

ECOLOGICAL ASSESSMENT REPORT

30th July 2025

Highlands Farm, Collingbourne
Ducis, Marlborough SN8 3EG

Client: Toby Helme & Elle Leonsis

Agent: Fowlers Architecture & Planning

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This report has been prepared to identify the presence of protected species and habitats within the site, where this falls within the scope of the agreed works.

This report has been produced using all reasonable skill and care, and a Quality Assurance (QA) review process has been conducted prior to issue of this report.

SURVEY DATA LIFESPAN AND VALIDITY:

Survey data can be considered valid for 12-18 months from the survey date in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Advice note (CIEEM, 2019) due to the presence of and/or potential for mobile species to be present within the site.

It must be noted that update surveys will be required in the event a Natural England mitigation licence is required. In the event roosting bats are present, the licence application must be informed by up-to-date survey data from the then current bat survey season (May to August). An update building inspection will also be required within 3 months of the application.

The results of the surveys and this assessment are representative at the time of the surveys taking place.

ABR Ecology Ltd cannot accept responsibility for third party data supplied within this report.

This document has been prepared in accordance with CIEEM's Guidelines for Ecological Report Writing (CIEEM, 2017).

At the time of writing, standard methodologies have been used which are accepted by Natural England and other statutory bodies. No responsibility will be accepted where standard methodologies change and where Government, national bodies and industry subsequently modify standards.

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Non-technical summary

- ◆ ABR Ecology Ltd were commissioned by Toby Helme & Elle Leonsis to produce an Ecological Assessment informed by a Preliminary Ecological Assessment (PEA), Preliminary Roost Appraisal (PRA) and a suite of bat activity surveys at Highlands Farm, Collingbourne Ducis, Marlborough, SN8 3EG. This report was requested to support a full planning application for the the demolition and replacement of the existing dwelling on-site.
- ◆ This assessment is informed by a Preliminary Ecological Appraisal (PEA) and Preliminary Roost Appraisal (PRA) on the 10th July 2024 by Natural England class 2 licensed bat ecologist Phil Smith ACIEEM and graduate ecologist Jordan Elliott-Murray and further bat activity surveys were conducted on the 26th July 2024, 29th August 2024 and 24th September 2024.

Habitats, protected sites and invasive species:

- ◆ Biodiversity net again has not been considered as part of this report as the applicant's agent has advised that the new dwelling will consist exclusively of a dwelling that is self-build or custom housebuilding as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015; therefore, the application is exempt from mandatory Biodiversity Net Gain (BNG) under the Environment Act 2021.
- ◆ Habitats on-site include other neutral grassland (g3c), developed land; sealed surface (u1b6), other broadleaved woodland (w1g), buildings (u1b5), artificial unvegetated; unsealed surface (u1c), introduced shrub (u1 847), other native hedgerows (h2a6), a line of trees (w1 33) and rural trees (g3c 32).
- ◆ The hedgerows on site consisted of 80% native species and so qualify as priority habitats, additionally, the closest habitat of principal importance is 'Deciduous Woodland' situated 12m from the east border of the site. Where impacts may occur upon priority habitats, a Construction Environmental Management Plan (CEMP) will be followed as detailed in Section 4 to safeguard the priority habitats hedgerow and deciduous woodland.

Badgers:

- ◆ No evidence of badgers was recorded on site; however, the habitat on-site is considered to hold potential for badgers, see Section 4 for details.

Bats:

- ◆ A PRA was conducted and internal evidence of bats, confirmed by DNA analysis as that of brown long-eared bat, was noted within the house (B1).

- ◆ Three bat activity surveys were conducted upon B1; a maximum count of one serotine and three common pipistrelle bats were recorded exiting from the property during any one survey.
- ◆ The property supports day roosts for brown long-eared bats and serotine and three common pipistrelle day roosts, as identified through the bat activity surveys in 2024.
- ◆ The bat roosts are of site level importance as determined by the CIEEM Bat Mitigation Guidelines and in line with Natural England's Earned Recognition Minimum Expectations Guidelines compensation.
- ◆ **The works will result in the loss of the identified roosts; a bat European Protected Species (EPS) licence from Natural England is required following planning approval and prior to any works commencing to ensure works are lawful.** It is the responsibility of the applicant to arrange for application of the EPS licence.
- ◆ The general site supports commuting and foraging bats, and there is potential for artificial lighting to impede bats using the general property.
- ◆ A bat mitigation plan is provided in Section 4. This plan involves a works method statement including supervision by a class 2 licensed bat ecologist, lighting control measures, temporary and permanent replacement bat roosts and post-monitoring.
- ◆ The applicant must note that the survey data has a limited lifespan, and the EPS licence must be informed by up-to-date surveys. Therefore, update survey(s) will likely be required following planning to inform the EPS licence. A PRA must be conducted within 3 months of the licence application and activity survey data must be obtained from the then 'current' bat survey season (May – August).
- ◆ The trees on-site were not considered to hold potential for roosting bats and therefore no further action is recommended in relation to trees.

Dormice:

- ◆ There is low potential for dormice to be impacted by the proposals; a method statement for removal of hedging within the site must be followed and the CEMP will ensure protection of the remaining hedgerows on-site; details are provided in Section 4.

Great crested newts:

- ◆ Great crested newts (GCN) are not considered to be impacted by the proposals, and no further action is recommended for this species.

Nesting birds:

- ◆ Bird nests were recorded on the house and shed (B1 & B3) and there is potential for nesting birds to be present within the habitats on-site. Mitigation for nesting birds is detailed in Section 4.

Reptiles and common amphibians:

- ◆ The habitat on-site is considered to hold low potential for reptiles and common amphibians, in areas of longer tussocky grassland, the woodland and hedges to the edge of the site. A method statement will be followed for habitat clearance and the CEMP will ensure protection of retained habitats; details are provided in Section 4.

Hedgehogs:

- ◆ Hedgehogs have been recorded within the local area and the site provides foraging and sheltering opportunities for hedgehogs. It is considered likely that hedgehogs utilise the site; a mitigation strategy is provided in Section 4.

Ecological enhancements:

- ◆ To ensure the proposed development is compliant with the National Planning Policy Framework (NPPF) and The Wiltshire Core Strategy, ecological enhancements will be provided and are detailed in Section 4.

1. Introduction

- 1.1 ABR Ecology Ltd were commissioned by Toby Helme and Elle Leonsis to produce an Ecological Assessment to support a planning application to demolish the existing property and erect a replacement property at Highlands House, Collingbourne Ducis, Marlborough, SN8 3EG (central grid reference: SU 26491 54537).
- 1.2 This assessment is informed by a Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) conducted on the 10th July 2024 by Natural England class 2 licensed bat ecologist Phil Smith ACIEEM and graduate ecologist Jordan Elliott-Murray. Bat activity surveys were conducted on the 26th July 2024, 29th August 2024 and 24th September 2024.
- 1.3 An existing location plan is provided in Appendix A and proposed plans in Appendix B.

Site Context

- 1.4 The site comprises a residential property situated within the rural area of Collingbourne Ducis, Wiltshire. The property is directly surrounded by an equestrian centre, arable land and woodland. The wider surrounding landscape comprises woodland and arable land and pasture. The immediate and surrounding landscapes are considered to provide good habitats for wildlife.

Purposes and aims of this assessment

- 1.5 This assessment primarily aims to determine the biodiversity value of the site and looks to identify the presence/likely absence of protected and vulnerable species onsite. Bat activity (dusk) surveys were conducted to supplement the PRA survey and to determine the presence/likely absence of bats within the buildings.
- 1.6 The results of the PRA, activity (dusk) surveys and the data search were principally aimed at determining if a bat roost is present within the property and/or whether the buildings/structures hold the 'potential' to support roosting bats in line with The BCT Good Practice Guidelines 4th ed (Collins, 2023). This report is based on the results of the PEA, PRA, activity (dusk) surveys and records of bats and bat roosts as supplied by Wiltshire and Swindon Biological Records Centre (WSBRC, 2024).
- 1.7 This report aims to establish whether the proposed works will likely impact roosting bats; the report also aims to identify if there is a requirement for a bat European Protected Species (EPS) licence or Bat Mitigation Class Licence

(BMCL) from Natural England to allow the works to proceed lawfully following planning approval.

Relevant planning policy and legislation

- 1.8 Full details of relevant planning policy and legislation are provided in Appendix C of this report; the following policy and legislation in respect of biodiversity is applicable to this application:

- ◆ *Annex II and IV of the EC Habitats and Species Directive 1992*
- ◆ *The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019*
- ◆ *The National Planning Policy Framework (NPPF) 2024 – Section 15*
- ◆ *The Natural Environment and Rural Communities (NERC) Act 2006 – Sections 40 and 41*
- ◆ *The Wildlife and Countryside Act 1981 (as amended) – Section 1 and Schedules 5 and 9*
- ◆ *The Wiltshire Core Strategy (2015) - Core Policy 50 ‘Biodiversity and geodiversity’*

- 1.9 **It is the responsibility of the applicant(s) to ensure that the proposed development proceeds in full compliance with legislation, national and local policy, and in accordance with all conditions of the obtained planning consent(s). It is also the responsibility of the applicant(s) to request a report amendment / reassessment of the site where the scale/nature of the proposed plans subsequently change.**

2. Methodology

Desktop data search

- 2.1 Internationally protected sites including Ramsars, Special Protection Areas (SPAs), Special Areas of Conservation (SACs) were identified within a 7.5 kilometre (km) radius and nationally designated sites including Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs) and Local Nature Reserves (LNRs) were identified within a 2km radius of the site using the Multi-Agency Geographical Information for the Countryside website (MAGIC) (2024).
- 2.2 Wiltshire & Swindon Biological Records Centre (WSBRC, 2024) were contacted to provide records of any protected, vulnerable and notable species and any locally designated sites such as Local Wildlife Sites within a 2km radius of the application site.
- 2.3 A search was also conducted on the MAGIC website (MAGIC, 2024) to identify the presence of nearby priority habitats, European Protected Species (EPS) licences and known great crested newt breeding ponds.
- 2.4 'Core Statutory Networks' and 'Non-core Statutory Networks' have been identified by WSBRC (WSBRC, 2024) on or adjacent to the site.
- 2.5 This information was used to evaluate the potential of the site for protected and vulnerable species, and to determine whether there is potential for development impacts on these species, surrounding habitats and protected sites.

Botanical survey (UKHab)

- 2.6 A botanical survey of the site was conducted on 10th July 2024 by experienced botanist Phil Smith ACIEEM assisted by seasonal ecologist Jordan Elliott-Murray.
- 2.7 The survey involved a detailed flora survey of habitats, and each flora species was allocated an abundance in accordance with the DAFOR scale, using local (L) as a pre-fix where a species was restricted in distribution across the habitat:

D – Dominant
A – Abundant
F – Frequent
O – Occasional
R – Rare

- 2.8 Habitats on site were classified and coded in accordance with the UKHab Classification System, using the Habitat Definitions Version 2.0 document (UKHab Ltd, 2023). Other features of ecological interest were identified using ‘target notes’.

Protected species assessment

Badgers

- 2.9 A walkover was conducted during the site visit looking for potential evidence of badgers (*Meles meles*). Evidence of badgers can include the presence of setts (underground burrows), ‘snuffle marks’ (nose marks and scratches from badger foraging within the earth), latrines (territorial marking sites), scats, hair, footprints and well-worn paths.

Bats

- 2.10 Natural England class 2 licensed bat ecologist Phil Smith and graduate ecologist Jordan Elliott-Murray undertook the PRA on the buildings. Conditions for the PRA survey are provided in Table 1 below:

Table 1: Weather conditions, equipment and timings for PRA survey

Survey date	Time of survey	Surveyor(s)	Equipment available for use	Weather conditions		
10/07/2024	11:00am	Phil Smith ACIEEM and Jordan Elliott-Murray	High-powered torch, mirrors, sealable bags, FFP3 face masks, gloves, extendable ladder, endoscope, binoculars	Temp:	Oktas cloud cover:	Beaufort wind force:
				17°C	8/8	1/12

- 2.11 The surveying ecologists have received training in Working at Heights (and in-house training in the use of ladders for PRA surveys), Manual Handling, and Emergency First Aid at Work to ensure compliance with Health and Safety legislation (The Work at Height Regulations 2005, Manual Handling Operations Regulations 1992, The Health and Safety (First-Aid) Regulations 1981).
- 2.12 The PRA was undertaken in accordance with The Bat Conservation Trust (BCT) Good Practice Guidelines 4th edition (Collins, 2023). A systematic search was made of any internal building areas / loft spaces and exterior building areas. Where present, information was compiled on the potential and actual bat entry/exit points (where possible); potential and actual bat roosting locations; and any evidence of bats found.

- 2.13 The internal inspection involved a search of internal building areas and where loft spaces were present, the ecologists undertook a search of areas such as beams/felt; fibreglass insulation/flooring; crawl boards; water tanks; internal chimney stacks; gable ends; and stored materials etc.
- 2.14 The external building assessment included an inspection of the ground/flooring, and where present, any windowsills, windowpanes, behind peeling paintwork/lifted render, brick/block work, chimneys, eaves, lead flashing, tiles and soffits etc.
- 2.15 Evidence of roosting bats include:
- ◆ The presence of physical live/deceased bats
 - ◆ Bat droppings (distinguished from rat/mouse droppings by their crumbly texture)
 - ◆ Fur-oil staining around entry/exit points
 - ◆ Urine splashing
 - ◆ Feeding remains, such as insect wings and casings
- 2.16 The building was identified as a ‘confirmed’ bat roost if evidence of roosting bats was recorded. If bat droppings were present, a sample of droppings were collected and couriered to Swift Ecology Ltd for DNA analysis to confirm the species of bat present.
- 2.17 Most native bats in the UK are crevice-dwelling species, with bats roosting in remote areas, such as between tiles and membrane, behind cladding, at wall tops, in cavities, soffits and behind lead flashing, to name a few examples. Evidence of these species is often concealed and/or inaccessible due to the remote nature of the roost. Therefore, where no evidence of roosting bats was recorded, an assessment on the availability of potential roosting areas and bat access points around the buildings as well as the quality/availability of surrounding bat habitat, was conducted. The buildings were then assigned a category based on a sliding scale of ‘none’ to ‘high potential’, in accordance with the BCT Guidelines (Collins, 2023) as shown in Table 2 below:

Table 2: Guidelines for assessing the potential suitability of buildings for bats (Collins, 2023)

Bat roosting potential	Description
‘High’	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis & potentially for longer periods of time due to their size, shelter, protection, conditions (temperature, humidity, height above ground level, adverse light levels, or high levels of disturbance), and

	surrounding habitat. The structure has the potential to support high conservation status roosts for example maternity or classic cool/stable hibernation sites.
‘Moderate’	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions (temperature, humidity, height above ground level, adverse light levels, or high levels of disturbance), and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity & hibernation and this is made irrespective of species conservation status, which is established after presence if confirmed via the PRA).
‘Low’	The building features one or more potential roosting features that could be used by bats opportunistically at any time of year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions (temperature, humidity, height above ground level, adverse light levels, or high levels of disturbance) and/or suitable surrounding habitat to be used on a regular basis or by a larger number of bats.
‘Negligible’	There are no obvious habitat features likely to be used by bats, however there is a small element of uncertainty as bats can use small and apparently unsuitable features on occasion. (*negligible is defined as ‘so small or unimportant as to be not worth considering, insignificant’. This category may be used where there are places that a bat could roost or forage (due to one attribute) but it is unlikely that they actually would (due to another attribute).
‘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).

Ground level tree assessment (GLTA) – roosting bats in trees

- 2.18 A ground level tree assessment (GLTA) was conducted to identify Potential Roosting Features (PRFs) in any trees onsite. The GLTA involved a detailed inspection of the exterior of the tree from the ground to look for features that bats could use for roosting. Trees with identified PRFS were categorized in accordance with the following guidelines (Collins, 2023) (Table 3 below):

Table 3: Types of Potential Roosting Features (PRFs) (Collins, 2023)

Suitability	Description
PRF-I	PRF is only suitable for individual bats either due to size or lack of suitable surrounding habitats.

PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony.
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- 2.19 The inspection was carried out systematically and consistently around all parts of each tree (from all angles and close to the trunk and further away). PRFs that can be exploited by bats are presented in Table 4 below:

Table 4: Examples of PRFs within trees

PRFs formed by disease and decay	PRFs formed by damage	PRFs formed by association
Woodpecker holes	Lightning strikes	Fluting Ivy
Squirrel holes	Hazard beams	
Knot holes	Subsidence cracks	
Pruning cuts	Shearing cracks	
Tear outs	Transverse snaps	
Wounds	Welds	
Cankers	Lifting bark	
Compression	Desiccation	
Forks	Fissures	
Butt rots	Frost cracks	

Bat activity surveys

- 2.20 Licensed bat ecologist Russell Hoyle ACIEEM, assistant ecologists James Gooding, Peter Allen and Georgia Linter, graduate ecologists Chloë Whittaker, Jordan Elliott-Murray and Emily Parsons and seasonal surveyors Celia Konieczna, Sam Jones and Adam Wheeler undertook the bat activity (dusk) surveys of the building on-site. Conditions for the dusk surveys are provided in the full results in Appendix E of this report.
- 2.21 The activity surveys were conducted in accordance with The BCT Good Survey Practice Guidelines (Collins, 2023) and the Interim Guidance Note: Use of night vision aids for bat emergence surveys and further comment on dawn surveys (Bat Conservation Trust, 2022).
- 2.22 The surveys involved a direct observation of the external building to identify any bats exiting from their roosts. The ecologists used automated bat detectors and a Night Vision Aid (NVA) (five Nightfox Whiskers) to identify any later emerging species and to identify bats where vision was limited (for example, roofs under the cover of tree canopies). A screenshot of the 'darkest point' of the surveys captured using the NVA is provided in Appendix E.
- 2.23 Where present, information was compiled on the species, numbers, access points, roosting locations and flight paths. Information was also obtained on

general activity on site such as foraging and commuting bats crossing the property.

- 2.24 The dusk surveys commenced 15 minutes before sunset and finished between 1.5-2hrs after sunset. The survey was conducted when the temperature was 10°C with no strong winds or precipitation.
- 2.25 Following the dusk surveys, the footage from the NVAs was reviewed by an analyst using a motion detection software. Bat calls were analysed using Kaleidoscope Pro Analysis Software.

Dormice

- 2.26 An assessment was conducted to evaluate the suitability of the habitats on site for the dormouse (*Muscardinus avellanarius*), a small, nocturnal mammal which occupies habitats such as hedgerows, scrub, woodland and treelines. The dormouse requires good habitat connectivity and suitable food resources providing fruit, nuts, nectar and/or insects throughout the year.

Great crested newts (GCN)

- 2.27 The habitats on site were assessed for their potential to support the great crested newt (*Triturus cristatus*) (GCN). GCN occupy both aquatic and terrestrial habitats, spending most of their life cycle on land and a short period of the year for breeding and egg-laying. Suitable terrestrial habitats can include grassland, woodland, hedgerows, scrub, and tall herb communities; and suitable overwintering (hibernation) sites can include piles of materials such as rubble/logs and at the base of buildings/stone walls.
- 2.28 GCN are known to travel up to 500 metres (m) from their breeding sites; for this reason, an aerial assessment was made prior to the site visit to determine if any waterbodies were present onsite and around the site (offsite). Any accessible waterbodies were assessed under the Habitat Suitability Index (HSI) (Oldham et al, 2000, 2008) to determine the suitability of the waterbody to support great crested newts.

Nesting birds

- 2.29 A search was conducted for evidence of nesting birds within and around the vegetation during the site visit. Evidence of nesting birds can include the physical presence of chicks and/or adult birds, nesting material, eggs and/or egg casings, feathers, and white splashing (droppings).

Reptiles and common amphibians

- 2.30 An appraisal of the habitats on site was conducted to evaluate their suitability for common British reptiles, such as slow worm (*Anguis fragilis*), common

lizard (*Zootoca vivipara*), grass snake (*Natrix natrix*) and adder (*Vipera berus*), and common amphibians such as common frog (*Rana temporaria*).

- 2.31 Suitable habitats for reptiles and amphibians include those with a varied structure, offering a range of niches for basking and foraging. Typical habitats include rough and unmanaged grassland with shorter margins, heathland, woodland, scrub and ruderal vegetation. Potential overwintering (hibernation) sites can include piles of materials such as rubble/logs, rockeries and at the base of buildings/stone walls.

Survey limitations and data lifespan

PEA and PRA survey

- 2.32 An aerial search for waterbodies is constrained by the accuracy of OS maps. Several websites were accessed to minimize the chances of missing waterbodies, however, garden ponds within residential properties are not often mapped and it is possible that waterbodies have been missed as part of this assessment.
- 2.33 A ground-based tree survey looking for evidence of bats can be constrained by canopy cover and by the angle of the viewer. Where a tree meets a certain age and size, this is considered to increase the probability of bat roosts in trees due to declining tree health and the likelihood of disease/rot offering cavities for bats.
- 2.34 The site visit provides a ‘snapshot’ of the site and does not take into account seasonal variation. Species may have been overlooked due to the constraints of the season and time in which the survey was undertaken. A lack of evidence of a species does not confirm its absence from site, rather there was no indication of its presence at the time of survey.
- 2.35 Bats are highly mobile species, and it is therefore possible for bats to occupy the property at any time in the future, particularly if any alterations/changes occur to the property. The PRA only provides a ‘snapshot’ in time and does not account for seasonal variation; bats may have been overlooked due to seasonal constraints. As such, it is not possible to have complete certainty that bats are not present, rather, there was no indication of bat/nesting bird presence at the time of survey.
- 2.36 Potential evidence of bats, in particular crevice-dwelling species, may have been overlooked due to access restrictions to remote areas of the buildings. Binoculars were used to help identify any potential bat droppings on the exterior features of the buildings.

- 2.37 Often bats leave no visible sign of their presence on the outside of a building, and even when they do, wet weather can wash evidence away.

Bat activity surveys

- 2.38 Some bat species, particularly long-eared bats (*Plecotus sp.*) and myotis (*Myotis sp.*), emerge later in the evening when light levels are low, making it difficult to identify bats which have emerged from the building. To overcome this constraint, the survey was supplemented by Night Vision Aids (NVAs) which can identify bats emerging from their roost during darkness.
- 2.39 Environmental conditions can affect bat activity, including temperature, humidity, wind speed and precipitation. The effect of weather conditions on active bats is likely to be different for different species in different situations (e.g. open versus sheltered habitats), for example, pipistrelle (*Pipistrellus sp.*) bats are more resilient to changes in ambient temperature.
- 2.40 In the absence of bats emerging, the ecologists have used their best judgement to determine the roost type by ruling out the types of roosts which are not present. This includes assessments such as ruling out feeding roosts due to the lack of feeding evidence, determining that a maternity roost is not present due to a lack of bat evidence or ruling out hibernation roosts based upon the internal temperature/humidity.

Reporting and survey data lifespan

- 2.41 The data within this report should not be seen as comprehensive. Data obtained from the data search (WSBRC, 2024) is unlikely to provide a complete record of species within the search area. It is possible that a species may occur within the vicinity of the site that has not been identified within the data search.
- 2.42 Survey data is considered valid for 12-18 months from the survey date in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Advice note (CIEEM, 2019) due to the presence of and/or potential for mobile species to be present within the site; and is only intended for the proposals outlined within this report. If any material changes to the site occur and/or if the nature and/or extent of the proposed development changes, an update visit(s) to reassess the site will be required, and any conclusions provided herein may not be relied upon.
- 2.43 **The applicant must note that the survey data has a limited lifespan for the EPS licence application. The EPS licence application must be informed by a PRA within 3 months of the licence application date, and activity survey data must be obtained from the then 'current' bat survey season (May to**

August) in which the licence is applied for. For example, activity surveys are conducted, and planning is approved in August and the EPS licence is applied for in July the following year, a minimum of one update dusk survey would be required in the months of May-June in the same year prior to the EPS licence application in July.

3. Results

Desktop data search

Internationally, nationally and regionally protected (statutory) sites

- 3.1 MAGIC (MAGIC, 2024) was used to identify any international statutory sites located within 7.5km of the application site and national/local sites within 2km of the site. Results are presented in Table 5 below:

Table 5: International/national/local sites with 7.5km / 2km of the application site

Site name	Distance from site	Designation	Area (ha)	Site description
North Wessex Downs	Onsite	National Landscape	173105	Largest tracts of chalk downland in southern England and one of the least affected by development. It includes the bright, bare uplands of the Marlborough, Berkshire and North Hampshire Downs and sweeps on its western edge to a crest above the White Horse Vale.
Salisbury Plain	4.4km southwest	SAC	21460.88	Designated for Annex I habitats <i>Juniperus communis</i> formations on heaths or calcareous grasslands and semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites) and Annex II species Marsh fritillary butterfly <i>Euphydryas</i> (<i>Eurodryas</i> , <i>Hypodryas</i>) <i>aurinia</i> .
Salisbury Plain	4.4km southwest	SPA	19714.54	During the breeding season the SPA regularly supports at least 14.5% of the stone-curlew western European population, 20% of the British quail population, 1.2% of British hobby population and over winter the SPA regularly supports 0.7% of the British hen harrier population.

Impacts on statutory sites

The Salisbury Plain SAC/SPA – recreational pressures

- 3.2 As the site is planned to remain for a single dwelling, as plans are for no increase of residential dwellings on-site, it is anticipated that no impacts upon the Salisbury Plain SPA will occur.
- 3.3 No impacts on statutory sites are anticipated as part of the works and therefore no further action is recommended in relation to statutory sites.

Locally designated (non-statutory) sites

- 3.4 WSBRC (WSBRC, 2024) was consulted to identify any non-statutory sites within 2km of the application site; and the results of which are provided in Table 6 below:

Table 6: Non-statutory sites within 2km of the application site

Site name	Distance from site	Designation	Area (ha)	Site description
Rag Copse	480m northeast	Local Wildlife Site (LWS)	36.73	A beech plantation on an ancient woodland site, north of Collingbourne Forest, with mixed broadleaved shrubs and trees retained around the outside edge.
Collingbourne Wood	565m east	LWS	211.39	Part of the Collingbourne Forest ancient woodland site, the wood consists of compartments of beech, pine and fir plantations divided by tracks and rides, with mixed broadleaved shrubs and trees retained around its outer boundary.
Brokenway Copse	605m north	LWS	7.66	A small area of ancient semi-natural, managed woodland.
Hanging Copse	1.3km east	LWS	4.83	Semi-natural broadleaved woodland which is believed to be at least in part ancient. Coppice-with standards in the south while the north may be secondary woodland on old lynchets.
Gammon's Copse	1.5km east	LWS	1.65	A small stand of ancient semi-natural broadleaved woodland.
Heath Copse	1.7km northeast	LWS	4.51	Ancient semi-natural broadleaved woodland partially replanted following wind-throw.
Chantry Copse	1.8km east	LWS	7.73	Ancient semi-natural broadleaved woodland on a gently sloping, west-facing chalk site.
Cockshord, Great Wickheath, Sawpit and Oxdown Copses	1.8km southeast	LWS	63.39	Beech and hornbeam plantation on an ancient woodland site with fairly narrow rides and damp in places.
Oxhanger Wood	1.8km east	LWS	4.13	A small, ancient semi natural broadleaved

				woodland site on a fairly steep west-facing chalk slope.
Tanner's Copse	1.8km northeast	LWS	4.02	Ash, field maple and oak standards with hazel coppice.
Heaven Corner/Heron's Copse	1.9km south	LWS	62.50	Ancient woodland site - part of the larger Collingbourne Forest. Largely plantation beech, fir and spruce, occasional pine.

Impacts on non-statutory sites

- 3.5 No impacts on non-statutory sites are anticipated as part of the works and therefore no further action is recommended in relation to statutory sites.

Priority habitats

- 3.6 The closest habitat of principal importance identified on an aerial search of the site is 'Deciduous Woodland' situated approximately 12m from the eastern boundary of the site (MAGIC, 2024). A Construction Environmental Management Plan (CEMP) will be required to ensure protection of this woodland from works; details are provided in Section 4.
- 3.7 Further discussion is provided under 'Botanical survey (UKHab)' below regarding on-site priority habitats.

Ecological Networks

- 3.8 No 'Core Statutory Networks' or 'Non-core Statutory Networks' were identified on site (WSBRC, 2024).

Protected, rare and vulnerable species

- 3.9 WSBRC (WSBRC, 2024) were consulted to provide any records of protected/vulnerable species of interest as presented in Table 7 below:

Table 7: Protected and vulnerable species within 2km of the site

Common name	Latin name	Number of records	Latest record	Nearest record to site
Bats				
Brown long-eared bat	<i>Plecotus auritus</i>	2	2011	665m southwest
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	1	2011	665m southwest
Myotis sp.	<i>Myotis</i> sp.	2	2015	230m west
Noctule	<i>Nyctalus noctula</i>	2	2015	230m west
Pipistrelle sp.	<i>Pipistrellus</i> sp.	2	2015	660m southwest
Birds				
Barn owl	<i>Tyto alba</i>	2	2022	Within 2km
Brambling	<i>Fringilla montifringilla</i>	1	2021	1540m southeast

Cuckoo	<i>Cuculus canorus</i>	1	2019	1540m southeast
Curlew	<i>Numenius arquata</i>	1	2009	1730m south
Fieldfare	<i>Turdus pilaris</i>	2	2008	1560m east
Firecrest	<i>Regulus ignicapilla</i>	3	2021	1540m southeast
Grey partridge	<i>Perdix perdix</i>	1	2021	Within 2km
Hobby	<i>Falco subbuteo</i>	2	2021	1730m southeast
House sparrow	<i>Passer domesticus</i>	5	2021	1730m southeast
Peregrine	<i>Falco peregrinus</i>	1	2021	Within 2km
Quail	<i>Coturnix coturnix</i>	2	2021	Within 2km
Red kite	<i>Milvus milvus</i>	13	2021	1730m southeast
Skylark	<i>Alauda arvensis</i>	7	2021	1155m northwest
Spotted flycatcher	<i>Muscicapa striata</i>	1	2021	1730m southeast
Stone-curlew	<i>Burhinus oedicephalus</i>	1	2019	Within 2km
Yellowhammer	<i>Emberiza citrinella</i>	4	2021	1730m southeast
Flora				
Bluebell	<i>Hyacinthoides non-scripta</i>	24	2018	670m southeast
Invertebrates				
Black oil-beetle	<i>Meloe proscarabaeus</i>	2	2022	Within 2km
Blood-vein	<i>Timandra comae</i>	1	2022	1980m southwest
Brown hairstreak	<i>Thecla betulae</i>	5	2014	660m southwest
Cinnabar	<i>Tyria jacobaeae</i>	1	2004	925m northeast
Dingy skipper	<i>Erynnis tages</i>	1	2006	Within 2km
Small emerald	<i>Hemistola chrysoprasaria</i>	1	2005	Within 2km
Small heath	<i>Coenonympha pamphilus</i>	2	2006	1560m southeast
White admiral	<i>Limenitis camilla</i>	4	2018	1165m south
Other mammals				
Brown hare	<i>Lepus europaeus</i>	2	2013	1150m northwest
Eurasian badger	<i>Meles meles</i>	4	2013	1155m northwest
Hazel dormouse	<i>Muscardinus avellanarius</i>	3	2020	1845m south
West European hedgehog	<i>Erinaceus europaeus</i>	6	2020	1685m southwest

3.10 The above records will be used to inform the assessment of the site and to inform the enhancement potential of the site for protected species.

Botanical survey (UKHab)

Habitats recorded on site

- 3.11 The following habitats were recorded within the site (a habitat map with full species lists for each habitat are provided in Appendix D and photographs provided in Appendix E of this report) (Table 8 below):

Table 8: Habitats recorded on-site

Habitat	UKHab primary code	Description and UKHAB secondary code(s)	Location within site
<i>Other neutral grassland</i>	g3c	Lawns associated with the house.	Across the site.
<i>Developed land; sealed surface</i>	u1b6	Areas of patio at the rear of the house.	Centre of the site.
<i>Introduced shrub</i>	u1	Areas of ornamental planting around the house and within the garden (847).	In the centre and the southwest.
<i>Artificial unvegetated; unsealed surface</i>	u1c	A gravel driveway forming the entrance to the site.	In the northwest.
<i>Other broadleaved woodland</i>	w1g	An area of broadleaved woodland is present along the western boundary of the site.	Western boundary.
<i>Scattered trees</i>	u1	Three hawthorn trees (<i>Crataegus monogyna</i>) are present on-site (32).	Across the site.
<i>Line of trees</i>	w	A line of common lime trees (<i>Tilia × europaea</i>) forms the northern boundary of the site (33).	Northern boundary.
<i>Species rich native hedgerows</i>	h2a5	Two native species-rich hedgerows are present on-site. Hawthorn is the dominant species in both hedges.	In the south and east.
<i>Buildings (B1, B2, B3)</i>	u1b5	A two-storey house (818) is present at the centre of the site and two wooden sheds are present in the northwest and east, respectively.	Across the site.

- 3.12 A grass pile (Appendix D – Target note 1) was recorded within the other neutral grassland in the south of the site.

Protected species assessment

Badgers

- 3.13 No evidence to suggest badgers are present on-site was noted; the nearest known badger record is located over 1km away from the site (WSBRC, 2024).
- 3.14 Despite no evidence of badger being recorded on-site, the site is in a rural location with surrounding areas of woodland and pasture which provide highly suitable habitat for this species. Therefore, the CEMP must address the potential for badgers; further details are provided in Section 4.

Bats

Preliminary Roost Appraisal (PRA)

Buildings

3.15 Descriptions of the buildings surveyed for roosting bats with their respective roosting potential / status are provided in Table 9 below and photographs of the buildings are provided in Appendix E:

Table 9: Building descriptions

Building	Description	
House (B1)	• The detached house constructed from brick elevations. • An annexe is present on the eastern elevation. • Wooden cladding is present on the front and rear dormers, the dormers also have pitched clay tiled roofs. • The roof is pitched and hipped and constructed of clay roof and ridge tiles. • Two internal chimneys with lead flashing are present. • Wooden fascias and barge boards are present. • Wooden and uPVC window and door frames are present. • A porch is present on the front elevation with a hipped, clay tile roof. • A clay tiled balcony is present on the first floor southern elevation. • One enclosed rectangular void is present in the west of the building: - The void measures approximately 13.3m in length, 7m in width and 3m in height to the apex. - The loft is lined with breathable membrane. - The roof is constructed of a full truss and 2 partial floating ridge beams. - Fibreglass insulation is present, and the void is partially boarded. - Cobwebs are present. - A water tank is present.	
	Potential access points:	Potential roosting areas:
	- Gaps at the lead flashing. - Gaps at the fascias on the west elevation. - Lifted tiles across the roof.	- Crevices between roof tiles and roof membrane. - Crevices behind or beneath the wooden fascia. - Hanging from internal structures e.g. ridge beam. - Under the lead flashing.
	Evidence of bats recorded (Appendix F for map):	
	- Approximately 1 pint of long-eared bat species (<i>Plecotus</i>) droppings were recorded in a pile under the west gable. - Approximately 200-300 long-eared bat species droppings were piled in the southwest of the loft. - Approximately 300 long-eared bat species droppings were scattered throughout the loft void.	
	DNA analysis of dropping sample (as tested by Swift Ecology Ltd):	
	- Confirmed as brown long-eared bats.	
	Roost status / potential of the building for bats:	
	'Confirmed roost' for brown long-eared bats	
	Wooden shed (B2)	• A shed with wooden elevations and a pitched, bitumen felt roof is present in the east of the site.

	Potential access points:	Potential roosting areas:
	- A broken roof is present.	- No crevices or suitable roosting provisions were noted within the sheds.
	Evidence of bats recorded:	
	- No evidence of roosting bats such as droppings, staining or feeding remains were identified.	
	DNA analysis of dropping sample (as tested by Swift Ecology Ltd):	
	- N/A	
	Roost status / potential of the building for bats:	
	'Negligible potential' for roosting bats	
Wooden shed (B3)	• Ashed with wooden elevations and a pitched, corrugated metal roof is present in the northwest of the site.	
	Potential access points:	Potential roosting areas:
	- Open doorways.	- No crevices or suitable roosting provisions were noted within the sheds.
	Evidence of bats recorded:	
	- No evidence of roosting bats such as droppings, staining or feeding remains were identified.	
	DNA analysis of dropping sample (as tested by Swift Ecology Ltd):	
	- N/A	
	Roost status / potential of the building for bats:	
		'Negligible potential' for roosting bats

3.16 During the PRA, the house (B1) was identified to support a **'confirmed roost'** for brown long-eared bats due to the presence of bat droppings within the loft void. Following current national guidance, a suite of three bat activity surveys were conducted on the house and the results of which are presented under 'Bat activity surveys' below.

3.17 The remaining buildings (B2 and B3) were considered to hold **'negligible potential'** for roosting bats, and no further action is recommended in relation to roosting bats and these buildings.

Trees

3.18 The trees on-site were assessed for their potential to support roosting bats; all trees were considered to hold negligible potential for roosting bats due to a lack of Potential Roost Features (PRFs) and/or due to their smaller size. Therefore, no further action is recommended in relation to roosting bats and trees.

Bat activity surveys

3.19 A suite of three bat activity surveys were undertaken in July/August/September 2024 upon the house (B1) in line with The BCT Good Survey Practice Guidelines (Collins, 2023). Full results of the surveys are supplied in Appendix G with surveyor and bat roost locations in Appendix H; a summary of the results are provided in Table 10 below:

Table 10: Summary of results from the dusk surveys

Survey date	Emergences/re-entries	General bat activity
26/07/2024	- A total of two common pipistrelle bats were recorded exiting from the apex of the eastern gable at 21:04 and 21:14. - One common pipistrelle was recorded exiting from the northwest gable ridge at 21:21. - One common pipistrelle was recorded exiting from the main ridge of the house at 21:21.	- The following species were recorded generally commuting and foraging across the site during the survey: - Common pipistrelle - Noctule - Long-eared bat sp. - Barbastelle (<i>Barbastella barbastellus</i>)
29/08/2024	No bats were recorded entering or exiting the house during the survey.	- The following species were recorded generally commuting and foraging across the site during the survey: - Common pipistrelle - Serotine (<i>Eptesicus serotinus</i>) - Myotis bat sp. - Long-eared bat sp.
24/09/2024	A serotine bat was recorded exiting from the eastern gable apex at 19:22.	- The following species were recorded generally commuting and foraging across the site during the survey: - Common pipistrelle - Serotine - Long-eared bat

Discussion and bat impact assessment

3.20 Five bat roosts were identified within the property, the roosts have been classified in accordance with the CIEEM Bat Mitigation Guidelines (Reason, P.F and Wray, S, 2023) as shown in Table 11 below and roost locations are provided in Appendix F:

Table 11: Impact assessment of the works on the onsite bat roosts

Roost no	Info	Species	Roost type	Location of access point/roost	Importance of roost	Impact
Roost 1		Brown long-eared bat	Day roost (assumed)	Droppings in the loft / access point unknown.	Site	Destruction/loss
Roost 2		Common pipistrelle	Day roost	The apex of the eastern gable.	Site	Destruction/loss
Roost 3		Common pipistrelle	Day roost	The northwest gable ridge.	Site	Destruction/loss
Roost 4		Common pipistrelle	Day roost	Under the main ridge of the house.	Site	Destruction/loss

Roost 5	Serotine	Day roost	Likely within the loft void / at the wall top / accessed from the apex of the eastern gable.	Site	Destruction/loss
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- 3.21 The roosts were identified as day roosts as the survey data does not indicate the presence of a maternity roost, satellite roost or feeding perch.
- 3.22 The building holds some limited hibernation potential in the form of external crevices between tiles and felt, however following the BCT Guidelines (Collins, 2023) rationale for undertaking an assessment of roosting potential for winter bats, the building does not support traditional hibernation features such as underground sites/tunnels/basements and so this site has been treated as holding low potential to support hibernating bats and no further works are required in relation to this.
- 3.23 The proposals will impact upon day roosts for brown long-eared bats, common pipistrelle and serotine. Following the ‘Minimum Expectations for Bat Mitigation, Compensation, Monitoring and Management’ document (Natural England, 2023), where more than three species and/or more than three roosts are present, or where more than small numbers of bats will be impacted; the provision of at least one feature, suitable for the species concerned (e.g., bat box/tile/brick/crevice) per roost and species to be impacted is considered appropriate.
- 3.24 Additionally for the presence of the serotine, a rarer/restricted species, like-for-like roost provision preferred however failing that, new building roost of the same qualitative value (i.e. it can be of a different size provided that it provides the same quality in terms of access, temperature, humidity etc). Bat boxes will not be suitable measures for this species.
- 3.25 **As the works will impact the identified bat roost, a bat European Protected Species (EPS) mitigation licence from Natural England will be required following planning approval and prior to any works commencing. An EPS licence is required to ensure the works are lawful and can only be obtained following approval of all consent(s).**

Artificial Lighting at Night (ALAN)

- 3.26 The development is also anticipated to result in a change to Artificial Lighting At Night (ALAN) through internal light spill and external light fixtures.

- 3.27 Illuminating a bat roost can cause disturbance and this may result in the bats abandoning the roost or even becoming entombed within it (BCT & ILP, 2023). Lighting is therefore considered an obstruction under the legislation protecting bats and their roosts. ALAN is consequently a key consideration and must be controlled to minimise impacts on bats that are roosting within the buildings on-site.
- 3.28 A number of commuting and foraging bats were also recorded across the general property and within the gardens, with light-sensitive species including the rare barbastelle bat, long-eared and myotis bats. Bats are very sensitive to artificial lighting, which can impede their ability to successfully forage and can alter flightpaths (BCT & ILP, 2023). As bats are using the property during nocturnal hours, it is also essential that new lighting is designed to minimise impacts on foraging bats, particularly around areas with mature vegetation such as trees and hedges. Light spill can extend beyond the site boundary and may therefore also impact bats using neighbouring land.
- 3.29 A bat mitigation, compensation and lighting plan and details of the EPS bat licensing process are detailed in Section 4 of this report.

Dormice

- 3.30 The closest known record for dormice within the local area is approximately 1.8km south of the site (WSBRC, 2024) and the closest European Protected Species (EPS) licence for dormice is located approximately 14.3km southeast of the site (MAGIC, 2024).
- 3.31 The hedgerows on-site provide some suitable habitat for this species; and whilst there are no known records, there is a significant area of woodland to the east of the site with connectivity to the site. The hedgerows on-site are considered to possess a low likelihood of dormice, and some areas of hedging will require removal to facilitate the reconfigured new dwelling. Therefore, a method statement for hedgerow removal with replacement hedgerow planting is detailed in Section 4; the remaining hedgerows will be protected throughout works as will be detailed in the approved CEMP for the site.

Great crested newts (GCN)

- 3.32 No waterbodies are present on-site, and an aerial assessment revealed no waterbodies within 250m of the site (MAGIC, 2024). There are no known records for GCN within the local area (WSBRC, 2024) and the nearest known positive GCN licence return is approximately 5.5km south of the site (MAGIC, 2024).

- 3.33 The site also falls within a 'Green Risk Zone' for GCN (Natural England, 2025) indicating that there is a low probability of GCN being present within the area. Therefore, GCN are not considered likely to be present on-site and this species is not discussed further in this assessment.

Nesting birds

- 3.34 Bird nests were present at the southern eaves and under the fascias on the west elevation of the house (B1) and an old nest was found within B3; there is also potential for nesting birds to be present within the hedgerows, trees and introduced shrub on-site. Therefore, a mitigation strategy for nesting birds is detailed in Section 4.

Reptiles and common amphibians

- 3.35 The site features some suitable fringe habitats for reptiles including long grass fringes and a grass pile on-site (see target note 1 – Appendix D). There are no records for reptiles and/or common amphibians within 2km of the site (WSBRC, 2024), however, there is suitable vegetation cover and complexity, and the site connects to surrounding habitats, allowing connectivity for the movement of reptiles.
- 3.36 The majority of suitable reptile habitat will be retained; however, the working area will require clearance to facilitate the works, and some hedging will require removal. The remaining habitats will be retained and protected from construction/demolition activities. A works method statement is detailed in Section 5 and the CEMP for the site will ensure protection of retained habitats surrounding the works area.

Other species - hedgehogs

- 3.37 There are six records for hedgehog within the local area (WSBRC, 2024). It is considered likely that hedgehogs use the site for foraging and commuting purposes. It is therefore considered possible that hedgehogs will be adversely impacted in the short-term by the proposed development, including through entrapment in trenches/excavations, and in the long-term through loss of foraging opportunities and access into the site, if unmitigated for. Therefore, to ensure the long-term viability of the local hedgehog population, a mitigation and compensation strategy will be implemented. Further details are provided in Section 4.

4. Biodiversity mitigation and enhancement plan

Construction Environmental Management Plan (CEMP)

- 4.1 The site is situated within an ecologically sensitive location, with known habitats for bats and nesting birds, and potential habitats for reptiles, dormice, badgers and hedgehogs on-site. The hedgerows on-site are native and species-rich and therefore qualify as priority habitat under Section 41 of the NERC Act 2006; the woodland to the east and other areas of woodland surrounding the site are also priority habitats and likely to support a range of species.
- 4.2 A Construction Environmental Management Plan (CEMP) to ensure protection of on-site habitats and protected species must be approved by Wiltshire Council prior to works starting and will include specific, detailed measures to address the following impacts:
- ◆ **Noise/vibration:** Noise and vibration will be minimised, and this will be required to ensure that noise/vibration is kept to a minimum and for the shortest duration possible to minimize impacts on fauna including nesting birds.
 - ◆ **Chemical leaching/run-off/dust spill:** Dust arising from the works will be minimized using dust suppression technology and all plant and machinery will be fitted with drip trays to prevent spillage. Machines will need be refuelled in an area of impermeable hardstanding and chemicals stored securely.
 - ◆ **Vegetation clearance:** Any required vegetation clearance will address the potential presence of nesting birds/dormice/reptiles/hedgehogs as outlined below.
 - ◆ **Lighting:** To avoid impacts on nocturnal species, no night-time working will be permitted, and this will negate the requirement for any temporary site lighting. Working hours will be from 08:00am to 18:00pm only.
 - ◆ **Siting of site welfare facilities:** Welfare facilities will be sited away from the site boundaries, woodland and hedgerows to minimise noise/disturbance on habitats and fauna.
 - ◆ **Stockpiling of materials:** Deliveries should be timed to ensure that the minimal amount of material is being stored on-site for the shortest amount of time. Any materials required to be stored on site will be kept on crates off the ground on the driveway to the front away from the woodland, hedgerows and site boundary to minimise the chance that animals such as hedgehogs and reptiles will take refuge within them.
 - ◆ **Heras fencing:** 'Heras' fencing will be installed to protect the hedgerows, woodland and tussocky grassland habitats around the edge of the site to

mitigate harms associated with construction works on these areas. A minimum buffer zone of 2m between the hedgerow/woodland and the fence will need to be implemented, increasing to allow for Root Protection Zones for trees where present. Once installed, the Heras fencing will not be removed or altered during the works without prior agreement of the project ecologist and the local planning authority.

Roosting bats

- 4.3 The PRA and dusk surveys of Highlands Farm were undertaken, and the house was identified to support day roosts for brown long-eared bats, serotine and common pipistrelles, which are of 'site' importance.
- 4.4 As the proposals will result in impacts on the roosts, a works method statement must be followed under a bat European Protected Species (EPS) or Earned Recognition (ER) mitigation licence from Natural England. The licence can only be obtained following approval of all consent(s) and must be obtained in advance of any works commencing.

EPS or ER licence application

- 4.5 A bat EPS or ER licence from Natural England must be sought to allow works to proceed lawfully. The licence must pass three legal tests in order to be approved; the three tests are as follows:
 - 1. The development is in the interests of public health and safety or is required for other imperative reasons of overriding public interest.
 - 2. There must be no satisfactory alternative that will cause less harm to the species.
 - 3. The development must not harm the long-term conservation status of the bat species.
- 4.6 As noted in the R (Vivienne Morge) V Hampshire County Council 2011 case, the three legal tests must be addressed at the planning stage. The tests have been assessed below:

Imperative reasons of overriding public interest

- 4.7 The demolition and replacement of the dwelling is required by the applicant to meet the needs of the current family. The current dwelling is in a poor state of repair and a replacement dwelling is needed to ensure that the family can live comfortably, providing sufficient living space and a property up to modern living standards.

No satisfactory alternative

- 4.8 The applicant does not own an alternative dwelling and wish to make the property their home for the foreseeable future. The 'do nothing' option has been discounted as the applicant requires additional living space and without such an intervention the house would otherwise fall further into disrepair, become unliveable. Extensions to the existing property were not considered viable due to the poor condition the house is

currently in and would not provide the layout needed to provide the additional living space required. Replacement of the property has been judged as the most satisfactory method for ensuring the needs of the applicant are met, whilst ensuring the preservation of the onsite bat population.

Maintenance of the long-term conservation status of the bat species

- 4.9 The bat mitigation and compensation plan provided below details mitigation and compensation measures required to maintain the long-term conservation status of the onsite bat population.

Bat mitigation, compensation and enhancement plan

- 4.10 The bat mitigation, compensation and enhancement plan to be implemented under the EPS licence is provided in Table 12 overleaf; this strategy is guided by the 'Minimum Expectations for Bat Mitigation, Compensation, Monitoring and Management document (Natural England, 2023) (see Appendix I for plan).

Table 12: Bat mitigation, compensation and enhancement strategy

Phase of works	Action	Description	Notes to applicant:
Post-planning and before any works commence to the building(s)	1. Contact project ecologist once all planning consent(s) are obtained.	Contact project ecologist to determine whether any update surveys are required for the bat European Protected Species (EPS) bat mitigation licence application to Natural England (NE).	- An update PRA (building inspection) will be required within 3 months of the licence application. The PRA can be undertaken at any time of year. - A minimum of one update dusk survey will be required if the EPS licence is applied for after April 30th the year following the dusk surveys (e.g. surveys conducted in May/June 2025 and licence is applied for in May 2026, therefore a minimum of one update dusk survey required in 2026 before licence application). The update dusk survey(s) can only be conducted between May and August. It is important to factor this into your project timescales.
	2. EPS licence is submitted to Natural England for approval.	EPS licence application submitted to Natural England for approval following any required update survey(s) by the ecologist.	- The ecologist will require time to prepare the licence application, and during busy periods this can take a number of weeks. - Following submission to NE, the EPS licence application takes a minimum of three weeks to be obtained following submission, however, the applicant should note that this can take longer depending on how busy NE are at the time of submission. Works to the building affecting the bat roost cannot commence until the EPS licence is approved.

Phase of works	Action	Description	Notes to applicant:
	3. EPS licence is approved from NE; contact ecologist.	EPS licence is approved from NE. Contact ecologist to schedule works start date and supervision of works by an ecologist (see 'works method statement' under the below).	Ensure adequate time is allocated to schedule in contractors and class 2 licensed bat ecologist, as the ecologist will need to be onsite during works.
	4. Erection of bat boxes on trees within applicant's ownership (see Appendix I for full details and figures).	- Prior to any works commencing and following approval of the EPS licence, one 'Improved Cavity Bat Box', one 'Improved Crevice Bat Box' and one 'Beaumaris Woodstone® Bat Box' of the type 'Maxi' must be erected on suitable mature trees within the applicant's ownership. - The boxes must be erected at a minimum 3.5 metres (m) from ground level on a sunny aspect. Any limbs/branches must be pruned back around the entrance(s) and below the bat box(es) to ground level to ensure the entrance to the boxes are unobstructed and allows for a clear flightpath.	Bat boxes can be purchased by the applicant from https://www.nhbs.com/improved-cavity-bat-box https://www.nhbs.com/improved-crevice-bat-box and https://www.nhbs.com/beaumaris-woodstone-bat-box 
Works/demolition phase following approval of EPS licence – works method statement	5. Works can commence and ecologist attends site to undertake supervision of all destructive works. Works method statement to be followed by all contractors.	Works method statement:	
		'Toolbox talk': Prior to any works commencing onsite, the licensed bat ecologist will provide a 'toolbox talk' to all contractors regarding the bat EPS licence, legal protection of bats, the onsite bat roosts and potential for bats to be present in the works areas, the contractors' responsibilities, health and safety, and best working practice to avoid injuring any bats.	- A class 2 licensed bat ecologist must be present onsite during <i>all</i> works affecting the bat roost(s). If the ecologist is not present during these works, this would constitute a breach of the EPS licence. - Temperature and weather restrictions apply for all works affecting the bat roost(s): - No works can take place during adverse conditions including heavy rain and/or

Phase of works	Action	Description	Notes to applicant:
		• Pre-works loft inspection: Prior to any works commencing, the ecologist will inspect the loft space. If any bats are present and where possible, the ecologist will capture any bats roosting internally by gloved hand or static net where appropriate. Any bats found will be transported to a bat box already erected onsite. • Destructive works: Following the internal check, the ecologist will directly supervise the 'soft' dismantling of all building areas with potential for bats. Features such as roof tiles, felt, eaves, mortar, timbers and wall tops will be carefully dismantled by hand and hand tools only. Features will be removed carefully by contractors and inspected for bats / evidence of bats. Should a bat be present, the licensed ecologist will capture and translocate the bat to the bat box. • Injured/underweight bats: Any injured or underweight bats will be immediately taken into care (as directed by the Batworker's Manual, s. 7. 3, pp 64 – 66; 3rd ed. 2004 and in accordance with the Bat Conservation Trust's (BCT) Bat Care Guidelines: A Guide to bat care for rehabilitators 2nd ed 2016). • Continuing works: Once all features deemed suitable for bats have been carefully dismantled and inspected by the licensed ecologist, works may then continue unsupervised.	strong winds. This is on welfare grounds to bats. - Winter works (mid-November – mid-March) can only commence following four consecutive days/nights when temperatures are consecutively at 8°C or above. • In the event a bat is found during any unsupervised time, the applicant is legally obliged to stop all works immediately and contact the project ecologist for advice. • All persons other than the class 2 licensed bat ecologist are strictly forbidden from handling or interfering with bats in any way.
	6. Permanent replacement bat roosts, bat access	Replacement bat access points to be created:	

Phase of works	Action	Description	Notes to applicant:
	points and enhancement bat roosting features to be constructed (refer to Appendix I for full details and list of figures).	- Four 'bat ridge tiles' will be created with two on the northern and two on the southern roof ridge tiles (see Appendix I - Figure 2) to compensate for the loss of the pipistrelle bat roosts. - Two 'Habibat Bat Access Slate tiles' will be used to allow access into the new bat loft (see 'replacement bat loft within roof space' below); one on the northern and one on the western side of the roof providing access into the new bat loft. This is necessary to allow the brown long eared bat and serotine bats to have separate access points (see below for further details regarding the bat loft and illustrations in Appendix I - Figure 1). - Each access point will be created by leaving a 30mm x 100mm gap in the mortar bedding and any infill mortar within the ridge tile and adjacent ridge tile will be left out to create a tunnel-like structure. - A cut of felt measuring 30mm x 100mm will be made in the felt under the second tile (ensuring this is not located directly above a rafter to ensure clear access). - The gap between the first roofing battens (nearest to the ridge) must measure at least 30mm wide to ensure bats can access the loft through the felt.	NOTE: Bituminous 1F felt or TLX bat safe (or any membrane with a snagging propensity test certificate) must be used exclusively in all bat accessible areas/roosts. Breathable felts such as 'Tyvek' are NOT permitted for use in bat roosting areas due to entanglement risk where fibres 'fluff' up over time (Waring <i>et al.</i>, 2011). NOTE: photographic evidence of the replacement bat roosts and bat access points including close-up photos of the use of bituminous 1F felt, or TLX bat safe (or any membrane with a snagging propensity test certificate) must be supplied to the ecologist by the applicant for the bat licence return. The applicant is advised to speak to their contractors in advance of these works to ensure photographs can be taken in advance of roof completion; failure to supply this evidence will result in a breach of the EPS licence. - No external light fixtures must be erected within at least 5m of the replacement bat roost access points / roosting features (see 'Artificial Lighting at Night (ALAN)' below for full strategy).
		Replacement bat loft within roof space:	

Phase of works	Action	Description	Notes to applicant:
		• A replacement bat loft will be created in the new extension (see Appendix I). • The bat loft will measure 5m in length, 4m in width and 2.4m in height. • The entire bat loft must be lined exclusively with bituminous 1F type felt only or TLX bat safe (or any membrane with a snagging propensity test certificate) (see ‘Notes to applicant’). • Rough-sawn timber boards will be installed for 3m internally within the bat loft either side of the ridge beam at a 45° angle. Angled brackets can be used to fix the beams to the roof rafters. The boards will be installed to create crevices between the ridge beam and the timbers suitable for long-eared bats (see Appendix I - Figure 3). • The loft space will be insulated using fibreglass insulation on the loft floor only (no insulation to be installed on the underside of the roof). • The roof space housing the bat roost must comprise an uncluttered truss and preferably no truss to ensure bats have adequate pre-flying space. • The bat loft will feature a laminated sign at the inside of the loft hatch entrance / on a rafter adjacent to the loft hatch stating that the roof space is a dedicated bat roost, with contact details for the Bat Conservation Trust (BCT) displayed.	

Phase of works	Action	Description	Notes to applicant:
		Artificial Lighting at Night (ALAN): - In addition to bats roosting within the property, a number of commuting / foraging bats use the general property including barbastelle, long-eared and myotis bats. The following specifications for lighting must be adhered to and are based upon the 'Bats and Artificial Lighting At Night' Guidance Note BN08/23 (BCT & ILP, 2023): - No external light fixtures will be installed within 5m of the replacement bat roost access points and roosting features. - Preferably, no additional new external light fixtures will be installed. If external lighting is required, this will be installed for safety purposes only. No external luminaires will be installed where these will cast light spill onto surrounding vegetation, such as mature trees. - All luminaires will lack UV elements when manufactured. Metal halide, compact fluorescent sources will not be used. - Only LED type luminaires will be used due to their sharp cut-off, lower intensity, good colour rendition and dimming capability. - A warm white light source (2700Kelvin or lower) will be adopted to reduce blue light component. - Light sources will feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats (Stone, 2012). - Internal luminaires will be recessed only (as opposed to using a pendant fitting) where installed in proximity to windows to reduce glare and light spill. - Column heights must be carefully considered to minimise light spill and glare visibility. This	- The applicant is advised that illuminating a bat roost can cause disturbance and this may result in the bats deserting the roost or even becoming entombed within it. Lighting is therefore considered an obstruction under the legislation protecting bats and their roosts; lighting will also be a condition of the EPS licence. - ALAN holds potential to negatively impact foraging bats using the general property, in addition to other nocturnal wildlife. Lighting causes disturbance and impedes the ability of bats to successfully forage, with long-eared bats being among the most affected by artificial lighting. It is therefore of the utmost importance that lighting is carefully designed to ensure safety purposes only but to minimize impacts on bats.
	7. Installation of external light fixtures and internal light spill - Artificial Lighting at Night (ALAN)		

Phase of works	Action	Description	Notes to applicant:
		must be balanced with the potential for increased numbers of columns and upward light reflectance. - Only luminaires with a negligible or zero Upward Light Ratio, and with good optical control, will be used. - Luminaires must always be mounted horizontally, with no light output above 90° and/or no upward tilt. - External security lighting will be set on motion sensors and set to a 1-minute (or less) timers. - Bollard or low-level downward-directional luminaires will not be installed. This is due to a considerable range of issues, such as unacceptable glare, poor illumination efficiency, unacceptable upward light output, and increased upward light scatter from surfaces. - Only if all other options have been explored, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed. However, due to the lensing and fine cut-off control of the beam inherent in modern LED luminaires, the effect of cowls and baffles is often far less than anticipated and must not be relied upon solely.	

Phase of works	Action	Description	Notes to applicant:
Post-works phase – completion of works	8. Submit photographic evidence of replacement bat roosts / roosting features for bat licence return.	Upon completion of the works, the applicant must contact the ecologist with photographic evidence of all replacement bat roosting features / bat access points for submission to Natural England.	- NOTE: photographic evidence of the replacement bat roosts and bat access points including close-up photos of the use of bituminous 1F felt or TLX bat safe (or any membrane with a snagging propensity test certificate) the cuts in the felt and ridge tiles must be supplied to the ecologist by the applicant for the bat licence return. - The applicant is advised to speak to their contractors / roofers <i>in advance</i> of the works to ensure that good quality photographs of the bat access points and bat roosting features are obtained during the course of works. Failing to obtain photographs of the bat access points in the roof at the time of installation, for example, can cause issues, as it cannot then be confirmed that full access has been made for bats due to the roof (and access points) being fully tiled over. - Failure to supply this evidence will result in a breach of the EPS licence. The Local Planning Authority may also request a compliance visit post-works.
	9. One post-monitoring visit to be undertaken by the ecologist within the active bat season between 2- and 5-years following completion of the works.	Within two to five years following completion of the construction works, the ecologist will contact the applicant to arrange for a post-monitoring visit. This visit will include an inspection of the replacement bat roosts and access points and a dusk survey during the active season (May to August).	The applicant must make access available for the post-monitoring visit. Failure to allow for the visit will constitute a breach of the EPS licence, it is the responsibility of the applicant to ensure that access is available, and the applicant must contact the ecologist with any changes to contact details etc.

Hedgerow mitigation plan and method statement for dormice, nesting birds and reptiles/amphibians

- 4.11 The following strategy will address the protection of hedgerows, woodland and tussocky grassland which provide the potential to support dormice, nesting birds, and reptiles within the application site.
- 4.12 The hedgerows, woodland and tussocky grassland on-site are considered to provide potential habitat for reptiles, nesting birds, hedgehogs, badgers and dormice. The removal of three sections of hedgerow will be required as part of the works to facilitate the new positioning of the replacement dwelling.
- 4.13 A works method statement will be followed for site works which will be incorporated into the CEMP, as detailed below:

Works method statement for hedge/tree removal:

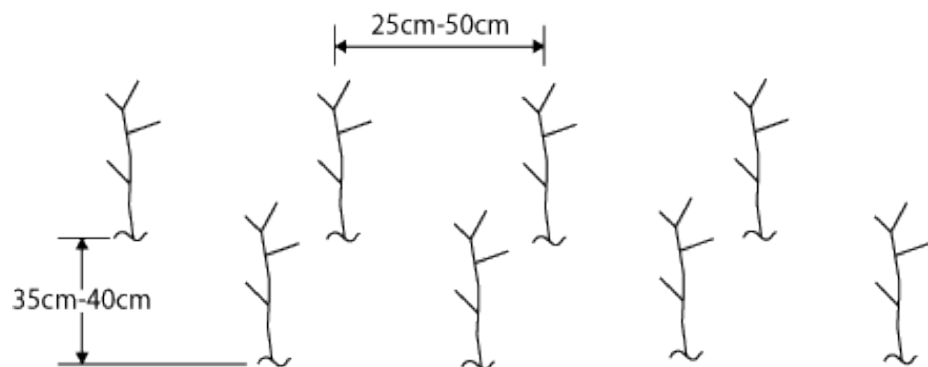
- Supervision of the works will be undertaken by an experienced dormouse worker alongside a 'toolbox talk' on dormouse, reptile and nesting bird ecology. The talk will inform the site contractors on when to stop at signs of hibernating dormice, what to do if a bird/reptile/amphibian/dormouse is found (which will include leaving a 5m buffer around the nest/area and receiving advice from the licensed ecologist) and measures of best practice to reduce any harm to dormice and reptiles/nesting birds within the area.
- One hibernaculum (rubble/log pile) will be created within blue line land in the southwest, as shown in Appendix I, prior to wider works commencing and prior to the reptile hibernation season.
- The licensed worker will undertake a pre-works survey of the area which will include a fingertip search of any holes in trees and careful checks of the stumps looking for dormice/reptiles and nesting birds. If a dormouse is recorded at this stage, works must stop and a licence must be sought from Natural England, following any required survey work.
- To prevent harm to any dormice within the local area, the hedge sections will be felled to 0.5m stumps between the months of **November and February** (to also avoid the nesting bird season) when the low temperatures are at least 5°C. This will also ensure protection of any potential reptiles leaving the stumps in-situ.
- As dormice/reptiles will be hibernating at ground level during the winter period, the trees will be felled to 0.5m stumps to ensure the dormice and reptiles have safe hibernation sites throughout the winter. To prevent harm to hibernating dormice and reptiles/GCN this will be done by hand where possible with limbs being removed in sections and lowered to the ground rather than by machine which can kill any hibernating animals.
- The stumps will be removed in the spring, from April onwards when the temperatures are between 10°C – 18°C (until October only) by machine following a direct search of the stumps for dormice nests and reptiles by the

ecologist. The dormice, if present, will then be active and will have moved from the area to suitable adjoining habitat. Any reptiles/amphibians during this period will be active and will be encouraged into the sections of hedgerow being retained.

- Any areas of longer vegetation/grassland to be removed will be strimmed to a height of 20cm followed by a cut down to 2cm and will take place in one direction towards the nearest area of retained habitat.
- If an active bird's nest is encountered, works will cease immediately, and the nest will be left undisturbed. The ecologist will instate a minimum 5m works exclusion buffer zone marked out with red/white hazard tape and a second site visit by the ecologist to check the status of the nest will be required before works can continue in this area. Works may only continue when the nest is deemed to be unoccupied/no longer active by the ecologist.
- Any demolition/construction works occurring to the house/sheds will preferably be undertaken in the winter months outside of the nesting bird season (ensuring that temperature restrictions are followed for roosting bats as detailed above). Works will ideally take place between the 1st September and 28th February.
- Any demolition/construction works to the buildings will in any case be undertaken under the direct supervision of a suitably experienced ecologist due to the presence of a bat roost within the house. Pre-works checks for signs of nesting birds will be undertaken by the ecologist. If an active nest is encountered, all works will cease immediately, and the nest will be left undisturbed. The ecologist will instate a minimum 5m works exclusion buffer zone marked out with red/white hazard tape and a second site visit by the ecologist to check the status of the nest will be required before works can continue in this area. Works may only continue when the nest is deemed to be unoccupied/no longer active by the ecologist.
- The remaining hedgerows, tussocky grassland and woodland will be retained and protected by use of 'Heras' fencing as shown in Appendix I. This will ensure machinery does not accidentally track into hedges potentially disturbing/damaging nests. The 'Heras' fencing will allow for a minimum 2m construction buffer (to be increased where necessary in line with BS 5837:2012 Trees in relation to design, demolition and construction (British Standards Institution, 2012) to ensure Root Protection Zones) and will remain in place throughout the duration of the works. This fencing will only be removed post-construction.
- **If a bird's nest/dormouse/reptile/amphibian is encountered at any other unsupervised time, all works in the area must cease immediately the ecologist must be contacted immediately to provide further advice.**

Replacement hedge planting:

- Three new sections of hedgerow will be planted to offset the loss of existing hedgerow habitat and comprise a mixture of at least five native, woody species to provide nesting and foraging habitat for wildlife, species will be selected from the following list:
 - Hawthorn (*Crataegus monogyna*)
 - Spindle (*Euonymus europaeus*)
 - Field maple (*Acer campestre*)
 - Dogwood (*Cornus sanguinea*)
 - Oak (*Quercus sp.*)
 - Hazel (*Corylus avellana*)
 - Elder (*Sambucus nigra*)
 - Crab apple (*Malus sylvestris*)
 - Guelder-rose (*Viburnum opulus*)
- The new hedgerow whips will be sourced from British-grown stock and will be planted between November and March. The whips will be planted in two rows at a density of six plants per 1m approximately 35cm apart. The roots must be kept damp throughout the planting process.



- Biodegradable spiral guards will be required to protect the whips and canes will be used to support the whips and will be removed after 3-5 years. Any new whips will be replaced where they become diseased/die and replaced with plants of the same species and size.
- The existing and retained hedgerows will be retained and managed by the occupiers. This will include watering where necessary. Once the hedgerows have become established, hedgerow laying and cutting will be required to result in good hedge structure.

Hedgehogs and badgers

- 4.14 Hedgehogs and badgers have the potential to utilise the site for commuting and foraging purposes. It is considered possible that they will be adversely impacted in the short-term by the proposed development, including through entrapment in trenches/excavations if unmitigated for. Therefore, to ensure the long-term viability of the local population, the following mitigation strategy will be fully implemented:

- To prevent mammals from becoming entrapped overnight, any trenches must have a 150mm wide ramp installed at a 45-degree angle or will be covered over to prevent overnight entrapment.
- To ensure hedgehogs may continue to access the site, any new close-boarded fencing on-site will feature specialised hedgehog 'gravel board' with a minimum of one on every boundary of fence or custom-made 'highway' (hole) that will measure a minimum of 13cm x 13cm.

Biodiversity enhancements

4.15 To ensure compliance with national and local planning policy biodiversity enhancements will be required as part of the proposed development. Features within the proposed development to enhance the site for biodiversity (Appendix I for plan and specifications) will feature the following:

- ◆ X 1 ridge tile design for crevice dwelling bats as shown in Figure 2 of Appendix I.
- ◆ X 2 'Manthorpe Swift Brick' or similar approved (<https://www.nhbs.com/manthorpe-swift-brick>)
- ◆ X 3 new fruit trees will be included on-site to provide enhanced foraging opportunities for species such as badgers, nesting birds and invertebrates.

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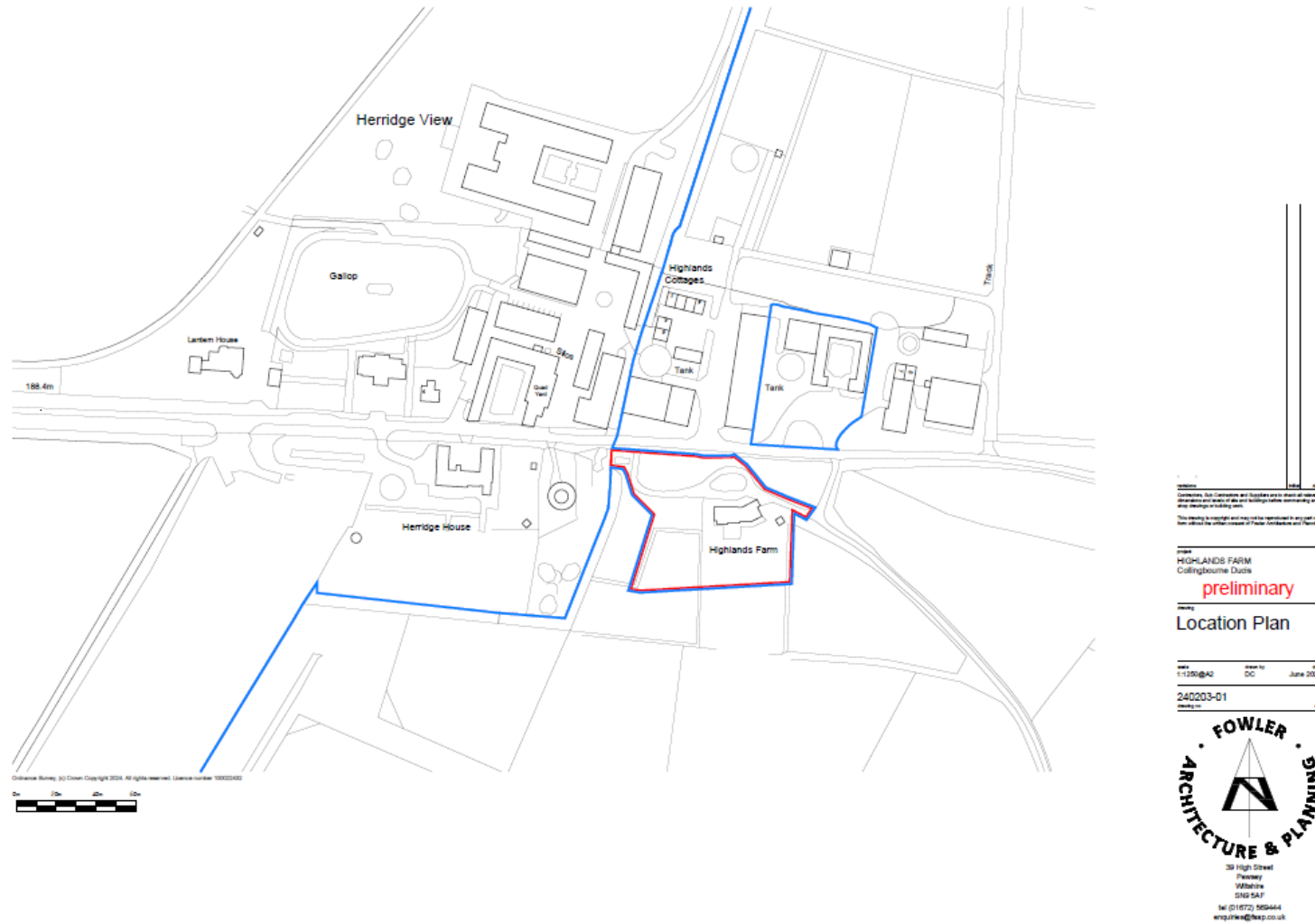
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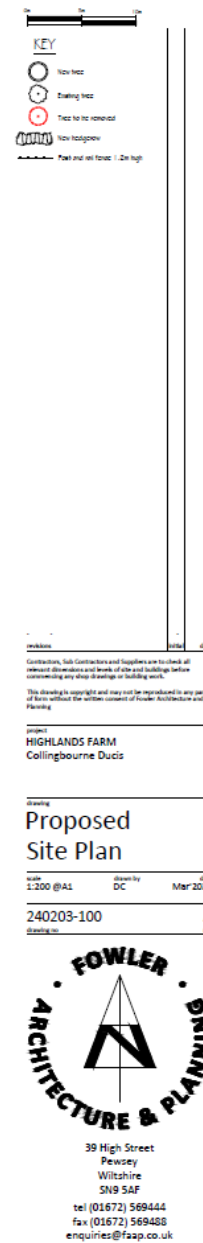
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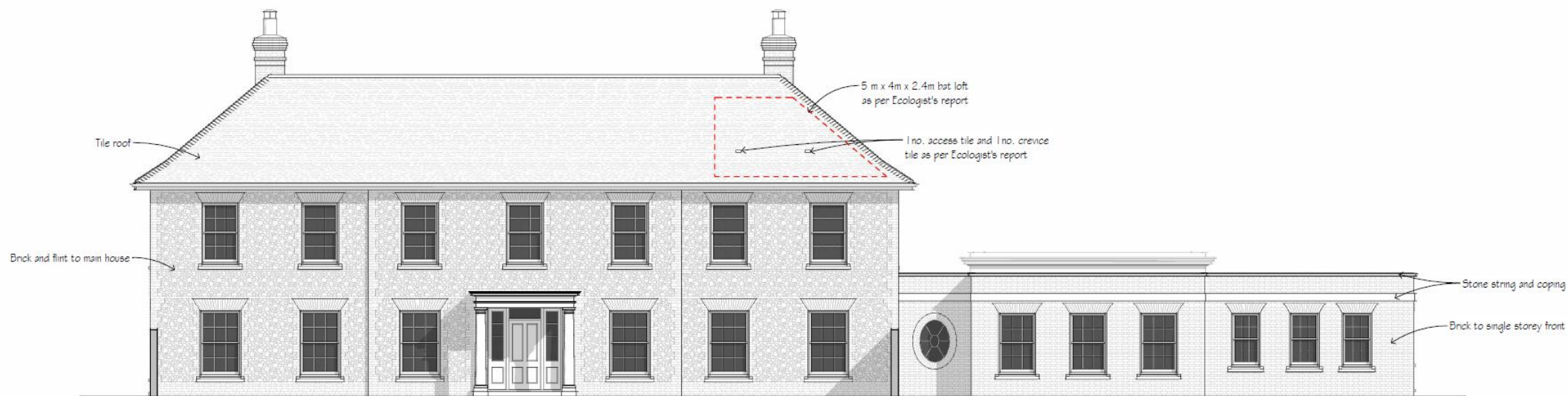
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Appendix A: Site location plan



This is a detailed site plan for a residential property. The plan shows a large, irregularly shaped lot with a curved boundary on the left and top. A "NEW DWELLING" is located in the lower-left quadrant, consisting of a main rectangular structure with a gabled roof and a smaller attached section. To the right of the new dwelling is a "Parking building removal" area, indicated by a red outline. A red circle with an 'X' is located in the upper-left quadrant, near a curved driveway. A red rectangle is located in the upper-right quadrant, near a curved driveway. The plan also shows various landscaping features, including trees (represented by circles and ovals), shrubs (represented by small dots), and a fence line. A "DRIVING ACCESS" is labeled at the top left. The plan is oriented with North at the top.





North Elevation

1 : 100



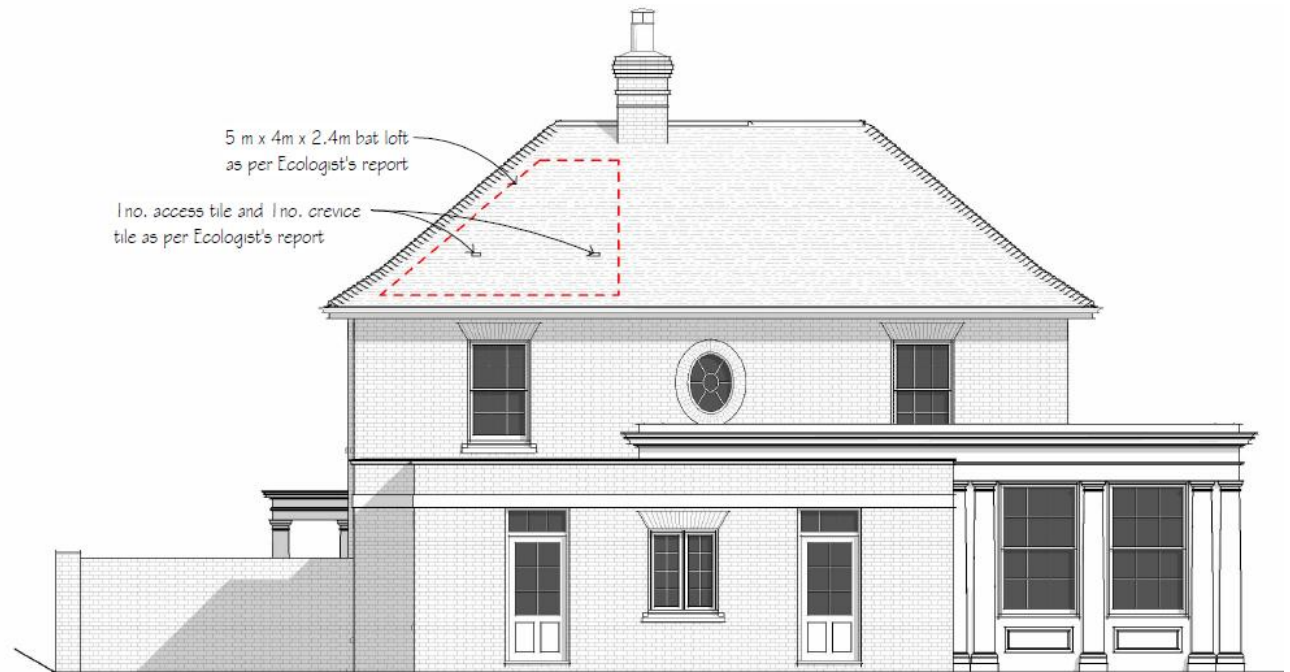
South Elevation

1 : 100



East Elevation

1 : 100

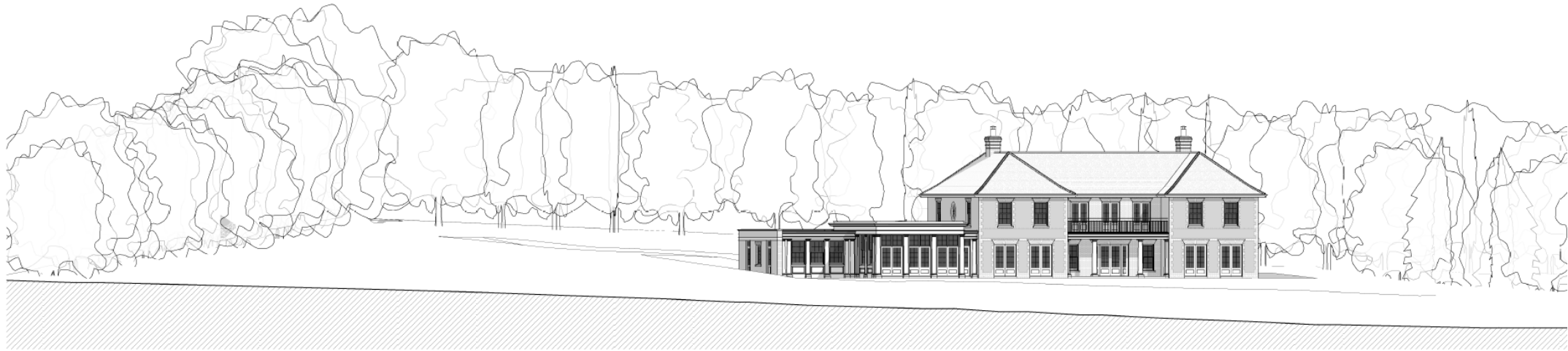


West Elevation

1 : 100



Section 1
1 : 200



Section 2
1 : 200

Appendix C: Relevant legislation and planning policy

Legislation and UK BAP priority habitats/species

Legislation

In England, all bats, dormice, otters (*Lutra lutra*), white-clawed crayfish (*Austropotamobius pallipes*) and great crested newts are legally protected under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

A number of species are also listed under Annex II of the EC Habitats and Species Directive (1992), including barbastelle, Bechstein's bat (*Myotis bechsteinii*), greater horseshoe (*Rhinolophus ferrumequinum*), lesser horseshoe (*Rhinolophus hipposideros*), great crested newt, white-clawed crayfish and otter.

The above named species and adders, slow worms, grass snakes, common lizards, common frog (*Rana temporaria*), palmate newt (*Lissotriton helveticus*), smooth newt (*Lissotriton vulgaris*), water voles (*Arvicola amphibius*) and several invertebrate species are also protected under Schedule 5 of the Wildlife and Countryside Act (WCA) (1981) (as amended). Schedule 9 of the WCA (1981) includes non-native, invasive species including (but not limited to) Himalayan balsam (*Impatiens glandulifera*) and signal crayfish (*Pacifastacus leniusculus*). Badgers are legally protected under The Protection of Badgers Act (1992).

All birds, their nests and eggs are protected under Section 1 of The WCA (1981) (as amended) and it is thus an offence, to intentionally kill, injure or take any wild bird; intentionally take, and damage or destroy the nest of any wild bird while it is in use or being built.

A number of sites designated for nature conservation are afforded legal protection due to being of European importance. These include Special Areas of Conservation (SACs) (protected under the EC Habitats and Species Directive (1992), Special Protection Areas (SPAs) for birds (protected under the EC Birds Directive) and Ramsar (Ramsar Convention, 1975). Other protected sites include Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs) Local Nature Reserves (LNRs) and Protected Road Verges which are designated under the WCA (1981) and strengthened by The Natural Environment and Rural Communities Act (NERC) (2006).

SPAs and SACs were previously included in the Natura 2000 sites and following amendments to the legislation, are now included under the 'National Site Network'. Ramsar sites do not form part of the 'National Site Network' however, are afforded the same protection. These changes allow the Government to continue commitment to the international commitments under the Bern Convention, the Oslo and Paris Conventions (OSPAR), Bonn and Ramsar Conventions.

UK BAP priority species and habitats

Several species and habitats are listed under the UK Biodiversity Action Plan (UK BAP) (JNCC, 2016) as priority habitats/species due to their vulnerability or rarity as listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006) and Section 40 places a duty on all public authorities to conserve biodiversity. These are known as habitats / species of 'principal importance' under Section 41 of the NERC Act (2006).

These include several terrestrial and freshwater habitats, including some hedgerows and streams, and several species such as hedgehogs, barbastelle, Bechstein's bat, both species of horseshoe bat, brown long-eared bat, soprano pipistrelle, noctule (*Nyctalus noctula*), water voles, white-clawed crayfish and otter.

National and local planning policy

NPPF – The National Planning Policy Framework

The National Planning Policy Framework (NPPF) (Ministry of Housing, Communities & Local Government, 2024) sets out the Government's planning policies for England and how these should be applied. In the context of this report, Section 15 of NPPF is relevant and applicable, Section 15 states:

'Planning policies and decisions should contribute to and enhance the natural environment by, minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.'

New developments and projects are supported where plans promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue measurable net gains for biodiversity.

To ensure this application is compliant with Section 15 of NPPF, habitat enhancements will be required to demonstrate a biodiversity net gain as an outcome of the development.

Section 15 of NPPF also gives consideration to sites with potential to impact on irreplaceable habitats, and states:

'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.'

To ensure this application is compliant with Section 15, this application should be accompanied by a suitable arboricultural report to assess the presence of potential ancient or veteran trees.

The Wiltshire Core Strategy

The Wiltshire Core Strategy (2015) (Wiltshire Council, 2015) Core Policy 50 'Biodiversity and geodiversity' states that all proposals for development, including those which will affect sites of regional and local biodiversity, nationally and internationally protected sites will:

'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'.

Core Policy 50 also states that 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.

Appendix D: Habitat map and species lists



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Species	DAFOR scale abundance
Broadleaved woodland (w1g):	
Ash	Dominant
Elder	Rare
Field maple	Occasional
Ivy	Locally dominant
Wild cherry	Occasional
Introduced shrub (u1 847):	
American willowherb	Occasional
Bittersweet	Rare
Bramble	Frequent
Common nettle	Abundant
Creeping thistle	Occasional
Hedge woundwort	Rare
Mint	Rare
Raspberry	Dominant
Rosebay willowherb	Rare
Silver birch	Occasional
Spear thistle	Rare
Spindle	Rare
Wild marjoram	Rare
Willow species	Rare
Yorkshire-fog	Frequent
Other neutral grassland (g3c):	
Annual meadow-grass	Occasional
Common cat's-ear	Frequent
Cleavers	Rare
Cock's-foot	Occasional
Common bird's-foot trefoil	Frequent
Common centaury	Locally frequent
Common knapweed	Rare
Common mouse-ear	Occasional
Common ragwort	Locally occasional
Cow parsley	Occasional
Creeping bent	Occasional
Creeping buttercup	Locally dominant
Daisy	Rare
Dandelion sp.	Occasional
Germander speedwell	Rare
Goat's-beard	Rare
Greater plantain	Locally occasional
Perforate St. John's-wort	Locally occasional
Red clover	Occasional
Ribwort plantain	Occasional
Rough hawk's-bit	Locally abundant
Self-heal	Rare
Smooth sow-thistle	Rare
White clover	Abundant
White dead-nettle	Rare
Wild carrot	Rare
Wild marjoram	Rare
Wild teasel	Rare
Yarrow	Rare

Yorkshire-fog	<i>Dominant</i>
<i>Species rich native hedgerow (H1 – h2a5):</i>	
Bittersweet	Occasional
Blackthorn	Rare
Bramble	Rare
Bryony	Rare
Common cat's-ear	Rare
Common nettle	Rare
Common vetch	Rare
Dogwood	Rare
Elder	Rare
False oat-grass	Rare
Field maple	Rare
Hawthorn	Dominant
Hazel	Rare
Hogweed	Rare
Pedunculate oak	Rare
Self-heal	Rare
Yorkshire-fog	Rare
<i>Species rich native hedgerow (H2 – h2a5):</i>	
Beech	Locally dominant
Blackthorn	Occasional
Common cat's-ear	Occasional
Common nettle	Rare
Dogwood	Occasional
False oat-grass	Frequent
Field maple	Rare
Hawthorn	Dominant
Hazel	Rare
Hogweed	Rare
Self-heal	Rare
Spindle	Rare
Wayfaring tree	Rare
Yorkshire-fog	Rare

Appendix E: Photographs



Photo 1: Water tank in the loft void.



Photo 2: Inside the loft void.



Photo 3: Bat droppings scattered in the loft.

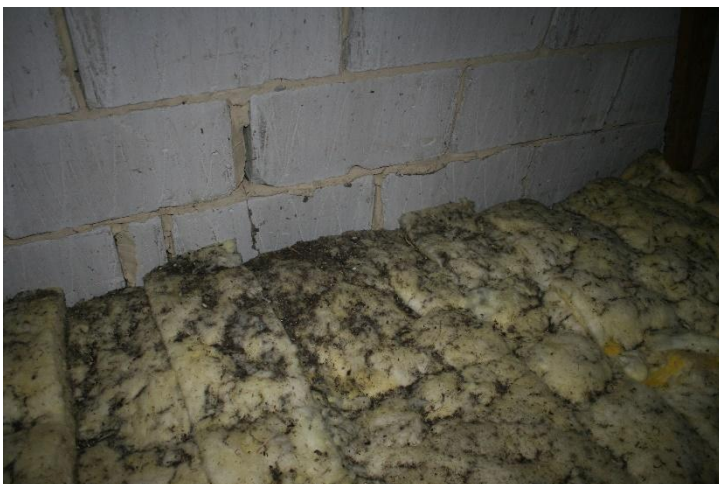


Photo 4: Bat droppings at the gable.

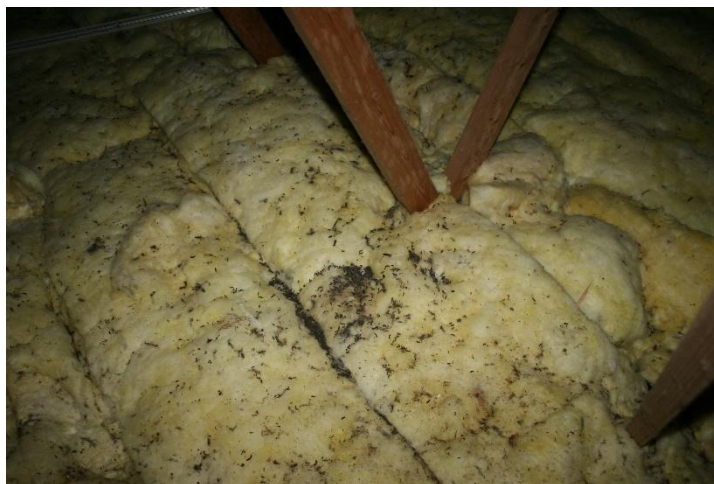


Photo 5: Bat droppings in the loft.



Photo 6: Northwest view of the house (B1).



Photo 7: Gaps under the fascia on the west gable (B1).



Photo 8: South elevation of the house (B1).



Photo 9: South elevation of the annexe (B1).



Photo 10: Lifted tiles on the annexe (B1).



Photo 11: North elevation of the annexe (B1).



Photo 12: Northeast view of the house (B1).



Photo 13: Other neutral grassland (g3c), driveway (u1c) and tree line in the north.



Photo 14: Introduced shrub (u1 847) and B2 in the east.



Photo 15: Inside B2.



Photo 16: Other neutral grassland (g3c) in the south.



Photo 17: H1 (h2a5) in the east.



Photo 18: H2 (h2a5) in the west.



Photo 19: B3 in the northwest.



Photo 20: Inside B3.



Photo 21: Old bird's nest in B3.



Photo 22: Hawthorn, other neutral grassland (g3c) and H2 (h2a5) in the north.



Photo 23: Hawthorn, introduced shrub (u1 847) and other neutral grassland (g3c) in the west.



Photo 24: Broadleaved woodland (w1g) on the western boundary.

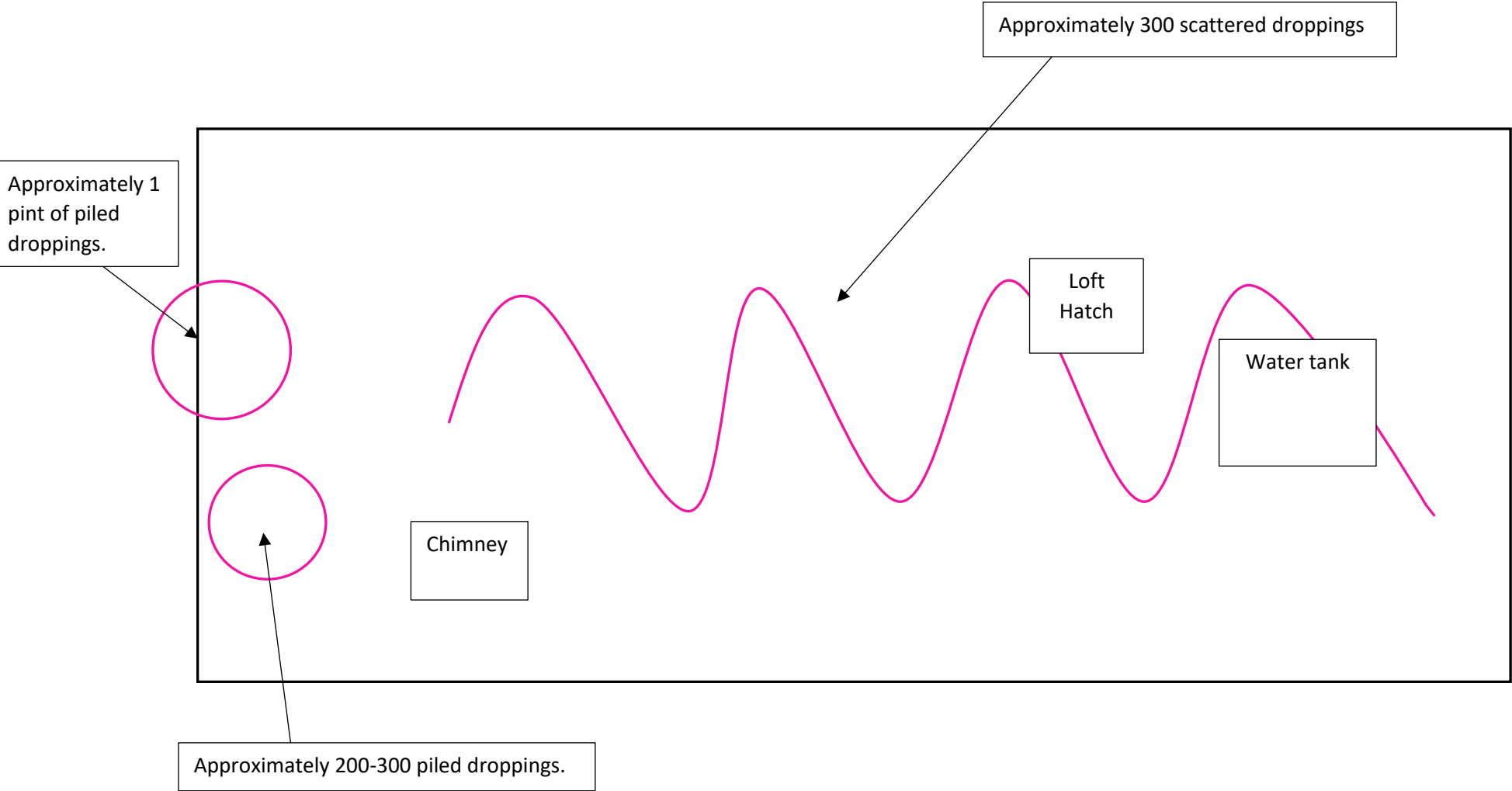
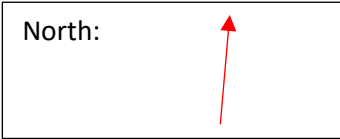


Photo 25: Other neutral grassland (g3c) in the east.



Photo 26: Introduced shrub (u1 847) mixing into H1 (h2a5) in the east.

Appendix F: Bat evidence map



Appendix G: Bat activity survey results

Table 13: Bat activity survey results

Bat activity (dusk) survey						
Date: 26.07.2024	Sunset: 21:02	Weather conditions: Mild	Precipitation: None	Site location: Highlands Farm - House		
Temp: Start: 16°C End: 15°C	Beaufort wind force (Bft): 0/12	Detectors used: EchoMeter Touch 2 + tablets x 4		Oktas cloud cover: 6/8	Start Time: 20:47	End Time: 22:32
Surveyor:		Surveyor position:		NVA used? (Y/N):	NVA equipment used:	
Peter Allen		Northeast		Y	Nightfox Whisker	
Chloe Whittaker		South		Y	Nightfox Whisker	
Jordan Elliot-Murray		Northwest		Y	Nightfox Whisker	
Celia Konieczna		Southeast		Y	Nightfox Whisker	
Unmanned camera		East		Y	Nightfox Whisker	
Time	Sp. if ID'd	Number of bats		Comments on behaviour/activity		
21:01	Noctule	1		Heard not seen in northeast		
21:04	Common pipistrelle	1		Emergence eastern gable apex.		
21:11	Common pipistrelle	1		Heard not seen in northeast		
21:14	Common pipistrelle	1		Emergence eastern gable apex.		
21:21	Common pipistrelle	2		One emerged from the front northwest gable ridge and the other emerged from the main ridge (circled in green).		
21:26	Common pipistrelle	3		Foraging around in the garden and along the hedge.		
21:34- 21:38	Common pipistrelle	1		Foraging in the southwest.		
21:41	Common pipistrelle	1		Commuted from the northeast to the southeast, then foraging in the back garden.		
21:46- 21:55	Common pipistrelle	1		Heard not seen in the south.		
21:47	Long-eared bat	1		Heard not seen in northeast		
21:49	Long-eared bat	1		Heard not seen in northeast and south.		
22:08	Common pipistrelle	1		Commutated from the south to the north along the west elevation.		
22:10	Noctule	1		Heard not seen from the southeast and south.		
22:11	Western barbastelle	1		Heard not seen from the southeast.		
22:11- 22:12	Common pipistrelle	1		Heard not seen in the south.		
22:12	Long-eared bat	1		Heard not seen in northeast		

22:13	Common pipistrelle	2	Foraging around the west elevation and in the front garden.
22:22	Long-eared bat	1	Heard not seen in northeast
22:24	Long-eared bat	1	Heard not seen in the south.
22:25	Long-eared bat	1	Heard not seen in northeast
22:26	Western barbastelle	1	Heard not seen in northeast

Figure 1: Common pipistrelle exit point on the eastern gable (21:04 & 21:14).



Figure 2: Common pipistrelle exit point on the northwest gable ridge.



Figure 3: Common pipistrelle exit point on the main ridge.



Figure 4: Example darkest point screenshot of the northwest elevation.



Table 14: Bat activity survey results

Bat activity (dusk) survey						
Date: 29/08/2024	Sunset: 19:58	Weather conditions: Clear	Precipitation: None	Site location: Highlands Farm - house		
Temp: Start: 18°C End: 16°C	Beaufort wind force (Bft): 1/12	Detectors used: EchoMeter Touch 2 + tablets x 4		Oktas cloud cover: 1/8	Start Time: 20:47	End Time: 22:32
Surveyor:		Surveyor position:		NVA used? (Y/N):		NVA equipment used:
Georgia Linter		Northeast		Y		Nightfox Whisker
Sam Jones		South		Y		Nightfox Whisker
James Gooding		Northwest		Y		Nightfox Whisker
Emily Parsons		Southeast		Y		Nightfox Whisker
Unmanned camera		North		Y		Nightfox Whisker
Time	Sp. if ID'd	Number of bats		Comments on behaviour/activity		
20:18-20:29	Common pipistrelle	1		Foraging in the northwestern treeline.		
20:18	Common pipistrelle	1		Commuted west to northeast.		
20:22	Common pipistrelle	1		Commuted over the roof and foraging in the northeast.		
20:22-END	Common pipistrelle	2		Foraging in the southeast.		
20:27-20:35	Serotine	1		Foraging in the northern front garden.		
20:33	Common pipistrelle	1		Heard but not seen in the northeast.		
20:40	Serotine	1		Commuted east to west over the front lawn in the north.		
20:40-END	Common pipistrelle	1		Foraging in the southwestern rear garden with social calls.		
20:47	Common pipistrelle	1		Commuted south to north over the building.		
20:47	Common pipistrelle	1		Commuted northeast to southwest.		
20:48	Long-eared sp.	1		Heard but not seen in the southwest.		
21:15	Long-eared sp.	1		Heard but not seen in the southwest.		
21:18	Myotis sp.	1		Heard not seen in the southeast.		

Figure 5: Example darkest point screenshot of the south elevation



Table 15: Bat activity survey results

Bat activity (dusk) survey						
Date: 24/09/24	Sunset: 18:59	Weather conditions: damp, cold	Precipitation: None	Site location: Highlands Farm - house		
Temp: Start: 12°C End: 11°C	Beaufort wind force (Bft): 1/12	Detectors used: EchoMeter Touch 2 + tablets x 4		Oktas cloud cover: 7/8	Start Time: 18:44	End Time: 20:29
Surveyor:		Surveyor position:		NVA used? (Y/N):	NVA equipment used:	
Emily Parsons		Northwest		Y	Nightfox Whisker	
Russell Hoyle ACIEEM		Southwest		Y	Nightfox Whisker	
Adam Wheeler		Southeast		Y	Nightfox Whisker	
Peter Allen		Northeast		Y	Nightfox Whisker	
Unmanned		North		Y	Nightfox Whisker	
Time	Sp. if ID'd	Number of bats		Comments on behaviour/activity		
19:19	Common pipistrelle	1		Heard not seen in the northwest.		
19:22	Serotine	1		Emergence from eastern gable apex.		
19:23 – END	Common pipistrelle	2		Foraging along the southwest hedge.		
19:25	Serotine	1		Commuted west to east.		
19:26-END	Common pipistrelle	2		Foraging in the northwest.		
19:26 - END	Common pipistrelle	2-3		Foraging in the trees in the east.		
19:27	Serotine	1		Foraging in the north.		
20:02	Long-eared sp.	1		Heard not seen from the southeast.		

Figure 6: Serotine exit point at the eastern gable



Figure 7: Example darkest point screenshot of the northeast elevation



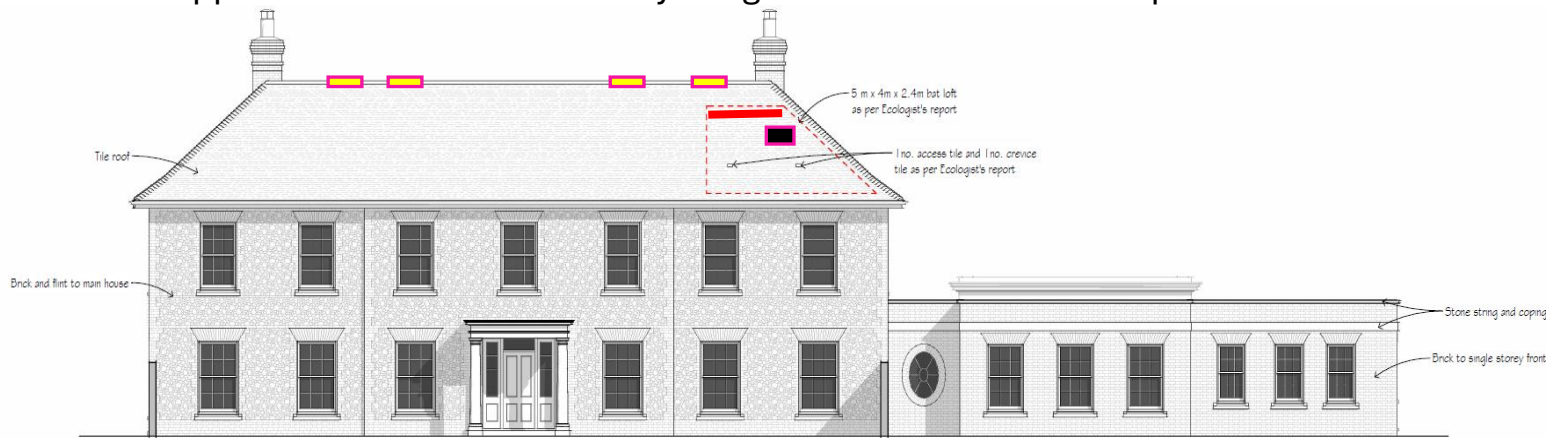
Appendix H: Bat roost and surveyor locations



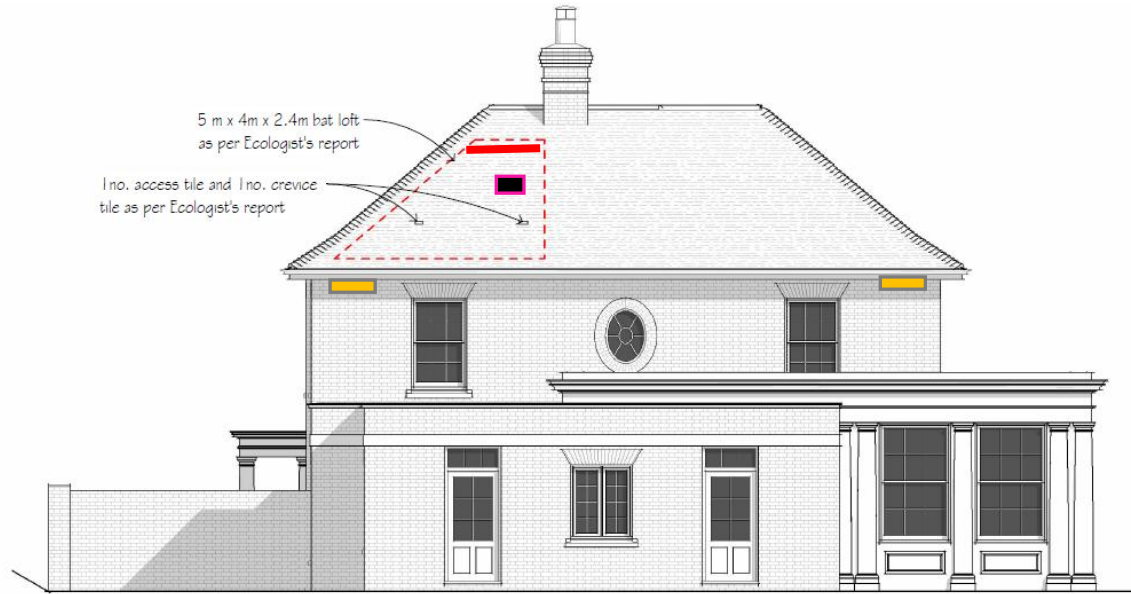
*Image taken from Google Maps, 2025.

LEGEND:	
Key:	Description:
	Surveyor/camera locations.
	Serotine and brown long-eared bat day roost.
	Serotine access point.
	Common pipistrelle day roosts.

Appendix I: Bat and biodiversity mitigation and enhancement plan



North Elevation
1 : 100



West Elevation
1 : 100

LEGEND:	
Key:	Description:
	X 4 'bat ridge tiles' within new ridge. Three are to replace the loss of three roosts by common pipistrelle and one as a biodiversity enhancement.
	X 2 'Habibat bat access tiles' within new roof to provide an access point for the brown-long eared and serotine using the loft.
	X 2 'Manthorpe Swift Brick' or similar approved.
	New bat loft area to be lined exclusively with 1F bitumen felt. New loft will measure 5m in length x 4m in width x 2.4m in height which will be enclosed with a loft hatch for essential maintenance.
	3m of rough-sawn timbers will be installed either side of the ridge beam to provide suitable roosting features.

Figure 1: Habibat Bat Access Tile



Figure 2: Bat ridge tile design for crevice dwelling bats

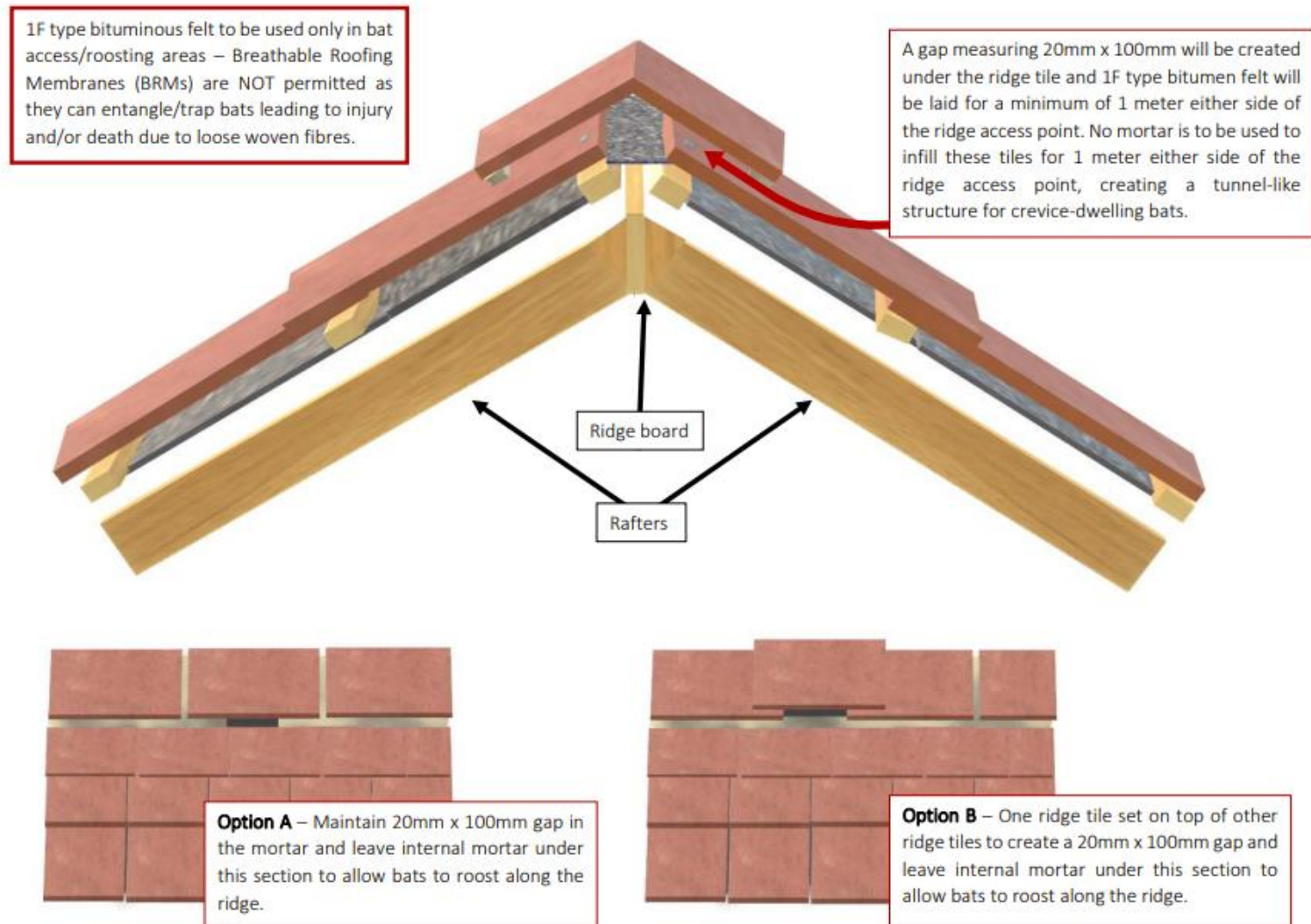
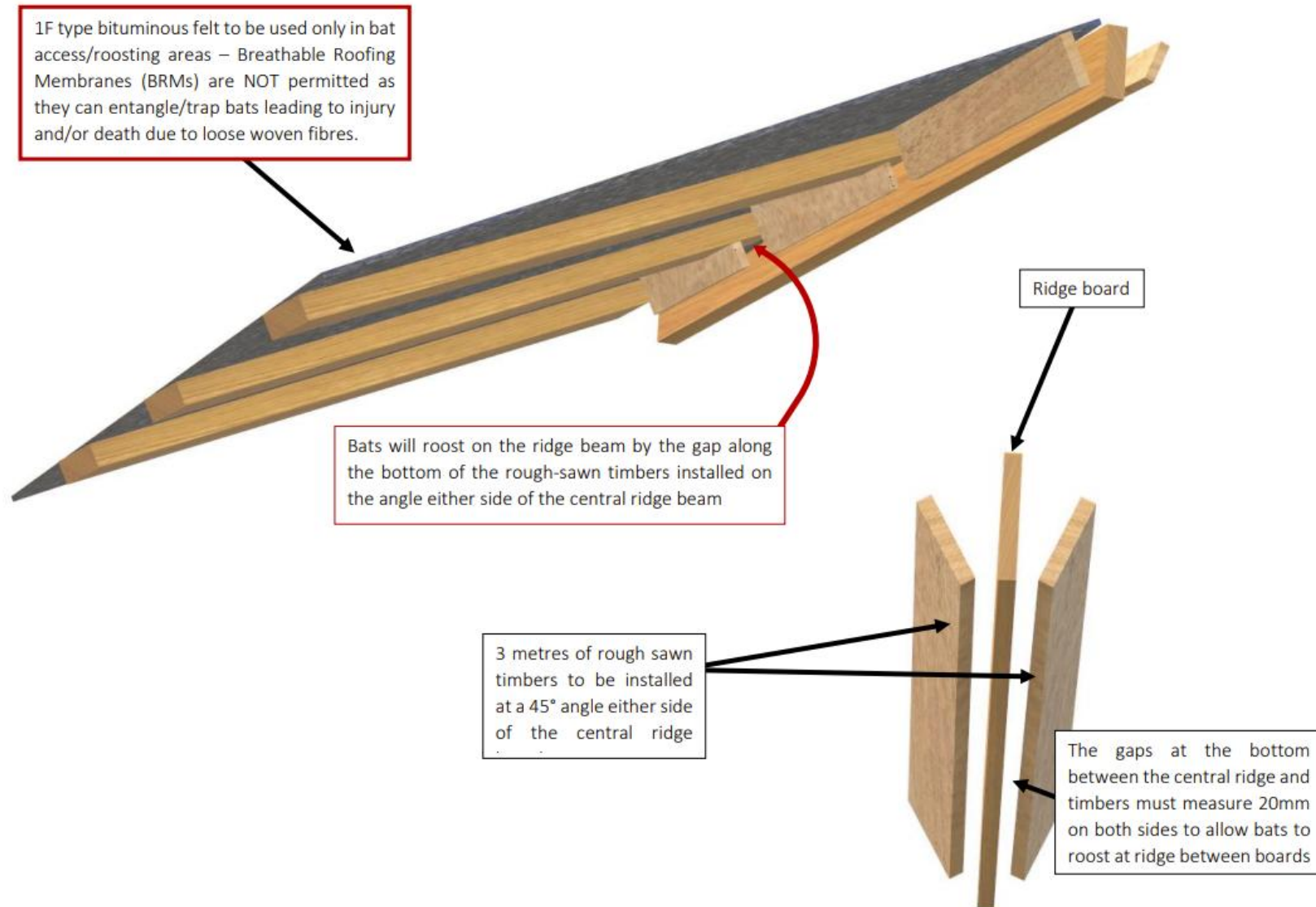
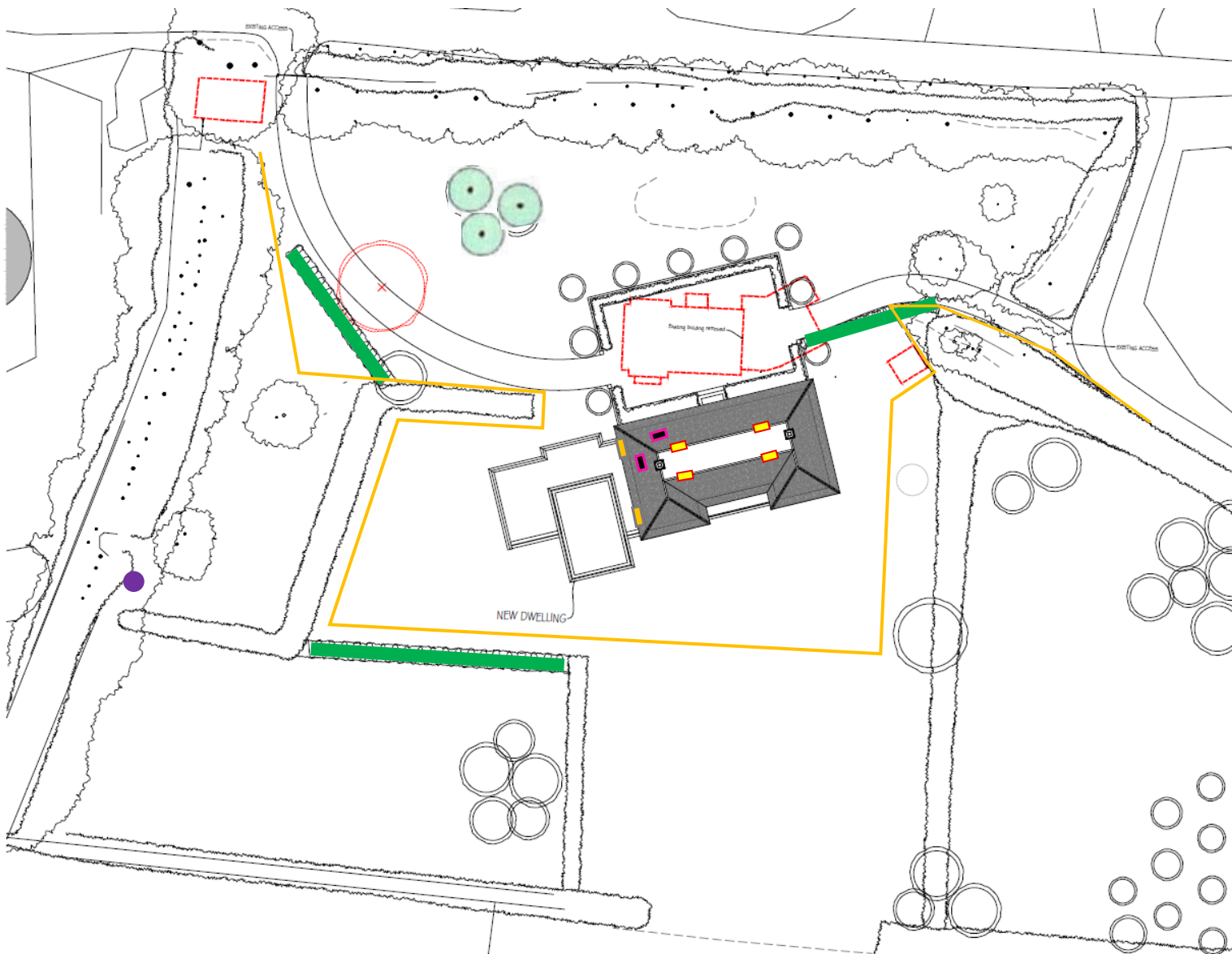
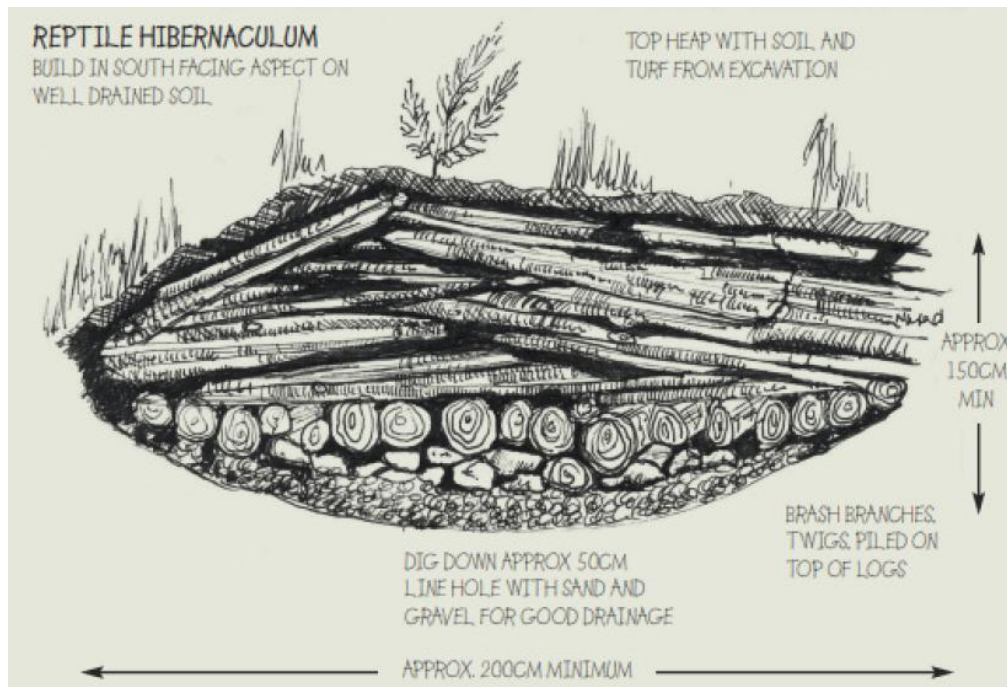


Figure 3: Ridge Enhancement for void dwelling bats





LEGEND:	
Key:	Description:
	Four ridge tile design for crevice dwelling bats
	Two habibat bat loft access tiles
	Two 'Manthorpe Swift Brick' or similar approved (see photo on next page)
	Location of 'Heras' fencing
	Proposed new hedge planting
	X 3 fruit trees (see photo on next page)
	Hibernacula (see diagram on next page)
	New tree
	Existing tree
	Tree to be removed



Two 'Manthorpe Swift Bricks' (or similar) will be installed on the western elevation of the new house as close to the eaves as possible.



Any new close-boarded fencing on-site will feature hedgehog gravel boards or custom-made holes within every boundary that will measure 13cm x 13cm.



At least three new fruit trees will be planted to replace those being lost and enhance the site for biodiversity. The trees will provide nesting/roosting and foraging opportunities for local birds and bats and support invertebrate populations.

