



Bat Inspection & Emergence Survey Report

Leonora House

Horizon Homes

July 2024

IES/2023/152/Version 1.0

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NON-TECHNICAL SUMMARY

Purpose

This report identifies the likelihood of use of the site by bats, and to provide an assessment of the likely importance of the site for this group. It is designed to inform the development and identifies any further survey work required to allow the development to proceed.

Methodology

An internal and external inspection, followed by bat emergence surveys were carried out in accordance with the methodology outlined in the Bat Conservation Trust's manual *Bat Surveys: Good Practice Guidelines (2023)*.

Key Issues

Leonora House is a low conservation status roost for low numbers of non-breeding common and soprano pipistrelle bats.

A bat licence will be required for certain works that could impact bats and otherwise causing an offence. As well as the traditional bat development licence process, the site also qualifies for the Bat Mitigation Class Licence or Bat 'Earned Recognition' Class Licence approach.

Aside of compensation required for licensing, it recommend that further bat roosts are created to provide an enhancement of the proposals.

Legal obligations

All bats are protected under the Habitats Regulations 2017, and under The Wildlife and Countryside Act 1981 (as amended), and it is an offence to kill, disturb or injure them, or to damage or destroy their breeding or resting places. It is also an offence to obstruct access to their resting or sheltering places.

All wild birds, their nests and eggs are protected under the Wildlife and Countryside Act 1981 (as amended), making it a criminal offence to kill, injure or capture wild birds, and to damage, obstruct, disturb, or destroy their nests.

Conclusions

No further survey is required to inform a planning decision. If no works are undertaken under licence within the next year, then an update survey is likely to be required to ensure the baseline conditions described are accurate prior to a licence registration. A licence from Natural England will be required in order to carry out certain works that would likely cause an offence. The site should be eligible for registration on the Bat Mitigation Class Licence or Bat Earned Recognition schemes which have the added benefit of reduce determination times and administrative costs.

1 INTRODUCTION

1.1 Background

1.1.1 IES Consulting were instructed by Horizon Homes to undertake a bat inspection and emergence survey at Leonora House, Chippenham, SN15 3DY and centered on Grid Reference ST925726. A site location plan can be seen in **Figure 1**.

1.1.2 The aim of this survey was to determine the use of the site by bats, to determine the existence and location of any valuable areas for bats and to identify the presence or likely absence of bats on the site.

1.1.3 The purpose of this report is to:

- Identify the use of the site by bats;
- Inform the design to allow significant ecological effects to be avoided/minimised wherever possible;
- Recommend general bat mitigation/compensation measures; and
- Assess the impact of the development on any bat population using the site.

1.1.4 This report was authored by Daisy-Mae Bradley-White (BSc) who has over 2 years' worth of ecological surveying experience, including bat survey work, and Kate Hall who over 3 years of bat survey experience. The report was reviewed by Vilas Anthwal (BSc MCIEEM) who has held a Natural England bat survey licence since 2007, is accredited the Bat Mitigation Class Licence and Bat Earned Recognition schemes and has over 20 years' experience of ecological surveying, including bat survey work.

1.2 Site Description

1.2.1 The site spans Leonora House and grounds, an original Victorian built building. Located on Wood Lane, 3km east of the A350 and approximately 1km southeast of Chippenham town centre. The site is set predominantly in a residential area with a primary school directly opposite.

1.3 Development Proposals

1.3.1 It is proposed to demolish the existing buildings and develop new residential dwellings.

2 PLANNING POLICY, LEGISLATION AND GUIDANCE

2.1 Planning Policy

2.1.1 A review of planning policy was undertaken to inform this report, and this is summarised below. Full details of the planning policy relevant to the site can be found in **Appendix A**.

National Policy

- **National Planning Policy Framework (February 2019)** - this document is a material consideration in planning decisions, and states that planning policies and decisions should provide net gains for biodiversity.

Local Policy

- **The Wiltshire Local Plan** - Core Policy 50 seeks to ensure that all stages of sustainable development are informed by relevant ecological information, from site selection and design to planning decisions and long-term management.
- 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.
- All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.

2.2 Legislation

2.2.1 The following legislation has been taken into account when preparing this report, and full details are given in **Appendix A**.

- **The Conservation of Habitats and Species Regulations 2017** - this provides protection for European Protected Species and European Protected Sites.
- **The Natural Environment and Rural Communities Act 2006** - this extends the duties of public bodies in relation to biodiversity. It establishes the Section 41 species and habitats of principal importance for the purpose of conserving biodiversity, which need to be taken into account by a public body when performing any of its functions.

- **The Countryside and Rights of Way Act 2000** - this act places a duty on Government departments and the National Assembly for Wales to have regard for the conservation of biodiversity, and to maintain lists of species and habitats for which conservation steps should be taken or promoted, in accordance with the Convention on Biological Diversity. It strengthens the legal protection for species named on the Wildlife and Countryside Act 1981 and creates a new offence of reckless disturbance.
- **The Wildlife and Countryside Act 1981** - this act provides legal protection for wild birds, Sites of Special Scientific Interest, plants, reptiles and other amphibians and other animals, and makes it a criminal offence to kill, injure or take those species listed in the act, and to damage, obstruct or destroy their resting places, or disturb them in their resting places.

2.3 Guidance

2.3.1 This report has been prepared in accordance with the following guidelines:

- CIEEM Guidelines on Ecological Report Writing.
- Bat Conservation Trust Bat Surveys for Professional Ecologists - Good Practice Guidelines
- Biodiversity Net Gain - Good Practice Principles for Development.
- Biodiversity Net Gain - Good Practice Principles for Development Part A: A practical guide & Part B: Case Studies.
- BS42020:2013 Biodiversity - Code of Practice for Planning and Development.

3 METHODOLOGY

3.1 Overview

3.1.1 The surveys were carried out on the site following the methodology outlined in the Bat Conservation Trust's manual *Bat Surveys: Good Practice Guidelines (2023)*. Weather conditions were recorded using an Extech Mini Thermoanemometer to determine wind speed and temperature. **Appendix B** gives any notes and limitations to the survey work.

3.1.2 Surveys were conducted during the optimal period for detecting maternity roosts (May through July).

3.1.3 The entire site was included in the survey, and the desk study included a wider area as described in 3.2 below.

3.2 Desk Study

3.2.1 The purpose of the desk study is to review information available in the public domain. The NBN Atlas provides some species records on a creative commons licence which allows for them to be used for commercial purposes. The site and an area of 1km surrounding the site was searched for records of bats.

3.2.2 Data was obtained from the following sources on:

- NBN Atlas. (5th February 2024)
- MAGIC. (5th February 2024)
- Wiltshire and Swindon Biological Records Centre (3rd May 2024)

3.3 Internal and External Inspection

3.3.1 The field survey was carried out on 15th January 2024. Internal and external inspections can be carried out year round.¹ The extent of the survey area and results of the survey can be seen on **Figure 2**.

3.3.2 An internal and external inspection of the building was undertaken using a ladder, torches and close focusing binoculars to inspect the roof, eaves and any ledges on the buildings. Where appropriate, a video endoscope was also used.

3.3.3 Evidence of bat activity and the potential for the building to support a bat roost was searched for during the inspection survey. Any suitable roosting, foraging and commuting habitat was also recorded during the survey.

3.3.4 Evidence of bat activity is usually detected by the following signs:

¹ Table 2.2, page 18, BCT Bat Surveys for Professional Ecologists Good Practice Guidelines 3rd Edition 2016.

- bat droppings (these will accumulate under an established roost);
- insect wings (from feeding);
- oil (from fur) and urine stains;
- scratch marks;
- holes, apertures and other opportunities for bats to roost; and
- actual sightings (including corpses).

3.3.5 The preliminary roost inspection was carried out by Daisy-Mae Bradley-White (BSc) who has a years' worth of ecological surveying experience, including bat survey work, and Vilas Anthwal (BSc MCIEEM) who has held a Natural England bat survey licence since 2007, is accredited on the Bat Mitigation Class Licence and Bat Earned Recognition scheme and has over 20 years' experience of ecological surveying, including bat survey work.

3.4 Emergence Survey

3.4.1 The field survey was carried out between May and June 2024. The extent of the survey area and location of surveyors can be seen on Figure 3. All the checks were made in suitable weather conditions and accurately reflected the use of the site by bats.

3.4.2 Surveyors used Anabat Scout full spectrum bat detectors, Echometer Touch 2 Pro full spectrum bat detectors, and EM3 full spectrum bat detectors. Surveyors used Nightfox Red and Nightfox Whisker night vision cameras. Where necessary, any calls were analysed using Anabat Insight, and any footage was reviewed using windows media player.

3.4.3 Dusk emergence surveys started approximately 15 minutes before sunset, and were continued until 1.5 hours after sunset, or later if the lead surveyor determined cause to do so, for example sustained bat activity at a roost.

3.4.4 Any bats emerging or entering the buildings were recorded, including the time of emergence/entry, species (if identified) and direction of flight. All passes made by bats were also recorded, with 10 seconds of continuous echolocation being recorded as one pass (so 13 seconds would be 2 passes), and again with the species of bat and the flight direction also being noted on the survey form.

3.4.5 The field survey was carried out by:

- Kate Hall (BSc (Hons)) who has 3 years' experience of ecological surveying, including bat survey work.
- Daisy Bradley-White (BSc (Hons)) who has over 2 years' experience of ecological surveying, including bat survey work.
- Tilly Tilbrook (MSc CEcol MCIEEM) who has over 20 years' experience of ecological surveying, including bat survey work.

- Emma Heath (PGCert CIEEM) who has over 9 years' experience of ecological surveying, including bat survey work.
- Dominic Walding (BSc (Hons)) who is in his first year of ecological surveying, including bat survey work.
- Corrie Grafton (BSc (Hons)) who has over 3 years' experience of ecological surveying, including bat survey work.
- Jenny Hyndman who has over 3 years' experience of ecological surveying, including bat survey work.
- Tom Miles (BSc) who has over 9 years' experience of ecological surveying, including bat survey work.
- Lucy Masters (BA MSc) who has over 2 years' experience of ecological surveying, including bat survey work.
- Eleanor Hewins (PhD MCIEEM) who has over 23 years' experience of ecological surveying, including bat survey work.
- Beth Gerrard (BSc) who is in her first year of ecological surveying, including bat survey work.

3.4.6 The weather conditions for each survey are given in Table 1 below:

Table 1: Survey Weather Conditions

Date	2 nd May 2024	22 nd May 2024	11 th June 2024
Temp start (°C)	11	13.7	15.1
Temp end (°C)	10	13	11.4
% Cloud cover start	100	70	80
% Cloud cover end	100	100	90
Wind average start (Beaufort scale)	1	0	0

Wind average end (Beaufort scale)	0	0	0
Precipitation	0	0	0
Sunrise/Sunset time	20:34	21:04	21:25

4 RESULTS

4.1 Desk Study

4.1.1 Data availability varies regionally, and the results should not be considered to be an exhaustive list of species. The absence of data is not evidence of the absence of a particular species or habitat. Both the NBN and MAGIC were accessed on 5th February 2024. The Wiltshire and Swindon Biological Records Centre was accessed on 3rd May 2024.

4.1.2 The desk study noted that the PEA and internal/external inspection visit both assessed the site as being suitable to support bats.

4.1.3 Table 2 below gives details of any bat species recorded within 2km of the site in the last ten years.

Table 2: Summary of records of bat species

Latin Name	Common Name	European Legal Protection	UK Legal Protection	Section 41 Species
<i>Plecotus auritus</i>	Brown Long-eared Bat	Y	Y	Y
<i>Pipistrellus pipistrellus</i>	Common Pipistrelle	Y	Y	
<i>Nyctalus noctula</i>	Noctule	Y	Y	Y
<i>Myotis spec.</i>	Myotis (unidentified)	Y	Y	
<i>Eptesicus serotinus</i>	Serotine	Y	Y	
<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle	Y	Y	Y
<i>Rhinolophus hipposideros</i>	Lesser Horseshoe Bat	Y	Y	Y
<i>Rhinolophus ferrumquinum</i>	Greater Horseshoe Bat	Y	Y	Y
<i>Barbastella barbastellus</i>	Barbastelle	Y	Y	

4.1.4 A search of NBN Atlas, showed there were no known bat roosts within 1km of the site recorded in the last 10 years.

4.1.5 A search of the MAGIC database for European Protected Species licenses within 5km of the site identified 17 licenses within the last 10 years. Table 3 below gives details of these licenses.

Table 3: Summary of European Protected Species licenses

Licence Case Reference	Species	Start Date	End Date
2017-31337-EPS-MIT	Brown Long-eared bat	27/10/2017	27/10/2027
2017-31914-EPS-AD2	Brown Long-eared, Lesser Horseshoe bat	10/04/2018	09/04/2028
2018-33546-EPS-MIT-1	Lesser Horseshoe	24/05/2018	23/05/2028
2018-36586-EPS-MIT	Common Pipistrelle, Soprano pipistrelle	01/09/2018	01/09/2023
2015-13668-EPS-MIT-4	Brown Long-eared, Soprano Pipistrelle	19/02/2019	05/10/2020
2017-31914-EPS-AD2-1	Brown Long-eared, Soprano Pipistrelle, Lesser Horseshoe	24/11/2019	05/04/2029
2018-36586-EPS-MIT-1	Common Pipistrelle, Soprano Pipistrelle	11/02/2019	01/09/2023
2019-39434-EPS-MIT	Soprano Pipistrelle	26/02/2019	26/02/2024
2019-42682-EPS-MIT	Brown Long-eared, Common Pipistrelle, Soprano Pipistrelle, Whiskered bat	26/09/2019	31/03/2020
2019-43073-EPS-BDX	Common Pipistrelle	09/10/2019	31/10/2019
2019-43644-EPS-MIT	Common Pipistrelle, Serotine, Soprano Pipistrelle	11/12/2019	31/12/2022
2019-43809-EPS-MIT	Common Pipistrelle	26/11/2019	31/12/2024
2020-48642-EPS-MIT	Brown-Long eared, Common Pipistrelle, Soprano Pipistrelle	01/09/2020	30/04/2031
2014-5332-EPS-MIT	Brown Long-eared, Soprano Pipistrelle	20/01/2015	01/01/2020
2015-13668-EPS-MIT	Brown Long-eared, Soprano Pipistrelle	06/10/2015	05/10/2020
2015-8200-EPS-MIT	Brown Long-eared bat	29/04/2015	31/12/2017
2015-13668-EPS-MIT-1	Brown Long-eared, Soprano Pipistrelle	11/01/2016	05/10/2020

4.2 Internal and External Building Inspection

4.2.1 This section should be read in conjunction with **Figure 2**, which shows the layout of the site and the results of the field survey.

4.2.2 The site is comprised of Leonora House, located on Wood Lane, 3km east of the A350 and approximately 1km southeast of Chippenham town centre. The site is set predominantly in a residential area with a primary school directly opposite.

Leonora House

4.2.3 Leonora house is an original Victorian building dating back to the late 1800s which has subsequently been extended to the front and rear. It is stone built with a slate tiled hip and valley roof, along with several ornamental roof stacks. Attached to the west of the main house are 11 self-contained apartments within a flat roofed extension. Access to the property is immediately off Wood Lane which leads to a gated car park.

4.2.4 Externally, the house has a mixture of both sash and double-glazed windows which are all well sealed. The stone walls are in generally good condition as is the the pitched roof. There was also a small number of holes through the walls on the eastern elevation providing potential bat access. There are several potential access points on the property, mainly gaps or missing slate tiles and led flashing surrounding the roof and chimney stacks. As well as sections of raised led flashing, hanging tiles and missing or rotten fascia boarding on all four elevations, these potential access points are highlighted in **Figure 2**.

4.2.5 Internally Leonora House is in a disused condition most rooms are well lit. There are two roof voids in the building. The main roof void to the south of the main house is a well-lit, open plan area. It has been lined internally with expandable roof foam between exposed wooden beams. There are sections of secondary breathable roof linings in this area, however many of these sections are boarded up. There are very few roosting opportunities in this area and no droppings were found upon the time of the inspection.

4.2.6 The second roof void to the north was also lined with a spray on expandable foam; however, this roof void was dark and better suited to internal roosting. A dead bat was found in this area, a sample was sent for DNA testing by Warwick University and identified as a common pipistrelle bat (*Pipistrellus pipistrellus*). The bat was quite old (at least one year) and no other conclusions about the age or sex could be determined upon examination. No other evidence of bats was seen in the roof void at the time of the inspection. An old bird nest was found in this roof space.

4.2.7 The basement of the main house is enclosed with no direct access outside. Despite some gaps in the brick in this area, these were too shallow to support a roosting bat, no droppings were seen in the basement.

4.2.8 Due to the age and character of the building as well as sections of missing tiles, gaps through the wall and in roofing materials, Lenora House is considered to be of high potential to support roosting bats. This is aside of the dead bat found in the roof void which also highlights the likely presence of a bat roost.



Plate 1: Lenora House, southern elevation with the original house to the east and flat roof extension to the west



Plate 2: Lenora House, internal

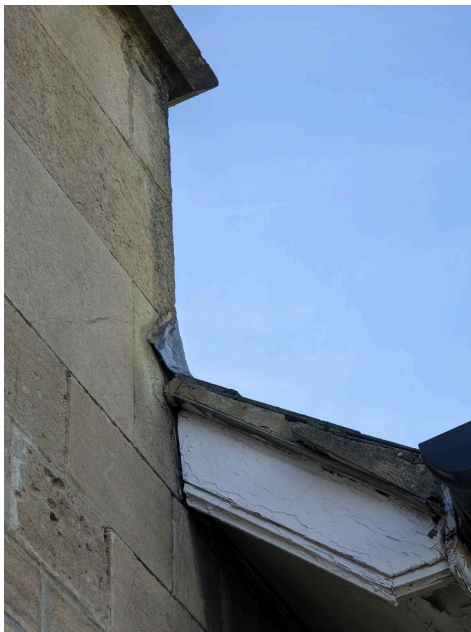


Plate 3: Lenora House, external lead flashing loose

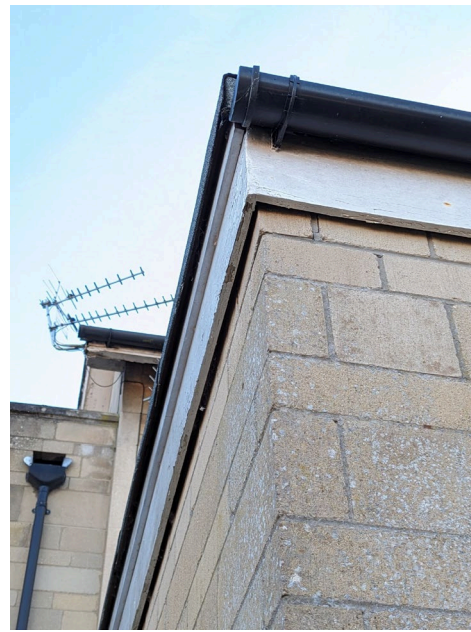


Plate 4: Lenora House, external gaps under fascia boarding



Plate 5: northern roof void, where a dead common pipistrelle bat was found



Plate 6: southern roof void of Lenora House



Plate 7: Basement of Lenora House

Assessment of Suitability

4.2.9 Evidence of bats using the building was found at the time of the inspection, including the discovery of a dead common pipistrelle bat in the northern roof void of the main building. The buildings are considered to be of high suitability to support roosting bats, in accordance with the BCT guidelines.² There are several access points which could provide roosting opportunities for bats, and the surrounding habitats are well linked to the wider countryside.

² Table 4.1, page 35, BCT Bat Surveys for Professional Ecologists Good Practice Guidelines 3rd Edition 2016.

4.3 Emergence Survey

4.3.1 This section should be read in conjunction with **Figure 3**, which shows the extent of the survey area and the results of the field survey; and **Appendix C**, which contains photographs of the site.

2nd May 2024

4.3.2 The survey started at 20:19 and ended at 22:04, sunset was at 20:34.

4.3.3 Surveyors 3, 4 and 5 heard their first bat at 21:06, a common pipistrelle. None of the surveyors saw the bat which is assumed to have passed nearby..

4.3.4 No other bats were seen or heard by any surveyors throughout the rest of the survey. In summary, no bats emerged from the building.

22nd May 2024

4.3.5 The survey started at 20:50 and ended at 22:34, sunset was at 21:04.

4.3.6 Surveyor 2 saw their first bat, a soprano pipistrelle, at 21:45 passing east to west across the sites' garden.

4.3.7 Surveyor 3 heard their first bat, a soprano pipistrelle, at 22:26.

4.3.8 Surveyor 4 heard their first bat at 21:47, a soprano pipistrelle, at 21:37.

4.3.9 Surveyor 6 saw their first bat, a common pipistrelle, at 21:45, foraging along the hedgerow to the west.

4.3.10 No other bats were seen or heard by any surveyors throughout the survey, and no bats were seen to emerge from the building.

11th June 2024

4.3.11 The survey started at 21:10 and ended at 22:55, sunset was at 21:25.

4.3.12 Surveyor 1 saw their first bat, a common pipistrelle, at 21:50, which continued foraging in the front garden of the building until 22:03. At 22:07 and 22:14, they noted a common pipistrelle pass from above the hedgerow to the east into the garden to forage. At 22:28, they noted a common pipistrelle fly from west to east over the building.

4.3.13 Surveyor 2 saw their first bat at 21:50, the same common pipistrelle foraging around the front garden continuously.

4.3.14 Surveyor 3 heard their first bat, a common pipistrelle, pass at 22:28. They heard a soprano pipistrelle pass at 22:39 and 22:54.

4.3.15 Surveyor 4 heard their first bat, a common pipistrelle, pass at 22:04. At 22:28, they noted a common pipistrelle pass over the building from west to east. At 22:39, they heard another common pipistrelle pass.

4.3.16 Surveyor 6 noted their first bat, a soprano pipistrelle which emerged from the building (Point A, **Figure 3**) at 22:00 and flew northeast alongside the building.

4.3.17 Surveyor 7 noted their first bat, a common pipistrelle, at 21:49, flying from north to south between the buildings on site. This bat continued foraging around the front garden until 22:03. They noted common pipistrelle passes at 22:14 and 22:27.

Summary

4.3.18 Across the three surveys, a single soprano pipistrelle bat was seen to emerge from the southeast elevation of the buildings (Point A, **Figure 3**) on one occasion. Other activity recorded included common pipistrelle bats foraging in southern garden. All other activity was described as brief commuting passes of little relevance to the habitats on site.

5 EVALUATION AND RECOMMENDATIONS

5.1 Evaluation

5.1.1 Leonora House is a confirmed roost for common pipistrelle and soprano pipistrelle bats. One soprano pipistrelle bat was seen emerging from the southeast elevation of the building (Point A, **Figure 3**). One dead common pipistrelle bat was found in the smaller roof void upon inspection (**Figure 2**). Singly roosting non-breeding pipistrelle bats are relatively common as defined in table 3 below.

Table 3: Conservation Status of Bats³

Species	Conservation Status Assessment		
	Local	County	Regional
Common pipistrelle	Considered common and are likely to be widely distributed in the local area.	Common and widespread	1,870,000 in England. Widespread throughout the UK and population considered to have increased since 1999.
Soprano pipistrelle	Considered common and are likely to be widely distributed in the local area.	Common and widespread	2,980,000 in England. Widespread throughout the UK and population considered to have increased since 1999.

5.1.2 Bats and their roosts are protected against several potential offences including disturbance, obstruction to a roost, damage or destruction of a roost as well as killing or injuring bats themselves. Any future proposals where such offences may take place may qualify for a derogation licence to allow otherwise illegal operations to continue.

Ecological Impact Assessment

5.1.3 In the absence of mitigation measures the demolition of Leonora House would result in the loss of two day roosts, one each for individual common pipistrelle and soprano pipistrelle bat. This is a permanent, direct, irreversible effect which will affect a single roost site for each species. Section 5.2 outlines the proposed mitigation and compensation which will enable the development to proceed legally.

5.1.4 The provision of the mitigation and compensation in Section 5.2 means there will be no significant residual impacts on conservation status of species present as a result of the development.

³ Bat Conservation Trust, 2023. The National Bat Monitoring Programme Annual Report 2022. Bat Conservation Trust, London

5.2 Recommendations

5.2.1 The site is suitable for registration on the Natural England Mitigation Class Licence scheme or the Bat Earned Recognition (BER) Class Licence, which cover low conservation status roosts. Whilst there will not be any timing restrictions on the works, since this is not a maternity or hibernation roost, the following elements will need to be incorporated:

- No breathable roof membrane will be used on buildings with compensatory roosts, instead bituminous roof lining will be used. This is because breathable roof membranes have been shown to ensnare and kill bats as they degrade.
- As part of the licence requirements, a suitably qualified and licenced ecologist will need to oversee demolition of the roof and provide a toolbox talk to contractors undertaking work which may encounter bats.
- Whilst pipistrelle bats are not particularly light sensitive, there will be no external lighting directly illuminating bat roost access features.

5.3 Opportunities for Enhancement

5.3.1 In order to fulfil the requirements of the National Planning Policy Framework, all developments must show biodiversity gain. The following recommendations aim to ensure that this policy requirement is met:

- Whilst two replacement roosts would be used as standard compensation for the loss of the roosts in Leonora Home. It is recommended as an enhancement to increase the number of bat roost features and enhance the proposals.
- Four access tiles will be provided in to the roof of the new buildings. Traditional bituminous “Type 1f” roofing felt will be used where bat access is created.
- In addition four bat roost boxes will be placed high up (at least 4m up) on south facing walls. These can be integrated in to walls or mounted externally. If external they will be made of durable woodcrete or similar material.

6 CONCLUSIONS

6.1.1 The desk study and survey work have identified the site as being a low conservation status roost for two common species of bat (common pipistrelle and soprano pipistrelle).

6.1.2 The site is eligible for registration on the mitigation class licence scheme or the BER class licence, and recommendations for compensation and enhancement have been made as part of this report.

6.1.3 No further survey work is required to inform these proposals. The baseline conditions described in this report are true for the time at which the survey was undertaken. If no works are undertaken within the next year then an update survey may need to be undertaken to ensure the baseline conditions described are accurate.

IES Consulting Ltd 2024

7 REFERENCES

Guidance Documents - General

BS 42020:2013 *Biodiversity - Code of Practice for Planning and Development*. British Standards Institution.

CIEEM, CIRIA, IEAM (2016) *Biodiversity Net Gain: Good Practice Principles for Development*.

CIEEM (2017) *Guidelines on Ecological Report Writing*. Chartered Institute of Ecology and Environmental Management, Winchester.

CIRIA (2019) *Biodiversity Net Gain. Good Practice Principles for Development A Practical Guide*.

Guidance Documents - Habitats and Species

Bat Conservation Trust (2018) *Guidance Note 08/18 Bats and Artificial Lighting in the UK*.

Collins, J. (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd Edition)*. Bat Conservation Trust, London.

English Nature (2004) *Bat Mitigation Guidelines*.

JNCC (2004) *Bat Workers' Manual*

Legislation and Policy

HMSO The Conservation of Habitats and Species Regulations 2017

HMSO The Countryside and Rights of Way Act 2000

HMSO The Natural Environment and Rural Communities Act 2006

HMSO The Wildlife and Countryside Act 1981.

MHCLG (2019) National Planning Policy Framework.

FIGURE 1: SITE LOCATION

FIGURE 2: INTERNAL AND EXTERNAL INSPECTION

FIGURE 3: EMERGENCE SURVEY

APPENDIX A: POLICY AND LEGISLATION

POLICY

National Policy

National Planning Policy Framework (February 2019) - this document is a material consideration in planning decisions, and states that planning policies and decisions should provide net gains for biodiversity. The overarching environmental objective is to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. Paragraph 170 d) 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.

Local Policy

- The following policies are applicable to the site:
- The Wiltshire Local Plan - Core Policy 50 seeks to ensure protection and enhancement of these sites and features, it is vital that all stages of sustainable development are informed by relevant ecological information, from site selection and design to planning decisions and long-term management. All effects should be considered, including positive and negative, direct, and indirect, cumulative, and on and offsite impacts over the lifetime of the development (including construction, operational and restoration phases), also considering disturbance effects such as noise, lighting, recreational pressures, trampling, traffic, domestic pets, vandalism etc.
- Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity, and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource and secure the integrity of local ecological networks and provision of ecosystem services.
- All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.
- All effects upon the natural environment should be addressed sequentially in accordance with the principle of the 'mitigation hierarchy':
 - Avoid e.g. site location, buffers
 - Reduce, moderate, minimise
 - Rescue e.g. translocation

- Repair, reinstate, restore
- Compensate or offset.

LEGISLATION

General

The Conservation of Habitats and Species Regulations 2017

This transposes the EU Habitats Directive into UK law, and provides protection for European Protected Species and European Protected Sites.

All bat species are covered under Schedule 2 (animals) of this legislation, and are known as European Protected Species.

You need a mitigation licence if your work will have impacts on European protected species that would otherwise be illegal, such as:

- capturing, killing, disturbing or injuring them (on purpose or by not taking enough care)
- damaging or destroying their breeding or resting places (even accidentally)
- obstructing access to their resting or sheltering places (on purpose or by not taking enough care)

The Natural Environment and Rural Communities Act 2006

This act established Natural England, and extended the duties of public bodies in relation to biodiversity by amending the CROW Act 2000 and the Wildlife and Countryside Act 1981. It established the Section 41 species and habitats of principal importance for the purpose of conserving biodiversity, which need to be taken into account by a public body when performing any of its functions. There are currently 7 bat species of principle importance:

- | | | |
|---------------|-----------------------|--------------------|
| ▪ Barbastelle | ▪ Soprano pipistrelle | ▪ Lesser horseshoe |
| ▪ Bechstein's | ▪ Brown long-eared | |
| ▪ Noctule | ▪ Greater horseshoe | |

The Countryside and Rights of Way Act 2000

This act places a duty on Government departments and the National Assembly for Wales to have regard for the conservation of biodiversity, and to maintain lists of species and habitats for which conservation steps should be taken or promoted (those these lists have been superseded by the S41 lists of the NERC Act 2006), in accordance with the Convention on Biological Diversity. It amends the SSSI provisions of the Wildlife and Countryside Act 1981 by providing increased power for their protection and management.

It strengthens the legal protection for species named on the Wildlife and Countryside Act 1981, including changing the maximum penalty to a term of imprisonment rather than a fine, and creates a new offence of reckless disturbance. This means that if a person takes an unacceptable risk, or fails to notice an obvious risk, they will be liable.

The Wildlife and Countryside Act 1981

This act provides legal protection for wild birds, Sites of Special Scientific Interest, plants, reptiles and other amphibians and other animals, and makes it a criminal offence to kill, injure or take those species listed in the act, and to damage, obstruct or destroy their resting places, or disturb them in their resting places.

Under Schedule 5 of the Act, all species of bat (*Chiroptera* spp.) and their place of rest or shelter more generally known as 'roosts' are protected under the Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000) and Conservation of Habitats and Species Regulations 2017. This makes it illegal to kill, injure, capture or disturb bats or obstruct access to, damage or destroy bat roosts. Under the law, a roost in any structure or place used for rest or shelter is protected. As bats tend to reuse roosts, the roost is fully protected whether the bats are present or not.

APPENDIX B: NOTES AND LIMITATIONS

IES Consulting staff and their sub-consultants have endeavoured to identify the presence of protected species wherever possible on site, where this falls within the agreed scope of works.

Up to date standard methodologies have been used, which are accepted by Natural England (previously English Nature) and other statutory conservation bodies. No responsibility will be accepted where these methodologies fail to identify all species on site. IES cannot take responsibility where Government, national bodies or industry subsequently modify standards.

The results of the survey and assessment work undertaken by IES Consulting were representative at the time of surveying.

IES Consulting have advised on the optimum survey season for a particular habitat/species prior to undertaking the survey work. However, IES Consulting cannot accept responsibility for the accuracy of surveys undertaken outside this period.

IES Consulting cannot accept responsibility for data collected from third parties.