



Preliminary Roost Assessment for Bats and Nesting Birds and Nocturnal Bat Survey Report

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Methods used to prepare this report, including those carried out in the field followed The Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct.

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1 INTRODUCTION

- 1.1 Cotswold Environmental Ltd was instructed to carry out a Protected Species Survey for bats and nesting birds, which comprised a Preliminary Roost Assessment (PRA) and Nocturnal Bat Surveys of the residential dwelling at Clevancy House, Clevancy, Hilmarton, Calne, Wiltshire SN11 8ST. The site is located at approximate National Grid Reference (NGR): SU 04939 75333.
- 1.2 The proposals are described as the conversion of the loft void to a bedroom. A planning application will be submitted to Wiltshire Council in due course.
- 1.3 This report provides survey data based on a field visit that was carried out in May 2025 and subsequent nocturnal bat surveys carried out during July and August 2025. The purpose of the daytime survey was to assess the buildings for their suitability to support protected species and to ascertain evidence of any protected species, most notably bats and nesting birds. The field visit results provide information to determine the potential ecological impact the proposed development may have on protected species, and to inform the level of further survey effort and mitigation required to comply with relevant nature conservation policies and legislation. The evaluation and findings in this report can be used by Wiltshire Council in their view of the planning application. Survey results should be considered valid for a period of 12-18 months (subject to consultation with the Local Planning Authority and/or Natural England).
- 1.4 The National Planning Policy Framework (NPPF) (December 2024) sets out the government planning policies for England and how they should be applied. Chapter 15: Conserving and Enhancing the Natural Environment, is of particular relevance to this report as it relates to ecology and biodiversity. The Government Circular 06/2005, which is referred to by the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.
- 1.5 Clevancy House is located to the north of the road that runs through the hamlet, and approximately 6.5 km north-east of Calne town centre. The site location is shown in Fig. 1: Site Location Map and the survey boundary is shown in Fig. 2: Site Map.

Survey Objectives

- To determine suitability for protected species
- Ascertain evidence of protected species
- Determine the potential ecological impact the proposed development will have on protected species

- Inform the level of further survey effort that is required.

2 METHODOLOGY

Desk Study

- 2.1 A records search was undertaken using desktop resources including the Multi-Agency Geographic Information for the Countryside¹ (MAGIC) resource. MAGIC was used to search for records of designated sites, habitats and granted European Protected Species Licenses (EPSLs) within a 2km radius. Google Earth² was also used to study the nearby landscape.

Field Survey

Preliminary Bat Roost Assessment

- 2.2 Ecological consultant Jason Skinner (NE Class 2 Bat Survey licence 2020-50774-CLS-CLS) carried out the field survey on Tuesday 13th May 2025.

Primary Surveyor Experience

- 2.3 Jason Skinner has nine years professional ecological experience, primarily involved with bats and reptiles through consultancy and assisting on research projects. Experienced with small-scale and large-scale development projects and involvement in the management and supervision on multiple bat mitigation licences. Co-author of peer-reviewed research papers on reptiles and amphibians. Member of Staffordshire and Wiltshire Bat Groups.
- 2.4 Survey effort was completed in line with official assessment guidelines³ and largely followed that recommended by the Chartered Institute for Ecology and Environmental Management (CIEEM)⁴ and British Standard Code of Practice⁵. The assessment followed the standard methodology. The site was searched using visual encounter survey techniques. Potential bat movement corridors and movement barriers were assessed and noted. During the site visit, where possible, all areas of the building were internally and externally examined for evidence of bats. The building survey included an internal and external assessment using a powerful torch and endoscope where required.

¹ Multi-Agency Geographical Information for the Countryside (MAGIC). Crown Copyright and database rights [2025]. Ordnance Survey 100022861. Available at: <http://www.magic.gov.uk/>

² https://www.google.co.uk/intl/en_uk/earth/

³ Collins J (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th edn. Bat Conservation Trust, London.

⁴ CIEEM (2017) Guidelines for Ecological Report Writing. CIEEM, Winchester.

⁵ British Standards Institution (2013) BS 42020:2013. Biodiversity – Code of practice for planning and development. British Standards Institution, London.

- 2.5 Internally, the building was assessed using a powerful torch beam to scan the walls and flat surfaces for droppings and other signs of bat activity. Feeding remains such as moth and butterfly wing concentrations were also surveyed for. All holes and crevices considered by the surveyor as likely to be used as a bat roost were examined to ascertain presence or absence of bats.
- 2.6 Externally, visual ground inspections of all elevations were undertaken using binoculars and a telephoto lens where required. Photographs were taken to capture likely features of ecological value to bats and birds i.e. missing tiles, damaged or missing mortar, exposed gable ends, gaps within soffit board, rotten timber and other potential entry points. Other external aspects of the buildings were surveyed, including windows, windowsills, external doors and the ground within close proximity of the structure was thoroughly inspected for bat droppings and feeding remains.

Table 1: Guidelines summary for assessing potential bat roost suitability

Suitability	Description of building, tree or structure
None	The building, tree, or structure has no features with the potential to support roosting bats and is entirely unsuitable. This includes structures that are fully sealed, modern, well-lit, and/or in exposed locations with no access points, no internal voids, and high levels of human disturbance.
Negligible	The building or tree has minimal features (e.g. small gaps or cracks), but these are assessed as highly unlikely to be used by bats due to their condition, location, or lack of access to suitable internal voids.
Low	A structure or tree with one or more potential roost sites that could be used by individual bats opportunistically. However, potential roost sites not suitable for larger numbers or regular use (i.e. maternity or hibernation).
Moderate	A structure or tree with one or more potential roost sites that could be used by bats, but unlikely to support a roost of high conservation status.
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time.
Confirmed roost	Evidence of bats or use by bats found.

Nocturnal Bat Survey

- 2.7 A suite of three dusk nocturnal bat surveys were carried during July and August 2025 following recommendations from the preliminary survey. Survey effort was carried out by Consultant ecologists Jason Skinner (Natural England Class Level 2 bat survey licence holder) and Kayleigh Stewart, and supported by seasonal ecologist David Howard. Nocturnal bat survey effort was completed in line with

official assessment guidelines⁶. Surveyors were positioned to cover areas of the structure where PRFs and/or potential entry/emergence points were identified during the PRA, with two used during the survey.

- 2.8 During the surveys, the surveyors took up a static positions 15 minutes prior to and 1.5 hours after sunset. Visual observations of bats were noted, and bat species were identified using bat detectors. The information recorded included weather, timings, whether bats emerged or re-entered the building, direction of travel, species and activity e.g. foraging, commuting. Equipment used during the nocturnal surveys included Echo Meter Touch II recorders coupled to Apple and Android tablets and heterodyne bat detectors (Elekon Bat Scanner Stereo).
- 2.9 Each surveyor was paired with an infrared camera system (Canon XA, Sony AX, models) coupled with field monitors and infrared lighting were used to strengthen the survey data. Examples of infrared camera views during the darkest point of the surveys are included within the Site Images of this report.
- 2.10 In addition to the three infrared cameras deployed on site, a fourth unmanned infrared camera was utilised, paired with an EchoMeter Touch 2 bat detector to synchronise visual and acoustic recordings. The footage and echolocation data were reviewed the following morning to assess bat activity and species presence.
- 2.11 Recorded bat calls were analysed using Kaleidoscope 5.1.9i where required.
- 2.12 Climatic monitoring (temperature and relative humidity) within the identified roost location were recorded onsite using an Elitech RC-51 Environmental Data Logger, deployed between July-September 2025. Data was recorded at 15 m logging intervals.

Inspection for nesting birds

- 2.13 The survey also included an internal and external inspection of the surveyed building for evidence of common nesting birds as well as notable and protected species. Inside the building, artificial light was used to search for birds, dead birds, dead chicks, nesting material and eggs.

⁶ Collins J (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th edn. Bat Conservation Trust, London.

Limitations

- Bat droppings deposited in or around the exterior degrade quickly due to weather. The presence of bats or their roost must not be disregarded in the absence of droppings.
- Many bat species in the UK are crevice-dwelling bats and as such, are difficult to find during PRAs.
- Given the proposal's limited footprint, the absence of LERC data is not considered likely to materially affect the conclusions of this report.
- For Health & Safety purposes ladders were not used to gain close views of the external roof structure.

3 RESULTS

Desk Study

Designated Sites

- 3.1 The boundary of the North Wessex Downs Area of Outstanding Natural Beauty (AONB) lies 80 m to the south-west of the property, although, according to the MAGIC database, no further statutory or non-statutory designated sites exist within a 2km radius of the site boundary. Furthermore, no internationally designated sites such as special areas of conservation (SACs), designated for their bat populations, exist within a 10 km radius of the site.

Local Habitats

- 3.2 Clevancy House is located within a rural setting with limited surrounding development, comprising a residential dwelling and detached garage with associated garden and hardstanding. Mature trees grow at the boundaries of the property and along the road. Farmland surrounds the hamlet, comprised of grazing pasture which opens out to arable fields bordered by hedgerows, although these appear to be intermittent. The surrounding environment is poorly wooded overall, although a linear block of Deciduous Woodland (Priority Habitat) runs through the agricultural landscape to the south-east, approximately 350 m from the site, this wooded area includes Ancient and Semi-Natural Woodlands (Ancient Woodland Inventory) known as Clevancy Wood and Corton Wood. Further notable habitats within a 2 km radius include a block of Traditional Orchard (Priority Habitat) located 420 m to the north-east a single parcel of Lowland Calcareous Grassland (Priority Habitat) located 1.7 km to the south-west and three parcels of good quality semi-improved grassland.

Granted European Protected Species Licences (EPSLs) within a 2km Radius

- 3.3 According to the Magic website, no EPS licences have been granted for bats within a 2km radius of the survey site.

Field Survey

Table 2: Weather conditions during the preliminary roost assessment

Date	Start	Finish	Temp °C	Wind	Cloud	Rain	Notes
13/05/2025	10:30	11:50	18	Calm	16 %	Dry	N/A

Preliminary Bat Roost Assessment (PRA) Results

Residential Dwelling - Building 1 (B1)

- 3.4 The surveyed building is a detached, two storey stone-built residence consisting of a main pitched roof with two dormer windows and a gable fronted projection to the front south-east facing roof aspect. A single chimney stack is located midway along the roof and the roof coverings across the whole structure are comprised of imitation stone tiles and a single loft space that spans the entire roof of the main section is located within the roof structure.
- 3.5 Externally, the stone elevations of the building are generally in good condition, with the masonry well-pointed and structurally sound. The eaves of the roof along the south-west and north-east facing elevations are open and covered in wire mesh, which effectively limits potential roosting opportunities for birds or bats that might otherwise utilise these features for shelter. The residential dwelling is clad in imitation stone tiles, which are generally well fitted with only a few minor gaps present. A limited number of crevices were observed in the cladding, though these did not appear to provide significant roosting opportunities. Key external potential roosting features were identified on the north-west facing gable end, where gaps were noted between the wooden soffit and the wall. These gaps could serve as potential entry points for bats. The south-east gable end was well sealed without obvious roosting opportunities.
- 3.6 Upon inspection of the loft void, the roof structure appeared to be in relatively good condition. The roof has exposed rafters and a timber framework, with bitumen felt underlining that was largely intact and in good condition. However, gaps were observed at the apex of the gable end, where greasy staining was noted, which coincided with the external features mentioned above. This staining suggests regular activity in this particular area by bats.
- 3.7 Internally, within an enclosed loft, a congregation of approximately 35 to 40 Natterer's bat *Myotis nattereri* was found near the ridge beam. Bat droppings were scattered throughout the loft space, with

notable concentrations beneath the ridge beam. The most likely entry point appears to be the gap at the apex of the gable end, although it is possible that additional, unidentified entry points may exist.

Garage - Building 2 (B2)

- 3.8 Although the garage does not form part of the proposed development, an onsite detached garage is included within this assessment due to its potential to provide bat roost compensation as part of a subsequent mitigation strategy to support the planning application.
- 3.9 The building is a timber-built garage with a pitched timber-framed roof clad in flat concrete tiles and finished with concrete ridge capping. The roof is underlined with a plastic membrane. Approximately two-thirds of the structure is open-sided and functions as a carport, while the remaining third forms an enclosed single garage currently used for storage.
- 3.10 Externally, the timber cladding across all elevations was intact and well-maintained, with no visible defects, gaps, or signs of weathering that could offer access to crevice-dwelling bats. All concrete roof tiles and ridge capping were tightly fitted and flush with adjacent tiles, with no raised, slipped or missing tiles recorded. The open-sided carport provides unrestricted access to the interior, although the enclosed single garage section was well sealed, with no visible openings or gaps around doors, cladding, or roof junctions.
- 3.11 Internally, the building was fully accessible for inspection, with no enclosed loft space present. The open carport section exposed the internal timber frame and roof lining, while the enclosed garage area was also openly viewable. The plastic roofing membrane was intact throughout, with no visible tearing or sagging. No signs associated with bat presence, such as droppings, urine staining, feeding remains, or characteristic brown staining around potential access points, were observed.

Nocturnal Bat Survey Results

Survey One - B1

- 3.12 During the first nocturnal survey, completed on the 8th of July 2025 three species of bat were recorded: common pipistrelle *Pipistrellus pipistrellus*, noctule *Nyctalus noctula* and Natterer's bat *Myotis nattereri*. Activity comprised of regular commuting passes and foraging activity in the rear garden of the property by common pipistrelle, with the first call from this species recorded at 21:52 h, after which continuous activity was observed. In addition, low numbers of commuting noctules were recorded early into the survey effort, however these were not visually observed.

- 3.13 **A maximum count of 116 Natterer's bat were observed emerging from a slit in the north-west facing gable end of the property. Emergence began at 21:54 h with bats dispersing in an easterly direction, following which emergences continued steadily until 22:52 h.**

Survey Two - B1

- 3.14 During the second nocturnal survey conducted on the 29th of July 2025 three bat species were recorded: common pipistrelle, noctule and Natterer's bat. As with the previous survey activity was characterised by frequent foraging activity by common pipistrelle in the rear garden of the property, with up to three engaging in interactive flight. The foraging began at 21:00 h and after which was continuous throughout the survey effort. Furthermore, a single commuting pass by noctule was noted at 21:08 h, however this was not visually observed.
- 3.15 **A maximum count of 89 Natterer's bat were observed emerging from the same emergence location as survey 1, comprising a slit in the north-west facing gable end of the property. Emergence began at 21:44 h and continued steadily until 22:30 h. Five Natterer's bat were also observed re-entering through the same point.**

Survey Three - B1

- 3.16 During the third nocturnal survey conducted on the 19th of August 2025 four bat species were recorded: common pipistrelle, noctule, Natterer's bat and serotine *Eptesicus serotinus*. Common pipistrelles were frequently observed foraging over the rear garden of the property throughout the survey period, beginning at 20:38 h and continuing until the end of the survey. Additionally, low numbers of commuting noctule were observed during the same time frame, and a single serotine passed over the site in an easterly direction at 20:46 h.
- 3.17 **A maximum count of 27 Natterer's bat were observed emerging from a slit in the north-west facing gable end of the property. Emergence began at 21:10 h and continued steadily until 21:45 h.**

Table 3: Weather conditions during nocturnal bat survey

Date	Start	Finish	Sunset	Start/finish Temp °C	Wind	Cloud	Rain	Notes
08/07/2025	21:05	22:55	21:23	17/15	Still	5%	Dry	N/A
29/07/2025	20:45	22:30	21:00	16/14	Light breeze	100%	Dry	N/A
19/08/2025	20:00	21:50	20:19	20/17	Light breeze	60%	Dry	N/A

Climatic Monitoring - Bats

- 3.18 An Elitech RC-51 Environmental Data Logger was deployed within the roost to record temperature and relative humidity between 8th July - 23rd September 2025. The average recorded temperature during the monitoring period was 19.1°C, with the highest recorded temperature was 37°C and lowest 11.3°C. The average humidity level recorded within the roost was 61.9%, with the highest 92.2% and lowest 26.5%.

Inspection for nesting birds

- 3.19 Gaps beneath roof tiles can provide valuable nesting opportunities for small passerine birds, including species like the blue tit *Cyanistes caeruleus*, which typically seek out cavities with small, concealed entrances for nesting. These sheltered spaces mimic the natural environments these birds prefer, such as tree hollows. However, despite the potential suitability of the site, no direct evidence of nesting activity was observed during the building assessment. This included the absence of typical indicators such as bird droppings, nesting material (e.g., feathers, twigs, or moss), or signs of frequent bird activity around the area. Furthermore, no notable bird species were recorded on the site during the inspection, suggesting that, at the time of assessment, the roofs were not being actively used for nesting or roosting by local bird populations.

4 INTERPRETATION AND RECOMMENDATIONS

- 4.1 A daytime assessment was commissioned with a view to assess the residential dwelling at Clevancy House, Clevancy for its potential to support protected species, notably roosting bats and nesting birds. The proposals include alterations that will directly impact the loft void which has been identified as a confirmed bat roost due to the presence of bats.
- 4.2 As part of the desk study, online resource MAGIC was checked for granted EPS licences and statutory and non-statutory designated sites. However, results from the online desk study showed no EPSLs have been granted and no designated sites were identified within a 2 km radius. In addition, the proposals are considered minor as they are limited to the existing building and will not extend the structure beyond its existing footprint, therefore, provided that surrounding habitats are not subjected to the inappropriate use of nocturnal lighting, no impacts to nearby habitats beyond the site boundary are anticipated as a result of the development proposals.
- 4.3 The building is located within a rural setting, and the surrounding mature trees and hedges create essential ecological corridors, providing vital habitat links to the woodland that is located to the south-east. This woodland, likely rich in biodiversity, will likely offer an abundance of resources such as food, shelter, and suitable breeding sites for a wide range of species. Among these are several species of bats, which could be reliant on the area's veteran trees for roosting and the dense,

sheltered canopies of the woodlands for foraging. Ancient woodlands, such as those located to the south-east of the site, will play a crucial role in supporting local wildlife populations, including for bats.

Building Assessment

- 4.4 The external inspection identified a limited number of potential roosting features suitable for crevice-dwelling bats, primarily in the form of narrow gaps between the wooden soffit and the stonework on the north-west facing gable end. These features are considered suitable for use by low numbers of individual bats but are of limited extent and offer restricted internal space. Internal inspection of the loft void confirmed the presence of a maternity roost of Natterer's bat, with approximately 35-40 individuals recorded roosting near the ridge beam. Accumulations of droppings and evidence of staining indicate long-term and sustained use of the building by this species. The most likely emergence point corresponds with the gap at the apex of the north-west facing gable end, although additional minor access points could also be utilised. Collectively, the evidence confirms that Building 1 supports an established maternity roost of Natterer's bat.
- 4.5 In line with BCT survey guidance it was recommended that three dusk emergence surveys be undertaken on the building to gather further information pertaining to use of the building by bats, completed during the 2025 maternity season. Three surveyor positions coupled with infrared cameras were used to cover all potential roosting features and emergence points identified during the day time survey.
- 4.6 During the nocturnal surveys completed in July and August 2025, a total of four bat species were recorded utilising the wider environment, with activity dominated by the commuting and foraging behaviour of common pipistrelle. Species diversity was generally considered low despite the presence of highly suitable nearby habitats, notably areas of woodland and mature tree cover. The surveys confirmed that the building supports a maternity roost of Natterer's bat within a slit in the north-west facing gable end of the property. The highest number of emergences was recorded during the first survey in early July, when 116 individuals were observed, reducing to 89 in late July and 27 by mid-August. This steady decline in emergence numbers corresponds with the natural disbanding of the maternity colony as juveniles become independent and adult females disperse to alternative roosting sites towards the end of the breeding season.
- 4.7 As the proposed works will impact a confirmed maternity roost of a European Protected Species, an EPS licence will be required from Natural England prior to commencement. This licence can only be applied for following successful planning approval and typically takes 30-45 working days to be determined.

Roost Characterisation

- 4.8 Results of the 2025 nocturnal surveys confirm that the surveyed dwelling is utilised as a maternity roost by a maximum count of 116 Natterer's bats, with the roost access identified as a slit feature at the north-western gable end of the property (see Appendices: Figure 3). The timing of survey observations, coupled with peak counts exceeding 100 individuals, are characteristic of a maternity colony of this species. Given the type of roost and number of individuals recorded, this roost is classified as being of high conservation significance. An outline mitigation plan is detailed below.

Licence and Mitigation

- 4.9 As the proposed development will result in the loss of a maternity roost for Natterer's bat, a bat mitigation licence will be required from Natural England in order for the development to lawfully proceed. This must be issued prior to the commencement of development works and may be applied for following successful planning approval. Natural England expect three tests to be satisfied before a licence can be issued. These tests are as follows:

- There is no satisfactory alternative.
- The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.
- The action authorised preserves public health or public safety or other imperative reasons of overriding public interest including those of the social or economic nature and beneficial consequences of primary importance for the environment.

- 4.10 Regarding the derogation test '*The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range*', the following consideration has been given:

- The mitigation strategy set out in this report has been designed in such a way to provide future roosting provisions specifically for this species, and to promote enhancements for other bat species in the area.

- 4.11 The mitigation set out in this report is to ensure the safeguarding of a Natterer's bat maternity roost and to additionally promote net gain at the site, in line with the current National Planning Policy Framework (NPPF) (Dec 2024).

- 4.12 In accordance with The Bat Mitigation Guidelines 2023, **works will not take place during the maternity season which runs between mid-April and mid-September**. Once works have started, the client will commit to ensuring bat mitigation is complete by the start of the following maternity

period. Delays would potentially result in the Natterer's bat maternity roost disbanding, causing major negative impact at site level.

4.13 Using data collected from daytime survey undertaken in May 2025 and nocturnal surveys in July and August 2025, based on the surveyed building supporting a maternity roost for a maximum count of 116 Natterer's bat, the recommended RAMs and Mitigation Strategy in support of the licence application would include the following:

4.14 Before the commencement of any works upon the structure, the following must be implemented:

- Prior to the commencement of any works, two receptor bat boxes will be installed upon the building or a mature tree within the grounds of the property, using Schwegler 1FF (or similar). Bat boxes will be installed no less than 4m from ground level and not face north. The bat box will provide provisional roosting space for any bats that are found during the licensed supervision (i.e. roof strip). It will also provide suitable roosting habitat for other bats in the area.
- All contractors working on the proposed development must be briefed on the legal protection afforded to bats and their places of shelter and on how to proceed if a bat is discovered during the course of the work.
- A bat-licensed ecologist will then carry out a final inspection inside the buildings to check for the presence of any bats.
- Works must be undertaken slowly, by hand and with care. A licensed bat worker will carry out a watching brief when critical works are carried out, such as when tiles and other key roofing components are removed from the roof (if required). The client will provide secure scaffolding or a cherry picker in order for the ecologist to safely inspect the roof.
- The supervising ecologist will continue the watching brief until the building is declared free of bats. Any bats found during this period will be safely removed by the ecologist and placed in the bat box. If in the unlikely event a bat is discovered after the ecologist is no longer supervising, works must halt immediately and the appointed ecologist responsible for the licensed works must be contacted for advice. If you are not able to reach the ecologist, then contact The Bat Conservation Trust: 0845 1300 228. Never handle bats for legal and Health & Safety purposes.

Compensation Enhancements

4.15 It is considered that that key compensation and mitigation elements linked to such a licence to ensure the favourable conservation status (FCS) of bat species concerned (Regulation 53(9)(b)) will include the following mitigation strategy:

- 4.16 Breathable membranes such as Tyvec pose a risk to bats due to entanglement and therefore **must not be used** in conjunction with bat mitigation proposals with the exception of TLX BatSafe which has recently been approved by Natural England for use in conjunction with bat roost; a snagging propensity test certificate must be sent in with the EPS Licence application where this material is selected for use. Alternatively, traditional Type 1F bitumen roofing felt can be used for bat mitigation which will be a condition of the mitigation licence. Additionally, any timbers used in conjunction with the works must be untreated to prevent any form of toxic impacts to bats.
- 4.17 The original loft void will be lost as part of the proposed conversion works. To compensate for the loss of the Natterer's bat maternity roost, a new bat loft will be incorporated into the proposed development scheme which will provide roosting and pre-emergence flight space. The loft will be a minimum of 5 m in length and the height from ridge to floor will be at least 2 m.
- 3 x access points will be created along the ridge. They will be evenly spaced along the ridge and ideally at 2 m intervals. They will be achieved by leaving out the bedding mortar or by overlapping ridge tiles to form a natural gap (access holes will be created on either side of each ridge tile to invite bats from either side of the roof pitch). The gaps will then provide access directly into the loft void. Ridge access holes will be 250mm X 25mm. Holes will be made in the felt behind ridge openings (same size as ridge access points) so that bats can pass through into the void space.
 - If the bat loft leads into any additional loft space, a partitioning wall will be created using timber. This is to ensure the bat loft remains private and undisturbed. Furthermore, the bat loft will not be used for storage and will not be entered by anyone without a bat Natural England bat licence.
 - No new lighting will be installed that would shine directly towards the roost access points.
 - No lighting will be used in the new bat loft. No ceiling lights that allow spill into the loft will be fitted below. No additional night-time security lighting that would shine on the mitigation features will be fitted to the outside of the building.
 - Type 1 (BS 747) bitumen felt will only be used. **NO OTHER MEMBRANE SUCH AS MODERN BREATHABLE TYPES ARE SUITABLE FOR USE IN A BAT ROOST.** The timbers inside the building will not be treated by any chemical-based substances that might cause harm to bats and the timbers will be left rough-sawn

- No climbing plants will be allowed to grow up the side as they may eventually block roost access.
- A lockable inspection hatch will be created which is to be large enough for a bat-licensed ecologist to gain entry for monitoring and cleaning.
- Post-monitoring surveys will be carried out by the ecologists to gain information relating to the success of the bat mitigation, as stipulated by Natural England.

4.18 Once completed, bat mitigation features are to be checked by an appropriately licensed and experienced bat consultant prior to works being completed so that changes can be made if necessary. Mitigation will also need to be signed-off on completion by the licensed bat consultant. Once the works are complete, if required, a compliance letter can be provided to Wiltshire District Council at their request.

Nocturnal lighting measures

4.19 The insensitive use of external lighting within the proposed development could have a negative impact upon bats using the site for foraging and commuting activity.

4.20 As suitable bat habitat occurs within the nearby surrounding environment, low-level lighting will be used to avoid indirect disturbance to bats and other nocturnal animal species that may exploit local habitats and measures must be taken to ensure bats are safeguarded from inappropriate use of light and noise throughout the hours of night during the construction period, as well as to protect important commuting corridors for bats. Any external lighting installed as part of the development must be used in accordance with Guidance Note 08/23: Bats and Artificial Lighting⁷.

4.21 Sensitive lighting strategy measures during the construction period are as follows:

- Works must not be carried out after dusk and must not commence until after dawn.
- Generators and machinery that emit significant noise levels must not be left to run after dusk.
- LED lighting sources must be used, which generally have a narrower and more directional beam.
- Light spill must be controlled and if lighting is required at night, hooded shields must be fitted to prevent spill onto nearby habitats that are likely to support wildlife, including nearby trees and hedgerows.
- Lighting must not be directed towards any bat or bird compensation features.

⁷ <https://theilp.org.uk/publication/guidance-note-8/23-bats-and-artificial-lighting/>

4.22 In addition to the above, when selecting appropriate external lighting, the following specifications will be taken into consideration:

- Any external lighting incorporated into the proposed development will be LED luminaires due to their sharp cut-off, lower intensity, good colour rendition and dimming capability.
- Luminaires will feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats⁸.
- All luminaires will lack UV elements when manufactured. Metal halide, fluorescent sources will not be used⁹

Nesting birds

4.24 The gaps present beneath the tiles provide a limited level of suitable onsite nesting opportunities, although no evidence of nesting was discovered during the building assessment. As such, impacts to nesting birds as a result of the proposals are considered to be unlikely. However, if at any point nesting birds are discovered utilising the building, without appropriate mitigation, these may be impacted by the development proposals. Impacts to nesting birds can be avoided by timing works outside the bird nesting season which generally runs between February-August, or by ensuring a site visit is carried out by a suitably qualified ecologist ahead of works commencing. In the event that any nesting birds or suspected nesting activity is discovered prior to works commencing, works must cease and the appointed ecologist contacted for further advice.

Biodiversity Enhancement

4.25 As a householder application the scheme is exempt from Mandatory Biodiversity Net Gain. However, the NPPF (2024) outlines obligations of Local Planning Authorities to promote Biodiversity Net Gain where possible. There are various options available with regards to biodiversity enhancement on site:

Bats

4.26 Receptor bat boxes installed as part of the mitigation strategy associated with the European Protected Species Licence application will be retained onsite to provide enhancement for local bat populations.

4.27 **Note:** Once a bat box is occupied, it is an offence to disturb any bat when it is roosting, or to kill, injure or handle a bat without the appropriate licence granted by Natural England. If a sick or injured bat is found, the local Wildlife Trust or bat group should be contacted for further advice. If

⁸ Stone, E.L. (2013) *Bats and lighting: Overview of current evidence and mitigation*

⁹ Bat Conservation Trust & Institute of Lighting Professionals (ILP) 2023. *Guidance Note 08/23: Bats and artificial lighting in the UK. Bats and the Built Environment Series.*

maintenance of the bat boxes is required, a suitably licensed bat worker or local bat group must be consulted.

Nesting Birds

4.28 Ways to enhance the site value with regards to bird nesting would be to fit nest boxes to the building or nearby trees. Options include close-hole boxes and open-fronted boxes which would then provide opportunity for a variety of bird species. We recommended that one external bird nest box (Schwegler 1B or similar) is installed onsite.

4.29 For maximum success, our recommendations are as follows:

- Bird boxes must be positioned away from busy areas where disturbance would be more likely and ideally not fixed above windows or doorways.
- Following British Ornithology Trust guidelines, bird boxes must be positioned no lower than 2m from ground level and preferably above 3 m to prevent possible predation.
- The proposed placement of the bird nest boxes must allow for a clear flight path, without obstruction to the nest box entrance.
- Avoid installing nest boxes in a south-westerly facing direction in order to offer protection from prevailing winds and rain.
- The close-hole boxes and open-fronted boxes will be slightly tilted in a downwards position to offer further weather protection.

APPENDIX A: LEGISLATION SUMMARY

National Planning Policy Framework December 2024

The National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, 2024) states: Planning policies and 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.

Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 172), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

Wildlife & Countryside Act 1981 (as amended)

The Wildlife & Countryside Act 1981 (as amended) [WCA] is the primary legislation for England and Wales for the protection of flora, fauna and the countryside. Part I within the Act deals with the protection of wildlife. Most European Protected Species offences are now covered under the Conservation of Habitats and Species Regulations (see below), but some 'intentional' acts are still covered under the WCA, such as obstructing access to a bat roost.

The WCA prohibits the release to the wild of non-native animal species listed on Schedule 9 (e.g. Signal Crayfish and American Mink). It also prohibits planting in the wild of plants listed in Schedule 9 (e.g. Japanese Knotweed and *Rhododendron ponticum*) or otherwise deliberately causing them to grow in the wild. This is to prevent the release of invasive non-native species that could threaten our native wildlife.

The provisions relating to animals in the Act only apply to 'wild animals'; these are defined as those that are living wild or were living wild before being captured or killed. It does not apply to captive bred animals being held in captivity. There are 'defences' provided by the WCA. These are cases where acts that would otherwise be prohibited by the legislation are permitted, such as the incidental result of a lawful operation which could not be reasonably avoided, or actions within the living areas of a dwelling house.

Licensing

Certain prohibited actions under the Wildlife and Countryside Act may be undertaken under licence by the proper authority. For example, scientific study that requires capturing or disturbing protected animals can be allowed by obtaining a licence – e.g. bat surveys.

Conservation of Habitats and Species Regulations 2017 (as amended)

The Conservation of Habitats and Species Regulations 2017 (as amended) (which are the principal means by which the EC Habitats Directive is transposed in England and Wales) update the legislation and consolidate all the many amendments which have been made to the Regulations since they were first made in 1994. These regulations provide for the:

- protection of European Protected Species [EPS] (animals and plants listed in Annex IV Habitats Directive which are resident in the wild in Great Britain) including bats, dormice, great crested newts, and otters;
- designation and protection of domestic and European Sites - e.g. Site of Special Scientific Interest [SSSI] and Special Area of Conservation [SAC]; and
- adaptation of planning controls for the protection of such sites and species.

Public bodies (including the Local Planning Authority) have a duty to have regard to the requirements of the Habitats Directive in exercising their function – i.e. when determining a planning application. There is no defence that an act was the incidental and unavoidable result of a lawful activity.

It is possible for actions which would otherwise be an offence under the Regulations to be undertaken under licence issued by the proper authority. For example, where a European Protected Species has been identified and the development risks deliberately affecting an EPS, then a 'development licence' may be required.

Bats

In England and Wales, bats and their roosts are protected under the Conservation of Species and Habitats Regulations 2017 (as amended), and the Wildlife & Countryside Act 1981 (as amended). Taken together, this legislation makes it an offence to:

- Deliberately capture (or take), injure or kill a bat
- Intentionally or recklessly disturb a group of bats where the disturbance is likely to significantly affect the ability of the animals to survive, breed, or nurture their young or likely to significantly affect the local distribution or abundance of the species whether in a roost or not
- Damage or destroy the breeding or resting place of a bat
- Possess a bat (alive or dead) or any part of a bat
- Intentionally or recklessly obstruct access to a bat roost
- Sell (or offer for sale) or exchange bats (alive or dead) or parts of bats

A roost is defined as being 'any structure or place that is used for shelter or protection', and since bats regularly move roost site throughout the year, a roost retains such designation whether or not bats are present at the time.

Birds

All common wild birds are protected under The Wildlife and Countryside Act 1981 (and as amended). Under this legislation it is an offence to:

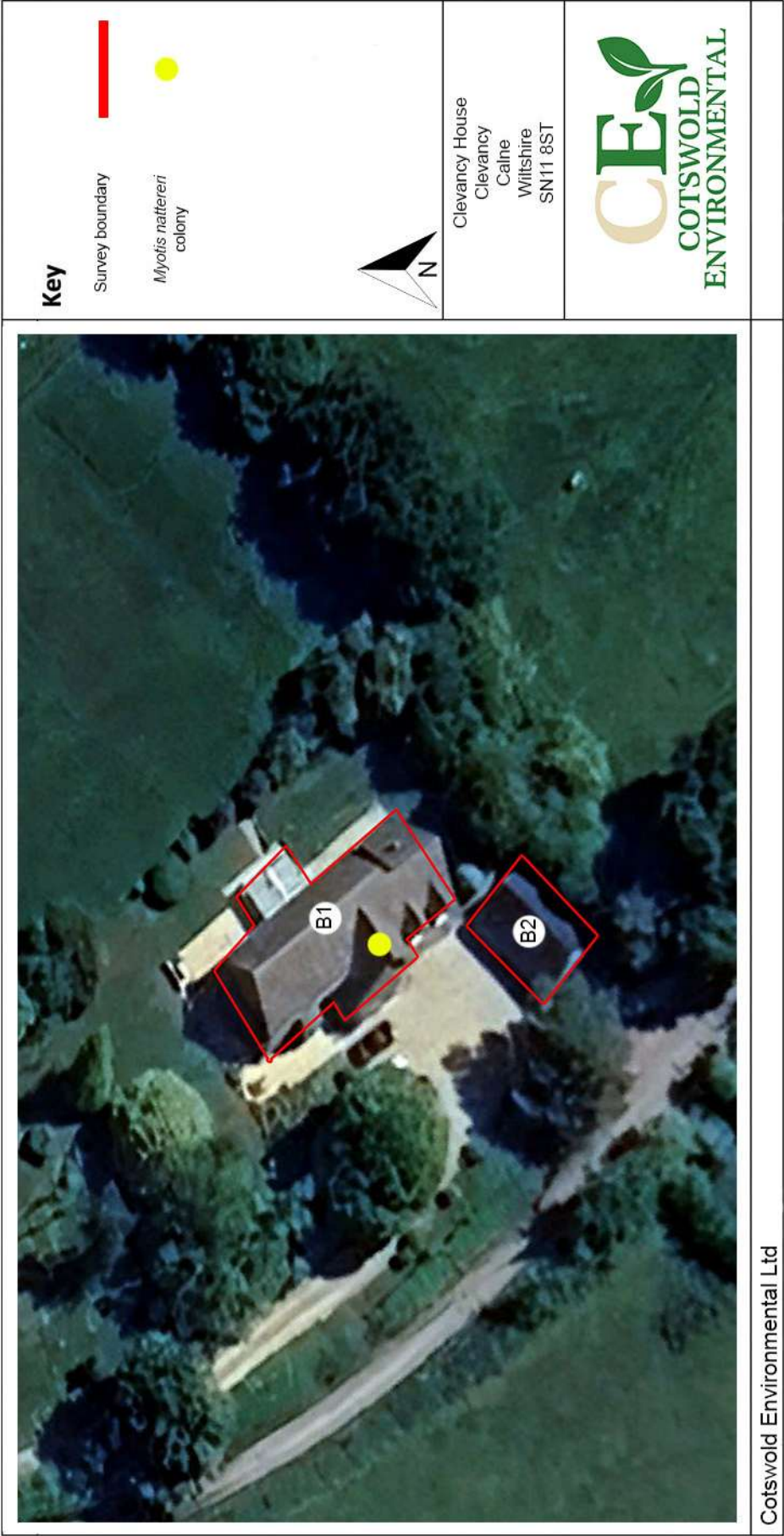
- Kill, injure or take any wild bird

- Take, damage or destroy the nest of any wild bird while it is in use or being built
- Take or destroy the egg of any wild bird

Certain rare breeding birds are listed on Schedule 1 of The Wildlife and Countryside Act 1981 (and as amended). Under this legislation they are afforded the same protection as common wild birds and are also protected against disturbance whilst building a nest or on or near a nest containing eggs/unfledged young.

[illegible]

Figure 1: Site location map



Cotswold Environmental Ltd

Figure 2: Site Map

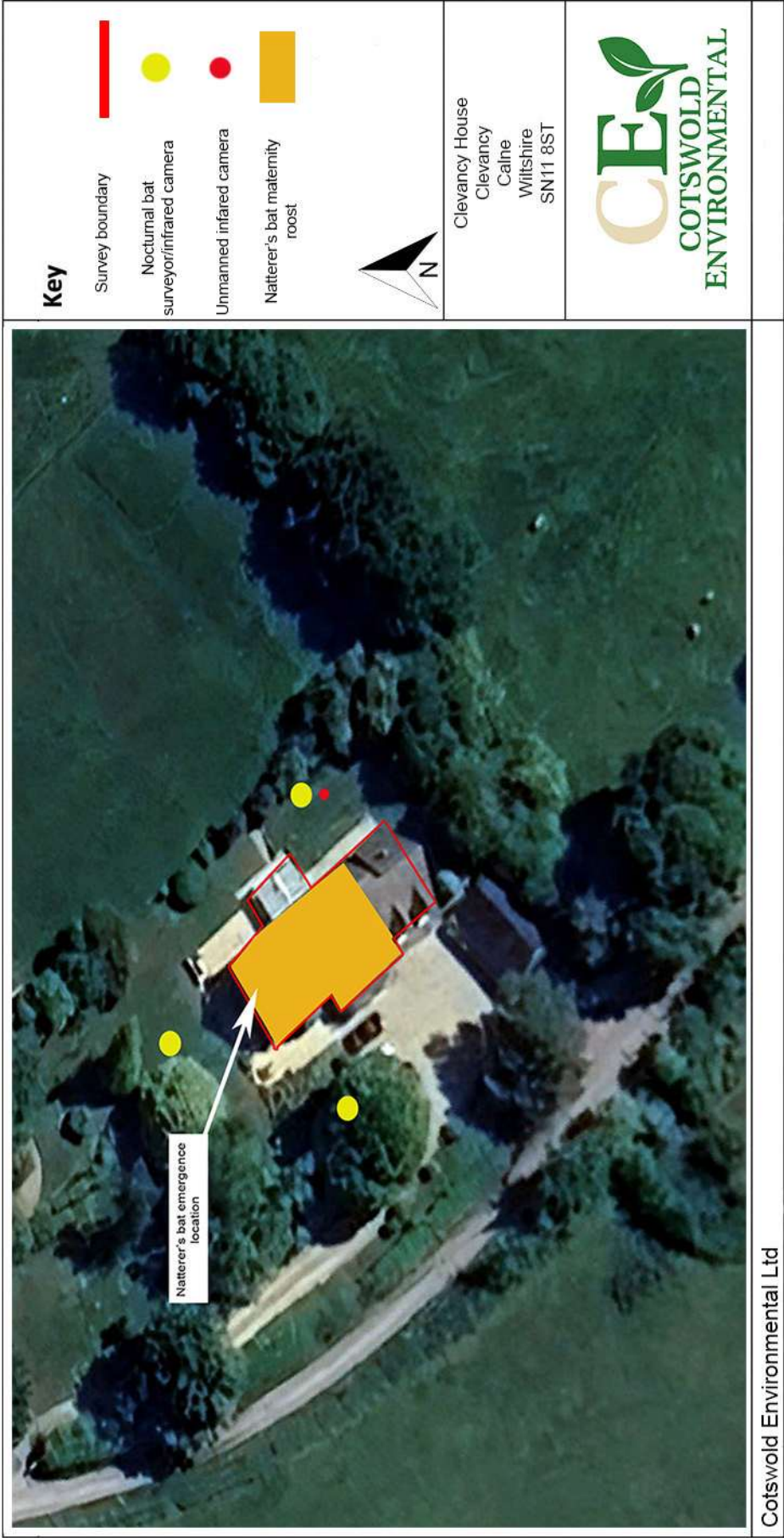


Figure 3: Nocturnal Bat Survey Map

APPENDIX C: SITE IMAGES



Photo 1: B1 - The roof of the dwelling is clad in imitation stone tiles



Photo 2: B1 - Dwelling viewed from the north



Photo 3: B1 - The north-west facing gable end of the dwelling



Photo 4: B1 - The south-east facing gable end wall.



Photo 5: B1 - Low number of suitable gaps present beneath the imitation stone tiles.



Photo 6: B1 - gap at roof edge, apex of the north-west facing gable end.



Photo 7: B1 - A missing tile on the rear north-east facing roof aspect



Photo 8: B1 - The single loft void covers the entire main section of the building.



Photo 9: B1 - Grease staining near the apex of the north-western gable end wall.



Photo 11: Natterer's bat *Myotis nattereri* roosting within the loft element of B1



Photo 12: B1 - droppings were present throughout the loft void.



Photo 13: B2 - Garage structure



Photo 14: B2 - Timber cladding of garage structure



Photo 15: B2 - internal view of roof structure



Photo 16: Example infrared camera view



Photo 17: Example infrared camera view



Photo 18: Example infrared camera view



Photo 19: Example infrared camera view