to the proposed alteration being resistant to any addition to the existing footprint of SSM other than in exceptional circumstances.

We also note the applicant's attached document 'Flood Risk Assessment' which seeks to mitigate the risk of flooding of the property. It states, 'The risk of surface water flooding is low' and, 'There is a yearly chance of flooding of zone 3 of 3.3%.' Please find attached photos of the extensive January 2023 flooding which severely impacted Sarum St Michael including rendering the foul drainage referred to as inoperative for a period of days. The development also suffered significantly from flooding in 2014.

ISSUES:

The main considerations which are material to the determination of this application are listed below:

- Principle
- Character & Design
- Neighbouring Amenities

- Flooding
- Ecology (including River Avon SAC)

PLANNING ASSESSMENT:

Principle:
Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 require that the determination of planning applications must be made in accordance with the Development Plan, the WCS, unless material considerations indicate otherwise.

The site is located within a mixed residential area within the principal settlement of Salisbury. Core Policies 1 and 2 of the WCS set out a settlement and a delivery strategy for the city and confirm that within a Principal Settlement, the principle of development is considered acceptable.

Furthermore, the site is already in use for its existing commercial purposes and the principle of extensions or additions to be used in association with the existing use of the site is accepted. This principle acceptability is however subject to the detail, such as its implications for the character of the area and neighbouring amenities. These will, therefore, be addressed in more detail below.

Character & Design:
Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires 'special regard' to be given to the desirability of preserving a listed building or its setting. In addition, Section 72 of the Act states that in the exercise of any functions, with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. In having 'special regard' (in relation to listed buildings) and/or in paying 'special attention' (in relation to conservation areas) the NPPF states that regard must be had as to whether the proposal will cause 'substantial harm', 'less than substantial harm' or no harm to the asset. Section 16 of the act relates to the granting of Listed Building Consent specifically stating that the local planning authority may grant or refuse an application for listed building consent and, if they grant consent, may grant it subject to conditions. In considering whether to grant listed building consent for any works the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest that it possesses and any listed building consent shall (except in so far as it otherwise provides) enure for the benefit of the building and of all persons for the time being interested in it.

Core Policy 57 states that new development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Residential extensions/alterations such as this are acceptable in principle subject to there being no adverse impacts. Core Policy 58 aims to ensure that Wiltshire's heritage assets such as the conservation area are protected and enhanced in order that they continue to make an important contribution to Wiltshire's environment and quality of life. It also, however, confirms that the designation of a Conservation Area or listed building does not necessarily preclude the possibility of new development and the Council is committed to working pragmatically with owners to find positive solutions which will allow adaptation of such buildings to reflect modern standards.

Good design helps to provide a sense of place, creates or reinforces local distinctiveness, and promotes community cohesiveness and social wellbeing; The layout and design of new developments must also be based on a thorough understanding of the site itself and its wider context, and seek to maximise the benefits of the site's characteristics. This will require careful consideration of the site layout. No two sites share the same landscapes, contours, relationship with surrounding buildings, street pattern and features. The proximity of poor quality or indistinct development is not a justification for standard or poor design solutions. New development should integrate into its surroundings whilst seeking to enhance the overall character of the locality; A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings.

In this instance, it is considered that the proposed works are relatively minor in terms of scale and mass, are of limited height being single-storey, will be constructed of materials to match the original building and will be concealed from public views due to the location of the proposals and the existing boundary treatments which are due to remain in place and are afforded a level of protection above the norm due to their location within the designated conservation area. The building itself has been subject to multiple alterations over its life and has no specific individual design, as such it is considered that the proposed works would not harm the character of the building itself and, as stated by the conservation officer, would not harm the character or setting of Kings House.
As stated it is the position of the Local Planning Authority (LPA) that this is a curtilage-listed building and before any works can be carried out an application for Listed Buildings Consent (LBC) should be submitted. This application merely concerns planning permission and as such could offer an alternative decision to an application for LBC. It is considered that the proposed works would not be harmful to the character of the surrounding area, special regard has been given when assessing the proposals given the location within a designated conservation area. Overall, it is considered that the scale, mass, height and design of the proposals would be acceptable to maintain the character of the application site, would not be harmful to the immediate surroundings and would preserve the Conservation Area, causing no harm, there is therefore no requirement for the public benefit test to be applied.

Neighbouring Amenities:
WCS policy CP57 (Ensuring High Quality Design & Space Shaping) requires that development should ensure the impact on the amenities of existing occupants/neighbours is acceptable and ensuring that appropriate levels of amenity are achievable within the development itself. The NPPF includes that planning should "*always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings"*. Residential amenity is affected by significant changes to the environment including privacy, outlook, daylight and sunlight, and living areas within private gardens and this, therefore, needs to be carefully considered accordingly.

Due to the limited height of the existing building and the proposed works combined with the enclosed and isolated location of the building, it is considered the works would have no tangible impact on the enjoyment of amenity spaces available to the occupiers of nearby dwellings.

Flooding:
It is noted that the application site is situated within flood zones two and three. Were this application for new buildings the development would be subject to the sequential test and would be in contravention of both Wiltshire and Environment Agency policies and as such would be declined. However, as this is an extension to an existing building, the floors are proposed to be no lower than the existing ones and, therefore, would not increase any levels of "vulnerability" for users for the building which is not proposed to be changed to a more vulnerable use and is to be continued to be used for a water compatible use.

Ecology (Protection of the River Avon SAC, water quality and protected species:
The Hampshire Avon is an internationally important chalk river which has been designated as a Special Area of Conservation (SAC) for its sensitive habitats and populations of fish and molluscs. The catchment covers over half the county and the river and its tributaries flow through many of Wiltshire's towns and villages. Development within the catchment has the potential to have a detrimental effect upon its qualifying features through direct damage, sedimentation, pollution, disturbance, or changes to its hydrological regime. Most of these impacts can be avoided or mitigated through the use of buffer zones, access management, habitat management and construction method statements. To ensure compliance with the requirements of the Habitats Regulations and Water Framework Directive, new development around the River Avon SAC catchment must not (alone or in combination) result in non-compliance with SAC water quality targets or compound existing problems of target exceedance in those parts of the catchment already failing SAC standards. Furthermore, new development must not prejudice achievement of conservation objectives for the SAC over the long term. In order to avoid and reduce potential environmental effects on

the River Avon SAC, development will need to incorporate measures during construction and operation to avoid and prevent pollution and mitigate potential disturbance effects; appropriate measures may include consideration of suitable buffer zones along watercourses, habitat enhancements and river access management measures. All development within 20m of the river banks should submit a construction management plan to the local planning authority to ensure measures proposed during construction are satisfactory.

The provided CEMP has been reviewed by the ecology team and by Natural England and is acceptable as the scale and nature of the works are considered to be so minimal that an appropriate assessment is not required. The ecology team have also confirmed that protected species mitigation can be secured by condition with an additional condition to prevent external lighting and suggested informatives.

Other Matters:
The comments raised by the respondents are not considered to be material considerations within planning. The private legal agreements made between SSM and the applicants are civil matters covered by legislation outside of the planning system. The comments made by the public respondent as to the motivation of the applicants are again not considered pertinent to the planning application process, the issues relating to flooding have been considered and answered above.

CONCLUSION:
The proposal would be of an acceptable overall scale and would result in limited implications for the character of the existing building, conservation area, heritage asset or street scene. Similarly, due to its location and scale, it is considered that the proposal would be unlikely to have a significant impact on the amenities enjoyed by occupiers of adjacent dwellings. Conditions are suggested in the interests of protected species and the proposal is screened out of requiring an Appropriate Assessment under the Habitats Regulations.

The proposal would, therefore, accord with the aims and objectives of the Wiltshire Core Strategy and other Government guidance and is recommended that planning permission be granted for the proposal.

RECOMMENDATION:
Approve subject to the following conditions

Conditions: (5)

1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2 The development hereby permitted shall be carried out in accordance with the following approved plans:

Application Form & Certificate Received 19th June 2023
Plans Ref:
Location & Block Plan Received 29th June 2023

Topographical Survey DWG: ADS-0854 Received 26th July 2023
Revised Proposed Elevations DWG: 3b Received 1st December 2023
Revised Proposed Floorplans DWG: 4b Received 1st December 2023

REASON: For the avoidance of doubt and in the interests of proper planning and for the protection, mitigation and enhancement of biodiversity.

3 The materials to be used in the construction of the external surfaces of the development hereby permitted shall match in material, colour and texture those used in the existing building.

REASON: In the interests of visual amenity and the character and appearance of the area.

4 No new external artificial lighting shall be installed at the site.

REASON: In the interests of conserving biodiversity.

5 Prior to the commencement of any works including vegetation removal and demolition, details of the number, design and locations of bat roosts and nesting opportunities for birds shall be submitted to the local authority for approval in writing. The approved details shall be implemented before the occupation of the final works and shall be maintained for the life of the development.

REASON: To provide mitigation /enhancement for biodiversity.

Informatives: (7)

6 Regardless of any grant of planning permission, the applicants are reminded that this building (The Fishing Lodge) is considered to be a designated heritage asset via Curtilage Listing of King's House and as such Listed Building Consent is required for the works. It is a Criminal Offence to carry out unauthorised works on Designated Heritage assets. The maximum penalty is two years imprisonment and/or an unlimited fine.

7 The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:
• on or within 8 metres of a main river (16 metres if tidal)
• on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
• in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact blandford.frap@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with the Environment Agency at the earliest opportunity.

8 Safeguards should be implemented during the construction phase to minimise the risks of pollution from the development. Such safeguards should cover:
- the use of plant and machinery
- wheel washing and vehicle wash-down
- oils/chemicals and materials
- the use and routing of heavy plant and vehicles
- the location and form of work and storage areas and compounds
- the control and removal of spoil and wastes.

9 Bats

There is a low risk that bats may occur at the development site. Many species of bat depend on buildings for roosting, with each having its own preferred type of roost. Most species roost in crevices such as under ridge tiles, behind roofing felt or in cavity walls and are therefore not often seen in the roof space. Bat roosts are protected all times by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 even when bats are temporarily absent because, being creatures of habit, they usually return to the same roost site every year. Planning permission for development does not provide a defence against prosecution under this legislation or substitute for the need to obtain a bat licence if an offence is likely. If bats or evidence of bats is found during the works, the applicant is advised to stop work and follow advice from an independent ecologist or the applicant is advised to follow the advice of a professional ecologist or to contact Natural England's Batline through the internet.

10 Nesting Birds

All British birds, their nests and eggs are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended) and the Countryside and Rights of Way Act 2000 while birds are nesting, building nests and sitting on eggs. The applicant is advised to check any structure or vegetation capable of supporting breeding birds and delay removing or altering such features until after young birds have fledged. Damage to extensive areas that could contain nests/breeding birds should be undertaken outside the breeding season. This season is usually taken to be the period between 1st March and 31st August but some species are known to breed outside these limits.

11 Protected Species General

The applicant should note that under the terms of the Wildlife and Countryside Act 1981 (as amended) and the Habitats Regulations 2017 (as amended) it is an offence to disturb or harm any protected species including for example, breeding birds and reptiles. The protection offered to some species such as bats, extends beyond the individual animals to the places they use for shelter or resting. Please note that this consent does not override the statutory protection afforded to any such species. In the event that your proposals could potentially affect a protected species you should seek the advice of a suitably qualified and experienced ecologist and consider the need for a licence from Natural England prior to commencing works. Please see Natural England's website for further information on protected species.

12 Artificial Lighting

The habitat within the proposed development site and the surrounding area is suitable for roosting, foraging and commuting bats. An increase in artificial lux levels can deter bats which could result in roost abandonment and/or the severance of key foraging areas. This will likely result in a significant negative impact upon the health of bat populations across the region. Artificial light at night can have a substantial adverse effect on biodiversity. Any new lighting should be for the purposes for safe access and security and be in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, ‘Guidance for the Reduction of Obtrusive Light’ (ILP, 2021), and guidance note GN08-23 “Bats and artificial lighting in the UK”, issued by the Bat Conservation Trust and Institution of Lighting Professionals.