

PURE ECOLOGY

Down Farm Stable

Kington St Michael, Wiltshire

SN14 6LP

Protected Species Report



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PURE ECOLOGY



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Table of Contents

1	<u>INTRODUCTION.....</u>	<u>1</u>
1.1	BACKGROUND	1
1.2	SITE DESCRIPTION.....	1
1.3	PROPOSED SCHEME	3
1.4	SCOPE OF THE STUDY	3
2	<u>PLANNING CONTEXT.....</u>	<u>5</u>
2.1	NATIONAL	5
2.2	WILTSHIRE	5
3	<u>PREVIOUS BAT SURVEY (2023)</u>	<u>7</u>
3.1	INTRODUCTION.....	7
3.2	SURVEY METHODS.....	7
3.3	SURVEY RESULTS AND CONCLUSIONS.....	7
3.4	SECURED MITIGATION	7
4	<u>METHODOLOGY (2025-2026)</u>	<u>8</u>
4.1	REVIEW OF EXISTING INFORMATION	8
4.2	FIELD SURVEY	8
4.3	PERSONNEL	9
4.4	EVALUATION	9
4.5	DEVIATIONS, CONSTRAINTS AND LIMITATIONS	11
5	<u>RESULTS.....</u>	<u>11</u>
5.1	STATUTORY DESIGNATED WILDLIFE SITES.....	11
5.2	GRANTED EPS (BAT) LICENCES WITHIN 4KM	11
5.3	EXISTING SPECIES INFORMATION.....	11
5.4	BUILDING INSPECTION (BATS).....	12
5.5	NESTING BIRDS.....	13
5.6	OTHER PROTECTED SPECIES	13
6	<u>ASSESSMENT.....</u>	<u>14</u>
6.1	DESIGNATED WILDLIFE SITES	14
6.2	BATS.....	14
6.3	NESTING BIRDS	15

Cont...

7 MITIGATION AND ENHANCEMENT STRATEGY 16

7.1 PROTECTION OF BREEDING BIRDS..... 16

7.2 NEW BIRD BOX..... 16

7.3 NEW CREVICE-DWELLING BAT ROOSTING FEATURES 17

7.4 EXTERNAL LIGHTING..... 18

8 REFERENCES..... 19

APPENDIX A. PROPOSED SCHEME.....20

APPENDIX B. 2023 BAT SURVEY INFORMATION 23

APPENDIX C. SECURED BAT MITIGATION 33

APPENDIX D. BAT ACCESS RIDGE TILE DESIGNS 36

1 Introduction

1.1 Background

The client is seeking planning permission from Wiltshire Council to convert a stable building to holiday lets at Down Farm, Kington St Michael, Wiltshire, SN14 6LP.

A householder planning permission (Ref. PL/2024/03484) and listed building consent (Ref. PL/2024/03885) was obtained for a barn conversion and demolition / replacement of a car port in 2024. The building work to both structures which abut the stable building was completed in 2024/25. A Bat Mitigation Licence under Natural England's Bat Mitigation Class Licence registration scheme (ref. RC045-10412A) was obtained for the development due to the buildings supporting day roosts for lesser horseshoe bats (*Rhinolophus hipposideros*), brown long-eared bats (*Plecotus auritus*) and common pipistrelle bats (*Pipistrellus pipistrellus*). Relevant results from the programme of bat surveys undertaken at Down Farm in 2023 is included in Section 3 because the survey area coverage provides background information on the Project Area stables building for the current planning application.

The Project Area for this planning application is the stable building shown on Figure 1 (in Section 1.2).

1.2 Site Description

Down Farm is located approximately 1km west of Kington St Michael. It comprises a farmhouse with various attached and detached outbuildings. The National Grid Reference for the application site is ST 89182 76764.

The application site and Project Area for this ecological study encompasses one outbuilding: the stable building as shown on Figure 1 and in Photos 1-4.

The stables is a single-storey brick / stone structure that is orientated on a southwest to northeast alignment. It abuts the northeast end elevation of an adjacent barn that was converted to a residential dwelling in 2025.

The stable block comprises seven compartments, which are generally open / connected to each other. There is one exposed gable end facing northeast. The roof is pitched and clad in clay pantiles and ridge capping. Internally, the walls are brick, stone and blockwork. The internal roof structure comprises timber trusses, purlins and rafters, and the internal roof is lined with lathe and plaster between the rafters, within which there are some gaps. There is a single, narrow ridge board. The stable block is accessed *via* stable doors on the front (southeast-facing) side elevation, many of which are left open and there are also some open windows along this side wall. The interior of the stable building is therefore light and draughty (thermally unstable).

Down Farm sits in a farming landscape with immediate surrounding land comprising hard-standing and horse paddocks, with a mix of grassland and arable land further out. Hedgerows, tree-lines and small blocks of woodland surround the farm, while a small stream that forms a tributary of the River Avon flows ca. 500-100m to the west and north of the farm. The Project Area building therefore is surrounded by and connects to habitats that are valuable for commuting / foraging bats.



<i>Photo 3. Stable building – northeast gable</i>	<i>Photo 4. Stable building – interior of a compartment</i>
	

1.3 Proposed Scheme

The proposal is to create holiday lets within the stable building. Building renovation will include sealing the building and internal re-fit. The work is also very likely to include repairs of the roof and external walls of the building, and new insulation to upgrade the stable building for residential use.

The Proposed Scheme drawings are in Appendix A.

1.4 Scope of the Study

Pure Ecology has been commissioned to prepare a protected species survey, which includes a bat roost assessment of the Project Area building (stable building), and mitigation strategy to support a planning application for conversion of the stable building into holiday lets at Down Farm (described in Section 1.3).

The ecological assessment has been informed by existing baseline data obtained from the Wiltshire & Swindon Biological Records Centre and a visual inspection of the building.

Furthermore, this appraisal uses information collected from visual bat roost inspections and dusk bat roost and activity surveys undertaken in 2023 as part of a householder planning permission (Ref. PL/2024/03484) and listed building consent (Ref. PL/2024/03885) for works to convert the adjacent barn and demolish / replace a car garage structure (both of which abut the stable building), which was consented in 2024 – see Section 3 and Appendix B for further information.

The ecology report has been prepared by Anton Kattan and Stephen Dangerfield, consultant ecologists and Natural England licensed bat workers with a combined 55+ years' professional experience who are both full members of the Chartered Institute of Ecology and Environmental Management (CIEEM).

The specific aim of this study is to survey and assess the Project Area stables building for bats and other protected species that can be associated with buildings (e.g. nesting birds). This report discusses the predicted impacts of the Proposed Scheme on bats and other protected species, and establishes appropriate mitigation requirements as required. Advice is given on the legal protection for bats and licensing requirements under The Conservation of Habitats and Species Regulations 2017.

This planning application is exempt from Biodiversity Net Gain (BNG) as the proposed development does not impact a priority habitat and impacts less than 25 square metres (5m by 5m) of on-site habitat and less than 5 metres of on-site linear habitats such as hedgerows.

2 Planning Context

2.1 National

The National Planning Policy Framework (NPPF), December 2024, requires that the planning system should conserve and enhance the natural environment (Section 15) by, *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils* (para 187).

Scheme plans should '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' (para 192).

Local planning authorities should aim to protect and enhance biodiversity by applying the following principles (para 193):

- 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 border 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 or ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- d) Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements 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.

2.2 Wiltshire

The Wiltshire Core Strategy (Adopted January 2015) sets out the relevant policies relevant to biodiversity, as follows:

Core Policy 50: Biodiversity and geodiversity

Protection

Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in

order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services.

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

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

Biodiversity enhancement

All development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services. Such enhancement measures will contribute to the objectives and targets of the Biodiversity Action Plan (BAP) or River Basin/ Catchment Management Plan, particularly through landscape scale projects, and be relevant to the local landscape character.

Local sites

Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment. Damage or disturbance to local sites will generally be unacceptable, other than in exceptional circumstances where it has been demonstrated that such impacts:

- Cannot reasonably be avoided
- Are reduced as far as possible
- Are outweighed by other planning considerations in the public interest and
- Where appropriate compensation measures can be secured through planning obligations or agreements.

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

3 Previous Bat Survey (2023)

3.1 Introduction

As part of a householder planning permission (Ref. PL/2024/03484) and listed building consent (Ref. PL/2024/03885) for works to convert a barn and demolish / replace a car garage structure, both of which abut the stable building, a programme of bat survey was undertaken in 2023, which also covered this Project Area stable building.

The methods, results and conclusions of the 2023 survey, and the secured mitigation based on that survey are summarised in this Section with further details in Appendices B and C.

3.2 Survey Methods

Six visual bat roost inspections of the Project Area stable building (as well as the adjacent barn, car garage structure and Dutch Barn) were undertaken on 22nd June, 6th July, 13th July, 24th July, 17th August and 13th September 2023.

Three dusk bat activity surveys of the Project Area stable building (as well as the adjacent barn and car garage structure) were undertaken on the 6th July, 17th August and 13th September 2023 in accordance with guidance for professional survey standards.

3.3 Survey Results and Conclusions

The Project Area stable building at Down Farm supported a maximum of two lesser horseshoe (*Rhinolophus hipposideros*) bats, which were day roosting within the interior of the stable tack room that is within the south-western end compartment and abuts the car port.

There was no evidence of bat roosting within any other part of the stable building interior or exterior, and there was no evidence of a permanent night roost in the Project Area stable building.

The significance of the bat roost associated with the stable building at Down Farm was classified in accordance with the site assessment recommended in the Bat Mitigation Guidelines, as a summer day roost for very small numbers of a rarer species [lesser horseshoe bat] (not a maternity site), and therefore this roost was classed as being important in a *Site* context.

3.4 Secured Mitigation

This known day roost for lesser horseshoe bat (located in the southwest end compartment) was functionally linked with the connected car port, which provided sheltered access to the [tack room] compartment and it was therefore included within the previous householder planning and listed building consent, which secured the closure of this roost (sealing up the south-western end compartment due to the new

garage/ carport for planning consents PL/2024/03484 and PL/2024/03885) under a Natural England Mitigation Licence.

To replace the loss of this lesser horseshoe bat day roost, a dedicated bat loft was constructed in an adjacent Dutch barn which was designed and positioned to ensure continuity of the existing roosts in terms of its location within close proximity to the existing roost and adjacent woodland/ grassland. The location of the bat loft is shown on drawing LPC 5618 PR05 in Appendix C.

The bat loft was designed to provide a suitable roosting space for lesser horseshoe bats, which require a sufficiently large space within which they can fly around in prior to leaving the roost (see Appendix C).

4 Methodology (2025-2026)

4.1 Review of Existing Information

Records of designated sites and protected/ notable species within 1km and records of bats within 2km of the Project Area stable building were obtained from the Wiltshire and Swindon Biological Records Centre (WSBRC) on 3rd July 2023. This allows notable and relevant habitats and species, especially bats, to be highlighted and taken into consideration through the ecological appraisal process.

The DEFRA Multi-Agency Geographical Information for the Countryside (MAGiC) website was reviewed on 12th February 2026 for granted bat European Protected Species (EPS) licences within 4km of the Project Area at Down Farm.

Online mapping and aerial photographic resources were also consulted for contextual information.

4.2 Field Survey

4.2.1 Visual Inspections

A follow-up visual bat roost inspection and protected species survey of the Project Area stables building and the immediate surrounding land was undertaken on 17th December 2025, which was the seventh inspection since June 2023. Weather conditions for this last survey were good being overcast but dry.

The bat roost inspection was undertaken by licensed bat surveyors in accordance with Bat Conservation Trust guidelines (Collins, J (ed.), 2023).

The survey included an internal and external inspection of the Project Area stables building looking for signs of, or the potential for the building to support, roosting bats. A ladder, high-powered torch, endoscope and binoculars were all available and were

used where necessary to examine spaces, crevices and other small spaces suitable for roosting bats to occupy. Evidence of bat presence/occupation includes:

- Droppings.
- Urine staining.
- Feeding remains (such as moth wings).
- Smudge marks and scratches around potential bat roost holes.
- Live roosting bats, bat skeletal remains or dead bats.

Conditions indicating an absence of bats can include the presence of spider webs, bird nesting material, wasp nests (especially blocking potential entrances), live sheltering/hibernating butterflies/moths and other insects in crevice features.

The suitability of the building to support roosting bats was assessed according to the following categories:

1. Negligible potential/not a roost: no suitable features
2. Low potential: one or more suitable features that could be used by individual, or very low numbers of bats opportunistically
3. Moderate potential: one or more suitable features that could be regularly used by bats, but sub-optimal conditions may limit the potential for breeding or hibernating bats
4. High potential: one or more roost features that are suitable for use by a colony of bats on a regular basis and may support a maternity or hibernation site
5. Confirmed roost: evidence of current/recent bat occupation.

The survey also checked the building for the presence of nesting birds, while also assessing the building and immediate surrounding land for other protected species, e.g. badger, reptiles, amphibians etc.

4.3 Personnel

The building inspection survey was undertaken by:

- Anton Kattan: Natural England licenced bat worker (NE Class Licence Level 2 WLM-CL18, Licence No. 2015-12201-CLS-CLS) and full member of the CIEEM.
- Dr Stephen Dangerfield: Natural England licensed bat worker (NE Class Licence Level 1 WLM-CL17, Licence No. 2025-84478-CL17-BAT) and full member of CIEEM.

4.4 Evaluation

The importance of the ecological features identified by the desk study and field survey have been evaluated with reference to the Chartered Institute of Ecology and Environmental Management (CIEEM) Ecological Impact Assessment guidance (CIEEM, 2018).

This guidance recommends that an ecological feature's importance is determined with reference to a valuation of the ecological feature within a geographical framework. This may relate to:

- the quality or extent of a designated site or habitat;
- habitat/ species rarity;
- the extent to which rare habitats/species are threatened throughout their range; or
- their rate of decline.

The evaluation helps to determine the important ecological features which are subject to further consideration in the identification of the likely ecological effects (positive or negative) associated with the development of the site.

Where possible, formal criteria are used to set features of conservation importance within this geographical context. For example, the Guidelines for the Selection of Biological SSSIs (Nature Conservancy Council, 1989) can be used as a basis for the assessment of features at a National level. Similarly, published guidelines for the selection of SINCs (Sites of Importance for Nature Conservation) can be used as the basis for assessing features of county level importance (DEFRA, 2006). The value of an ecological feature is determined within a defined geographical context using the following criteria:

- International/ European;
- National (England);
- Regional (West England);
- County (Wiltshire)/ District and
- Local.

To evaluate importance of an ecological feature for bats, consideration has been given to species distribution and rarity at different geographical levels. For this assessment, reference has been made to:

- The UK Post 2010 Biodiversity Framework (published 2012)
- UK Biodiversity Action Plan
- Distribution Atlas of Bats in Britain and Ireland 1980-1999 (Richardson, 2000)
- *Mammals of the British Isles Handbook* (Harris and Yalden, 2008)
- Natural England, 2018. *A Review of the Population and Conservation Status of British Mammals* (JP025). [Online]
publications.naturalengland.org.uk/publication
- BCT and JNCC, 2017. *The state of the UK's bats 2017: National Bat Monitoring Programme Population Trends*. London: Bat Conservation Trust (BCT)
- Bat Conservation Trust, 2020. *The National Bat Monitoring Programme Annual Report 2019*. London: Bat Conservation Trust

4.5 Deviations, Constraints and Limitations

The bat survey undertaken to underpin this ecological appraisal (which includes daytime inspections and dusk emergence survey during 2023 and 2025) is concluded to comply with bat survey standards (Collins, 2023) and the presented data on roosting bats is considered to be robust and up to date. The existing ecological baseline therefore provides sufficient information for this latest planning submission.

5 Results

5.1 Statutory Designated Wildlife Sites

There are no statutory designated sites within the zone of influence of the Proposed Scheme:

- There are no European, national or local designations covering the Project Area buildings or Down Farm wider environs.
- There are no European or national designations within 1km of the Project Area.
- The Project Area is not within a European designated Special Area of Conservation (SAC) Bat Consultation Zone.

There are two non-statutory locally designated sites located within 1km of the Project Area as follows:

- Lower Eastern Wood Local Wildlife Site (Ref. ST87.032). A 1.68ha ancient semi-natural broadleaved woodland. Located 870m north.
- Hey, White and Grubbins Woods Local Wildlife Site (Ref. ST87.053). A 19.7ha ancient woodland site extensively replanted with conifers in the 1990s. Located 600m southeast.

5.2 Granted EPS (bat) licences within 4km

There are two granted EPS (bat) mitigation licences within 4km of Down Farm:

- 2014-5332-EPS-MIT (20/01/2015) Non-breeding brown long-eared and soprano pipistrelle
- 2016-19652-EPS-MIT (15/02/2016) Non-breeding common pipistrelle and lesser horseshoe bats

5.3 Existing Species Information

5.3.1 Bats

Nine species of bat/groups have been recorded within 2km of the Project Area including: Western barbastelle (*Barbastella barbastellus*), greater horseshoe (*Rhinolophus ferrumequinum*), lesser horseshoe (*Rhinolophus hipposideros*), noctule (*Nyctalus noctula*), serotine (*Eptesicus serotinus*), Natterer's / Myotis bat (*Myotis nattereri* / *Myotis* sp), brown long-eared (*Plecotus auritus*), soprano pipistrelle (*Pipistrellus pygmaeus*) and common pipistrelle (*Pipistrellus pipistrellus*).

Species in **bold** have known roosts within 2km of the Project Area.

5.3.2 *Other mammals*

5.3.3 *Birds*

A number of nationally notable bird species have been recorded within the local landscape, with birds typically associated with buildings and barns including swift (*Apus apus*), house martin (*Delichon urbicum*), house sparrow (*Passer domesticus*) and barn owl (*Tyto alba*).

5.3.4 *Herpetofauna*

There are no records of reptiles, great crested newt or other amphibians from within 1km of the Project Area.

5.4 Building Inspection (Bats)

5.4.1 *Building Appraisal*

The building inspection on 17th December 2025 identified external gaps/holes, as follows:

- Gap under one ridge tile (east-facing) due to missing mortar; and
- Gaps at roof edge due to missing mortar from under leading roof tiles.

These gaps were identified during the 2023 survey (see Appendix B) and it is therefore concluded the fabric of the stables building has not changed since the previous survey.

5.4.2 *Evidence of bats*

During the latest building inspection on 17th December 2025, which is the seventh inspection since June 2023, no evidence of bat roosting, presence/occupation or activity was recorded within the stables building interior: there are no live or dead bats, no scattered or accumulated bat droppings, no insect feeding remains, and no urine droplets were found. This latest finding confirms the findings / conclusions of the 2023 survey that this building is not used by bats for roosting or as a significant place of rest or shelter.

The majority of the stables building is light and thermally unstable with open doors and windows, which makes the building sub-optimal for roosting bats. Much of the building roof structure supports spider webbing spanning or covering the ridge board, tops of walls etc., which supports the conclusion that bats have not accessed or used the internal space or roof features of this stable building.

Note: the evidence of lesser horseshoe bat activity recorded during the bat surveys in 2023 was only within the south-western most compartment, which has now been closed-off / sealed under Natural England Bat Mitigation Class Licence site

registration ref: RC045-10412A as part of householder planning permission (Ref. PL/2024/03484) and listed building consent (Ref. PL/2024/03885). There was no evidence of lesser horseshoe bats within any other part of the stable building and no evidence of crevice-dwelling bats associated with external gaps found during the 2023 survey.

Following this latest bat roost inspection, which confirms the findings from surveys completed in 2023, the Project Area stable building at Down Farm is classed as not a roost with negligible potential to support roosting bats in the future (**Category 1**).

5.5 Nesting Birds

Evidence of bird nesting within or on the Project Area stables building is as follows:

- Fourteen old swallow nests observed on roof trusses/beams (two active nests recorded in 2023):
- Three old small passerine (e.g. wren, blackbird etc.) nests recorded on top of walls, roof beams or re-purposing a swift nest.

There is always a possibility for other small passerine bird nests to be present or constructed in the future within the stable building - i.e. tucked under eaves or at the roof apex etc.

There is no evidence of barn owl nesting, roosting or other activity within the Project Area stables building (this is the same as findings in 2023) and this species is not a constraint for the proposed development.

5.6 Other Protected Species

There are no other protected species associated with the Project Area stables building or the immediate surrounding land, which comprises hard-standing, dwelling buildings and a utilitarian farm building. For example, there is no badger sett, there is no pond and the land within and immediately surrounding the building is unsuitable for supporting reptiles and amphibians.

6 Assessment

6.1 Designated Wildlife Sites

Under the European Union (Withdrawal) Act 2018, EU-derived domestic legislation, such as existing environmental regulations that implement EU Directives, and Direct EU legislation (such as The Conservation of Habitats and Species Regulations 2017) which were in force immediately prior to the end of the transition period continue to form part of UK domestic law. Special Areas of Conservation (SAC) are designated under The Conservation of Habitats and Species Regulations 2017. The regulations provide for the designation and protection of European Sites, the protection of European protected species and the adaptation of planning and other controls for the protection of European Sites. SSSI are notified and protected under the Wildlife and Countryside Act 1981 (as amended). These sites are notified for nature conservation purposes as they support the best examples of the UK's habitats, flora and/ or fauna.

There are no European or national designations within 1km of the Project Area stable building, and the development is not within a Bat SAC Consultation Zone. There are two Local Wildlife Sites between 600m and 870m from the development site, which encompass broadleaved woodland.

The planning application red line boundary is within the curtilage of Down Farm residential dwelling and covers just the stable building. The potential effects of the proposed development will be fully contained within the application site and there are no identified impact pathways between the development and the LWS, such that the proposed scheme will not alter the existing baseline conditions of the locally designated sites in terms of structure/function of habitat, pressures on the sites or associated wildlife.

The Wiltshire Core Policy 50 states '*sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment*'. It is therefore concluded that there are no predicted impacts on statutory designated wildlife sites from the proposed development at Down Farm, which is in compliance with Core Policy 50.

6.2 Bats

Bats are protected under the Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000) and under The Conservation of Habitats and Species Regulations 2017. All species of bat are present on Schedule 2 of the Conservation of Habitats and Species Regulations 2017 and are subject to the provisions of Regulation 42 of those Regulations. Taken together, these protect bats from disturbance, injury or killing and make it an offence to damage, destroy or obstruct a breeding site or resting place they use.

The Project Area stable building at Down Farm does not support any roosting bat species, and as such there are no predicted impacts on bats or known bat roosts (*neutral impact*).

Note: the lesser horseshoe bat roost, confirmed to be in the south-western compartment in 2023, has been shut under Natural England licence. A replacement dedicated bat loft has been provided as compensatory mitigation (see Appendix C).

On the basis of the evidence gathered through this study and the previous 2023 bat survey (see Appendix B) a licence from Natural England under the provisions of The Conservation of Habitats and Species Regulations 2017 is not required for this proposed development at Down Farm because the Project would not result in an offence under Regulation 43 of the legislation.

6.3 Nesting birds

All breeding birds are protected in the UK under the Wildlife and Countryside Act 1981 (as amended) whilst they are actively nesting.

The stable block has supported nesting swallow and other small passerine birds. There is no evidence of barn owl nesting/roosting within the stable building.

The swallow and other small passerine bird nesting sites will be lost when the stable building is converted to residential use as holiday lets. There is also a risk that nesting birds could be disturbed or injured if the proposed building renovation is undertaken without appropriate safeguards.

The proposed development could have an adverse impact on nesting birds, which is predicted to be an effect at the *Local (Site)* scale. Mitigation to ensure protection of nesting birds is presented in Section 7.

There are nesting opportunities within the newly constructed car garage structure, provided under the previously consented scheme, and there is alternative swallow and other bird nesting habitat available associated with adjacent barns and buildings within the curtilage of Down Farm. It is therefore concluded a full replacement of lost swallow nesting habitat is not required for this proposed development, although a recommendation for new bird nesting habitat to be integrated as part of the building renovation is provided in Section 7.2.

7 Mitigation and Enhancement Strategy

7.1 Protection of Breeding Birds

To ensure protection of nesting birds in accordance with the Wildlife and Countryside Act, 1981 (as amended) the following action is required:

- Preferably undertake construction work (particularly the sealing-up of the building or removal of roof) affecting known or potential bird nesting sites outside the bird breeding season (bird breeding season is considered to be from 1st March to 31st August). This option will avoid the need for a pre-works inspection to determine the presence of nesting/breeding birds.

If this option is not feasible and construction work has to be undertaken during the bird breeding season as defined above, then the following action will be taken:

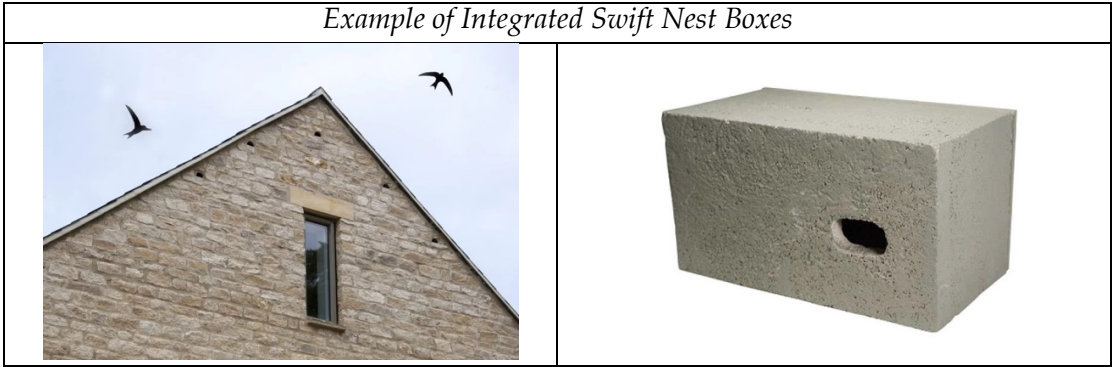
- A nesting bird inspection immediately prior (maximum 2 weeks in advance) to the commencement of construction work affecting known/potential bird nesting sites will be undertaken. If nesting birds (including birds constructing a nest or nest with eggs or hatchlings) are subsequently identified to be present work in that area must cease until the nest is clear (all birds fledged and vacated the nest).

Regardless of timing or findings of previous surveys, if nesting birds are found within the development site during any part of the construction phase, then work will stop and a qualified ecologist can be consulted for advice on preventing disturbance or damage to breeding birds.

7.2 New Bird Box

One integrated swift nest box will be incorporated on the newly refurbished stable building. This will be positioned on the north-east facing elevation away from direct sunlight, as shown on drawing LPC 5618-PR-203A in Appendix A. Swift nest boxes provide suitable nesting sites for a variety of bird species and are considered general enhancement for a range of birds that will nest on buildings.

A range of alternative bird boxes are available and can be incorporated depending on the proposed design and architecture. Boxes can be viewed on-line (for example www.nhbs.com or www.wildcare.co.uk).



7.3 New Crevice-dwelling Bat Roosting Features

To provide external bat roosting features as an enhancement for roosting bats, one bat wall mounted bat box will be attached to the exterior north-east gable of the adjoining barn, as shown on drawing LPC 5618-PR-203A in Appendix A. A range of suitable, durable [Woodstone] boxes can be view on-line (www.nhbs.com or www.wildcare.co.uk).

The bat box will be installed close to the roof apex (so that it is as high as possible) and no external lighting will be used adjacent to or shine directly at the bat box entrance slot (see Section 6.4). Clear lines of flight to the bat roost box entrance will always be maintained.



To ensure that a range of crevice features are provided as an enhancement, which will allow for the dynamic roosting behaviour by groups of bats, two lifted ridge tiles will also be provided on the roof of the renovated stables building.

The lifted ridge tiles will be located in the centre and at the north-eastern end of the roof of the stable block and by only using mortar at the edge of the tiles (to hold them in place) each lifted ridge tile will provide a cavity space at the top of the roof, leaving a 20mm wide gap on the bottom edge of the tile to allow bats access the void under the ridge tile. The open gap under the ridge tile will face south-east. The two lifted ridge tiles will be incorporated following the standard design Ridge Tile Access Detail 4A, show in Appendix D.

7.4 External Lighting

The integrity of the enhancement bat roosting habitat (bat box and lifted ridge tiles), including flight paths to and from the roosting features, within the Project Area as well as access to the secured bat mitigation (bat loft) for the previous barn conversion (Consent Ref. PL/2024/03484 and PL/2024/03885) and foraging/commuting habitat surrounding the Project Area can be conserved through the sensitive installation of external lights that will form part of the existing residential lighting requirements at Down Farm.

Additional external lighting should only be used where it is necessary for reasons of security and safety. In particular, new lighting should avoid being located adjacent to or directed at entrances to the new bat loft and other provided roosting features.

Where lighting is required, it should be kept at low level and at low intensity, with hoods and baffles used to direct the light to where it is required, thereby minimising outward light spill and avoiding upward light spill (Institution of Lighting Professionals, 2018). To minimise the impact on bats, the use of low pressured sodium lamps is recommended in preference to mercury or metal halide lamps which have a UV element that can affect the distribution of insects and attract bats to the area, affecting their natural behaviour.

The key principals for choosing a suitable type of lamp are:

- Avoid blue-white short wavelength lights: these have a significant negative impact on the insect prey of bats. Use alternatives such as warm-white (long wavelength) lights as this will reduce the impact on insects and therefore bats.
- Avoid lights with high UV content: (e.g. metal halide or mercury light sources) or reduce/completely remove the UV content of the light. Use UV filters or glass housings on lamps which filter out a lot of the UV content.

Selecting an appropriate lamp unit that is designed to be environmentally friendly will minimise light spill, but further controls can be imposed by installing directional accessories such as baffles, hoods and louvres on lamps to direct light away from ecologically sensitive areas.

LED (Light Emitting Diode) units are an effective way to direct the light into small target areas and are recommended for lighting the proposed parking and turning area. Composite LEDs can be switched off to reduce/direct the light beam to specific areas.

8 References

BCT and ILP, 2018. *Bats and Lighting in the UK: Bats and the Built Environment Series*. Version 3. London: Bat Conservation Trust (BCT); Institute of Lighting Professionals (ILP).

CIEEM, 2018. *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*. Version 1.1 ed. Winchester: Chartered Institute of Ecology and Environmental Management (CIEEM).

CIEEM, 2021. *Bat Mitigation Guidelines. A guide to impact assessment, mitigation and compensation for developments affecting bats*. Beta version 1.0: June 2021

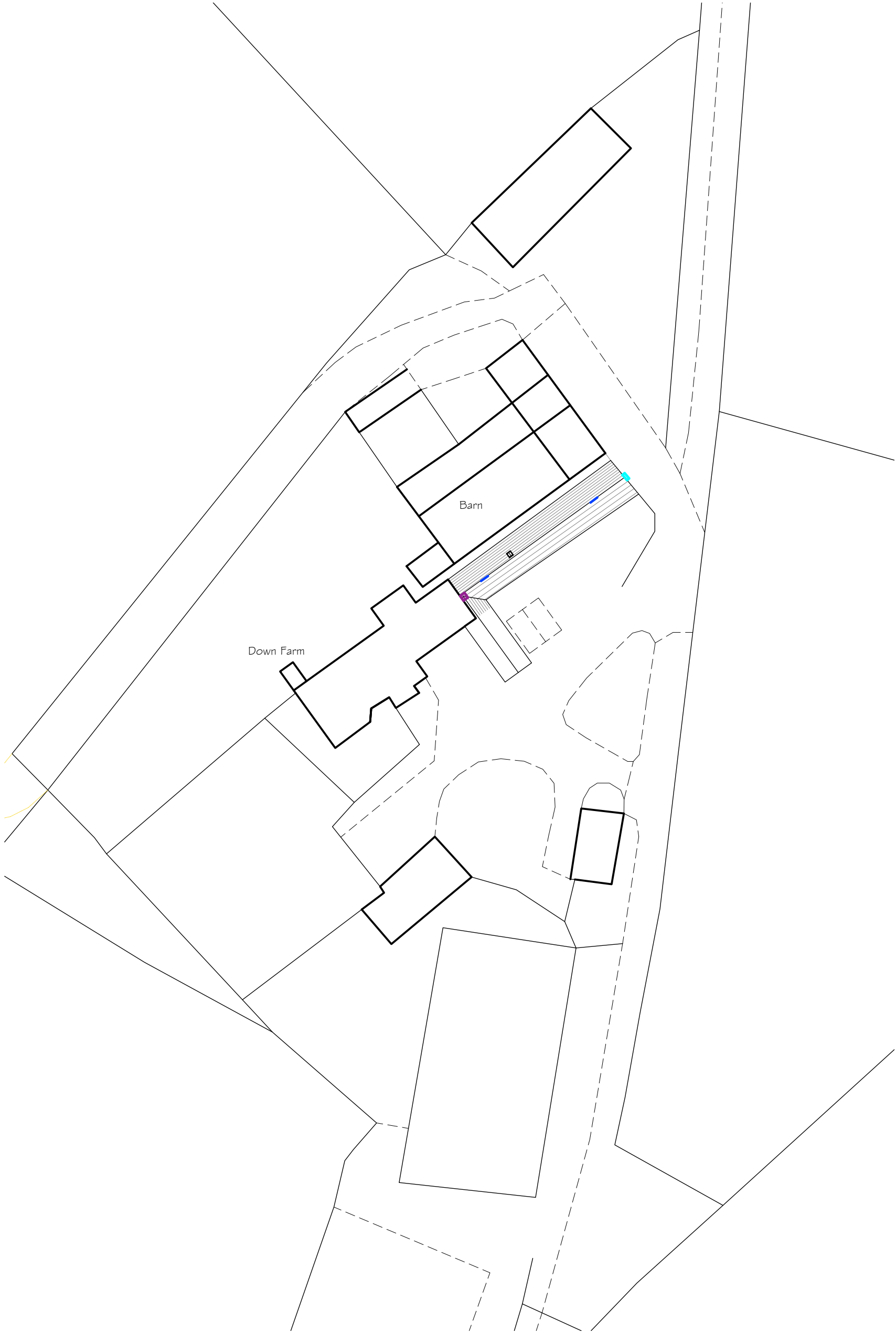
Collins, J., 2023. *Bat Surveys for Professional Ecologists: Good Practice Guidelines*. 4th ed. London: Bat Conservation Trust.

Collins, J. et al., 2020. *The implementation and effectiveness of bat roost mitigation and compensation measures for Pipistrellus and Myotis spp. and brown long-eared bat (Plecotus auritus) including in building development projects completed between 2006 and 2014 in England and W*. Conservation Evidence, Volume 17, pp. 19-26.

Mitchell-Jones, A., 2004. *Bat Mitigation Guidelines*. Peterborough: English Nature.

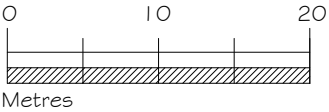
Schofield, H. (2008) *The Lesser Horseshoe Bat Conservation Handbook*. Vincent Wildlife Trust.

Appendix A. Proposed Scheme



SITE PLAN

-  Bat boxes (x1)
-  Ridge tile access (x2)
Detail 4A
-  Swift nest boxes (x1)



A	19.2.26	Wildlife mitigation
Rev	Date	Notes



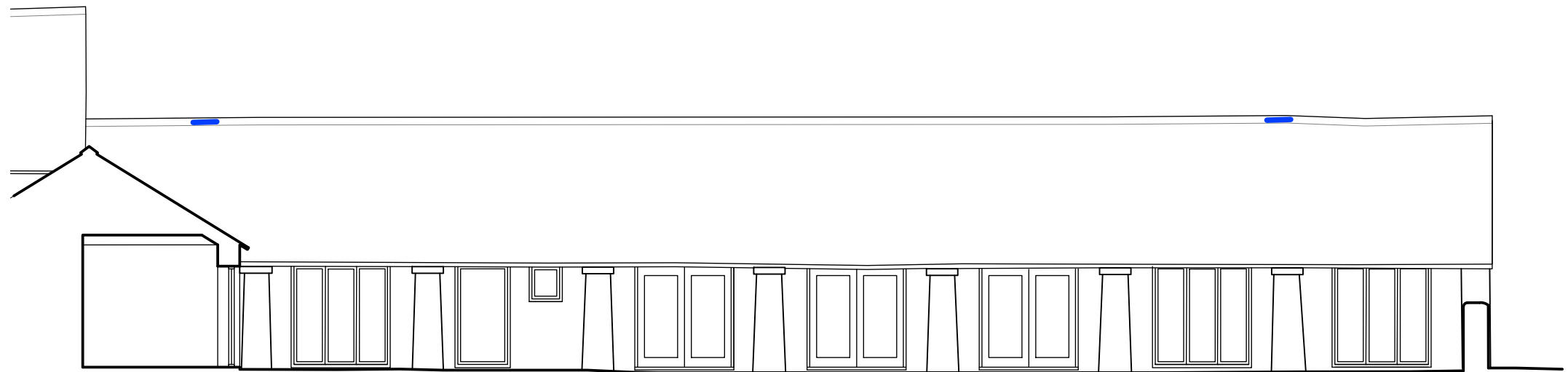
TOWN AND
COUNTRY
PLANNING
DEVELOPMENT
CONSULTANTS

LPC (TRULL) LTD.,
TRULL, TETBURY, GLOUCESTERSHIRE GL8 8SQ
Tel: 01285 841433 email: admin@lpctrull.com

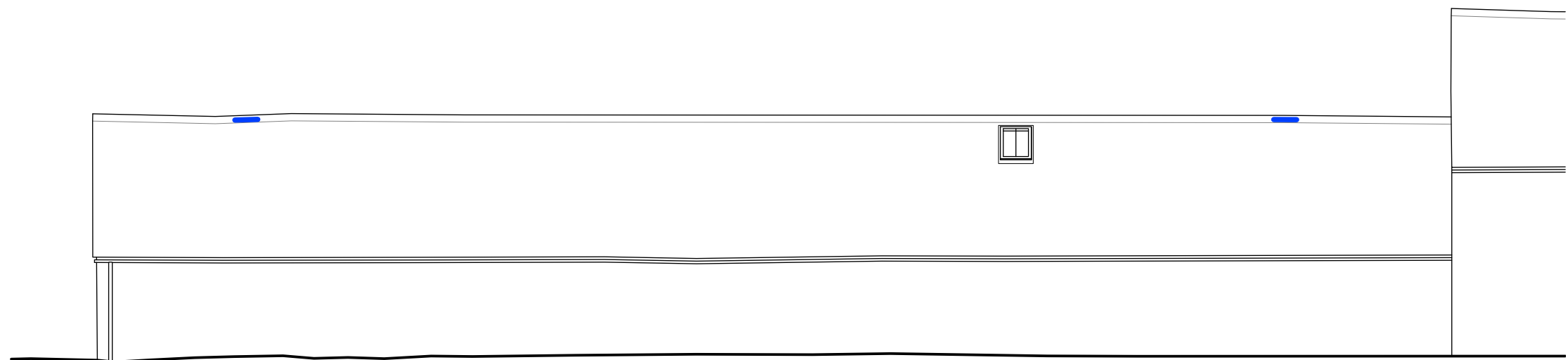
Client
Mr & Mrs Bliss
Project
Down Farm,
Kington St Michael
SN14 6LP

Drawing
SITE PLAN PROPOSED

Date: January 2026 Scale: 1:500 @ A3
Drawing Number
LPC 5618 PR 201 A



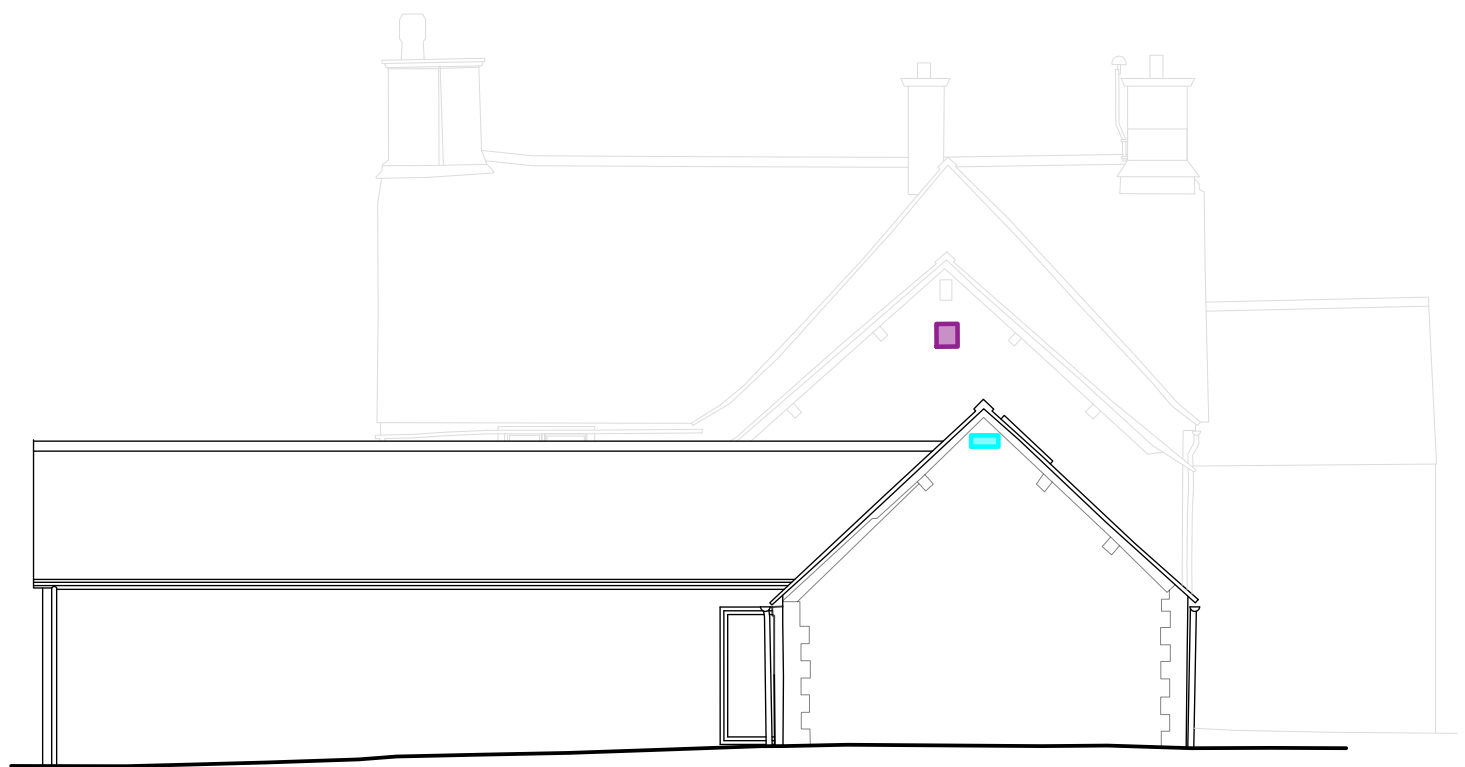
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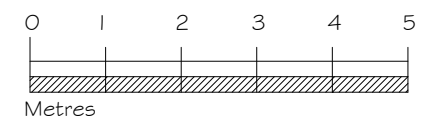
Datum 29.000m

Elevation 5

- Bat boxes (x1)
- Ridge tile access (x2)
Detail 4A
- Swift nest boxes (x1)



Elevation 3



A	19.2.26	Wildlife mitigation
Rev	Date	Notes



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Client:
Mr & Mrs Bliss

Project:
**Down Farm,
Kington St Michael
SN14 6LP**

Drawing:
PROPOSED ELEVATIONS

Date: January 2026 Scale: 1:100 @ A3
Drawing Number:
LPC 5618 PR 203 A

Appendix B. 2023 Bat Survey Information

Field Survey (2023)

Visual Inspections

An initial bat roost inspection and protected species survey of the three Project Area buildings and the immediate surrounding land was undertaken on 22nd June 2023. The weather was dry, 21°C, sunny (50% cloud) and still (Beaufort Scale 0).

The bat roost inspection was undertaken by licensed bat surveyors in accordance with Bat Conservation Trust guidelines (Collins, J (ed.), 2016).

The survey included an internal and external inspection of the three Project Area buildings looking for signs of, or the potential for the buildings to support, roosting bats. A ladder, high-powered torch, endoscope and binoculars were all available and were used where necessary to examine spaces, crevices and other small spaces suitable for roosting bats to occupy.

Evidence of bat presence/occupation includes:

- Droppings.
- Urine staining.
- Feeding remains (such as moth wings).
- Smudge marks and scratches around potential bat roost holes.
- Live roosting bats, bat skeletal remains or dead bats.

Conditions indicating an absence of bats can include the presence of spider webs, bird nesting material, wasp nests (especially blocking potential entrances), live sheltering/hibernating butterflies/moths and other insects in crevice features.

The suitability of the building to support roosting bats was assessed according to the following categories:

1. Negligible potential/not a roost: no suitable features
2. Low potential: one or more suitable features that could be used by individual, or very low numbers of bats opportunistically
3. Moderate potential: one or more suitable features that could be regularly used by bats, but sub-optimal conditions may limit the potential for breeding or hibernating bats
4. High potential: one or more roost features that are suitable for use by a colony of bats on a regular basis and may support a maternity or hibernation site
5. Confirmed roost: evidence of current/recent bat occupation.

An additional 5 visual inspections of the Project Area buildings to look for new field signs of bat roosting activity were also undertaken on 6th July, 13th July, 24th July, 17th August and 13th September 2023.

The survey checked the buildings for the presence of nesting birds, while also assessing the buildings and immediate surrounding land for other protected species, e.g. badger, reptiles, amphibians etc.

Dusk Emergence Surveys

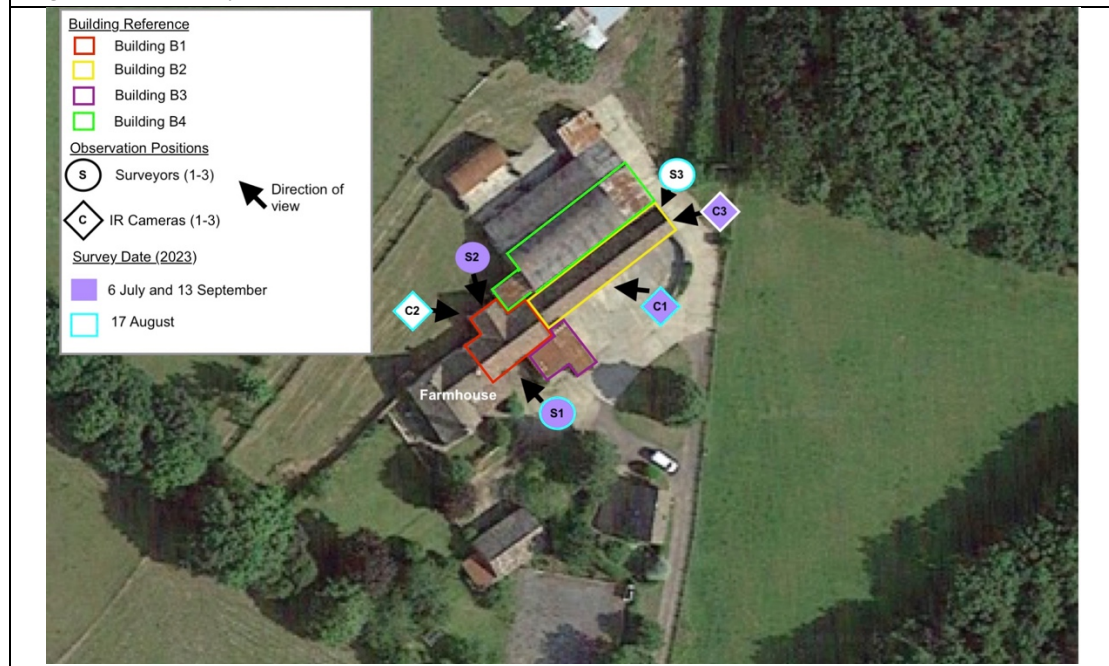
Three dusk bat activity surveys of the Project Area buildings were undertaken on the 6th July, 17th August and 13th September 2023 in accordance with guidance for professional survey standards (Collins J (ed.), 2016), and with consideration to current advice on survey protocol from the Bat Conservation Trust in their Interim Guidance Note '*Use of night vision aids for bat emergence surveys and further comment on dawn surveys*' (2022).

Each survey was covered by two surveyors and two IR camera positions. The Canon XA range of professional camcorder were used with the Canon XA11, XA40 and XA65 models employed at the site. The cameras were positioned around the buildings to provide coverage of the Project Area, as shown on Figure B1. Surveyor S1 had access to B1 to make internal checks during each dusk survey. Details of survey timings and weather conditions are provided in Table B1.

The surveyors were equipped with a range of bat detectors including Elekon Batscanner, Elekon Batlogger M, Echometer Touch Pro and Batbox Duet. Full-spectrum bat detectors were also placed alongside each IR camera to record bat echolocation calls on time-stamped files that can be linked to the roost emergence time of bats recorded on the cameras. Surveyor S1 (September only) and S3 (August) were also equipped with a Nightfox Whisker night vision binoculars.

Table B1. Timings and Weather Conditions for Bat Activity Surveys at Down Farm

Date (2023)	Survey Period (hrs)	Sunset (hrs)	Weather*
6 July	21:00 - 22:45	21:26	<10% cloud, 14-16°C, BF2, Dry
17 August	20:15 - 22:15	20:30	10% cloud, 20°C, BF1, Dry
13 September	19:15 - 20:40	19:27	60% cloud, 15-16°C, BF0, Dry
*BF – Beaufort Scale			

Figure B1. Surveyor and IR Camera Positions

The Project Area coverage provided by the IR cameras used is shown in Figures 4a-4c. The cameras provided remote, fixed position continuous recordings of the building elevations throughout the survey period (see Table B1) whilst the surveyors were able to be located at different positions or move around their designated location (shown on Figure B1) to actively observe the building interiors or periphery for bats emerging from the building. The IR camera recordings were analysed post-survey by reviewing the footage in real-time.

Personnel

Building inspections and bat dusk emergent surveys were undertaken by:

- Anton Kattan: Natural England licenced bat worker (NE Class Licence Level 2 WLM-CL18, Licence No. 2015-12201-CLS-CLS) and full member of the CIEEM;
- Dr Stephen Dangerfield: Natural England licensed bat worker (NE Class Licence Level 1 WLM-CL17, Licence No. 2015-11600-CLS-CLS) and full member of CIEEM;
- Rob Spencer: Natural England licenced bat worker (NE Class Licence Level 2 WLM-CL18, Licence No. 2015-14778-CLS-CLS); and
- Dominic Hill. Ecologist with five years' professional experience in bat survey, including advanced bat survey techniques (under project licence).

Initial Building Inspection for Bats (2023)***Building Appraisal***

During the initial buildings inspection on 22nd June 2023 some external gaps/holes on Buildings 1 and 2 were observed that could provide potential bat roosting habitat, as listed below.

B1 (Barn)

- Gaps along ridge line from missing mortar underneath ridge caps
- Opening / hole at apex of northeast facing gable elevation
- Gaps under lifted tiles or under ridge cap at apex of rear gable
- Gaps under lifted or through rotting timber ship-lap on rear of barn
- Gaps around door lintels on front and rear of barn

B2 (Stable block)

- Gap under one ridge tile due to missing mortar
- Gaps at roof edge due to missing mortar from under leading roof tiles

There are no external or internal gaps associated with Building B3, and the majority of the building interior provides unsuitable environmental conditions for roosting bats being open, light and draughty.

Any external gaps on adjacent buildings will remain unaffected by the proposed work.

Evidence of bats

During the initial buildings inspection on 22nd June 2023 the following evidence of bat presence or activity was recorded.

B1 (Barn)

- A small, scattered accumulation of approximately 80 mixed age droppings on a work bench under the mezzanine floor within the barn. Droppings of mid-size bat, which appear to be from brown long-eared bat. Low numbers of droppings scattered throughout barn.

B2 (Stable block)

- One lesser horseshoe bat observed hanging from roof at southern end wall in south-western compartment of the stable block.
- Directly below the lesser horseshoe bat in the south-western stable block compartment a small accumulation of approximately 20 fresh droppings.

B3 (Car port)

- No evidence of bat occupation, but bats enter the stables through the car port.

Following the initial bat roost inspection the Project Area buildings at Down Farm are categorised in terms of bat roost potential as follows:

- **B1 (Barn):** high potential bat roost (**Category 4**) with external gaps present on the barn associated with the roof and gable end walls, and bat droppings found within the barn interior with flyways into the building interior associated with the doors and holes in cladding timber ship-lap.
- **B2 (Stable block):** confirmed bat summer day roost for a single lesser horseshoe bat (**Category 5**) with potential for crevice-dwelling bats to use external gaps.
- **B3 (Car port):** negligible potential roost (**Category 1**) with an absence of bat roosting features and no evidence of bat occupation / activity.

Additional Building Inspections for Bats (2023)

A further five follow-on building inspections between 6th July and 13 September 2023 with weather conditions for each inspection set out in Table B2 below.

Table B2. Weather Conditions for Bat Roost Inspections at Down Farm

Date (2023)	Time	Temp °C	Cloud %	Wind BF	PPT
6 July	20:40	16	<10	2	Dry
13 July	15:00	20	90	3	Dry
24 July	09:00	13	100	3	Light rain
17 August	20:15	20	10	1	Dry
13 September	19:00	16	60	0	Dry
*BF – Beaufort Scale PPT = precipitation					

The following evidence of bat presence or activity was recorded.

- **6th July:** one lesser horseshoe bat observed hanging in south-western end compartment of the stable block (B2). No bats seen in any other stable compartment. No bats seen within the main barn (B1) or the car port (B3). No change in location/number of droppings.
- **13th July:** no bats seen in the main barn (B1) or car port (B3). No access to the stable block.
- **24th July:** one lesser horseshoe bat observed hanging in south-western end compartment of the stable block (B2). No bats seen in any other stable compartment. No bats seen within the main barn (B1) or the car port (B3). No change in location/number of droppings.
- **17th August:** one lesser horseshoe bat observed hanging in south-western end compartment of the stable block (B2). No bats seen in any other stable compartment. No bats seen within the main barn (B1) or the car port (B3). No change in location/number of droppings.
- **13th September:** two lesser horseshoe bat observed hanging in south-western end compartment of the stable block (B2). No bats seen in any other stable

compartment. No bats seen within the main barn (B1) or the car port (B3). No change in location/number of droppings.

Stable block (B2): confirmed bat summer day roost for a minimum of two lesser horseshoe bats.

Bat Dusk Emergence Surveys (2023)

Survey 6th July 2023

The results of the dusk emergence survey are summarized in Table B3. The roost locations are shown on Figures B2a – B2d with Target Notes (TN).

Table B3. Dusk Emergence Survey Results, 6th July 2023

TN	Building Ref	Roost Feature	Bat Species	Count	Note
1	B1	Gap at apex of south-western internal end blockwork wall of main barn	Brown long-eared	3	Bats emerged after 21:58 and a maximum of three bats observed in barn interior. One bat seen to crawl up wall and into gap at apex of wall. Bats continue to fly around barn interior, with one bat remaining in barn until survey end.
2	B2	Southwest compartment of stable block	Lesser horseshoe	1	Bat emerged from compartment before 22:25 – bat absent and no emergence observed by surveyors or on IR camera.

TN	Building Ref	Roost Feature	Bat Species	Count	Note
3	-	Stone roof tile on southeast facing slope of farmhouse roof (feature remains untouched)	Common pipistrelle	1	Emerged at 21:51 and flew south.

Survey 17th August 2023

The results of the dusk emergence survey are summarized in Table 4. The roost locations are shown on Figures B2a – B2d with Target Notes (TN).

Table B4. Dusk Emergence Survey Results, 17th August 2023

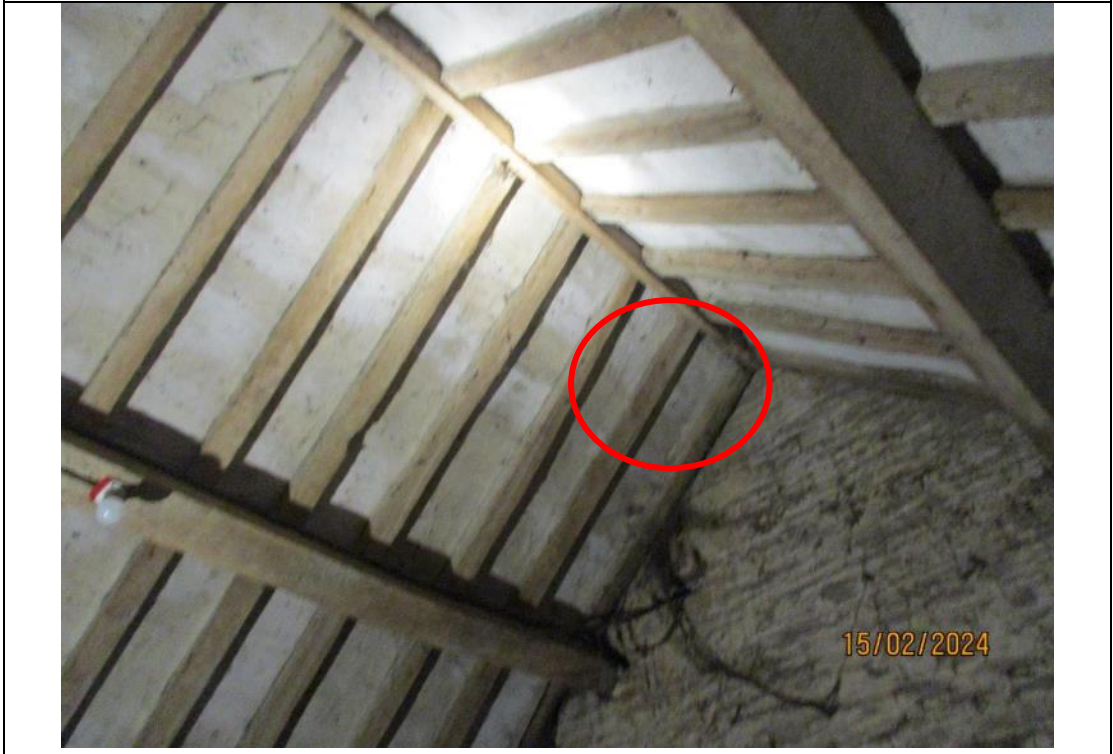
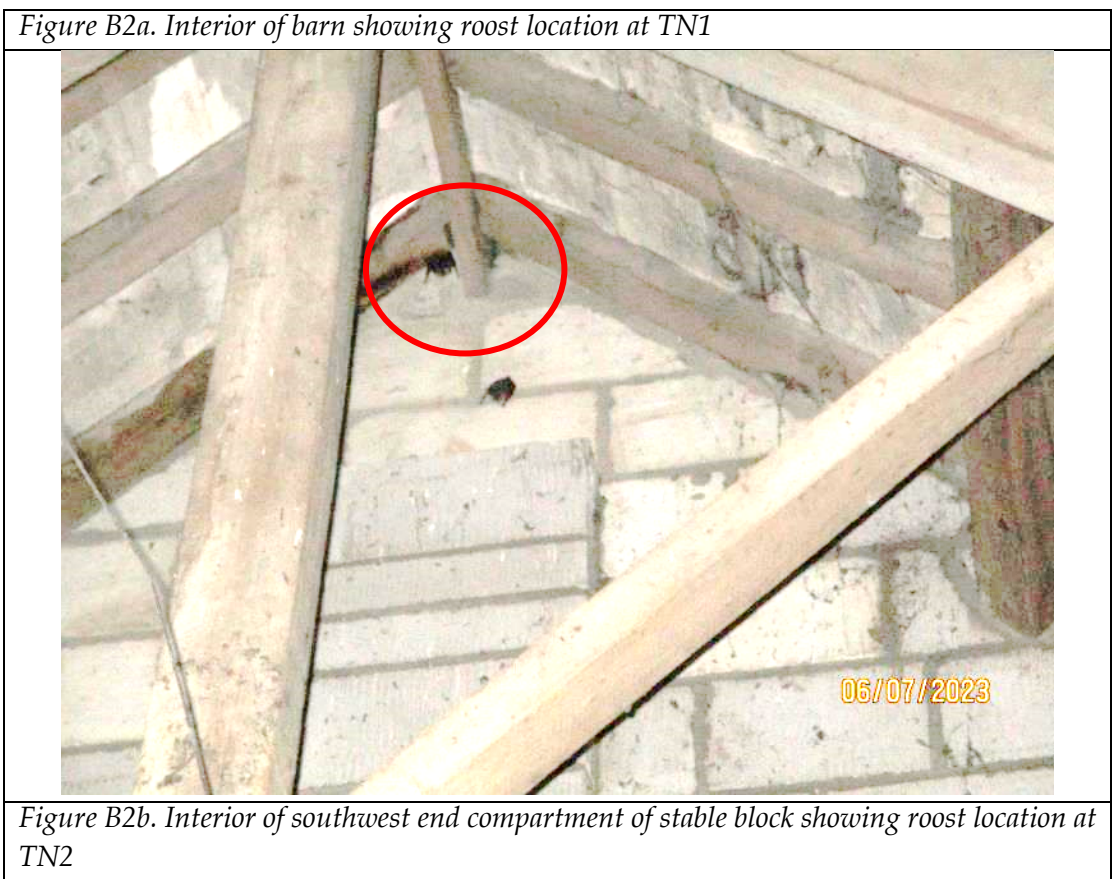
TN	Building	Roost Feature	Bat Species	Count	Note
1	B1	Gap at apex of south-western internal end blockwork wall of main barn	Brown long-eared	3	From 20:35 a maximum of three bats observed flying or at rest in barn interior. Two bats seen to return to gap at apex of south-western end wall at 21:00. At least two BLE bats remaining in barn at survey end.
2	B2	Southwest compartment of stable block	Lesser horseshoe	2	Two bats observed in southwest end compartment at end of survey.
4	B1	Gap in ship-lap near apex of northwest facing gable elevation	Common pipistrelle	1	Bat emerged at 20:50 before re-entering gap at 21:46 and re-emerging at 21:55.
5	B1	Gap under lintel of northwest facing gable elevation	Common pipistrelle	1	Bat emerged at 20:53 and flew north.

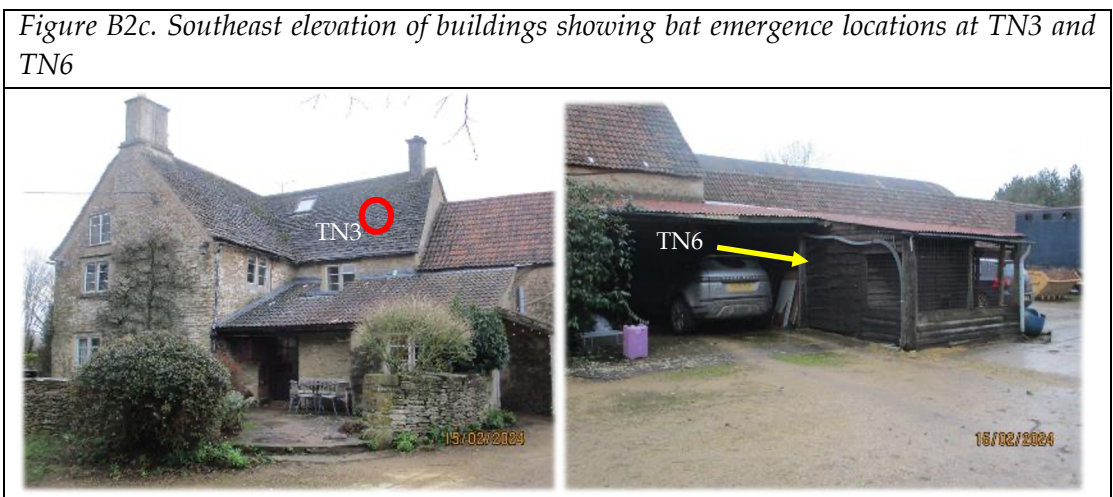
Survey 13th September 2023

The results of the dusk emergence survey are summarized in Table 5. The roost locations are shown on Figures B2a – B2d with Target Notes (TN).

Table B5. Dusk Emergence Survey Results, 13th September 2023

TN	Building Ref	Roost Feature	Bat Species	Count	Note
2 6	B2	Southwest compartment of stable block (roost) and opening between compartment and car port (flight of emergence)	Lesser horseshoe	1	Bat observed emerging out through the southeast facing entrance of the car port (via opening between car port and SW end compartment of stable block) and flying eastwards.
4	B1	Gap in ship-lap of northwest facing gable elevation	Common pipistrelle	1	Bat emerged at 19:49 and flew northwards.





Appendix C. Secured Bat Mitigation

Bat Loft

A new bat loft in the Dutch barn is designed and positioned to ensure continuity of the existing roosts in terms of its location within the immediately adjacent barn, which is close to the existing buildings and maintains proximity to adjacent woodland/grassland. The location of the bat loft is shown on drawing LPC 5618 PR05.

The loft is designed to provide a suitable roosting space for brown long-eared and lesser horseshoe bats, which both require a sufficiently large space within which they can fly around in prior to leaving the roost.

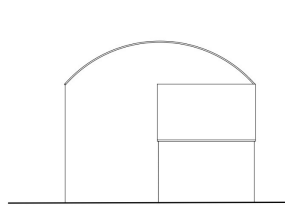
The new bat loft is shown on drawing LPC 5618 PR05 and Photos C1-C4. It is be ca. 7m wide by 4m long with a 2.1m internal height from floor to ceiling, which provides an internal volume of ca. 46.2m³ and sufficient height and volume for the two target bat species.

The bat loft incorporates the following features specifically designed for roosting bats, particularly a roost for lesser horseshoe bats and brown long-eared bats:

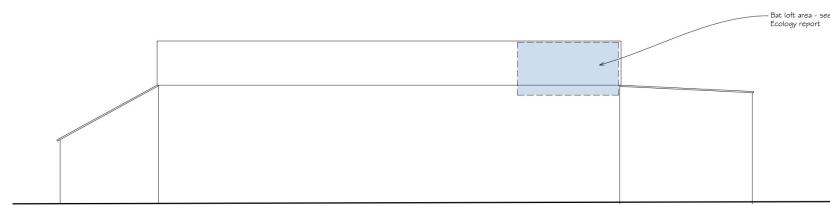
- A bat roost access comprising a hooded entrance with an opening 200mm high by 300mm wide to allow uninterrupted flight for lesser horseshoe (and brown long-eared) bats. The access will be created on the north-east aspect of the barn.
- Lesser horseshoe bats often enter buildings at ground level, and to accommodate this behavioural trait a second roost entrance will be created in the floor of the loft. This will allow bats to use the shelter of the barn (B4) as a flight area outside the roost. A 500mm x 500mm hatch (0.25m²) fitted with a baffle or tunnel entrance design will provide access from inside the barn, with the baffle/tunnel entrance fitted to reduce light incursion inside the roost.
- A clear line of flight to the roost entrance will be maintained at all times, and no external lighting will be used adjacent to or shine directly at the entrances.
- The bat loft is constructed of timber, with the internal ceiling being Oriented Strand Board (OSB), which bats can perch on. The roof has an open structure other than two purpose fitted baffles installed under the roof to create divides in the loft that provide more enclosed spaces for the bats to roost.
 - Baffle 1: fitted 500mm from the end wall and extending from the ceiling to 1000mm above the floor to create a dark void at the rear of the loft.
 - Baffle 2: fitted centrally under the roof and extending from the ceiling by 500mm to provide a sheltered area under the ceiling. The baffle will help reduce air flow in the mid-section of the loft from the roost entrance.
- The baffles are constructed from OSB with each baffle fitted with a “squeezed board” to provide roosting opportunities for crevice dwelling bats. The

squeeze board is a panel that attaches to the baffle with small battens leaving a 25mm gap between the two boards.

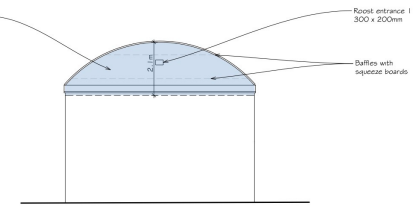
Photo C1. Exterior of Dutch barn with red arrow showing the bat loft tunnel entrance and blue arrow indicating the proximity of the stables building	Photo C2. Interior of Dutch barn showing the underside of the bat loft and internal roost entrance
	
Photo C3. Interior of the bat loft with inset images showing the roost entrances	Photo C4. Internal baffles in the bat loft to partition the void.
	



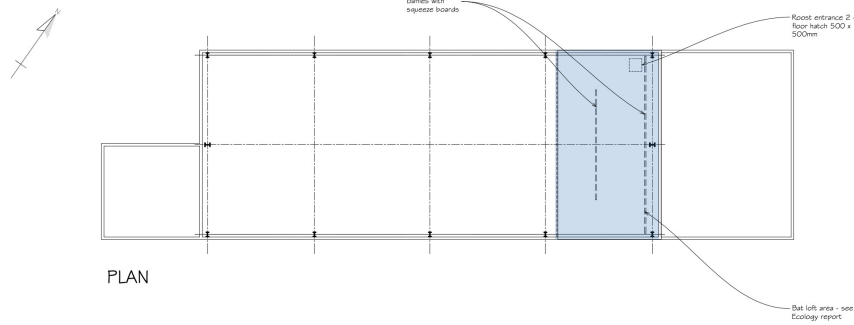
SOUTH WEST ELEVATION



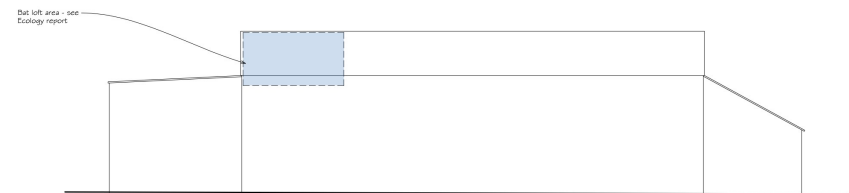
NORTH WEST ELEVATION



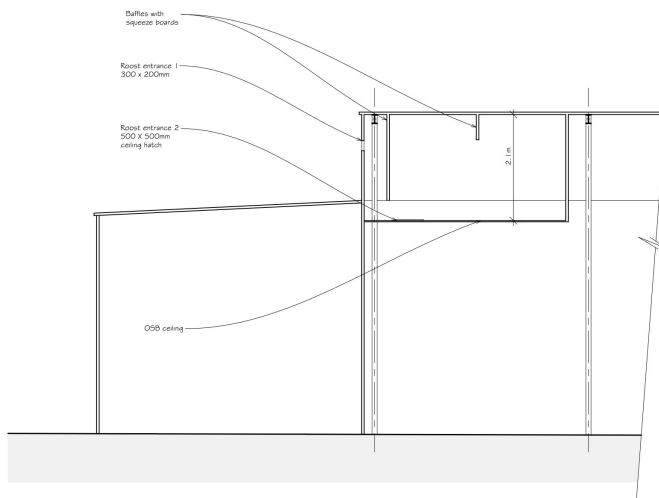
NORTH EAST ELEVATION



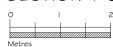
PLAN



SOUTH EAST ELEVATION



SECTION 1:50



Not to scale

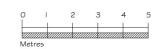
Down Farm,
Kington St Michael

SN14 6LP

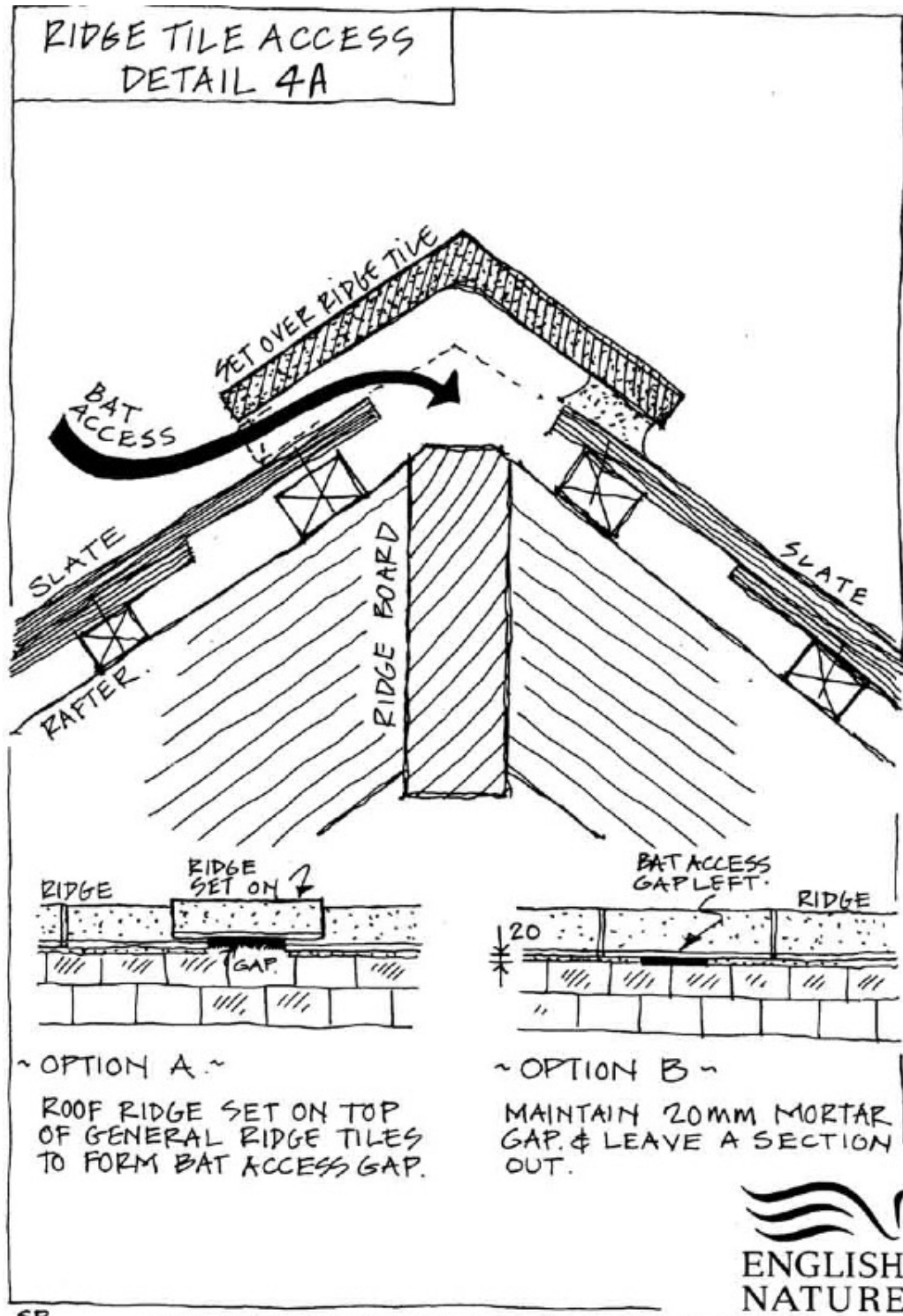
BARN # BAT LOFT

Date: 10/01/2024 Scale: 1:1000 A3 (297 x 420 mm)

LPC 5618 PR 05



Appendix D. Bat Access Ridge Tile Designs



SP

The above information is for guidance only and may not be appropriate in all circumstances, if in doubt seek professional advice.
English Nature Cumbria Team, Juniper House, Murley Moss, Oxenholme Road, Kendal LA9 7RL. Tel: 01539 792800 Fax: 01539 792830 Email: cumbria@english-nature.org.uk