



Preliminary Ecological Appraisal

The Holford Arms, Knockdown, Tetbury, GL8 8QY

For LPC (Trull) Ltd and on behalf of Mr James Reynolds

October 2025

DOCUMENT CONTROL SHEET

Project Name: The Holford Arms, Knockdown, Tetbury, GL8 8QY
Preliminary Ecological Appraisal

Client: Mr James Reynolds

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1.0 Introduction

1.1 Herdwick Ecology Ltd has been commissioned by LPC (Trull) Ltd and on behalf of Mr James Reynolds to undertake a Preliminary Ecological Appraisal (PEA) at The Holford Arms, Knockdown, Tetbury, GL8 8QY (Central Reference ST 83792 88303) to inform proposals for the creation of a spa within an existing outbuilding, together with a spa garden, the extension of the existing function building and the redesign of the pub beer garden.

1.2 This report has been prepared to support a full application to Wiltshire Council and aims to:

- Describe and evaluate the habitats present within the study area;
- Collate relevant biological records and assess their significance;
- Identify any protected species issues or potential issues that may exist; and
- Assess possible ecological constraints to development and make recommendations to avoid, minimise and mitigate for any potential impacts during the development of a detailed application; and
- Set out opportunities for net gain and ecological enhancements in line with relevant planning policy, legislation and other published guidance to inform a detailed application.

1.3 This report has been prepared by Ceri Griffiths, Director at Herdwick Ecology, who is a Full Member of the Chartered Institute of Ecology and Environmental Management (CIEEM). Reference is made to CIEEM Guidelines for Preliminary Ecological Appraisal¹ and BS 42020:2013 Biodiversity - Code of practice for planning and development².

2.0 Legislation and Planning Policies

2.1 In carrying out this assessment relevant legislation, planning policies, and best practice guidelines were consulted and include:

- Conservation of Habitats and Species Regulations 2017 (as amended);
- Wildlife and Countryside Act 1981 (as amended);
- Countryside and Rights of Way (CROW) Act 2000;
- Natural Environment and Rural Communities (NERC) Act 2006;
- National Planning Policy Framework 2024 (NPPF);
- Local Planning Policies and supplementary planning documents/technical guidance.

National Planning Policy Framework (NPPF) 2024

¹ CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal* (2nd. Ed.) CIEEM

² BSI (British Standards Institute) BS4202:2013 *Biodiversity – A code of practice for planning and development*. BSI, London.

- 2.2 National planning policy on biodiversity and conservation is set out in the National Planning Policy Framework (NPPF). This emphasises that the planning system should seek to minimise impacts on biodiversity and provide net gains in biodiversity wherever possible as part of the Government's commitment to halting declines in biodiversity and establishing coherent and resilient ecological networks. Chapter 15: Conserving and Enhancing the Natural Environment, is of particular relevance to this report as it relates to ecology and biodiversity. Relevant policies are set out below:
- 2.3 Paragraph 185: *"To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity..."*
- 2.4 Paragraph 186 states: "When determining planning applications, local planning authorities should apply the following principles:
- a) *'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused'*
 - b) Relates to developments affecting SSSI
 - c) Relates to developments affecting irreplaceable habitats, such as ancient woodland
 - 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 encouraged, especially where this can secure measurable net gains for biodiversity'.*
- 2.5 The Government Circular 06/2005, which is referred to by the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.
- 2.6 The above approach encapsulates the 'mitigation hierarchy' described in British Standard BS 42020:2013, which involves the following step-wise process:
- Avoidance – avoiding adverse effects through good design;
 - Mitigation – where it is unavoidable, mitigation measures should be employed to minimise adverse effects;
 - Compensation – where residual effects remain after mitigation it may be necessary to provide compensation to offset any harm; and

- Enhancement – planning decisions often present the opportunity to deliver benefits for biodiversity, which can also be explored alongside the above measures to resolve potential adverse effects.

- 2.7 The measures for avoidance, mitigation, compensation, and enhancement should be '*proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development*'

Conservation of Habitats and Species Regulations 2017 (as amended)

- 2.8 In summary these regulations, also referred to as the Habitat Regulations, cover the designation and protection of European sites and the protection of European protected species (EPS).

Environment Bill and Biodiversity Net Gain

- 2.9 The Environment Bill received Royal Assent on 9th November 2021, becoming the Environment Act; this includes the provision of biodiversity gain for developments in England, which will be mandated through an amendment to the Town and Country Planning Act 1990. The two-year transition period that follows Royal Assent means that mandatory Biodiversity Net Gain (BNG) became law on 12th February 2024, with small sites being mandatory on the 2nd April 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)

Local Plan

- 2.10 The Wiltshire Core Strategy Development Plan Document ('the plan') was formally adopted on 20 January 2015. The plan provides a positive and flexible overarching planning policy framework for Wiltshire for the period up to 2026. Policy 50 'Biodiversity and Geodiversity' states that: '*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.* The policy goes on to state that all developments should seek opportunities to enhance biodiversity.

Species Protection

- 2.11 A number of species, including all bats and great crested newts, are afforded protection under The Wildlife and Countryside Act 1981 (as amended)
- 2.12 Under this legislation, a person is guilty of an offence if a person intentionally or recklessly:
- disturbs any animal while it is occupying a structure or place which it uses for shelter or protection;
 - obstructs access to any structure or place which any animal uses for shelter or protection.

- 2.13 In addition the protection afforded through UK legislation, further protection is provided to a small group of species, commonly referred to as 'European Protected Species' under the Conservation of Habitats and Species 2017 (as amended) (also known as the Habitats Regulations)., including bats and great crested newts.
- 2.14 With regards to European Protected Species listed under Schedule 2 of the Act, it is an offence to:
- Intentionally or deliberately capture or kill, or intentionally injure the animal;
 - Deliberately disturb the animal or intentionally or recklessly disturb them in a place used for shelter or protection;
 - Damage or destroy a breeding site or resting place;
 - Intentionally or recklessly damage, destroy or obstruct access to a place used for shelter or protection.
- 2.15 The Habitats Directive provides for the derogation from these above prohibitions for specified reasons and providing certain conditions are met. Those derogations are transposed into the Regulations by way of a licensing regime that allows what would otherwise be an unlawful act to be carried out lawfully. Among the reasons why a licence may be granted and the reason relied upon by developers when seeking a licence to carry out operations for the purposes of development, is that there are imperative reasons of overriding public interest why the operation should be carried out.
- 2.16 Whilst Natural England is the licensing body, the LPA must have due regard for the Habitat Regulations during the planning process and that the following three derogation tests will be met:
- Test 1: *Regulation 53(2)(e) states: a licence can be granted for the purposes of "preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment".*
 - Test 2: *Regulation 53(9)(a) states: the appropriate authority shall not grant a licence unless they are satisfied "that there is no satisfactory alternative".*
 - Test 3: *Regulation 53(9)(b) states: the appropriate authority shall not grant a licence unless they are satisfied "that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range*

3.0 Methodology

Data Search

- 3.1 Online sources were reviewed, such as MAGIC³, to search for designated sites, priority habitats and records of local European Protected Species (EPS) licence. A data search can provide important contextual information to gain an understanding of the site and surrounds. In addition, the Wiltshire Council planning portal was searched for nearby applications.

Preliminary Ecological Appraisal

- 3.2 The site was surveyed on 8th July 2025 by Ceri Griffiths, Director of Herdwick Ecology, with full membership of Chartered Institute of Ecology and Environmental Management (CIEEM) and a Natural England bat and great crested newt licence holder. Weather conditions were dry and clear, with a temperature of 18°C.
- 3.3 Habitats and obvious features within the site were assessed following the UKHab criteria to inform the Biodiversity Net Gain calculations and condition assessments.

Preliminary Roost Assessment

- 3.4 The perimeter of the building (barn, outbuilding and modern function building) was systematically inspected, and the exterior assessed, with the aid of binoculars (Pentax 10 X 36), endoscope and high powered torch, where necessary. A description of the building was made, and the location of any potential access points or roost locations were noted. These included:
- Suitable cracks and crevices within stone or brick work;
 - Suitable access points via head of gable end and within lintels and gaps around the barn doors etc
 - Gaps around the eaves and across the roof lines
- 3.5 The surrounding habitat was also assessed for its suitability for foraging and commuting quality.
- 3.6 The internal assessment involved a search to look for bats, or evidence of bats such as droppings or staining around common roost locations. A high-powered torch and endoscope were used where necessary to inspect the building more closely.
- 3.7 Following the inspection, an assessment was made of the building's suitability to support a bat roost, following the criteria set out in Table 1 below.

³ <https://magic.defra.gov.uk/>

Table 1: Suitability Assessment⁴

Suitability	Roosting Habitat
Negligible	Negligible habitat features on site likely to be used by roosting bats.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats
Moderate	A building with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status
High	A building with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
Roost	Bats or evidence of bats recorded.

- 3.8 In many situations it is not possible to inspect all locations where bats may be present, or any bats that may be present, may not be visible at the time of the survey. Hence, an absence of bats does not necessarily mean that a roost is not present and further activity surveys may be required to confirm presence or absence.

Biodiversity Net Gain Assessment

- 3.9 The Statutory Biodiversity Metric is designed to provide a quantitative approach to assessing the changes in biodiversity value brought about by development or changes in land management. It is a habitat-based approach and uses the attributes of a habitat to provide a biodiversity value based on components such as distinctiveness, condition and strategic significance of the existing habitat as well as time to establish and difficulty of creation for proposed habitats.
- 3.10 The baseline Biodiversity Net Gain (BNG) calculations, as outlined below, provides a numerical habitat value which indicates the existing value of the habitats present on the site based on the identified habitat types and their condition score.

4.0 Baseline Conditions

- 4.1 The Application Site lies in a rural location in the hamlet of Knockdown, to the south of the A433, approximately 6.5km southwest of Tetbury in Gloucestershire. Westonbirt Arboretum lies 500m to the north. The wider landscape comprises predominately arable land under a mix of arable and pasture,

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

interspersed with hedgerow, which appear to be annually cut. There are only scattered properties in the immediate locality with a small business park to the west and southeast.

- 4.2 The Application Site currently comprises an existing pub with beer garden and associated parking to the front, an events building and outside seating area, and a camping and glamping site, with toilet/shower block, towards the south. There is also a detached residential property and outbuildings that are currently used for storage. Two defunct polytunnels are present on the western boundary.

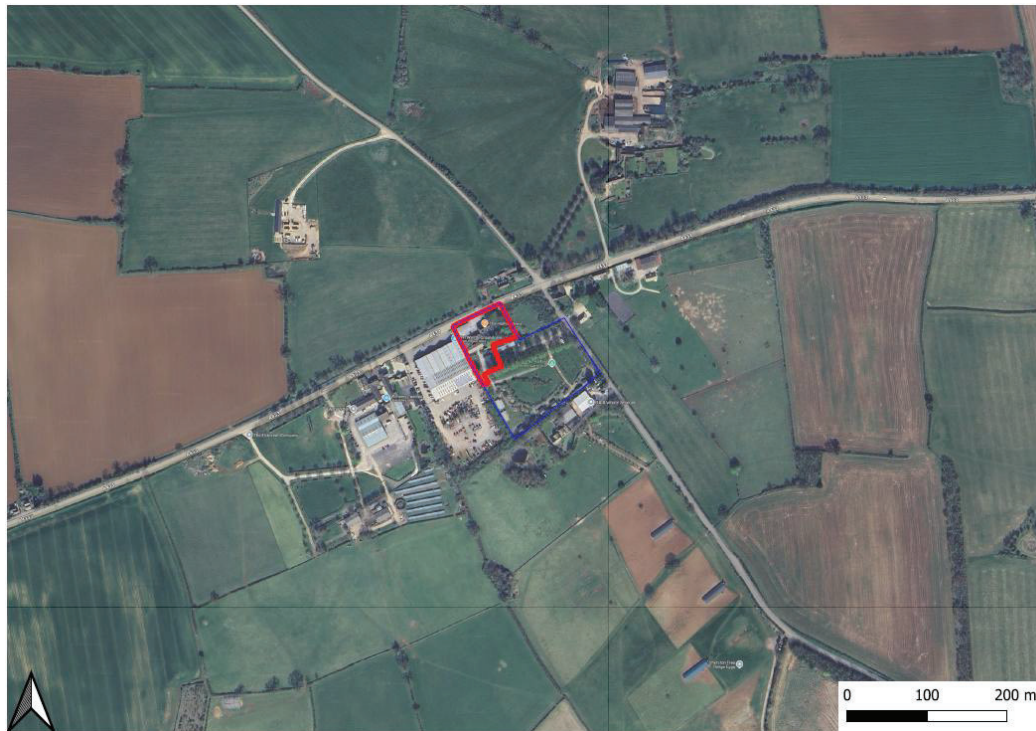


Plate 1: Site Location

Data Search

Statutory Designated Sites

- 4.3 There are no statutory designated sites within 3km of the Application Site and it does not sit within any Site of Special Scientific Interest (SSSI) risk zones for this development type. The closest SSSI is the Midger SSSI that comprises a variety of habitats which include ancient woodland and/unimproved calcareous grassland. An outstanding assemblage of breeding butterflies has been recorded. There are no International Site (Special Area of Conservation (SAC) or Special Protection Area (SPA)) within 10km of the Application Site.

Habitats

- 4.4 There are no Priority Habitats identified within 500m of the site. Westonbirt Arboretum to the north comprises a mix of Ancient and Ancient & Semi-Natural Woodland with a mix of coniferous and deciduous woodland.
- 4.5 Two waterbodies have been identified on OS mapping within 250m of the site. One lies within 30m of the southern boundary of the Application Site. A second lies 80m from the western boundary. There are additional ponds to the north of the A431.

Species

- 4.6 There are two European Protected Species (EPS) licences within 4km of the site boundary:
- Common and soprano pipistrelle resting place (dated 2011-2013) – 1.8km northeast
 - Lesser horseshoe bat resting place (dated 2023-2014) – 1.8km northeast
 - Lesser horseshoe and natterer's bat resting place (dated 2012-2015) – 1.84km southwest
- 4.7 There is a single EPS returns for great crested newt that lies 1.8km northwest. In addition, a number of ponds have been surveyed via eDNA in 2019-2019 which all returned an absent result, with the exception of one pond 1.4km east.

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- 4.8 The site covers approximately 0.36ha and is an operational pub with beer garden to the east and covered outdoor seating area/event space to the southwest. A modern function building lies towards the southern boundary of the Application Site. A more traditional barn overlooks the pub car park and is currently used for storage. The majority of the habitats comprise ornamental garden planting with shrubs, pleached fruit trees and scattered mature/semi-mature trees. The areas of lawn within the beer gardens are heavily trampled with patchy bare ground and minimal vegetation cover.
- 4.9 The species within the lawn are minimal and comprise *poa annua* and *lolium* mix, with occasional common lawn forbs including daisy *Bellis perennis*, dandelion *Taraxacum officinale*, yarrow *Achillea millefolium*, creeping buttercup *Ranunculus repens*, rib-wort plantain *Plantago lanceolata* and white clover *Trifolium repens*. The borders comprise a mix of ornamental and native mix such as *Malus* and *Prunus* with a range of species common shrubs including cotoneasters, box and privet. The trees are illustrated in the accompanying BNG condition assessment table, and illustrated on Plate 2. Species include horse chestnut, hazel, field maple and wild cherry. The habitats within the Application Site are common and widespread and of low ecological value. In summary, the site comprises the following primary UKHab classification habitats onsite:

Table 2: Baseline Habitats

UKHab	BNG SSM Metric	Justification
Urban – Developed Land / Sealed Surfaces u1b and Buildings u1b5	Urban – Developed Land / Sealed Surfaces	Includes all buildings, pub car park and all areas of sealed hardstanding such as the pathways.
Urban – Garden borders, shrub planting, pleached trees u1 828	Urban – Introduced Shrubs / Beer Garden	Areas of garden borders of predominately non-native species, shrubs with wood chip cover/bare ground. Managed as garden area.
Urban – u1 73	Urban – bare ground	Large areas of bare ground in between poor modified grassland. Some areas sufficiently large enough to warrant a separate code within metric.
Modified grassland g4	Modified grassland – poor condition	Mix of grass species but forb poor (<9species/m2) and suboptimal species – poor condition as only passes C, F & G.
Modified grassland g4 (only road verge)	Modified grassland – poor condition	Mix of grass species but forb poor (<9species/m2) and suboptimal species – poor condition as does not meet A but as passes C, F & G.
Urban Tree	Poor Condition	See Condition Assessment Forms T5, T6, T7, T10, T11
Urban Tree	Moderate Condition	See Condition Assessment Forms T1, T2, T3, T4, T8, T9

Table 3: Baseline Habitat Values

Habitat type	Area (ha)	Strategic significance	Condition	Habitat units
Urban – Developed Land, sealed surface	0.2402	N/A	N/A	0.00
Urban – Introduced Shrubs	0.0011	N/A	N/A	0.00
Urban – Bare Ground	0.053	N/A	Poor	0.11
Grassland – Modified	0.063	N/A	Poor	0.13
Grassland – Modified	0.006	N/A	Poor	0.01
Individual Tree	0.0285	N/A	Poor	0.11
Individual Tree	0.0774	N/A	Moderate	0.62
Total habitat area	0.47			0.98
Site Area (Exc ind trees)	0.36			

4.15 The baseline habitat value, as assessed using the Biodiversity Metric is **0.98** habitat units.

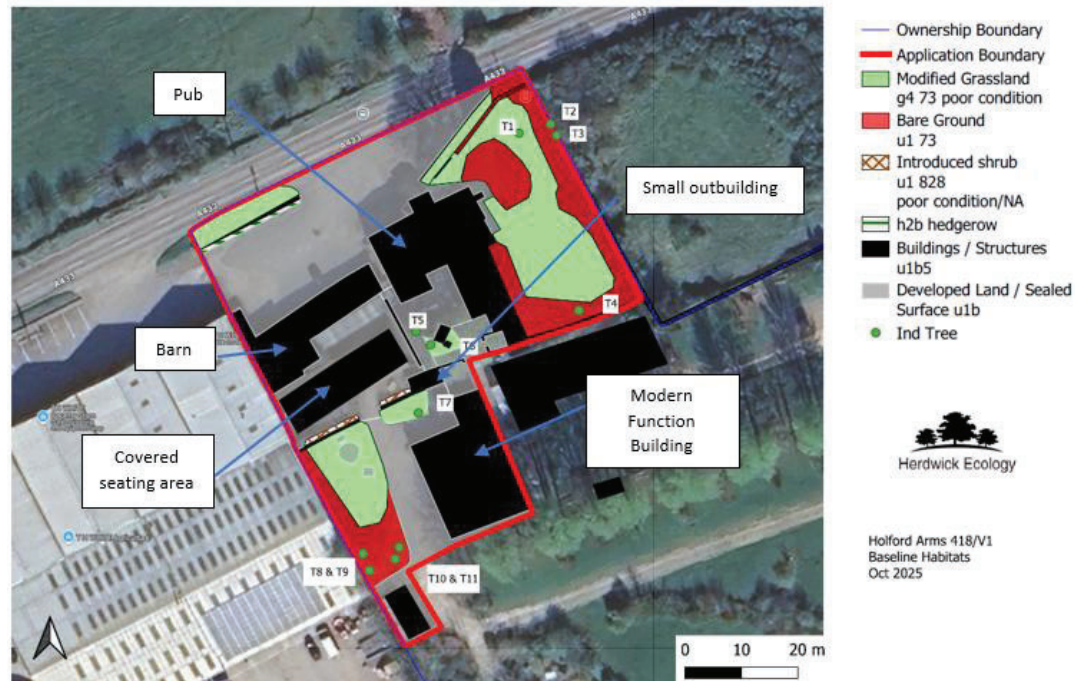


Plate 2: Baseline Habitats and Condition

Species

Bats – Roosting

Barn

- 4.16 A Preliminary Roost Assessment (PRA) was undertaken on the traditional barn in 2017 and repeated in 2019, together with activity surveys, including the use of automated bat detectors to record the use of the building throughout the night on consecutive days. The surveys recorded only numbers of lesser horseshoe and brown long-eared bats using the western side of the building for night roosting.
- 4.17 The update building inspection in July 2025 did not record any bats, but low numbers of bat droppings, in a small accumulation, considered likely to be from a *Myotis* bat, was found adjacent to the open barn door on the western side of the southern elevation. The droppings were sent for DNA analysis and confirmed to be from a Brandt's bat. The condition of the building was unchanged with the tiles and ridge tiles in good condition with no visible potential roost points identified. There were occasional gaps within the stone work on the south western elevation and these were inspected using an endoscope. They were found to be superficial and did not travel far into the stone work and were not considered to offer suitable long-term roosting opportunities. Internally, the barn is open and light and in regular use and, therefore, is not considered suitable for day roosting. In conclusion, the update PRA confirmed that the barn has potential for use as a night roost and, given that the baseline conditions are unaltered since 2019, and the update PRA/DNA, there is sufficient confidence the barn supports:

- Lesser horseshoe bat night roost used by low numbers/individual bats – low conservation status
- Brown long-eared bat night roost used by low numbers/individual bats - low conservation status
- Brandt's bat night roost used by low numbers/individual bats - low conservation status

4.18 The mitigation strategy was approved under the planning consent 19/03888/FUL, which incorporated a section of the new extension roof within the western elevation of the barn for dedicated use for bats. This mitigation strategy has been adapted and included within the new proposals, as set out within the accompanying planning drawings. Taking into account the Natural England Policy 4, that sets out alternative sources of evidence to reduce standard survey requirements, given the historic survey data, the updated PRA and DNA analysis, the ecological impacts of development can be predicted with sufficient certainty and confidence that there would not be a detrimental effect on the FCS of the species. There is also the additional costs and delays that will occur that would be disproportionate to the scale of the impact and any additional certainty. The previously approved mitigation is robust and it is highly unlikely that it would be amended, given if any additional surveys identified further roosts.

4.19 Given the presence of the aforementioned bat roosts, a Natural England bat mitigation licence will be required once planning has been received by prior to works commencing on the building. The mitigation plans are incorporated into the planning drawings, with further information on the licence process provided in Section 5 below.

Modern Function Building

4.20 The building is timber clad with a metal corrugated roof and . It is in a good condition with the cladding fully sealed and with insulation along the verges of the roof. No visible access points or potential roost sites were noted. Internally, there is no separate roof void and the building is light and open. The building is of negligible value for bats and no further surveys are required.

Outbuilding

4.21 There is a small single storey stone outbuilding that houses services and is used for storage. It has a pitched large Cotswold tile roof. The end timber rafters are visible on the gable ends, which are mortared in. Internally, there is no separate roof void. It is partially boarded but the board is in a poor condition and has collapsed in places due to damp ingress. The building is light and open with a distinct odour from the storage of materials. No bats or evidence of bats were noted. There is low potential for bats to be present beneath the tiles, due to the crevices that are created from the natural shape of the stone tiles. There is also a small gap on the gable end where there has been some deterioration on the verge. It is understood that there are no alterations to this building and therefore no further survey or

assessment is required. Should the proposals change, then it is recommended that a single bat emergence survey is undertaken to confirm absence of a roost beneath the tiles.

- 4.22 No PRF were noted within any of the trees proposed for demolition.

Bats – Foraging and Commuting

- 4.23 In terms of foraging and commuting habitats within the Application Site, there are minimal opportunities, with the possible exception of the mature trees around the beer garden. However, the site is well lit, together with the adjacent road and industrial estate. The habitats to the south will offer good habitat for bats.

Badgers

- 4.24 There was no evidence of badgers within the Application Site. The habitats to the south will offer some opportunities. As there are minimal impacts to vegetation/suitable habitats for badger no further survey or assessment is required but standard best practice construction methods should be implemented, as set out in section 5.

Breeding Birds

- 4.25 The trees will provide some habitat for common garden species of nesting birds, but the majority of the shrub planting is too low and thin to provide nesting opportunities. The internal areas of the barn may also offer some potential but the external features are considered to be sealed. The survey was undertaken during the breeding bird season and no active nests were noted.

Amphibians - Great crested newts (GCN)

- 4.26 Whilst there are waterbodies within 250m of the site, the current habitats are not optimum for great crested newts. Given the minimal habitat changes proposed, it is considered highly unlikely that great crested newts would be impacted on by the Proposed Development and, therefore, no further surveys are required. Standard best practice site clearance and construction methods should be implemented, as set out below.

Reptiles

- 4.27 As with the amphibians, the habitats within the Application Site are highly unlikely to provide opportunities for reptiles. No refugia or potential resting sites were noted and reptiles are unlikely to be impacted on by the proposals. Standard best practice site clearance and construction methods should be implemented, as set out below.

Other protected/notable species

- 4.28 Given the availability of high quality habitats within the wider locality, species, such as hedgehogs, are likely to move across the site. Again, standard best practice site construction methods should be adopted, where necessary, as detailed in Section 5.

5.0 Avoidance, Mitigation and Enhancement Measures*Mitigation and Enhancement Measures*

- 5.1 In line with National and Local planning policies, developments should seek to ensure the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species populations. Therefore the following section sets out avoidance and mitigation measures that should be implemented, together with enhancement opportunities, with the aim of delivering a net gain in biodiversity, in line with the mitigation hierarchy.

Development Description

- 5.2 The proposals allow for the redesign of the beer garden to the east, together with minor renovation of the pub building. It is understood that there will be no significant alterations to the pub or the small outbuilding that would trigger the need for further ecological surveys and the pub was not surveyed as part of this appraisal.
- 5.3 The barn will be converted into a spa, together with the renovation of the rear beer garden into a spa garden and outside seating area. The gardens will be redesigned with additional ornamental planting with numerous trees and shrubs. There will be additional seating and covered areas within the main beer garden with patio areas for outside entertainment and cooking areas. This will result in the loss the existing habitats, with the exception of some of the trees but a lawn and shrubs will be replanted as set out in the accompanying landscape design.
- 5.4 The function building will be extended into the proposed spa garden, resulting in the loss of hardstanding.
- 5.5 In summary, whilst there will be change in the operational use for the spa and spa garden, this will result in minimal changes to be habitats onsite. There will be some tree removal, which is illustrated further in accompanying BNG report. However, the design incorporates a large number of individual trees, together with a row of pleated trees, ornamental planting and an evergreen hedgerow. Whilst the majority of the design utilises ornamental species, given the setting and proposals it is considered appropriate. Where possible, species have been selected for the 'wildlife friendly' characteristics, as listed on the RHS website.



Plate 4: Proposed Site Plan

Biodiversity Net Gain

- 5.6 A separate BNG report has been prepared that demonstrates a 22% net gain in biodiversity.

Designated sites

- 5.7 There are no designated sites within 3km of the Application Site and it does not sit within a SSSI risk zone. Therefore, there are no predicted impacts to designated sites as a result of the Proposed Development.

Species

Bat Mitigation Strategy

- 5.8 As a roost has been identified, a Natural England bat mitigation licence will be required, post planning but prior to works commencing onsite. As the barn supports night roosts, it does not meet the criteria for a low impact licence (BMCL) and therefore a traditional site individual licence will need to be applied for.
- 5.9 The barn is to be converted into a spa. A dedicated roosting area will be created on the western elevation with an open access installed on the gable end to allow direct flight access into the roof void. The access will be 200mm x 300mm and cowled to reduce light ingress and inclement weather. Only

Type 1F bitumastic felt will be used – no BRM are permitted. The design is set out in Appendix 2, and illustrates an roosting area of 2.3m (L) x 4.4m (W) x 2.5m (H). In addition, a bat box (1FF Schwegler⁵ or similar) on a mature tree within the wider blueline boundary.

- 5.10 Once planning has been received, a Natural England bat mitigation licence will be applied for, implementing Policy 4 to reduce the requirement for further update surveys.
- 5.11 A licensed bat worker would be present to provide a tool box talk to all contractors and to check he barn prior to works commencing. There no timing restrictions under the low impact licence and, given the use as a night roost only, it is considered unlikely that bats would be hibernating with the building.
- 5.12 Should a bat be found during works, then it will be moved by the licensed ecologist into the tree mounted bat box.

Other Mitigation Measures

- 5.13 The following measures should be implemented:
- The lighting design will need to be sensitively designed to avoid all light spill across the roost entrance and surrounding vegetation. This will need to be demonstrated within the licence application. Any new lighting should adhere to the principles set out in the ILP Guidance Note 08/23 Bats and artificial lighting in the UK⁶
 - Foundation trenches and all excavations must either be covered overnight or must have scaffolding boards, or similar, placed within them to ensure that any animals that fall in are able to escape.
 - It is not anticipated that there will be any significant vegetation removal. Any vegetation removal must avoid the breeding bird season, which generally runs from March to August. If works are to be undertaken during this time then a check for breeding birds should be undertaken by an experienced ecologist prior to works starting. If an active nest is found then works will need to wait until the chicks have fledged, or an appropriate buffer zone implemented to ensure no disturbance to the active nest.
 - Raise stored materials (that might act as temporary resting places for species such as amphibians and reptiles) off the ground, e.g. on pallets.

Enhancement Opportunities

- 5.14 The proposed development should seek to achieve a net gain in biodiversity in line with National and Local planning policies. The following could be incorporated into the design:

⁵ [1FF Schwegler Bat Box With Built-in Wooden Rear Panel | NHBS Practical Conservation Equipment](#)

⁶ <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

- Bird boxes can be placed on the new building or on the larger trees within the gardens.
- Additional habitat boxes or log piles for invertebrates, hedgehogs and amphibians/reptiles could be placed adjacent to the new hedgerows to provide further opportunities for species.

5.14 Taking the above into account, whilst low status bat roosts has been identified, mitigation has been incorporated into the design and there will be no detrimental impact to the favourable conservation status of the species. Therefore it is considered the proposed development does not contravene the local planning policies and will seek to deliver a net gain in biodiversity in line NPPF.

Survey Validity and Natural England Bat Mitigation Licence Submission

5.15 Natural England state that it can take up to six weeks to determine a licence but it is recommended that at least 8 – 10 weeks should be allowed within the works programme.

Appendix 1 Site Photographs



Plate A1 Northern elevation of the barn



Plate A2 Covered Seating Area



Plate A3 Modern Function Building showing area where the extension is proposed



Plate A4 Interior of Modern Function Building

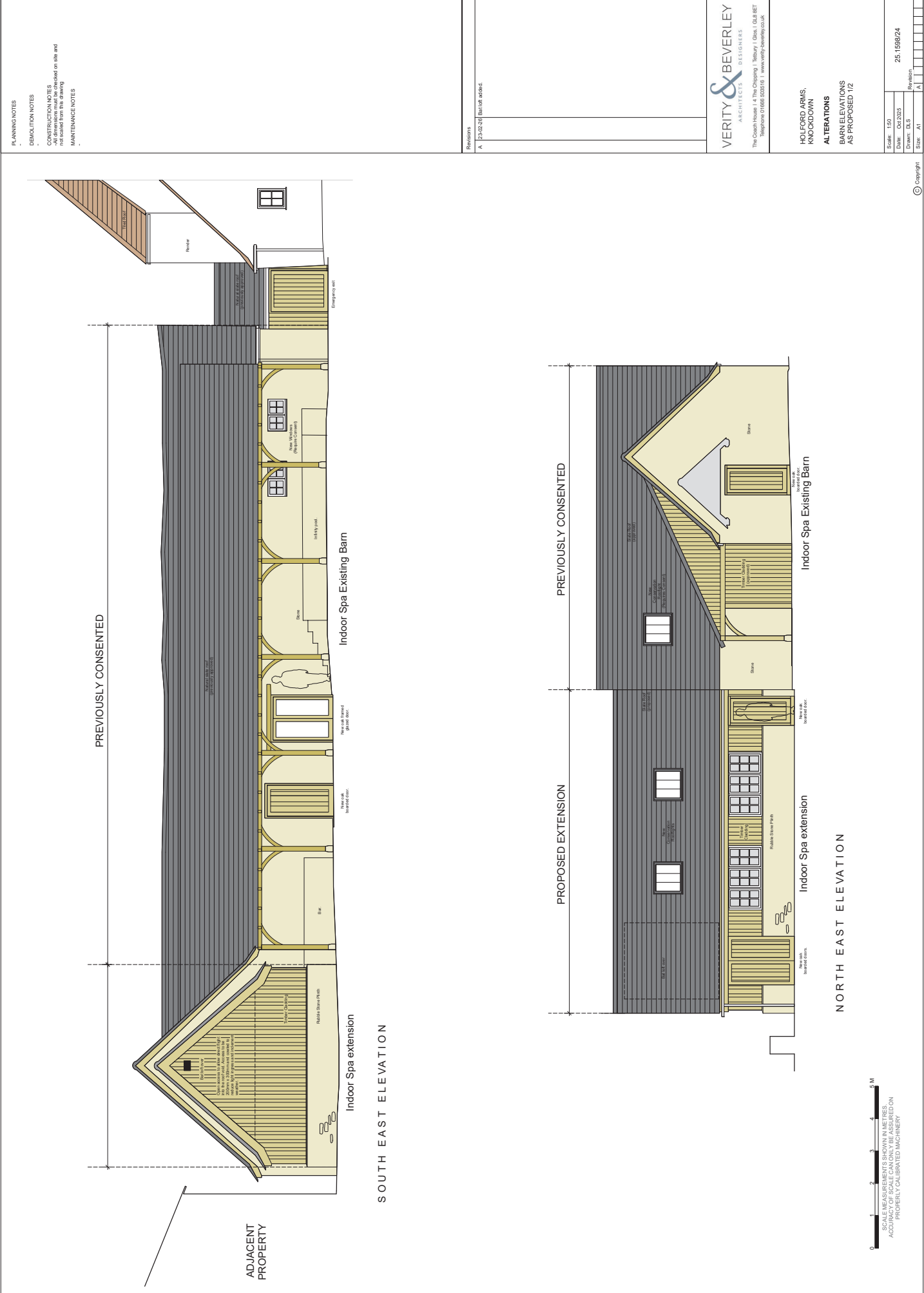


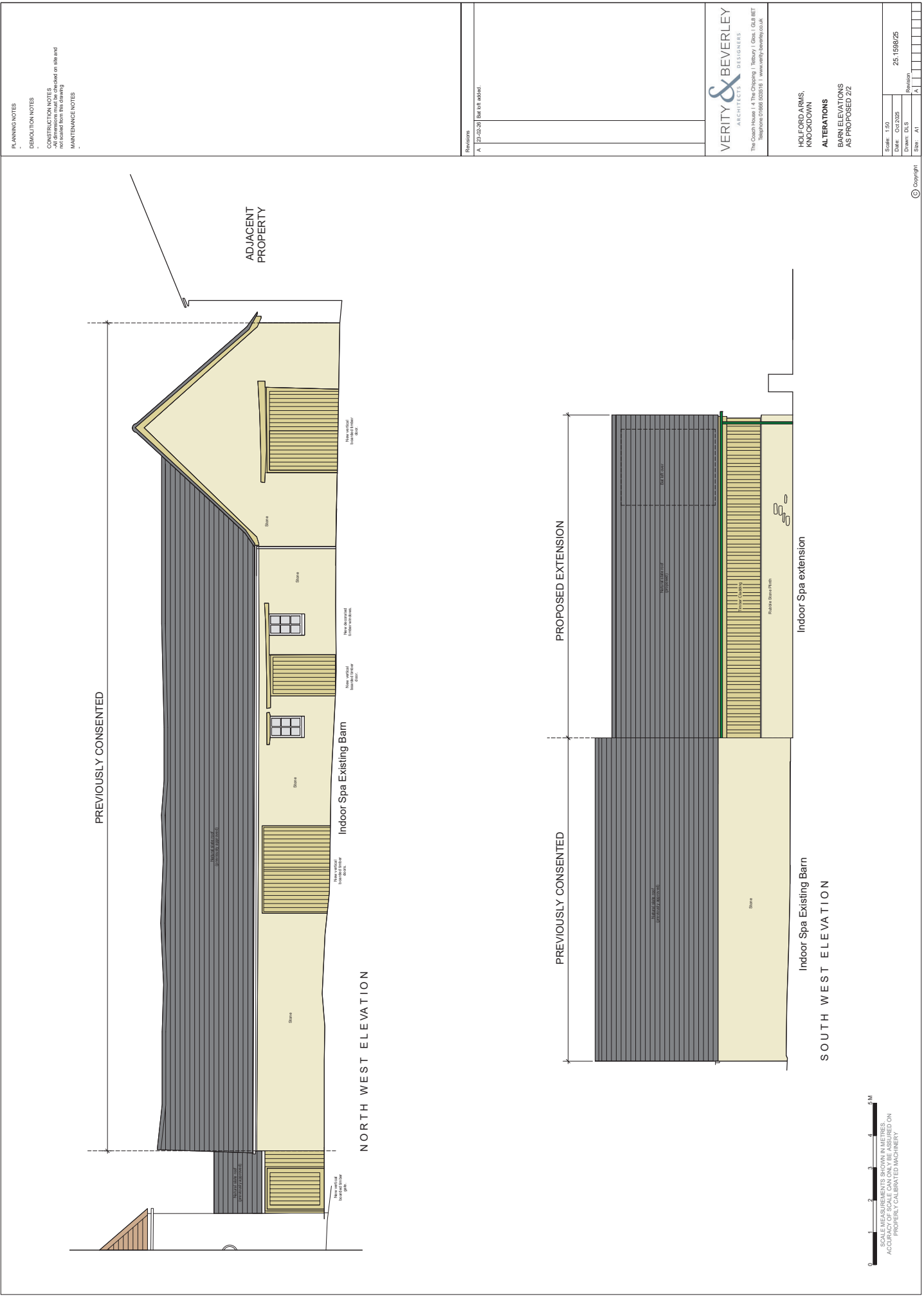
Plate A5 Small Outbuilding



Plate A6 showing grassland and areas of planting (T7 to the rear)

Appendix 2 Replacement Roost Design
Appendix 3 DNA Analysis





PLANNING NOTES

- DEMOLITION NOTES
- CONSTRUCTION NOTES
- MAINTENANCE NOTES

Revisions

A 22-02-26 Not yet added.

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HOLFORD ARMS,
KNOCKDOWN

ALTERATIONS

BARN ELEVATIONS
AS PROPOSED 2/2

Scale: 1:50	25.1558/25
Date: Oct 2025	Revision
Drawn: DLS	A
Site: A1	

0 1 2 3 4 5 M

SCALE MEASUREMENTS SHOWN IN METRES
ACCURACY OF SCALE CAN ONLY BE ASSURED ON
PROPERLY CALIBRATED MACHINERY

Sample ID: EG-2492-4

Sample information:

Sample type: Faecal

Species group: Bats

Suspected species:

Site Location: Tetbury

Comments: 418 Stables Holford

Laboratory information:

DNA Extraction Code: EG-2025-1825

Identification method: qPCR

Analysis Procedure Notes:

Laboratory Comments:

None

Species Identified:

Species 1: Myotis brandtii (Brandt's bat)

qPCR Ct Value: 19

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