

Bat Survey of 102 The Brambles, Lye Green

Client M Clark-Belk
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Non-technical Summary

Background

In August 2025, Crossman Associates was commissioned to undertake a bat survey of 102 Lye Green, Bradford on Avon, BA15 2DT (Ordnance Survey grid reference: ST 81342 59897).

A single emergence survey was completed of the dwelling and garage on site and follows on from a preliminary ecological appraisal (Seasons Ecology, reference SEB3152_01) that identified the building as having low suitability for roosting bats.

Methods

One bat emergence survey was also undertaken on 30 August 2025. The survey was led by Rob Spencer, a licence bat surveyor.

Results

No emerging bats were recorded.

General bat activity included five species, including a single greater horseshoe pass.

Recommendations

It is recommended that the following be undertaken as part of the development:

- Precautionary approach to be taken in relation to bats
- Low level lighting
- Retention of garden planting, where possible

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1. Background

- 1.1. In August 2025, Crossman Associates was commissioned to undertake a bat survey of 102 Lye Green, Bradford on Avon, BA15 2DT (Ordnance Survey grid reference: ST 81342 59897).
- 1.2. A single emergence survey was completed of the dwelling and garage on site and follows on from a preliminary ecological appraisal (Seasons Ecology, reference SEB3152_01) that identified the building as having low suitability for roosting bats.
- 1.3. Development proposals include demolition and rebuild.
- 1.4. Figure 1 under Appendix II provides a site location map.
- 1.5. The objectives of the emergence survey were to:
 - Assess whether bats are using the building as a roost.

Legislation

- 1.6. In the UK all species of bats are protected under the Wildlife and Countryside Act (1981) as amended and the Conservation of Habitats and Species (Amendment) Regulations. Under this legislation it is a strict liability offence to injure or destroy a bat or to disturb damage or destroy the resting place of a bat. Under this legislation the UK is obliged to fully consider bats within the planning process and the level of bat activity on-site must be fully assessed prior to the assessment the planning application.
- 1.7. In Britain all wild birds are granted legal protection under the Wildlife & Countryside Act (1981) (as amended). This legislation protects the birds, their eggs and nests whilst being built or in use.

2. Methodology

Desktop Study

Data search

- 2.1. The MAGIC website was accessed to gain information on any statutory site designations within 4 km of the site that are designated for bats.

National Planning Policy

- 2.2. National Planning Policy has been reviewed for policies that relate to nature conservation relevant to the site.

Field Survey

Evening emergence/ activity surveys

- 2.3. The survey was led by Rob Spencer, a licenced bat surveyor (licence no. 2015-14778-CLS-CLS).

- 2.4. One evening emergence / activity survey was carried out, with cameras positioned so that all aspects of the building suitable for roosting bats could be observed. Overall, the building was surveyed from five positions using a combination of surveyors and IR/thermal camera positions.



- 2.5. The survey was undertaken during suitable weather conditions. The emergence survey commenced at 15 minutes before sunset and continued for two hours. All general bat activity on site was also noted.
- 2.6. Echo meter touch, Peersonic bat detectors and IR cameras were used together with visual observations on flight patterns and feeding behaviour to aid identification to species level. Recordings of bat calls were made and later analysed using dedicated computer software Audacity and wildlife acoustics.

3. Results

Desktop Study

Data Search

3.1. The MAGIC website informed that there is one statutory site within 4 km of the site designated for bats:

- Bath and Bradford on Avon Bats SAC – The nearest part is located 2km to the north west of the site. This SAC includes the hibernation sites of 15% of the UK Greater Horseshoe bat *Rhinolophus ferrumequinum* population. Small numbers of Bechstein's bats *Myotis bechsteinii* have also been recorded hibernating in abandoned mines in this area. Lesser Horseshoe bats *Rhinolophus hipposideros* also use the site.

Planning Policy

3.2. National policy guidance is provided by National Planning Policy Framework (NPPF, December 2024), which sets out the Government's planning policies for England and how they should be applied to planning applications;

Conserving and enhancing the natural environment

- Planning decisions should contribute to and enhance the natural and local environment by:
 - a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Habitats and Biodiversity

- To protect and enhance biodiversity and geodiversity, plans should:
 - a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
- When determining planning applications, local planning authorities should apply the following principles:
 - a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
 - b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
 - c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁷⁰ and a suitable compensation strategy exists; and
 - d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Field Survey

Bat scoping survey

- 3.3. The external and internal conditions of the buildings are described in the table below and photographs can be found in Appendix II.
- 3.4. A table within Appendix III; information sheets set out the criteria for the way a building is assessed for its potential to support roosting bats.
- 3.5. The building was identified as **low suitability for roosting bats**. Therefore, one bat survey was undertaken. The survey was conducted by Rob Spencer, an experienced ecologist and licenced bat worker.
- 3.6. The table below details the results of the surveys.

Table 2; Bat emergence table

Survey Date	30/08/2025
Survey Conditions	Cloud: 90% Rain: 0 Wind (BS): 2 Start temp: 17°C End temp: 15°C Sunset time: 19:57 Start and finish time: 19:42, 21:27
Emergence survey	No emergence
General bat activity. Non emergence	20:05 – 21:02 20:05 – noctule pass 20:32 – long-eared pass

	20:16-20:30; common and soprano pipistrelle passes (multiple). 21.02 – 1 x greater horseshoe pass (heard not seen).
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Birds

- 3.7. No birds or bird nesting activity was recorded in any aspect of the dwelling.

Evaluation

Dwelling and garage

- 3.8. During the scoping survey, no droppings, staining, feeding remains or actual bats were observed. The buildings are in good condition.
- 3.9. The buildings have **low suitability** for roosting bats.
- 3.10. The emergence survey did not record any emerging bats, which confirms likely absence of a bat roost within the dwelling and garage.

Foraging and commuting habitat

- 3.11. The property is located within a rural area and lies near to farmland and woodland with habitats likely to function as commuting and foraging resource for bats. The survey recorded a small number of common bats using the gardens of the property as a foraging and commuting resource.
- 3.12. The site lies approximately 2 km from the Bath and Bradford on Avon Bats Special Area of Conservation (SAC), which is designated for its populations of greater and lesser horseshoe bats. A single greater horseshoe bat was recorded passing across the site during the survey, likely using the wider area for occasional foraging or commuting. Given the small, residential nature of the site and the limited

- availability of suitable roosting or extensive foraging habitat, the site is considered to be of **low importance** for greater horseshoe bats and other species associated with the SAC. The recorded activity suggests only transient use of the garden rather than a key foraging route or roosting resource.
- 3.13. Nonetheless, as the site falls within the functional zone of influence of the SAC, good practice measures—such as minimising external lighting and retaining boundary vegetation—should be implemented to ensure continued permeability of the landscape for bats. These measures will safeguard the site’s minor contribution to the wider ecological network supporting the SAC population.
- 3.14. The proposed development is not anticipated to have any significant adverse effect on the Bath and Bradford on Avon Bats SAC or local bat populations.**

4. Recommendations

- 4.1. The recommendations in the paragraphs below are provided to help ensure that wildlife and important ecological features are protected during the course of works. Recommendations also set out mitigation measures to minimise harm where this cannot be avoided and provide compensation measures to allow the proposals to meet current legislative and planning policy objectives.
- 4.2. The Natural Environment and Rural Communities (NERC) Act (2006) states that a public authority must 'in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity; Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'.
- 4.3. The NPPF (2024) states that planning decisions should contribute to and enhance the natural and local 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.
- 4.4. The following recommendations should be read alongside, and are intended to supplement, those provided in the Preliminary Ecological Appraisal (Seasons Ecology, 2025).**

Species recommendations

- 4.5. All bats within the UK are fully protected under the Wildlife and Countryside Act as Amended and the Conservation of Habitats and Species Regulations. Under this registration there are strict liability offence to injure or destroy a bat or to disturb, damage or destroy the resting place (roost) of a bat. Under the Bonn Convention, the UK is obliged through the planning system to protect important bat habitats.

- 4.6. Due to the lack of evidence of roosting bats within any aspect of the buildings, it is not considered necessary or beneficial to undertake any further survey work.
- 4.7. Due to the transitory nature of bats, there remains a very small possibility that bats could be encountered during the works; therefore, all works must proceed under a precautionary approach. Tiles and roof panels will be removed in a vertical rather than horizontal sliding motion. Soffits and masonry will be dismantled using a 'soft' approach taking care with cavity walls where present. All site workers will be vigilant at all times and in the very unlikely event that a bat is found, then works must stop immediately and advice should be sought from a suitably qualified ecologist.

Lighting

- 4.8. Although no bats were observed emerging from the building, foraging and commuting activity was recorded on site. To avoid deterring bats from using these areas, any new or replacement external lighting should be designed to minimise light spill onto potential foraging habitat, commuting routes, and boundary vegetation. Lighting should be limited to where it is essential for health and safety or security purposes.
- 4.9. Where lighting is required, the following principles should be adopted: use low-intensity, warm white lights (<2700 K); direct light downwards through the use of shields, cowls or hoods; and employ motion sensors or timers to ensure lights are only active when necessary. Light spill onto vegetation, hedgerows, trees and other features that may be used by bats should be avoided. These measures will help maintain the site's suitability for foraging and commuting bats in the long term.
- 4.10. "Lighting design should follow the principles outlined in *Bats and Artificial Lighting in the UK* (BCT & ILP, 2018)."

Landscape recommendations

- 4.11. Where possible, existing garden vegetation, including trees, shrubs and hedgerows should be retained and protected during any development or landscaping works. These features provide valuable foraging and commuting opportunities for bats and contribute to maintaining ecological connectivity within the wider landscape.

5. Limitations

- 5.1. This report records wildlife found during the survey and anecdotal evidence of sightings. It does not record any plants or animals that may appear at other times of the year and were therefore not evident at the time of visit.
- 5.2. The advice contained in this report relate primarily to factual survey results and general guidance only. On all legal matters you are advised to take legal advice.

6. References

Bat Conservation Trust (BCT) *Bats and Lighting in the UK* BCT

HMSO (1981) *Wildlife and Countryside Act 1981 (and subsequent amendments)*. HMSO

HMSO (1995) *Biodiversity*. The UK Steering Group Report

Joint Nature Conservation Committee (JNCC) *Common Standards Monitoring Guidance for Reptiles and Amphibians* (2004) JNCC

Mitchell-Jones, A.J (2004) *Bat Mitigation Guidelines* English Nature

Mitchell-Jones, A.J, & McLeish A.P. (2012) *The Bat Worker's Manual* (4th Edition)

Multi-Agency Geographical Information for the Countryside (MAGIC)
Website at www.magic.gov.uk

Stace, C. (1997) *New Flora of the British Isles 2nd Edition*. Cambridge University Press

TSO (2021) *National Planning Policy Framework*. TSO

TSO (2006) *Natural Environment and Rural Communities Act* TSO

Appendix I – Site Figures



 Site location



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Title Location plan

Site 102 Lye Green

Figure 1

Date 30/8/2025

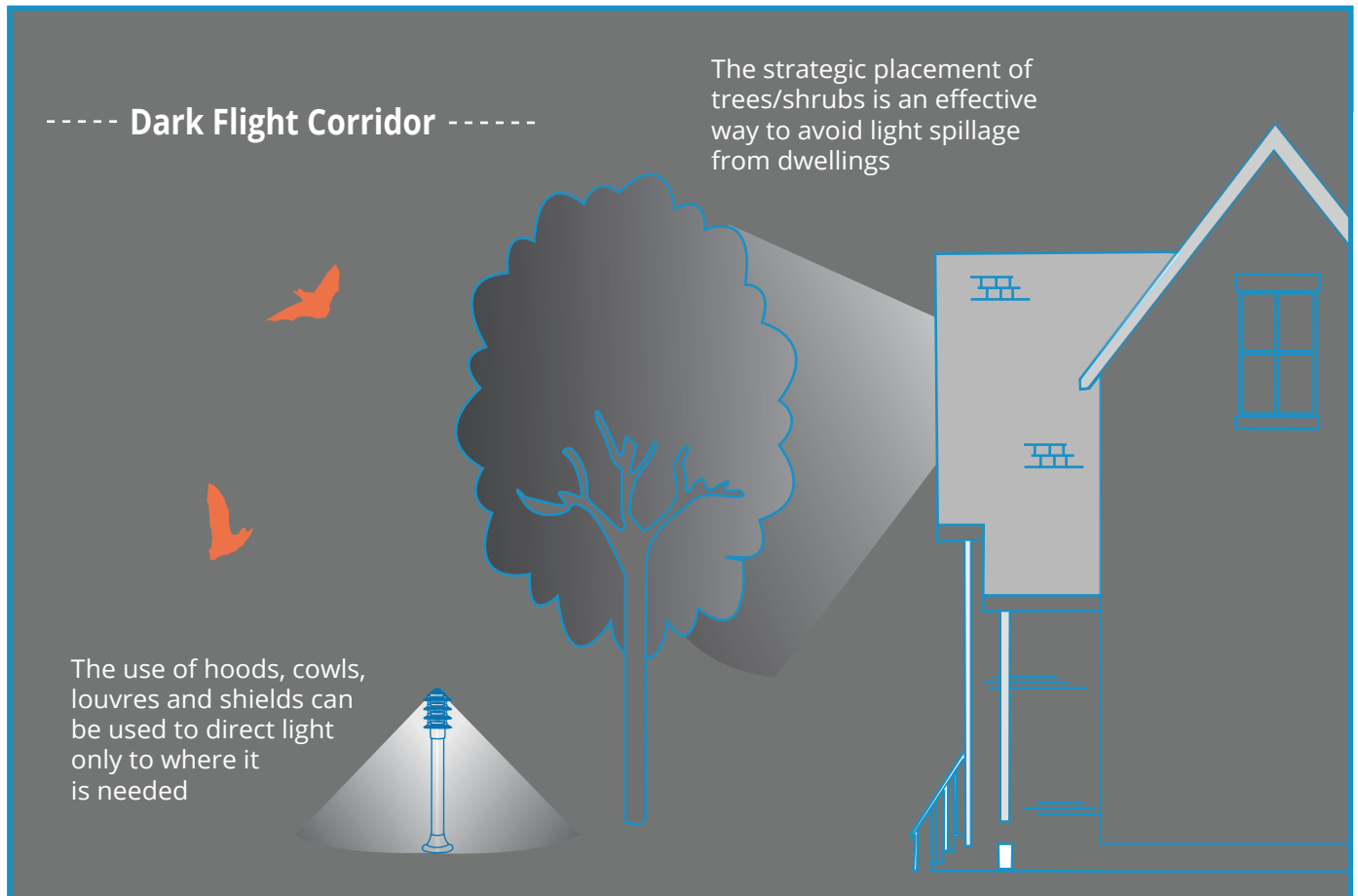
Scale Not to scale



Appendix II –Information Sheets

Sensitive Lighting for Bats

MITIGATION GUIDELINE N° 001



Lamp Type

The impact of light on bats can be minimised by the use of low/high pressure sodium lamps

Lighting Column

The height of lighting columns should be kept as low as possible to reduce the impact of light spill. For example for pedestrian walkways short bollard lights with a light level as low as 3lux directed downwards.

Timing of Lighting

The times at which lighting is left on should be limited where possible. The use of movement sensors for security lights can be used to reduce the amount of time a light is on each night.

Light Levels

Light levels within a landscape plan should be as low as possible. If lighting is not needed, don't light.

Light Mapping

Mapping the light spill of a lighting scheme using computer software can prove essential in designing schemes that are fit for purpose, minimise energy costs and create dark flight corridors and foraging areas for bats

Impacts of Light on Bats

As nocturnal mammals, light causes disturbance to bats, many species of which will actively avoid lit areas. The illumination of bat roosts can delay bats emerging and thus shorten their foraging time and eventually lead to bats abandoning their roost. Lit conditions also lead to an increase of predation as they are more easily seen.


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