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integrating nature conservation

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Preliminary Roost Assessment

7, 8, 9 Nethercote Hill
Lacock
Chippenham
SN15 2LD

March 2024

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QUALITY CONTROL		
The information which we have prepared and provided is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct.		
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Note this report is informative only and is not suitable for planning.

1. INTRODUCTION AND BACKGROUND

1.1. Darwin Ecology Ltd was commissioned by Mr Mark Johns to undertake a Preliminary Roost Assessment (PRA) of proposals for the buildings and habitats at 7, 8, 9 Nethercote Hill, Lacock, Chippenham, SN15 2LD[1]. The assessment was required to support a planning application for the erection of a rear single storey extension and the installation of solar panels on the western aspect of the roof.

1.2. The survey and report follow the Bat Conservation Trust (BCT) Good Practice Guidelines (2023).

Site Overview

1.3. The site is comprised of two adjoined cottaged and garden in a rural setting. The habitats within the gardens include boundary and interior hedgerows, young and mature trees, discrete habitat features (included log piles and structures) and transitional vegetation mosaic habitats. A number of bat and tree boxes were located on mature trees present within the boundaries of the site which were installed to provide enhancement for a previous planning application.

1.4. The building on site is immediately bordered by residential gardens to the north, west and south, and by a lane to the east (see **Figure 1)**.

1.5. The wider landscape is a mixture of agricultural and residential, with the village of Lacock located approximately 200m to the south and the remainder of the habitat comprising allotments, pasture fields bordered by hedgerows and the grounds of Lacock Abbey. The river Avon is located 320m to the east of the site (see **Figure 2**).

Purpose of this report

1.6. The purpose of this report is to provide sufficient information to assess the potential ecological impacts of the proposed development, and to identify what further information is required before a full assessment can be made.

1.7. This report is not suitable for planning.

[1] Ordnance Survey (OS) grid reference ST 91674 68791.



Figure 1: Site location within the local landscape with the building surveyed highlighted in orange (Copyright Google Earth Pro, 2024)



Figure 2: Site location within the wider landscape (Copyright Google Earth Pro, 2024)

Legislation

1.8. This report has been prepared in accordance with relevant legislation and policy. Further detail is provided in **Appendix 1**, however the following primary documents are of relevance:

- The Wildlife and Countryside Act 1981 (as amended) (WCA 1981);
- The Countryside and Rights of Way Act 2000 (as amended) (CRoW Act);
- The Conservation of Habitats and Species Regulations 2017 (as amended) (CHS 2017); and
- The Natural Environment and Rural Communities Act 2006 (NERC).

1.9. For any development that impacts on bats or bat roosts, in order to permit the works to legally proceed, it is necessary to obtain a European Protected Species Mitigation (EPSM) or Bat Mitigation Class (BMC) Licence from Natural England in advance of the works taking place. EPS Licences can be considered for up to 35 working days, BMC Licences take 10 working days. It is only possible to obtain a BMC Licence for low impact works.

1.10. Further details on the legislation and relevant policy can be found in **Appendix 1**.

2. METHODOLOGY

Desk Study

2.1. A desk study was undertaken for designated sites and bat species and habitat records within 2km of the site:

- The MagicMap website was reviewed, to obtain information on any designated sites of nature conservation interest within 2km of the site and details of any bat EPS licences issued within 2km;
- The Wiltshire County Council Planning Portal was searched for past and pending planning applications that may have associated ecological documents detailing results of bat surveys; and
- Google Maps and Ordnance Survey (OS) Leisure Maps was utilised to view aerial photographs, maps and mapnik data, and to assess the ecological context of the site within the wider landscape.

2.2. Natural England has developed a tool to help assess the potential risks to Sites of Special Scientific Interest (SSSIs) by proposed developments. These are known as 'Impact Risk Zones' (IRZs) and they define the area around a SSSI that could be sensitive to development, considering the particular sensitivities of the feature for which the site is designated.

2.3. The IRZs help inform whether a development proposal may affect a SSSI and if so, whether it is necessary for the Local Planning Authority (LPA) to seek pre-application advice from Natural England. Information on the IRZs was determined from the MAGIC website to determine if the LPA is required to seek consultation for the current development.

Preliminary Roost Assessment

2.4. Principal Ecologist Olatz Gartzia BSc MSc ACIEEM (Bat Class 2 Licence: 2015-16222-CLS-CLS) conducted a building inspection at the site at 7, 8 & 9 Nethercote Hill on 28th February 2024. The weather conditions at the time of the survey were overcast with light rain and a light breeze, and a temperature of approximately 8^{o}C. The following methodology was followed:

External Inspection

2.5. An investigation was carried out of external features with potential for use by roosting bats, such as gaps under roof and ridge tiles, gaps at soffit boxes or fascias. A search for bat droppings was made beneath each potential entry/exit point identified where accessible. The surveyor used binoculars and powerful, low-heat LED torch.

Internal Inspection

2.6. An investigation was carried out of the roof void (including the floor and walls) for signs of bats roosting and the access potential into the roof void for bats. The surveyor looked for bats, bat droppings, likely access points, signs of feeding, dead bats, scratch marks and staining, and made a suitability assessment of the structure of the roof.

Categorisation of Bat Roosting Potential

2.7. Each building was assessed for its potential to support roosting bats as detailed in **Table 1** below which is taken from the Bat Conservation Trust 2023 guidelines Table 4.1, Table 7.1 and Table 7.2.

Table 1: Roost classification from the Bat Conservation Trust (2023) guidelines.

Category	Description of roosting habitat	Number of surveys required
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).	No further surveys
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	No further surveys
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis by large numbers of bats.	Single survey between May to August
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, condition and surrounding habitat but unlikely to support a roost of high conservation status.	Two surveys with at least one survey between May to August.
High / Confirmed	A structure with one or more potential roost sites that are obviously suitable for use by a larger number of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts.	Three surveys with at least two surveys between May to August.

Limitations

2.8. Ecological surveys are limited by factors that affect the presence of plants and animals such as the time of the year, weather, migration patterns. The survey was undertaken in February and therefore represents a valid sample of ecological evidence present on that date/season.

2.9. Ecological data is typically deemed valid for 18 months. This report remains valid for 2 years from the date of the survey, however, a walkover survey after 18 months may be required to demonstrate whether or not the habitats have remained as described.

2.10. The desk study does not include data from the local environmental records centre (LERC). However, following CIEEM guidelines (2017) it is possible to conduct a robust assessment without the need of LERC data, for example for small-scale projects or on sites such as;

- A field in active arable cultivation where there is no impact on any hedges, trees or water bodies;
- A small area of cultivated garden/amenity grassland, as above; or
- A small urban site comprising mostly asphalt or compacted hardstanding.

2.11. The proposals only impact the building and surrounding hardstanding on site. This is a low impact, small-scale project that will not impact the vegetation on the site, and therefore the lack of LERC data is not considered a limitation to the ecological assessment of the site.

2.12. Many species of bat in the UK are crevice-dwelling, and bats or signs of bats can be difficult to find within a building. In addition, there may be areas that are inaccessible to the surveyor, for instance the eastern roof aspect was difficult to observe from the ground.

2.13. No other limitations were encountered, or assumptions made during either the desk study or the field survey and it is considered that with the access gained and recording undertaken an accurate assessment of the site's ecological importance has been made.

3. SURVEY RESULTS

Desk Study

3.1. The data search returned no statutorily designated sites within 2km radius of the site. The Bradford-on-Avon Bat Special Area of Conservation (SAC) is located 7.3km from the site, and therefore the site falls outside the sustenance zones for Bechstein's *Myotis bechteinii*, lesser *Rhinolophus hipposideros* and greater horseshoe *R. ferrumequinum* bats.

3.2. There were two records of EPS licences for bats within 2km, including one for the destruction of a resting place for common and soprano pipistrelle bats located 1.5km to the north of the site (2018-36586-EPS-MIT) and one for the destruction of a breeding place for brown long-eared bats 1.6km to the west of the site (2017-31337-EPS-MIT).

3.3. A search on the Wiltshire Council Planning Portal found applications from the last two years containing ecology documentation, however these only included records of sites with buildings with negligible potential for bats 200m south (PL/2023/02787) and 2.3km northeast (PL/2022/09164).

3.4. There are six areas of priority deciduous woodland sites located to the south of the site, the nearest of which is 80m from the site. The woodland areas present in Lacock Abbey Grounds are also within 500m of the site. Further priority habitats within 1km of the site comprise. Traditional orchards, wood pasture and parkland, and coastal and floodplain grazing marsh. There are no areas of ancient woodland within 1km of the application site.

Preliminary Roost Assessment

External Assessment

3.5. The building on site comprised two adjoined stone built residential properties with a pitched roof clad with interlocking clay tiles. Two brick chimneys were located within the roof, which appeared well sealed. The gable ends were made of stone, with a wooden barge boards present on the eaves. Several lifted tiles were recorded on the roof, including under ridge tiles as well as gaps under the lead flashing by the chimneys and vents. A crevice on the site wall was recorded on the western aspect by the guttering.

3.6. Two single storey flat roofed extension were present on the western aspect. The extension to the south, proposed to be demolished, had a corrugated metal roof and concrete breeze block walls. A gap was noted beneath the lead flashing on the southern end of the extension. The extension located to the north had a felted roof, with a wooden soffit box with was tightly fitted, and stone walls which appeared in good condition.

Internal Assessment

3.7. Internally, a single void was present measuring 15m long x 7m wide x 2m tall. The void was trussed and the two brick chimney breasts were blocking the internal space. The roof had exposed wooden beams and no roofing felt was present on the underside of the tiles. The

void appeared heavily cobwebbed along the ridge, around the chimneys and on the apex of either gable, however, several potential access points to the interior were recorded, including on several lifted tiles, the ridges and the eaves on the western and eastern aspects.

3.8. No evidence of bats was found, however, given the numerous access points and the presence of a small number of crevice features within the roof, the building was assessed as providing a **Moderate potential** for roosting bats.

Site Photographs



Image 1: Northern gable



Image 2: Rear of the building with flat roofed extensions



Image 3: Existing flat roofed extension with tight soffit box



Image 4: Gap beneath lead flashing on the extension to be demolished



Image 5: Internal roof structure



Image 6: Access recorded along the eaves

4. DISCUSSION AND RECOMMENDATIONS

Designated Sites

4.1. It is not anticipated that the proposed extension on the rear of the building will impact any statutory designated sites, priority habitats or ancient woodlands through land take or other direct effects. There will be no increase in residential dwellings and therefore no increased footfall on nearby designated site.

Bats

4.2. During the PRA, the building on site was assessed as providing a moderate potential to support roosting bats and as such, it will be necessary to undertake a minimum of two dusk emergence surveys. The surveys are required to confirm and identify whether a bat roost is present, the species of bats roosting at the site, characterise the type of bat roost (this can be a summer, winter hibernation, transitional, satellite, or maternity roost), and determine the access points bats are using to enter and exit the roost. These details are required to inform the planning application.

4.3. The surveys must be undertaken during the bat activity season (between May to August) to confirm the presence/absence of roosting bats. Should bats be found to emerge from the building, then a total of three dusk emergence/dawn re-entry surveys will be required to inform an EPS mitigation licence application to Natural England.

4.4. An overview of general mitigation requirements if bats are found is summarised in **Appendix 2,** however, a full mitigation plan appropriate for the site can only be be provided following the recommended further surveys and impact assessment.

Nesting birds

4.5. No active or disused bird's nests were recorded within the building, however several gaps which could be used by nesting birds were recorded within the building.

Overall conclusion

4.6. The full ecological impacts of the proposed development cannot be fully assessed following the PRA survey alone and further survey work will be required. Following the recommended bat activity survey work, detailed mitigation and enhancement recommendations will be made within an Ecological Impact Assessment report that will be suitable for planning.

5. REFERENCES

Collins, J. (ed.) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4rd edition).* The Bat Conservation Trust, London.

Ministry of Housing, Communities & Local Governments (2023) National Planning Policy [online] https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf [March, 2024]

Mitchell-Jones, A.J., (2002). *Bat Mitigation Guidelines*. English Nature, Peterborough.

Mitchell-Jones, A. J. & McLeish, A. P. (2004). *Bat Workers' Manual (3rd Edition)*. JNCC, Peterborough.

Ordnance Survey Maps [online] www.osmaps.ordnancesurvey.co.uk [March, 2024].

Schofield, H. W. & Mitchell-Jones, A.J. (2004). The Bats of Britain and Ireland. Vincent Wildlife Trust, Ledbury.

UK Government's Countryside Geographic Information Website [online] www.magic.gov.uk [March, 2024].

APPENDIX 1 - LEGISLATION AND POLICY

Bat Legislation

In England and Wales, all bat species and their roosts are legally protected under the European *Habitats Directive (1992)*; the *Conservation of Habitats and Species Regulations (2017)*; the *Wildlife and Countryside Act (1981) (as amended)*; the *Countryside and Rights of Way Act, 2000*; and the *Natural Environment and Rural Communities Act (NERC, 2006)*.

Barbastelle *Barbastella barbastellus*, Bechstein's *Myotis bechsteinii*, greater horseshoe *Rhinolophus ferrumequinum*, lesser horseshoe *Rhinolophus hipposideros*, brown long-eared *Plecotus auritus*, soprano pipistrelle *Pipistrellus pygmaeus*, and noctule *Nyctalus noctula* bats are all species of principal importance in England under *Section 41* of the *Natural Environment and Rural Communities Act 2006*.

You will be committing a criminal offence if you:

- Deliberately capture, injure or kill a bat;
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats;
- Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time);
- Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat; or
- Intentionally or recklessly obstruct access to a bat roost.

The government's statutory conservation advisory organisation, Natural England, is responsible for administering EPS licenses that permit activities that would otherwise lead to an offence.

A licence can be obtained if the following three tests have been met:

- Regulation 53(9)(a) - there is "no satisfactory alternative" to the derogation, and;
- Regulation 53(9)(b) - the derogation "will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range" and;
- Regulation 53(2)(e) - the derogation is for the purposes of "preserving public health or public safety or other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment".

National Planning Policy

5.1. The *National Planning Policy Framework (2023)* aims to minimise impacts on biodiversity and provide net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity. Chapter 15 'Conserving and

enhancing the natural environment' details what local planning policies should seek to consider with regard to planning applications.

5.2. Planning policies and decisions should contribute to and enhance the natural and local environment by:

> *180 a)* Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
>
> *180 b)* Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
>
> *180 d)* Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
>
> *181)* Plans should: distinguish between the hierarchy of international, national and local designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries;
>
> *182)* Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and Broads. The scale and extent of development within all these designated areas should be limited, while development within their settings should be sensitively located and designed to avoid or minimise adverse impacts on the designated area.

5.3. Specific policies regarding habitats and biodiversity comprise:

> *185)* To protect and enhance biodiversity and geodiversity, plans should:
>
> > *a)* Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them;

and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation and

b) Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species and identify and pursue opportunities for securing measurable net gains for biodiversity.

186) When determining planning applications, local planning authorities should apply the following principles:

a) If significant harm to biodiversity resulting from a development cannot be avoid (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) Development on land within or outside of Sites of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the feature of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) Development whose primary objective is to conserved or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around development should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

187) The following should be given the same protection as habitats sites:

a) Potential Special Protection Areas and possible Special Areas of Conservation;

b) Listed or proposed Ramsar sites; and

c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

Local Planning Policy

5.4. The local planning policy for the site is the Wiltshire Core Strategy, adopted January 2015. It sets out a strategic spatial vision, key objectives and overall principles for development in the county for the period up to 2026. The relevant policies regarding ecology, nature conservation and development comprise:

Core Policy 50 Biodiversity and Geodiversity

Protection

Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services.

All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.

Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 above where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.

Biodiversity enhancement

All development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services. Such enhancement measures will contribute

to the objectives and targets of the Biodiversity Action Plan (BAP) or River Basin/ Catchment Management Plan, particularly through landscape scale projects, and be relevant to the local landscape character.

Local sites

Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological

connectivity with the wider environment. Damage or disturbance to local sites will generally be unacceptable, other than in exceptional circumstances where it has been demonstrated that such impacts:

i. cannot reasonably be avoided

ii. are reduced as far as possible

iii. are outweighed by other planning considerations in the public interest

iv. where appropriate compensation measures can be secured through planning obligations or agreements.

Development proposals affecting local sites must make a reasonable contribution to their favourable management in the long-term.

Core Policy 51: Landscape

Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures:

i. The locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies.

ii. The locally distinctive character of settlements and their landscape settings.

iii. The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe.

iv. Visually sensitive skylines, soils, geological and topographical features.

v. Landscape features of cultural, historic and heritage value.

vi. Important views and visual amenity.

vii. Tranquillity and the need to protect against intrusion from light pollution, noise, and motion. viii. Landscape functions including places to live, work, relax and recreate.

viii. Special qualities of Areas of Outstanding Natural Beauty (AONBs) and the New Forest National Park, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty.

Proposals for development within or affecting the Areas of Outstanding Natural Beauty (AONBs), New Forest National Park (NFNP) or Stonehenge and Avebury World Heritage Site (WHS) shall demonstrate that they have taken account of the objectives, policies and actions

set out in the relevant Management Plans for these areas. Proposals for development outside of an AONB that is sufficiently prominent (in terms of its siting or scale) to have an impact on the area's special qualities (as set out in the relevant management plan), must

Core Policy 69: Protection of the River Avon SAC

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.

Where additional sewage discharges to a STW cannot be accommodated without measures to offset phosphate loading, development will be required to undertake proportionate measures (which may include contributions towards those measures identified in the Nutrient Management Plan) to demonstrate that the proposals would have no adverse effects upon the SAC.

Wiltshire Biodiversity Action Plan

5.5. The Wiltshire Biodiversity Action Plan (BAP) was published in 2002 and reviewed in 2008 by the Wiltshire Wildlife Trust and over 40 delivery partners who make up the Wiltshire BAP Partnership. It includes habitat action plans for 11 of the most significant of the UK Priority Habitats in Wiltshire which include woodland, wood-pasture, parkland and ancient trees, hedgerows, calcareous grassland, neutral grassland, traditional orchards, farmland habitats, built environment, standing open water and rivers, streams and associated habitats. In addition, a bat species action plan has also been included, covering all bat species found in Wiltshire, while other priority species have been included under the appropriate habitat action plans.

5.6. The Wiltshire BAP species list includes both species having national priority under the UK BAP and also species having local importance in Wiltshire including county notables. A total of 260 species have been included on the Wiltshire BAP species list.

5.7. The Wiltshire BAPs aim to achieve the following:

- Enable prioritisation and define actions for priority habitats and species in Wiltshire.
- Create a plan of action that can be delivered through a partnership of statutory, private and third sector organisations.
- Provide a baseline of current knowledge and a tool to help monitor key habitats and species.

- To link objectives, targets and actions to report nationally and enable conservation work carried out in Wiltshire to contribute to national targets and reporting.

5.8. In 2012, a landscape scale framework for conservation in Wiltshire was developed, identifying 11 Landscape Biodiversity Areas across Wiltshire and Swindon, made up of a number of priority habitats, designated sites and other areas of conservation significance. This aims to encourage landscape scale planning for species and habitat conservation across Wiltshire.

5.9. Wiltshire County Council (WCC), Natural England (NE) and local experts and researchers have jointly prepared the *Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire (2015)*. It is aimed at applicants, agents, consultants and planners involved producing and assessing development proposals in the landscapes surrounding Wiltshire's most sensitive bat roosting sites, which are protected by European wildlife legislation and applies to all types of developments that are subject to planning control.

5.10. The guidance gives details on how to mitigate any potential impacts on Wiltshire Bat SACs and to ensure that any potential issues are identified as early in the planning process as possible to prevent unnecessary delays to development projects. The guidance also outlines the ecological documents and plans, which should be submitted in support of planning applications, so as to ensure that the council has all the information required to undertake a reliable Habitats Regulations Assessment (HRA) should one be required.

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General Mitigation



General Mitigation for Bat Roosts

Bat Mitigation Class Licence (BMCL)

Registration for a BMCL can be submitted following planning approval. This licence permits the disturbance and/or capture of bats and/or damage/destruction of bat roosts of low conservation significance. You may apply for a BMCL in the following circumstances:

- No more than three common species of bat;
- Only individual or small numbers of bats of each species; and
- No more than three roosts in total across all structures at the site.

Natural England aim to provide licensing details in 10 working days

European Protected Species Licence (EPSL)

An application must be submitted by the local planning authority and must be granted before any works can commence on site. You must apply for an EPSL in the following circumstances:

- More then three species of bat or rooting structures are present at the site
- Rarer species are present
- Presence of a Maternity roost
- Roost present within a tree

Natural England aim to provide licensing decisions in 30 working days. Licences will only be granted where it can be shown there will be no detriment to the species of bats concerned.

Timing: If your roost is a confirmed **Hibernation** roost works cannot be carried out in **Oct-Feb**
If your roost is a confirmed **Maternity** roost works cannot be carried out in **May-Aug**



Supervision

Once you have been granted your licence, a Natural England bat-licensed ecologist will need to be on site to over see the stripping of any identified or potentially suitable roosting features. If any bats are found on site they can then be lawfully handled and placed safely into a newly provided bat box.
After the strip has taken place the provision of new roosting opportunities must be placed on site as mitigation such as bat boxes which are suitable for the roosting bat species which were found on site.

Materials

Breathable membrane (pictured on the left) should **not** be used in new loft voids as this can lead to entanglement and trapping of bats and increase the variability of the microclimate in the loft. Instead **bitumen felt** (pictured on the right) should be utilised as bats can grip onto it, helping to maintain a safe and suitable environment.



