

BAT SURVEY REPORT
OF
22 WOODS HILL, LIMPLEY STOKE, BA2 7GA



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VALIDITY

Due to the dynamic nature of ecological conditions the results of the survey(s) and related conclusions and recommendations as contained within this report should only be considered valid for up to 12 months from the date the last survey was undertaken.

Any alterations to the site proposals may invalidate the recommendations contained within this report.

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Non-Technical Summary

Abricon Ltd. was commissioned by Mr. Matthew Pickett to undertake bat emergence surveys in order to establish the likely impacts of the proposed development at 22 Woods Hill, Limpley Stoke, BA2 7GA hereafter referred to as the 'site'.

The site comprises a residential dwelling (B1) within the village of Limpley Stoke, Wiltshire. A Preliminary Roost Assessment (PRA) was undertaken in March 2025 which found evidence of bats (droppings) in main loft and identified a number of features with bat roosting and nesting bird potential.

The proposals that have been provided show that the development includes a proposed glazed extension of existing dwelling with associated internal alterations, with demolition of existing garage (B3) and erection of attached open-sided car port to existing detached studio (B2).

Buildings B2 and B3 were not subject to further surveys as they were assessed as having negligible habitat suitability for roosting bats.

The PRA identified bat droppings within the loft of B1 which were confirmed as serotine *Eptesicus serotinus* by eDNA analysis, as well as presence of potential bat roosting features (PRFs) on the building that could contain further concealed evidence of bats. Therefore, the building was classified as a confirmed bat roost, according to the Bat Conservation Trust guidelines (Collins, 2023).

During the course of the emergence surveys, **a maximum count of three bats were observed emerging** from the building. The surveys and DNA analysis have identified that the building is utilised as a day roost by serotine bats.

The site lies within the Bath and Bradford on Avon Bat Special Area of Conservation (SAC) and is located within the lesser horseshoe *Rhinolophus hipposideros* 2000m buffer and the greater horseshoe *Rhinolophus ferrumequinum* 4000m buffer, ~1.4km west of a core roost at the closest point. Despite this, no horseshoe bats were recorded during the bat emergence surveys.

Evidence of bird nesting activity was noted under the northern decking during the PRA survey.

The results of the PRA and the emergence surveys have highlighted the requirement for further actions, which are summarised in the table below:

Species/ Groups	Phase	Action(s) Required
Bats	After planning permission granted, prior to works starting on site	Precautionary Method of working, including seasonal and timing constraints to the works. OR Completion of a notification form to be submitted to Natural England under Section 10(5) of the Wildlife and Countryside Act 1981 (as amended) to allow works affecting the building which would otherwise be illegal only IF the development CANNOT be undertaken outside the activity season AND mitigation measure are implemented during works to prevent bats from being harmed.
	Design Stage	New lighting (internal and external) should be designed sensitively to minimise impacts of artificial lighting on offsite and onsite habitats on light sensitive bat species, particularly those for which the SAC is designated.
Birds	Site Clearance/ Demolition/ Construction	Compensation for the loss of the bird nest is required.

		It is recommended that works to the building are timed to take place outside of the nesting bird season (which is March-August inclusive). If this is not possible then a pre-works check, by an Ecological Clerk of Works (ECoW), prior to works affecting the building /decking will be required. If an active nest is found, a demarcated buffer zone should be installed until any chicks have fledged.
Invasive non-native species	Site Clearance	Measures to avoid the spread of Japanese knotweed are required prior to site clearance – see 5.4.
Ecological Enhancements	Construction/Landscaping	See 5.5 for suggested ecological enhancements.

1 Introduction

1.1 Survey Background, Aims & Objectives

- 1.1.1 Abricon Ltd. was commissioned by Mr. Matthew Pickett to undertake a Preliminary Roost Assessment (PRA) in respect of bats and birds at 22 Woods Hill, Limpley Stoke, BA2 7GA hereafter referred to as 'the site'.
- 1.1.2 Due to the number and type of features present, and the bat droppings identified within the loft space, the building B1 was assessed as a confirmed bat roost in accordance with the Bat Conservation Trust guidelines (Collins, 2023). From these results, further emergence surveys were therefore recommended in order to characterise the roost, identify species present, and in what numbers and for what purpose. This allows for an accurate assessment of the likely impacts of the proposed development on bats and to make recommendations for any further actions which may be required, including mitigation and/or licencing as appropriate.
- 1.1.3 The site lies within the Bath and Bradford on Avon Bat Special Area of Conservation (SAC) and is located within the lesser horseshoe *Rhinolophus hipposideros* 2000m buffer and the greater horseshoe *Rhinolophus ferrumequinum* 4000m buffer. The site is located ~1.4km west of a core roost at the closest point.
- 1.1.4 Details of the PRA can be found within a separate report titled: "Preliminary Roost Assessment of 22 Woods Hill, Limpley Stoke" (Abricon, 2025). This report should be available and read alongside this Bat Survey Report.

1.2 Site Location & Description

- 1.2.1 The site comprises a residential building (B1) and two garages (B2 and B3) situated within the village of Limpley Stoke, Wiltshire. The site is centred at British National Grid Reference: ST 78002 60999.
- 1.2.2 The buildings are surrounded by a residential garden bordered by mature tree lines and a woodland along the northern boundary. The A36 runs adjacent to the west of the site. The surrounding area comprises low density housing with many mature trees and wooded areas in and around the village, including the woodland that borders the site to the north, and across the A36 to the west of the site. The River Avon is located ~240m east of the site with the Kennet and Avon Canal ~320m east. The wider landscape consists of agricultural fields lined by mature hedgerows, linking multiple patches of woodland. Connectivity to and from the site is present in the form of the surrounding treelines and woodland features leading out to the wider landscape.

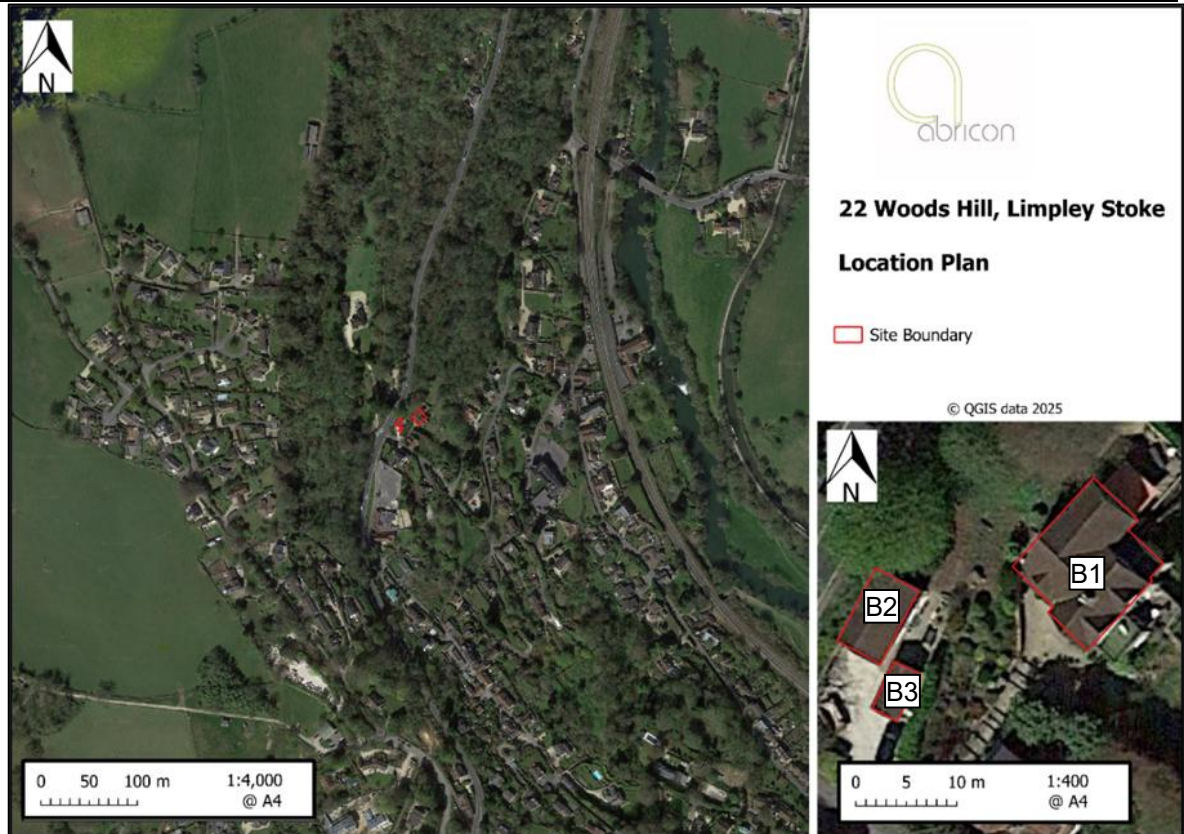


Figure 1 - Location of Site (highlighted red) – accessed 26/03/2025

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1.3 Proposed Development

- 1.3.1 The proposals that have been provided show that the development includes a proposed glazed extension of existing dwelling with associated internal alterations, with demolition of the existing garage and erection of an attached open-sided car port to the existing detached studio.

2 Methodology

2.1 Bats – DNA Analysis

- 2.1.1 During the site visit undertaken on the 26th March 2025, a sample of bat droppings was taken from the main loft of the building B1. This sample was sent to Swift Ecology for DNA analysis in order to determine the species from which they were derived.

2.2 Roost Characterisation

- 2.2.1 Once presence has been established, roost characterisation surveys are required to inform the impact assessment and design appropriate mitigation. Roost characterisation includes emergence surveys as well as collection of information regarding the physical characteristics of the roost and the surrounding area.

Bat Emergence Surveys

- 2.2.2 Bat emergence surveys can aid a building inspection by positive confirmation of access and egress points into and out of a structure. This method also allows recordings of bat echolocation calls for species identification to help determine the use and importance of a roost. Emergence surveys may also identify new roost areas where no evidence of bats was found during inspection.
- 2.2.3 A total of two dusk bat emergence surveys were undertaken by surveyors and infra-red cameras for observing bats and their activity using non-invasive and non-disturbing techniques. The surveys were conducted according to the Bat Conservation Trust's (BCT) 'Bat Survey for Professional Ecologists - Good Practice Guidelines' (Collins, 2023).
- 2.2.4 The surveyors were situated at key locations to ensure that all aspects of the building were observed at all times, particularly those areas that had the highest potential to be used by bats and/or where evidence of bat use was found. The dusk activity surveys commenced approximately 15 minutes prior to sunset and continued for approximately 2 hours after.
- 2.2.5 Any bats observed were recorded. Information included;
- Time;
 - Emergence or entry points;
 - Direction of flight;
 - Use of landscape;
 - Flight characteristics;
 - Size;
 - Height above ground;
 - Physical characteristics of bats seen; and
 - Behaviour.
- 2.2.6 Four positions were required in order to view the entire roof area at the same time, including two surveyors and four Night Vision Aids (NVAs) for each dusk emergence survey at 22 Woods Hill, Limpley Stoke. At least one licenced/experienced bat surveyor was present on each of the surveys. Surveyor locations are displayed in Figure 2 below.
- 2.2.7 The bat detectors used during the emergence surveys were: Echometer Touch 2 Pro (Wildlife Acoustics) with iPad/Samsung Galaxy Tablet and/or Elekon Batscanner paired with Anabat Express detectors for recording purposes. Analysis of recorded sound files was subsequently undertaken using AnalookW and Kaleidoscope software.

Table 1 – Weather Conditions for Emergence Surveys

Structure	Date	Sunset/Sunrise	Survey Time		Weather
22 Woods Hill, Limpley Stoke	26/06/2025	21:13	Start	20:58	16°C, Dry, Cloud 100%, Wind 0
			Finish	23:13	14°C, Dry, Cloud 100%, Wind 0
22 Woods Hill, Limpley Stoke	21/07/2025	21:31	Start	21:15	15°C, Dry, Cloud 100%, Wind 1
			Finish	23:31	13°C, Dry, Cloud 90%, Wind 0

Night Vision Aids

- 2.2.8 The survey of the building was augmented with the use of infrared cameras (Nightfox Whisker) with a standalone infrared light (a Nightfox XC5 850nm infrared flashlight) to illuminate the viewing area. The recorded footage was subsequently viewed at 1-1.5x speed to cross reference potential emergencies. Each NVA position had its own recording device (Anabat Express).
- 2.2.9 A still shot was taken at the darkest point of the survey to show the field of view and illumination of each NVA used. These images are shown in Appendix E.



Figure 2 - Bat Emergence Survey: Location of NVAs, bat detectors and field surveyors.

2.3 Personnel

- 2.3.1 Ella Colenso BSc (Hons) has been working as an environmental consultant since 2021. Her primary experience consists of Preliminary Roost Assessments, Preliminary Ecological Appraisals and protected species surveys as well as condition assessment and habitat mapping for Biodiversity Net Gain calculations. Ella holds Natural England protected species licence for bats (Level 1).
- 2.3.2 Sonia Lemon BSc (Hons) is an Assistant Ecologist working with Abricon Ltd. She has a BSc degree in Natural Sciences with a specialisation in Environmental Science and she has worked in environmental consultancy since May 2024. Sonia has written multiple scientific reports focused on endangered and vulnerable species and has volunteered with numerous environmental organisations over the past decade. Her primary roles include Protected Species' surveys such as Preliminary Roost Assessments, Dusk Emergence Surveys and Reptile Surveys, Analysis of Sound and Video Data and Report Writing. Sonia has also a Certificate in Bat Ecology and Surveying.

- 2.3.3 Sara Curtis has worked in the ecological consultancy sector since 2010. She has worked on projects from single dwellings to large scale, multi-phased developments covering a range of sectors. She has expertise in ecological survey techniques including 'extended' Phase I habitat surveys, protected and priority species surveys and biodiversity net gain condition assessments and is proficient in production Preliminary Ecological Appraisals, Preliminary Roost Assessments, Ecological Impact Assessment, mitigation strategies, BREEAM ecology assessments, Construction Environmental Management Plans, Biodiversity Net Gain assessments and Landscape and Ecological Management Plans. Sara holds Natural England protected species licences for bats (level 1), barn owl and hazel dormouse (level 2) and holds a Natural England and Natural Resource Wales licence for great crested newt and is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM). She also holds a CSCS card.
- 2.3.4 Jana Prapotnikova has worked in consultancy sector since 2006 with a focus on mammalian ecology, particularly bats and badgers. Jana runs Abricon's Ecology Department as well as being involved in project delivery. She has managed various ecological projects and has expertise in a range of ecological survey techniques including Phase 1 habitat assessments and a variety of protected species surveys (e.g. the aforementioned mammal species as well as reptiles and great crested newts). Jana also devises ecological mitigation schemes for a variety of protected species. She is well versed in producing preliminary ecological appraisals, BREEAM/CSH Ecology Assessments, protected species licences, Ecological Impact Assessments (EclA), Construction Environmental Management plans, Biodiversity Enhancement Schemes and Ecological Design Strategies. Jana holds Natural England and Natural Resources Wales Class 2 licence for bats as well as Natural England Class and Natural Resources Wales Class 1 licence for great crested newts. She is also a Registered Consultant of the Bat Low Impact Class Licence (BLIC) and holds the Bat Earned Recognition Accreditation (Level 2). Jana is a full member of Chartered Institute of Ecology and Environmental Management (MCIEEM).

2.4 Limitations

General Ecological Constraints

- 2.4.1 This survey only offers a "snapshot" of the site conditions and takes no account of seasonal differences, or of any species which may take up residence subsequently.
- 2.4.2 Due to the complexity of identifying bat species through their calls, some species are identified to genus level only (eg. *Myotis* species *Myotis sp.*) Some bat species are hard to record due to their faint call (eg. Long-eared species *Plecotus sp.*), however the night vision cameras would visually record them.

3 Results

3.1 Bat Emergence Surveys

Summary

- 3.1.1 A total of three serotine bat were observed emerging from the building B1 during the first dusk emergence survey, with two emerging during the second survey.**
- 3.1.2 The results of the DNA analysis confirmed the sample taken from the main loft of the building were derived from serotine only.
- 3.1.3 A total of seven bat species were incidentally recorded comprising: common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, serotine, noctule *Nyctalus noctule*, Leisler's bat *Nyctalus leisleri*, Myotis *Myotis sp.*, and long-eared bats *Plecotus sp.*

Dusk Emergence Survey – 26th June 2025

- 3.1.4 Bats were seen emerging from the southern side of the eastern dormer at 21:18 and 22:28 (Appendix F, EM1 and EM2), with a third emergence from under the soffit of the southern dormer at 21:45 (Appendix F, EM3). Sound analysis has confirmed these were all serotine bat.**
- 3.1.5 A total of 216 bat calls were recorded during the survey. Six species calls were incidentally recorded during the emergence survey, comprising common pipistrelle (105 calls), soprano pipistrelle (41 calls), serotine (46 calls), noctule (19 calls), Myotis (1 call) and long-eared bats (4 calls). The calls were fairly evenly recorded across the statics on the northern (62 calls), eastern (58 calls) and western sides (61 calls) of the building B1, with fewer recorded on the device located to the south of the building (35 calls).
- 3.1.6 During the survey, six common pipistrelles were seen flying south to north along the treeline to the west of the site between 21:36 and 22:08 with a pass at 22:16 travelling south. Serotines were seen passing north and south across the building at 21:44, 21:50 and 21:53 with foraging activity around the northern and eastern garden at 21:39. A brief pass from a soprano pipistrelle across the eastern garden was noted at 21:43. All other bat species that were recorded were heard and not seen, however they were likely commuting and/or foraging across the site and within the local area.

Dusk Emergence Survey – 21st July 2025

- 3.1.7 Bats were seen emerging from different locations during the second dusk survey. These were observed emerging from the southeast corner of the building at 21:16 (Appendix F, EM4) and from the apex of the southern dormer at 21:25 (Appendix F, EM5). Sound analysis has confirmed these were all serotine bat.**
- 3.1.8 A total of 730 bat calls were recorded during the survey. Seven species calls were incidentally recorded during the emergence survey, comprising common pipistrelle (396 calls), soprano pipistrelle (173 calls), serotine (78 calls), noctule (54 calls), Leisler's bat (13 calls), Myotis (2 calls) and long-eared bats (14 calls). Again, the majority of the calls were recorded from the detectors located to the north (302 calls) and east (238 calls) of the building, with fewer at the western location (132 calls) and the lowest number of recordings at the southern location (58 calls).
- 3.1.9 During the survey, noctule were seen foraging high above the site around 21:22 with one soprano pipistrelle seen commuting south along the western treeline at 21:40. Common and soprano pipistrelle were seen foraging within the northern and eastern garden occasionally between 21:22 and 21:31. All other bat species that were recorded were heard and not seen, however they were likely commuting and/or foraging within the local area.

3.2 Nesting Birds

- 3.2.1 No birds were noted to be nesting on the building during the two dusk emergence surveys. During the PRA, old evidence of a bird nest was noted under the decking on the northeast elevation of B1.

3.3 Invasive Species

- 3.3.1 During the emergence surveys, Japanese knotweed *Reynoutria japonica* was noted within the garden, close to the area impacted by the development. This is classified as an invasive non-native species and is listed in Section 9 of the Wildlife and Countryside Act 1(WCA) 1981 (as amended).

3.4 Other Protected / Priority Species

- 3.4.1 There were no indications during the surveys that any other protected/priority species may be using the building or may be impacted by the proposed development.

4 Evaluation and Impacts

4.1 Bats

- 4.1.1 All bat species within the UK are protected by national and international legislation (see Appendix A).
- 4.1.2 Two surveys were considered sufficient to obtain the information required to characterise the roost, determine the species and number of bats utilising the building.

Roosting Bats

- 4.1.3 The emergence surveys and DNA analysis have identified that the building is being used by one species of bat (serotine). Evidence of this comes in the form of a peak count of three serotine bats emerging from the building during the emergence/re-entry surveys.
- 4.1.4 The surveys undertaken onsite have identified that the main loft space of the dwelling is being used as a **day roost by a low number of serotine bat**. It is assessed that the building is not in use as a maternity roost and does not contain features suitable for hibernating bats.
- 4.1.5 Taking all the above into account, it is considered that the building is of **site conservation importance** for serotine bat (Reason-Wray, 2023).
- 4.1.6 The development proposals are understood to avoid direct impacts to the main roof, main loft, main soffits and eaves of the building and will instead be directly impacting the lower hipped roof of the northern elevation and internal structure only. It has been assessed that the building works will therefore not directly impact the existing roost. However, indirect impacts from noise, vibrations, dust or scaffolding may provide some level of disturbance to the existing roost.
- 4.1.7 With a Precautionary Method of working, including seasonal and timing constraints to the works, it is considered that after an initial short-term adverse impact, a long-term positive impact could be achieved by enhancing and securing the number of bat roosting features and spaces available on the site.
- 4.1.8 If works are to be timed within the activity season (April to October inclusive) it is considered that planned works will result in indirect impacts to the existing roost. According to the 'Advice Note: Guidance on bat disturbance and appropriate licensing approaches' (Natural England, 2024) and with the information provided at the time of writing this report, it is assessed that the works meet Level 2 – Offence likely under the WCA 1981 (as amended) but suitable for the Defence, of the disturbance thresholds. With the information provided it is estimated that the development will likely result in low-moderate disturbance for the roost due to the following points:
- The works are within expected occupancy times,
 - The works may discourage bats from using the nearby roost with only temporary impacts that will only last for a short and defined period of time,
 - The works will not affect maternity, satellite, mating, swarming or hibernation roosts during the periods when these roosts are likely to be occupied by breeding or hibernating bats,
 - The works will not permanently alter a roost's physical structure or inherent environmental conditions (including temperature, humidity).
 - The works will not result in local population level impacts.

Foraging/Commuting Bats

- 4.1.9 Bats were recorded commuting and foraging around the site.
- 4.1.10 The majority of the activity was focused across the northern and eastern gardens, with the western treeline also providing an occasional commuting corridor.
- 4.1.11 The site lies within the greater horseshoe 4000m buffer and the lesser horseshoe 2000m buffer of the Bath and Bradford on Avon SAC located approximately ~1.4km west of the nearest component unit of the SAC. The SAC is designated for its importance for greater horseshoe, Bechstein's bats *Myotis bechsteinii* and lesser horseshoe.

- 4.1.12 The landscapes around the SAC are important in providing foraging and commuting habitat needed to maintain the favourable conservation status of the SAC. Any impacts on these species could therefore affect the integrity of the SAC. These species were not recorded during the surveys, however the surveys only offer a small sample of data and are not a substitute for activity surveys.
- 4.1.13 All commuting structures and suitable habitats around the site are being retained, with the development located more than 10m from the surrounding woodland or treelines.
- 4.1.14 The proposed plans will result in increased amount of glazing, and as a result increased artificial light spill, which will affect the garden areas (mostly suboptimal grassland, decking and flowerbeds surrounding the building), however the glazing will be >20m from the site boundaries. Usually, the internal light spill is <0.5lux at approximately 3-4m from the glazing on buildings, therefore it is unlikely that the internal light spill will cause increased light levels on potential bat committing corridors.
- 4.1.15 Introduction of additional external lighting will likely cause increased light levels on the site and surrounding tree lines and woodland edge. Increases in artificial lighting have the potential to degrade the value of habitats for bats, and potentially even lead to a loss in a habitat's functionality as a commuting corridor and/or an accessible foraging resource. With mitigation, including a sensitive lighting plan, these impacts can be avoided.

4.2 Nesting Birds

- 4.2.1 All bird species within the UK are protected whilst nesting.
- 4.2.2 Evidence of a bird nest was noted under the decking off the northeast elevation of B1. The species is unconfirmed, however, the appearance was suggestive of wren *Troglodytes troglodytes*. If the proposed development is undertaken during nesting bird season this may have the potential to result in the damage/destruction of nests and eggs, and the killing/injury of individual birds, should they be present. With mitigation, including compensation for the loss of the bird nest, a pre-works check, sensitive timings of works or precautionary methods of working, it is anticipated that there will be **negligible impacts** on nesting birds.

4.3 Invasive Species

- 4.3.1 The proposed development may require the lawful removal/treatment of the Japanese knotweed prior to works commencing.
- 4.3.2 Japanese knotweed is legally classed as a controlled plant under the Wildlife and Countryside Act 1981 section 114 (2) (WCA 1981).
- 4.3.3 It is not an offence to have Japanese knotweed on your land and there is no obligation to notify anyone of the presence of this species. However, it is an offence to plant or otherwise cause this species to spread to other sites and grow in the wild. Without mitigation, site clearance could result in the disturbance and dispersal of Japanese knotweed into of wild which would result in a breach of legislation.

5 Recommendations

5.1 Further Actions

- 5.1.1 The results from the PRA and the further surveys highlight the need for further actions with regards to bats and birds within the site. Table 2 below provides a summary of the works required, whilst details are provided in the following paragraphs.
- 5.1.2 Please refer to the Ecological Mitigation and Enhancement Plan in Appendix C for the visual guide of all the recommended ecological mitigation and enhancement features to be included on-site.

Table 2 – Table of Further Actions

Species/ Groups	Phase	Action(s) Required
Bats	After planning permission granted, prior to works starting on site	Precautionary Method of working, including seasonal and timing constraints to the works. OR Completion of a notification form to be submitted to Natural England under Section 10(5) of the Wildlife and Countryside Act 1981 (as amended) to allow works affecting the building which would otherwise be illegal only IF the development CANNOT be undertaken outside the activity season AND mitigation measure are implemented during works to prevent bats from being harmed.
	Design Stage	New lighting (internal and external) should be designed sensitively to minimise impacts of artificial lighting on offsite and onsite habitats on light sensitive bat species, particularly those for which the SAC is designated.
Birds	Site Clearance/ Demolition/ Construction	Compensation for the loss of the bird nest is required. It is recommended that works to the building are timed to take place outside of the nesting bird season (which is March-August inclusive). If this is not possible then a pre-works check, by an Ecological Clerk of Works (ECoW), prior to works affecting the building /decking will be required. If an active nest is found, a demarcated buffer zone should be installed until any chicks have fledged.
Invasive non-native species	Site Clearance	Measures to avoid the spread of Japanese knotweed are required prior to site clearance – see 5.4.
Ecological Enhancements	Construction/ Landscaping	See 5.5 for suggested ecological enhancements.

5.2 Bats

Roosting Bats

- 5.2.1 The surveys identified that the residence is being used as a day roost by low numbers of serotine bat. The proposed works have the potential to result in temporary disturbance to the existing bat roost therefore measures will need to be taken to avoid harm and enable to work to proceed legally.

Either

- 5.2.2 A Precautionary Working method statement will be created to outline seasonal and timing constraints to the works in order to avoid impacts on roosting bats during the activity season (April to October inclusive).

Or

- 5.2.3 If works are to be timed within the activity season, a notification form will need to be submitted to Natural England under Section 10(5) of the Wildlife and Countryside Act 1981 (as amended). This must be used if all reasonable alternatives to avoid disturbance impacts have been considered and implemented (such as altering the works and/or timing the works to avoid occupancy times) – and a disturbance impact will occur despite these.

- 5.2.4 Mitigation measures will need to be implemented during works to prevent bats from being harmed. These may include:

- Avoiding dust creating within the roost
- Avoiding scaffolding or works within at least 1m of the confirmed egress points
- Avoidance of nighttime working and no artificial lighting during the hours of darkness
- Use of hand tools instead of machinery in close proximity to the roost

- 5.2.5 Natural England must confirm receipt of the notification form prior to any works which rely upon the Defence.

Artificial Lighting

- 5.2.6 The development falls within the buffer zone of the Bath and Bradford on Avon Bat SAC which is designated for particularly light sensitive species of bat.

- 5.2.7 Wiltshire Council's Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire (2015) recommends a variety of techniques supported to facilitate development that will avoid, minimise and/or compensate for light spill.

- 5.2.8 Should new external lighting be necessary, then a detailed sensitive lighting strategy should be prepared and followed with the aim to either reduce or ensure that lighting levels are not above the current levels as a result of the proposed development and **avoid light spill** on retained boundary habitats.

- 5.2.9 In order to mitigate for this, the building design should incorporate design features listed within the Bat Conservation Trust and Institute of Lighting Professional's '*Bats and artificial lighting in the UK*' (2023) which include the following key design points to limit any impact (see guidance for full details):

- All luminaires should lack UV elements when manufactured. Metal halide, compact fluorescent sources should not be used;
- LED luminaires should be used where possible due to their sharp cut-off, lower intensity, good colour rendition and dimming capability;
- A warm white light source (2700 Kelvin or lower) should be used to reduce blue light;
- Light sources should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats;
- Internal luminaires can be recessed (as opposed to using a pendant fitting) where installed in proximity to windows to reduce glare and light spill.
- Column heights should be carefully considered to minimise light spill and glare visibility. This should be balanced with the potential for increased numbers of columns and upward light reflectance as with bollards;

- Only luminaires with a negligible or zero Upward Light Ratio, and with good optical control, should be considered - See ILP GN01;
- Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt;
- Where appropriate, external security lighting should be set on motion sensors and set to as short a possible a timer as the risk assessment will allow. For most general residential purposes, a 1 or 2 minute timer is likely to be appropriate;
- The use of bollard or low-level downward-directional luminaires is strongly discouraged. This is due to a considerable range of issues, such as unacceptable glare, poor illumination efficiency, unacceptable upward light output, increased upward light scatter from surfaces and poor facial recognition which makes them unsuitable for most sites. Therefore, they should only be considered in specific cases where the lighting professional and project manager are able to resolve these issues;
- Only if all other options have been explored, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed. However, due to the lensing and fine cut-off control of the beam inherent in modern LED luminaires, the effect of cowls and baffles is often far less than anticipated and so should not be relied upon solely.
- Buildings, walls and hard landscaping may be sited and designed so as to block light spill from reaching habitats and features.

5.3 Nesting Birds

- 5.3.1 The presence of a historic bird nest below the northern decking mean further action is necessary. Works affecting the building and decking should be undertaken outside of the breeding bird season. The breeding season is influenced by climatic conditions of a given year but is generally taken to be between March and August inclusive.
- 5.3.2 If the works affecting the building/decking are required to take place between March and August (inclusive), affected areas should be checked by a suitably qualified and experienced ecologist immediately prior to works commencement, and if active nests are identified, a demarcated buffer of suitable size for the species will be installed and maintained until the birds have fledged (as confirmed by the suitably qualified ecologist).
- 5.3.3 Compensation will be required for the loss of the nest. This will include the installation of one integrated bird box (Build-In Half Open WoodStone Nest Box or similar woodcrete option) suitable for wrens positioned 1-2m off the ground on a northerly facing or shaded location to avoid direct sunlight or strong winds.

5.4 Invasive Species

- 5.4.1 Without mitigation, site clearance could result in the disturbance and dispersal of Japanese knotweed into the wild which would result in an offence under UK legislation. Removal/treatment of Japanese knotweed should therefore be undertaken prior to clearance works onsite. A specialist company will need to be contacted to advise on the removal/treatment of Japanese knotweed.

5.5 Enhancements and Planning Policy

- 5.5.1 Enhancement features for wildlife should be included in new developments to meet the recommendations contained within the National Planning Policy Framework 2024.
- 5.5.2 In addition to the mitigation bird box installed on the dwelling (5.3.3), a bird box (such as the Bilbao Nest Box or similar woodcrete option) should be installed on a suitable tree onsite. This should be installed facing northeast to southeast, ensuring it is not in direct sunlight or facing prevailing winds. The box should be hung at a minimum height of 2m.
- 5.5.3 A bat box (such as the Chillon Low Profile WoodStone Bat Box or similar woodcrete option) should be installed on a suitable tree onsite. This should be located in a sunny spot, facing a southerly direction, away from artificial light. This should be hung at a minimum of 3m from ground level.

- 5.5.4 It is recommended that an insect house could be installed in the garden alongside an area of vegetation. This should be facing a southerly direction.
- 5.5.5 A hedgehog house could be installed along the woodland edge at the northern boundary of the site.
- 5.5.6 Suggested locations for the above enhancement features are outlined in Appendix C. All ecological features should be installed as per the manufacturer's instructions.

References

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- BCT & ILP. (2023). Guidance Note 08/23: Bats and Artificial Lighting At Night. Bat Conservation Trust and Institution of Lighting Professionals.
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- Natural England (2024). *Advice Note: Guidance on bat disturbance and appropriate licensing approaches*.
- Reason, P.F. and Wray, S (2023). Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for development affecting bats. CIEEM, Ampfield.
- Stone, E.L 2013. Bats and Lighting – Overview of current evidence and mitigation. Bristol: University of Bristol
- UKHab Ltd (2023). UK Habitat Classification Version 2.0 (at <https://www.ukhab.org>)
- Wiltshire Council, (2015). *Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire*. Available Online: <https://www.wiltshire.gov.uk/media/992/Bat-S-A-C-developers-guidance-inc-Bath-Bradford-on-Avon-Chilmark-and-Mottisfont-pdf/Bath-and-bradford-on-avon-september-2015-bat-sac-guidance.pdf>

Appendix A – Wildlife Legislation & Policy

Bats

In the UK, all bat species are fully protected under The Conservation of Habitats and Species Regulations (Amendment) (EU Exit) 2019 and the Wildlife and Countryside Act 1981 (as amended). It is illegal to kill, injure, disturb, capture, possess or trade bats (or parts thereof); disturb bats whilst in a place of shelter or rest; or damage, destroy or obstruct access to a breeding site or resting place whether bats are present or not.

Operations which may affect bats may require a development licence from Natural England, which provides derogation for an otherwise unlawful activity.

Birds

In the UK, birds and their nests are protected under The Conservation of Habitats and Species Regulations (Amendment) (EU Exit) 2019 and the Wildlife and Countryside Act 1981 (as amended).

The Wildlife and Countryside Act 1981 (as amended) makes it a criminal offence to:

- Kill, injure, or take any wild bird (with exceptions to species listed in Schedule 2);
- Take, damage or destroy the nest of any wild bird while in use or being built;
- Take or destroy an egg of any wild bird;

The Natural Environment and Rural Communities Act (2006)

Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006) sets out a list of habitats and species that are of principal importance for the conservation of biodiversity in England. The list (including 56 habitats and 943 species) drawn up in consultation with Natural England, provides a guide to local and regional authorities when implementing their duty as defined in Section 40 of the NERC Act 2006;

- “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.” - Section 40(1).
- “Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat”. - Section 40(3).

Several species of bats and birds are listed as Species of Principal Importance under Section 41 of the NERC Act, 2006.

National Planning Policy Framework (2024)

National Planning Policy Framework (NPPF) (2024) sets out Government Policy on Biodiversity and Nature Conservation and places a duty on planners to make material consideration to the effect of a development on legally protected species when considering planning applications. NPPF also promotes sustainable development by ensuring that developments take account of the role and value of biodiversity and that it is conserved and enhanced within the development.

Bath and Bradford on Avon Bat Special Area of Conservation (SAC)

The Bath and Bradford on Avon Bats SAC is designated under the Habitats Directive 92/43/EEC, which is transposed into UK law under the Conservation of Habitats and Species Regulations 2010 (as amended) ('Habitat Regulations'). This means that the populations of bats supported by this site are of international importance and therefore afforded high levels of protection, placing significant legal duties on decision-makers to prevent damage to bat roosts, feeding areas and the routes used by bats to travel between these locations.

Annex II species that are a primary reason for selection of this site:

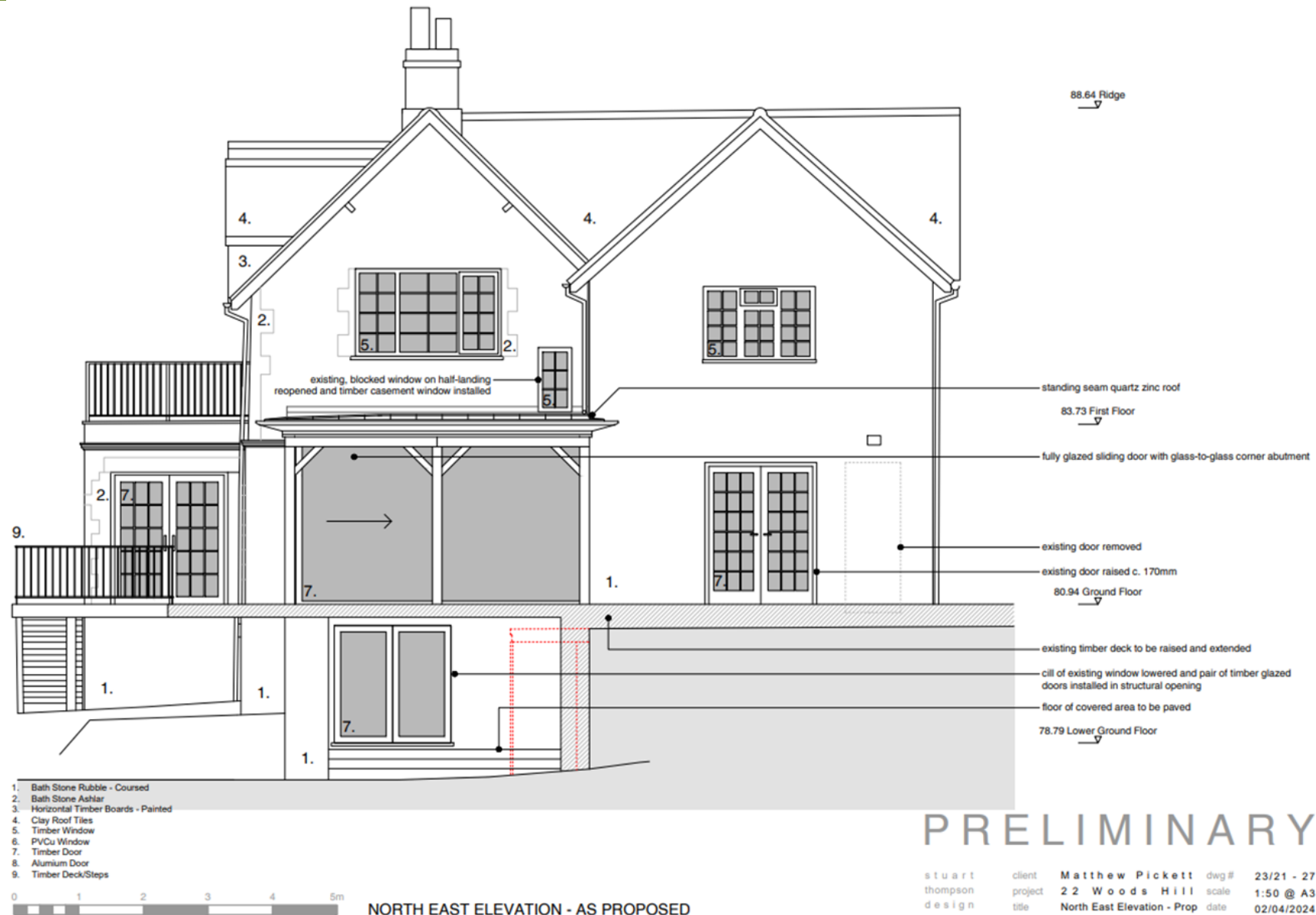
- Greater Horseshoe bat
- Bechstein's bat

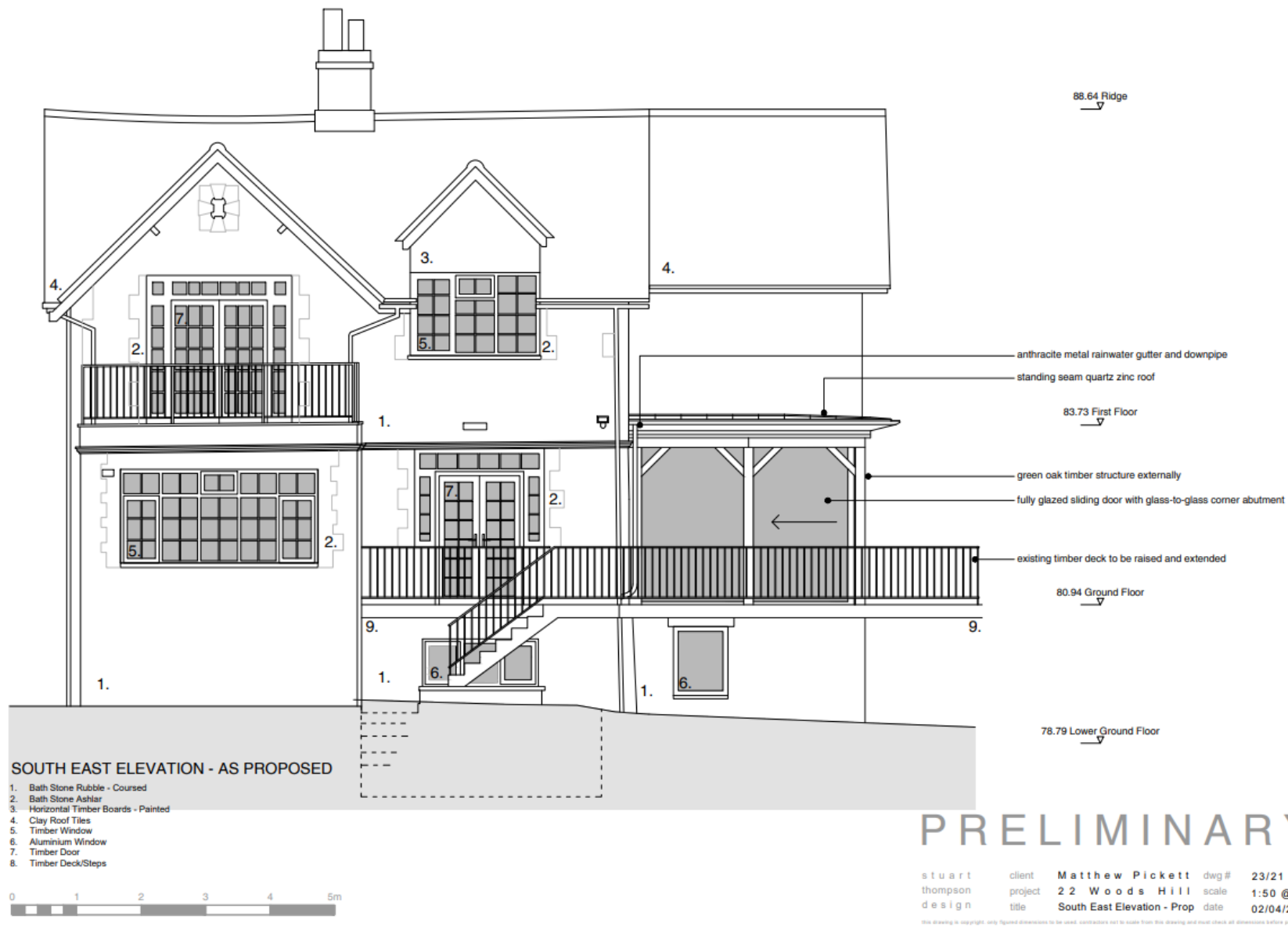
Annex II species present as a qualifying feature, but not a primary reason for site selection:

- Lesser Horseshoe bat.

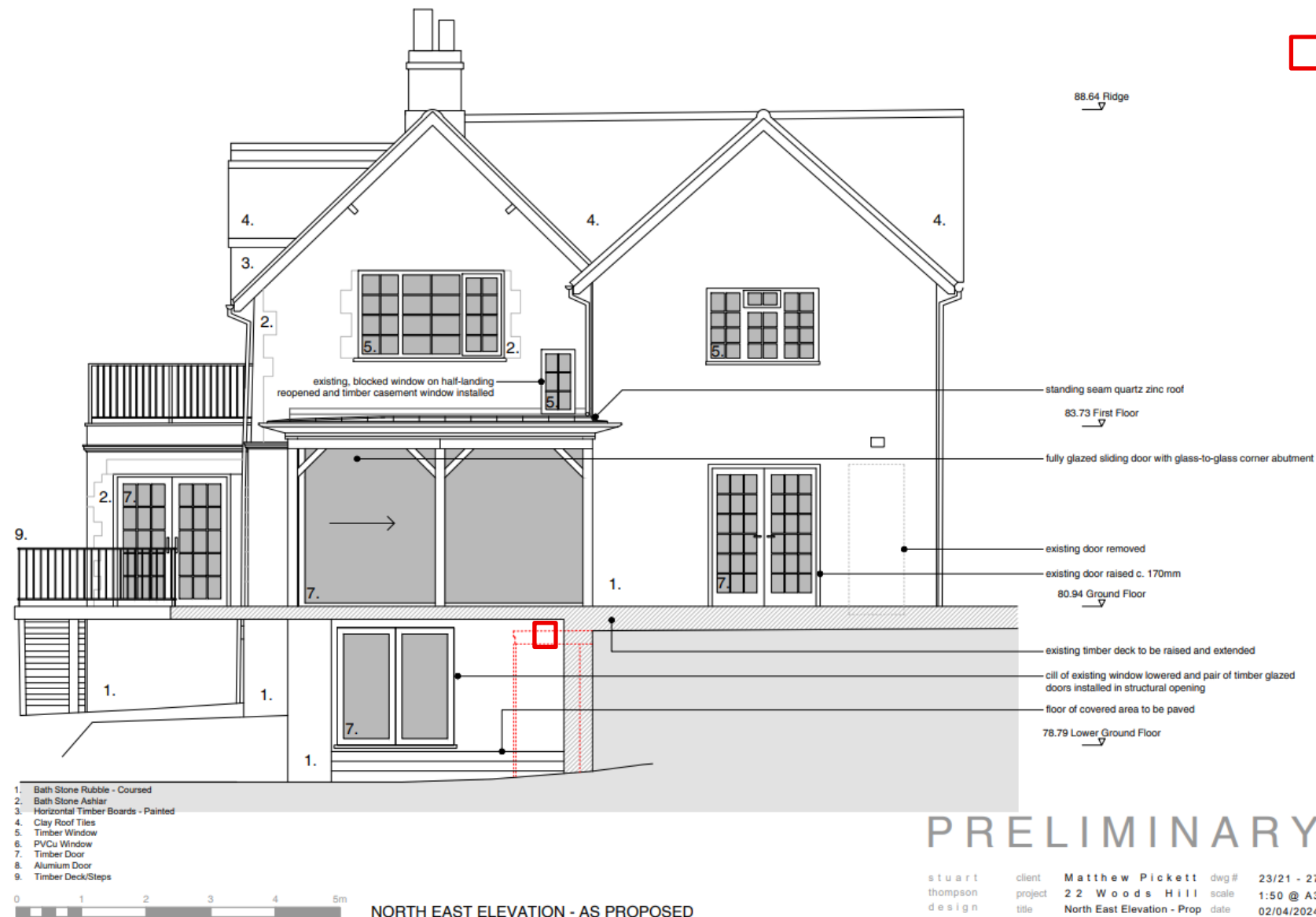
The landscapes around the SAC itself are also important in providing foraging and commuting habitat needed to maintain the favourable conservation status of the SAC's bats. Therefore, the guidance sets out strong requirements for consultation, survey information and appropriate mitigation, to demonstrate that development proposals will not adversely impact on the designated bat populations.

Appendix B - Proposed Site Plans

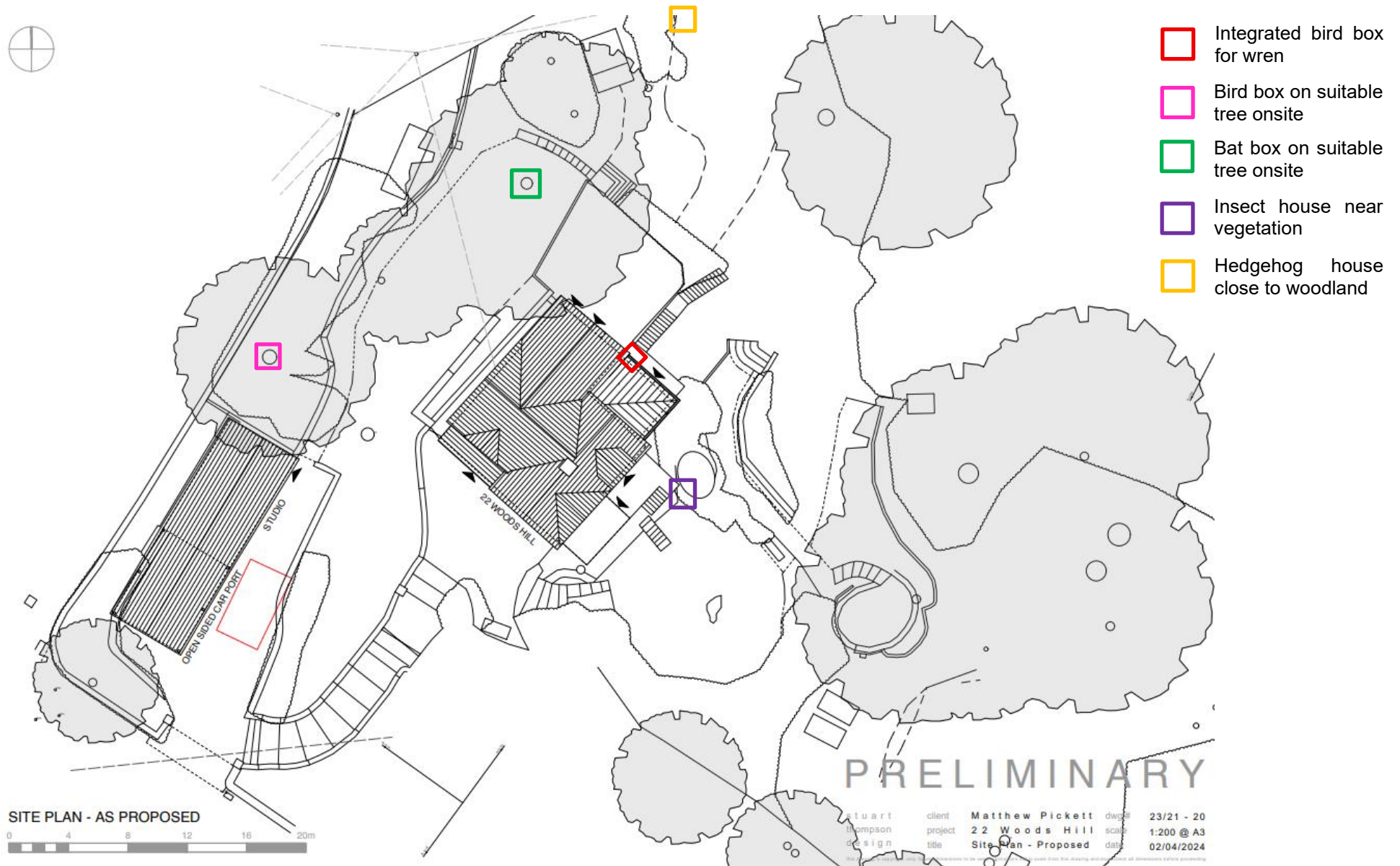




Appendix C – Ecological Mitigation and Enhancement Plans



Integrated bird box for wren



Appendix D – NVA Viewing Screenshots

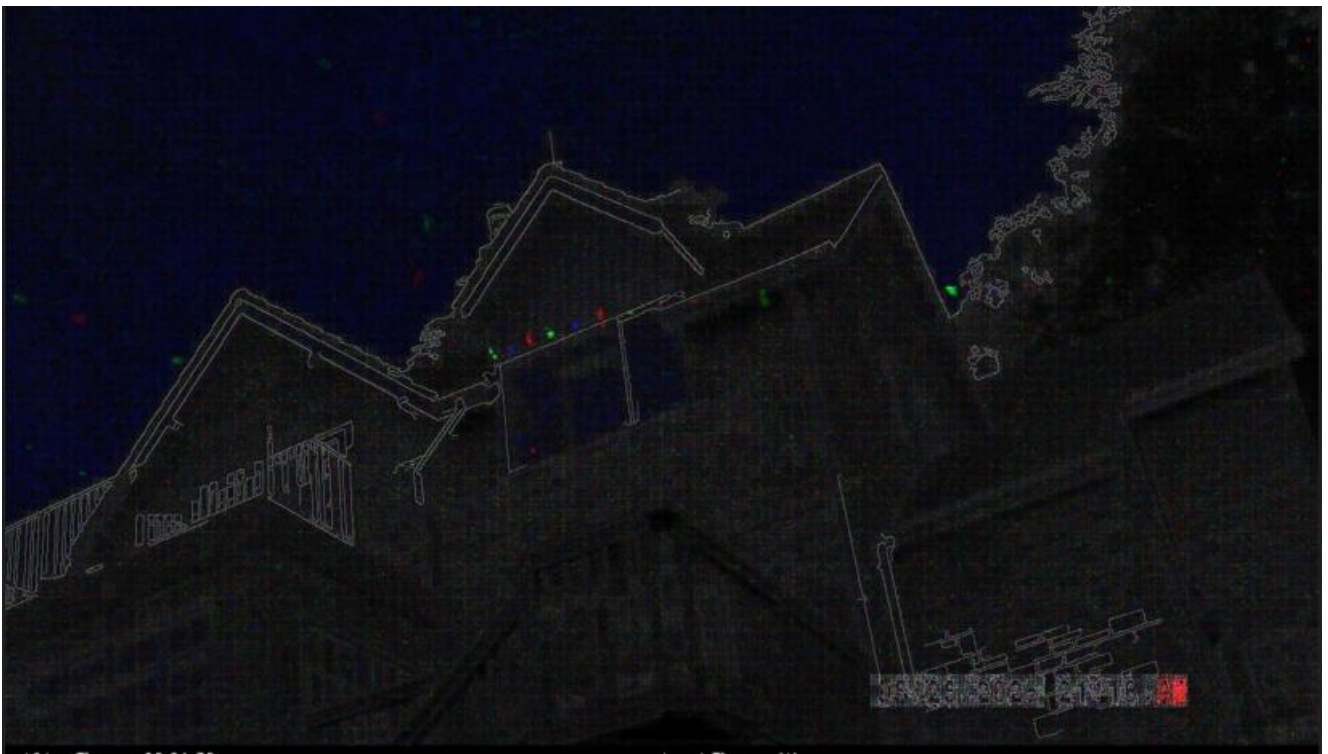
Dusk 26/06/2025	Start of Survey	End of Survey
Northern elevation	 A photograph of the northern elevation of a house at dusk. The house has a gabled roof and a chimney. The sky is dark, and the house is illuminated by a warm light source. A timestamp '06/26/2025 21:12:36' is visible in the bottom right corner.	 A photograph of the northern elevation of a house at night. The house is illuminated by a bright light source, creating a high-contrast image. A timestamp '06/26/2025 22:46:57' is visible in the bottom right corner.
Eastern elevation	 A photograph of the eastern elevation of a house at dusk. The house has a gabled roof and a chimney. The sky is dark, and the house is illuminated by a warm light source. A timestamp '06/26/2025 21:12:16' is visible in the bottom right corner.	 A photograph of the eastern elevation of a house at night. The house is illuminated by a bright light source, creating a high-contrast image. A timestamp '06/26/2025 22:51:48' is visible in the bottom right corner.
Southern elevation	 A photograph of the southern elevation of a house at dusk. The house has a gabled roof and a chimney. The sky is dark, and the house is illuminated by a warm light source. A timestamp '06/26/2025 21:14:20' is visible in the bottom right corner.	 A photograph of the southern elevation of a house at night. The house is illuminated by a bright light source, creating a high-contrast image. A timestamp '06/26/2025 22:49:40' is visible in the bottom right corner.
Western elevation	 A photograph of the western elevation of a house at dusk. The house has a gabled roof and a chimney. The sky is dark, and the house is illuminated by a warm light source. A timestamp '06/26/2025 21:13:07' is visible in the bottom right corner.	 A photograph of the western elevation of a house at night. The house is illuminated by a bright light source, creating a high-contrast image. A timestamp '06/26/2025 22:47:20' is visible in the bottom right corner.

Dusk 21/07/2025	Start of Survey	End of Survey
Northern elevation		
Eastern elevation		
Southern elevation		
Western elevation		

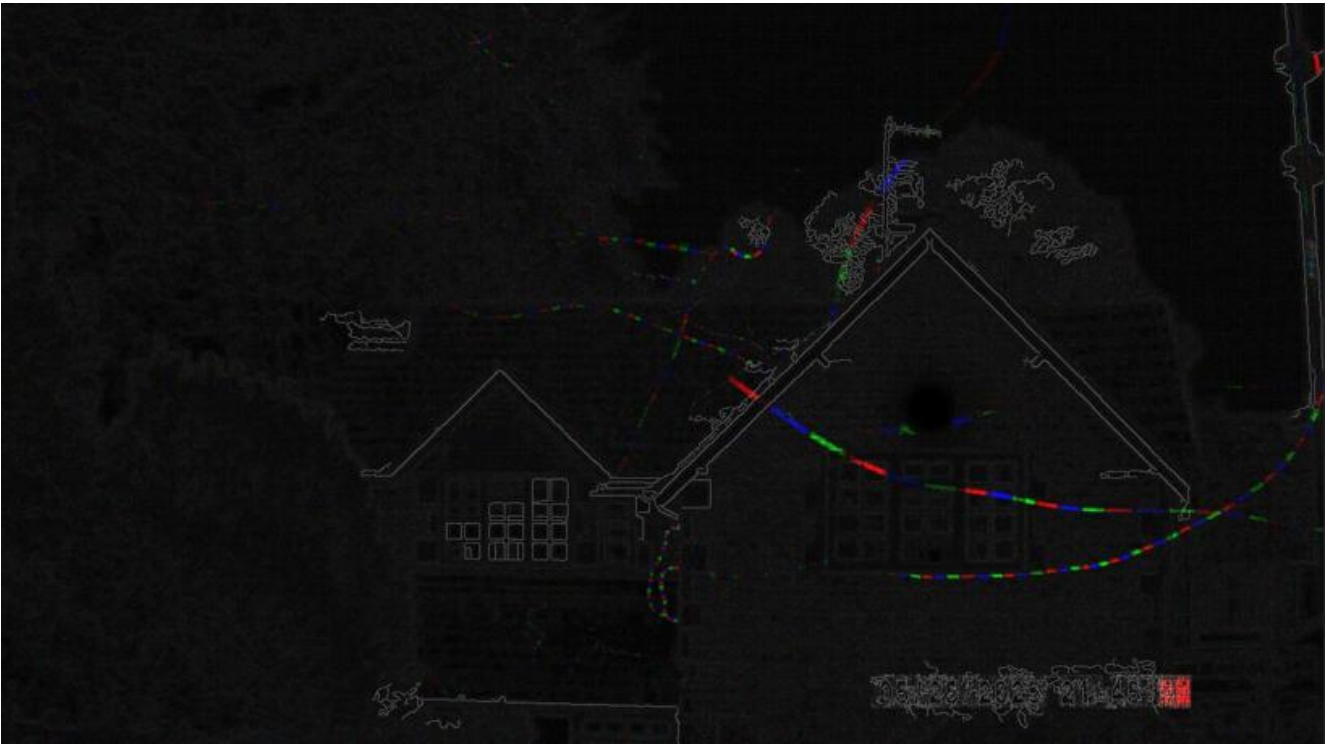
Appendix E – Bat Emergence Images

26/06/2025

EM1, EM2



EM3



21/07/2025

EM4



EM4



EM5

