

PRELIMINARY ROOST ASSESSMENT
OF
22 WOODS HILL, LIMPLEY STOKE, BA2 7GA



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Client	Mr. Matthew Pickett
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The material and data in this report were prepared under the supervision and direction of the undersigned.

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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.

Non-Technical Summary

Abricon Ltd. was commissioned by Mr. Matthew Pickett to undertake a Preliminary Roost Assessment (PRA) in respect of bats and nesting birds to establish the likely impacts of the proposed development at 22 Woods Hill, Limpley Stoke, BA2 7GA.

The site comprises three buildings, including a residential dwelling (B1), and two garages (B2 and B3) within the village of Limpley Stoke, Wiltshire. The PRA survey was undertaken in March 2025 and identified a number of features with bat roosting and nesting bird potential across the buildings.

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 and erection of attached open-sided car port to existing detached studio.

Further bat surveys are recommended for the building B1 as ~60 bat droppings were identified within the loft space and as such, this was assessed as a confirmed bat roost with the building being of 'moderate' suitability according to the Bat Conservation Trust guidelines (Collins, 2023). A minimum of two bat emergence surveys should be undertaken on the building. These will take place during the active bat season of between May and August inclusive. No further bat surveys are recommended for building B2 or B3.

Old evidence of nesting birds was noted on B1 during the site survey, and although no evidence of nesting birds was noted on B2 or B3 at the time of the survey, birds are highly mobile species and could establish new nests prior to works commencing. Therefore, a nesting bird check is recommended prior to works commencing or works should take place outside of the bird nesting season (March-August inclusive).

Details of these required actions are summarised in the table below:

Ecological Considerations	Phase	Action(s) Required
Bats	Design stage	Artificial lighting designed sensitively to minimise impacts of artificial lighting on offsite habitats of importance to foraging/commuting bats.
	Prior to planning determination	Two bat emergence surveys to be undertaken on the building B1 with at least one scheduled within the core active bat season of May - August.
	After planning permission granted, prior to works starting on site	Following the results of the emergences survey, a Bat Mitigation Licence (BML) may be required from Natural England in order to allow works affecting the building which would otherwise be illegal. This will include mitigation and enhancements as necessary.
Birds	Demolition/ construction	It is recommended that works to the buildings are timed to take place outside of the nesting bird season (which runs from March to August inclusive). If this is not possible then a pre-works check, by an Ecological Clerk of Works (ECoW), prior to works affecting the roof will be required.
Ecological enhancements	Construction and design stage	Ecological enhancements should be included within new developments and recommendations will be compiled following the completion of the further survey work recommended on the site.
Other protected species	Demolition/ construction	General avoidance measures to avoid impacting protected species during development will be included within the recommended further survey report.

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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 nesting birds to establish the likely impacts of the proposed development at 22 Woods Hill, Limpley Stoke, BA2 7GA.
- 1.1.2 The aim of the survey was to identify whether the site has evidence of, or potential for, bats and/or nesting birds to be present. The survey results will inform recommendations for mitigation, and/or further survey work, as appropriate.
- 1.1.3 This report is intended for use by the project design team by providing advice as to the likely ecological constraints present within the site relating to bats and nesting birds, as well as to establish the requirements for further surveys and possible mitigation measures required in order to address the likely impacts of the proposed development. This report does not constitute a full ecological impact assessment.

1.2 Site Location and 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 – accessed 26/03/2025

Imagery ©2025 Google

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 existing garage and erection of attached open-sided car port to existing detached studio.

2 Methodology

2.1 Desk Study

- 2.1.1 A desk study of freely available ecological records for the site and surrounding land was conducted in March 2025.
- 2.1.2 Statutory designated sites within 2km of the development site were obtained from the UK Multi-agency Government's Countryside Geographic Information website (MAGIC). Data was used in conjunction with an assessment of site plans and aerial photographs.

Table 1 – Consultees for the desk study

Consultee	Information Provided
MAGIC website	Statutory sites for nature conservation and European Protected Species (EPS) licence return data
Natural England	Designated site citations
Google Maps	Aerial photography of the site and surrounding area

2.2 Daytime Bat Walkover and Preliminary Roost Assessment

- 2.2.1 The appraisal conducted on 26th March 2025 by Ella Colenso BSc (Hons) (NE Class 1 Bat Licence) and Alex Linham MSci included a Daytime Bat Walkover (DBW) assessment of the habitats and Preliminary Bat Roost Assessment (PBRA) of the building(s) on-site, undertaken in accordance with Bat Surveys for Professional Ecologists - Good Practice Guidelines 4th Edition (Collins, 2023).
- 2.2.2 The assessment was conducted to identify any evidence of use by bats and nesting birds. The PRA was used to determine whether further surveys would be required.
- 2.2.3 To assist in a thorough search for bats the following equipment was used:
- Binoculars;
 - Torch;
 - Digital camera;

Bats

- 2.2.4 Signs of bats searched for included:
- Bats (alive or dead);
 - Droppings;
 - Staining;
 - Feeding signs;
 - Smell;
 - Social calling.

Birds

- 2.2.5 Signs of nesting birds searched for include:
- Birds (alive or dead);
 - Nests (current or disused);
 - Droppings;
 - Feeding signs;
 - Eggs.

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 Alex Linham MSc is a Seasonal Assistant Ecologist working with Abricon Ltd. He has worked in ecological consultancy since 2023 and is experienced in field surveys for bats, badger, dormouse, newt, and reptile. With Abricon his primary roles include the analysis of sound and video data, assisting with emergence/re-entry field surveys, and preparing data for report writing. Alex has completed the Certificate of Bat Acoustics Analysis.
- 2.3.3 Samuel Olney BSc (Hons), MCIEEM has worked in ecological consultancy since 2012 and is an experienced project manager for a range of project and client types, including for major infrastructure and development projects. He holds advanced survey licences for bats (NE Class 3&4), and a NE Class 1 GCN licence. Samuel is Named Ecologist and Accredited Agent on multiple bat mitigation and project licences. He is a full member of CIEEM and skilled in undertaking various ecological surveys including PEA, EcIA, protected species surveys and habitat condition assessment for BNG. Samuel has previously worked as an acting County Ecologist providing advice on wildlife legislation and commenting on ecological matters regarding planning applications on behalf of an LPA.
- 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 newt). 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 (EcIA), 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 newt. She is also a Registered Consultant of the Bat Low Impact Class Licence (BLIC) and holds NE Bat Earned Recognition Accreditation (BER – 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.

Site Specific Constraints

- 2.4.2 Due to the size and nature of the proposals it was not considered proportionate to purchase records from the local records centre to inform this assessment. This is in line with CIEEM guidance (CIEEM, 2020) on low impact proposals.
- 2.4.3 Views of parts of the roof pitches of B1 were not visible during the survey. This is because of the height of the building and the steep slope of the land. A drone survey was considered disproportionate in this case as the majority of the roof could be viewed and the areas which could not, would not be directly impacted by the proposed development. It was assessed this would not impact the results or conclusions of this report, and a further survey has been recommended regardless.
- 2.4.4 It is assumed a small loft would be present above the northeast extension of B1, however, no loft hatches were present and as such this could not be confirmed or accessed during the survey. Further emergence surveys will help determine if bats are utilising this space.

3 Results

3.1 Desk Study

Statutory Designated Sites for Nature Conservation

- 3.1.1 There are five statutory designated sites for nature conservation identified within a 2km radius of the site boundary, which are detailed in Table 2 below. The site is located within Site of Special Scientific Interest (SSSI) Impact Risk Zones (IRZ) of statutory designated sites however, it does not fall into any of the at-risk categories where the Local Planning Authority should consult with NE on the proposed development.
- 3.1.2 The site also lies within the greater horseshoe *Rhinolophus ferrumequinum* 4000m buffer and the lesser horseshoe *Rhinolophus hipposideros* 2000m buffer of the Bath and Bradford on Avon Special Area of Conservation (SAC). The SAC is designated for its importance for greater horseshoe, Bechstein's bats *Myotis bechsteinii* and lesser horseshoe.

Table 2 – Statutory designated sites for nature conservation within 2km.

Site Name	Designation	Reason for Designation	Approximate Distance from the Site
Cotswolds	National Landscape	Designated in recognition of its rich, diverse, and high-quality landscape.	Covering the majority of the search area, including the site itself
Midford Valley Woods	SSSI	Designated for calcareous ash-wych elm woods and its large populations of a plant which have a nationally restricted distribution.	550m northwest
Winsley Mines	SSSI	Designated for hibernation sites for greater horseshoe.	1.4km east
Bath and Bradford-on-Avon Bats	SAC	Designated for: - Greater horseshoe hibernation sites on the basis of the importance of this exceptionally large overwintering population. - Bechstein's bat hibernating in abandoned mines in this area. - Lesser horseshoe bat	1.4km east and 1.7km northwest
Combe Down and Bathampton Down Mines	SSSI	Designated for important hibernation sites for greater horseshoe, with lesser horseshoe, brown long-eared <i>Plecotus auritus</i> , Natterers <i>Myotis nattereri</i> , whiskered <i>M. mystacinus</i> and Daubentons <i>M. daubentoni</i> also regularly recorded.	1.7km northwest

- 3.1.3 Thirteen European Protected Species (EPS) licence applications referring to bats were identified within 2km of the site boundary. These are listed in Table 3 below.

Table 3 – Protected species records (MAGIC Mapping, 2025)

Case Reference	Species	License start and end date	Does license impact upon breeding site (Y/N)	Location from site
2018-34390-EPS-MIT-1	Common pipistrelle, Serotine	13/12/2018 13/12/2023	N	~230m south
EPSM2012-3940	Soprano pipistrelle	31/01/2012 31/08/2013	N	~500m east
2018-38349-EPS-MIT	Common pipistrelle	05/12/2018 31/03/2019	N	~600m south
EPSM2013-5684	Soprano pipistrelle	29/04/2013 30/08/2014	N	~600m east
2018-38379-EPS-MIT	Lesser horseshoe, Greater horseshoe	25/01/2019 25/01/2029	N	~790m north
2018-35301-EPS-MIT	Common pipistrelle, Lesser horseshoe, Natterer's, Serotine	08/06/2018 07/06/2028	Y	~990m southwest
2018-34152-EPS-MIT-1	Brown long-eared, Common pipistrelle, Lesser horseshoe, Soprano pipistrelle	07/06/2018 07/06/2028	N	~1.4km southeast
2014-6053-EPS-MIT	Common pipistrelle, Lesser horseshoe, Greater horseshoe, Serotine, Soprano pipistrelle	22/04/2015 31/03/2025	N	~1.5km southeast
2016-25512-EPS-MIT-1	Common pipistrelle, Lesser horseshoe, Soprano pipistrelle	22/11/2016 22/11/2016	N	~1.5km east
EPSM2011-2760	Lesser horseshoe, Greater horseshoe	02/03/2011 30/03/2014	Y	~1.7km north
2019-39129-EPS-MIT	Common pipistrelle, Lesser horseshoe	04/03/2019 04/03/2029	N	~1.7km northeast
2015-12806-EPS-MIT	Brown long-eared, Common pipistrelle	29/07/2015 31/12/2015	N	~1.7km east
EPSM2012-4244	Brown long-eared, Common pipistrelle	23/03/2012 31/12/2015	N	~1.7km east

3.2 Field Survey

3.2.1 The following section describes the habitats and any protected or priority species (or signs of) recorded during the field survey as well as the potential suitability of the habitats to support any of these species. For detailed results and additional information please refer to the following figures and appendices:

- Appendix B – Site Photographs

3.3 Preliminary Roost Assessment

Building Description – B1

3.3.1 Building B1 comprised a stone and block built residential dwelling with a complex, pitched roof of interlocking tiles. The dwelling had small extensions off the northeast, southeast and southwest elevations. Due to the height of the building and the steep slope of the land,

some areas of the roof could not be viewed during the survey. Where visible, the ridgelines across all roofs appeared in good condition with no gaps or cracks noted. The tiles generally appeared to be tightly fitted together (where visible) due to their design, with only occasional gaps noted, including cracked tiles at the base of the dormer on the southwest elevation of the building and on the northeast extension. No gaps or cracks were noted under the end tiles on all the gable ends and dormers across the building.

- 3.3.2 Gaps were noted under all the soffits, along the eaves of the building. Areas of wooden boarding were present on the dormers of the southeast and southwest elevations. Gaps were noted around these areas and the internal inspection showed these led directly into the interior of the loft space, as did the stone ventilation feature on the southeast gable.
- 3.3.3 The stonework across the building did not have any gaps or cracks and the windows and doors were well fitted within their frames, with no holes leading into the building. A wooden deck was present along the northeast elevation of the building, the space beneath was light and open and the majority was ~1m from ground level.
- 3.3.4 Internally a loft space was present above the main dwelling. This was ~210cm tall, was lined by bitumen felt and supported by wooden beams. Daylight was noted around the southeast and southwest dormers and along the eaves of the roof. No gaps or cracks were noted in the internal stone or blockwork of the gable ends. The loft space above the northeast extension was not accessible at the time of the survey due to it lacking a loft hatch.

Bat Inspection

- 3.3.5 Details:
- Evidence of bats was found within the main loft space. This included ~60 bat droppings located in a pile at the northeast gable end of the loft. These appeared fairly fresh at the time of the survey.
 - No individual bats were observed internally or externally during the building inspection.
 - A potential loft space above the northeast extension could not be accessed at the time of the survey.
- 3.3.6 A moderate number of potential roosting features were identified during the inspection of the building. These included:
- A small number of lifted and broken tiles across the roof pitches of the building;
 - Limited views of sections of the roof;
 - Gaps along the eaves of the building and around dormers that led into the loft space;
 - The main loft space above the dwelling;
 - A potential loft void above the northeast extension.

Building Description – B2

- 3.3.7 Building B2 was a block-built, detached office and garage space with a conventionally pitched roof of interlocking tiles. The ridgeline of the building appeared in good condition with no gaps or cracks, the tiles were well fitted together with no lifted or slipped tiles. Due to the slope of the land, the northwest roof pitch was only ~30cm from ground level. No gaps were noted under the end tiles of the gable ends. The fascia board along the southeast elevation sat far from the external wall without creating a crevice. No gaps were noted in the blockwork across the building, which was believed to not have a cavity wall. The windows along the southeast elevation were well fitted within their frames with no gaps leading into the interior of the building. The garage door on the southwest gable had a thin gap along the top leading inside the building.
- 3.3.8 Internally, the southern end of the building had a vaulted roof, with a small, enclosed loft space above the northern portion of the building. Both sections were lined by bitumen felt and supported by wooden beams. Daylight was noted along the northwest and southeast eaves. The loft space was full of thick cobwebs during the survey. No gaps or cracks were noted in the internal blockwork and the southern space was very light due to the windows.

Bat Inspection

3.3.9 Details:

- No evidence of bats such as droppings or urine staining were observed during the building inspection.
- No individual bats were observed internally or externally during the building inspection.

Building Description – B3

3.3.10 Building B3 was a smaller garage building of a similar construction to B2. The building had a conventionally pitched roof with interlocking tiles and was constructed of breeze blocks. The ridgeline and tiles appeared in good condition with no gaps or lifting noted. No gaps were noted under the end tiles of the gable ends. The fascia boards on the southeast and northwest elevations were tightly fitted to the exterior walls. The external blockwork appeared in good condition with no gaps or cracks. This is believed to not be a cavity wall. Small gaps were present above the garage doors on the northeast and southwest gable ends of the building however, these lead directly into the interior of the building without forming crevices. The windows on the southeast and northeast elevations were well fitted in their frames.

3.3.11 Internally, the roof was lined by bitumen felt and supported by wooden beams. The internal blockwork was in good condition and the space was fairly light due to the windows. Cobwebs ran along the internal ridgeline.

Bat Inspection

3.3.12 Details:

- No evidence of bats such as droppings or urine staining were observed during the building inspection.
- No individual bats were observed internally or externally during the building inspection.

3.3.13 Although access to the internal space would be possible through the gaps along the tops of the garage doors, there is no evidence that the internal space is being used by roosting bats. The internal spaces appear unsuitable for day roosting due to the light interior of the building.

Habitats

3.3.14 The residential garden around the property was bordered by treelines, with a woodland adjacent to the northern boundary of the site. The surrounding village contained many scattered trees and wooded areas connecting to hedgerows and woodlands in the farmland beyond. The River Avon and Kennet and Avon Canal also lie in close proximity. It is assessed that the surrounding habitats provide suitable habitat for bats which are likely to support foraging and commuting activity.

Evaluation

3.3.15 Evidence of bats was found within building B1, with opportunities to access the internal space through gaps along the eaves and around the dormers. During the survey, B1 was recorded as having opportunities for crevice dwelling bat species, including under lifted tiles and gaps in soffits. Due to the evidence of bats, indicative of a large bat species, found within the building, B1 has been assessed as a confirmed bat roost. According to BCT guidelines (Collins, 2023) B1 is evaluated as having 'moderate' suitability as the structure is unlikely to support a roost of high conservation status.

3.3.16 No bats or evidence of bats was identified within buildings B2 or B3 during the survey.

3.3.17 Although access into the buildings was possible along the wall tops (B2) and garage doors (B3), these buildings have been assessed as having 'negligible' roosting potential for bats due to the lack of evidence internally as well as the light internal environment and the cobwebs filling the loft space of B2 reducing the likelihood of bats utilising the internal spaces for roosting. No crevice dwelling features were present.

- 3.3.18 The surrounding site could be utilised by commuting or foraging bats and has been assessed as having 'high' suitability due to the presence of tree lines and the woodland to the north and west providing good connection from the site to the wider landscape. Occasional streetlights were present along the surrounding roads, however, due to the low number, this is unlikely to have an adverse impact on commuting and foraging bats within the local landscape.

3.4 Nesting Birds

- 3.4.1 Old evidence of a bird nest was noted under the decking on the northeast elevation of building B1. No birds were noted to be nesting on or in the buildings B2 or B3 and no other evidence of breeding birds using the buildings was identified during the survey. Ample habitat suitable for nesting birds is found nearby (residential gardens, agricultural land, trees, hedgerows) and is readily available.

Evaluation

- 3.4.2 Although no evidence of current nesting birds was noted during the survey, it is likely that the buildings on site provide some suitable nesting habitat for birds, with the wider environs providing suitable foraging habitat.

3.5 Other Protected Species

- 3.5.1 There were no indications during the building inspection that any other protected/priority species may be using the building. General avoidance measures to avoid impacting protected species during development should be included within the recommended further survey report.

4 Assessment of Impacts

4.1 Statutory Designated Sites for Nature Conservation

- 4.1.1 Due to the nature, scale of the works and habitats present onsite, it is anticipated that the proposed development would not impact directly or indirectly on statutory designated sites for nature conservation. See below in Section 4.3 for assessment of impacts on the Bath and Bradford on Avon Bat SAC.

4.2 Habitats

- 4.2.1 The development of B1 will extend marginally into the rear garden across amenity grassland (g4 Modified grassland) while B2 will be extended across land that is currently gravel (u1c Artificial unvegetated – unsealed surface). Neither habitat is assessed as having high habitat value. As such, it is understood that the proposed development will have a negligible impact on immediate surrounding habitats.

4.3 Bats

- 4.3.1 All bat species within the UK are protected by national and international legislation.

Roosting Bats

Building B1

- 4.3.2 Evidence of bats was identified in the main loft space during the survey. Although the current plans do not appear to impact the main roof or loft space directly, the proposed northeast extension will be in close proximity to this area and may have indirect impacts on roosting bats from noise, vibrations or lighting.
- 4.3.3 The development will include the demolition of the existing northeast extension which has been assessed as having some suitability for roosting bats. As the development will impact the features identified, this could have the potential to result in the loss of bat roosts (if present) or would cause damage, disturbance or accidental killing of any bats that may be present.
- 4.3.4 Further evaluation of any potential impacts from the development to bats will be assessed after the completion of the recommended bat emergence surveys.

Building B2

- 4.3.5 No evidence of bats was identified during the PRA of the building, with the internal environment being assessed as negligible for day roosting bats and no crevice dwelling features were noted. As such, the proposed demolition of this building is unlikely to result in impacts to roosting bats.

Building B3

- 4.3.6 No evidence of bats was identified during the PRA of the building, with the internal environment being assessed as negligible for day roosting bats and no crevice dwelling features were noted. As such, the proposed demolition of this building is unlikely to result in impacts to roosting bats.

Foraging/Commuting Bats

Habitat Loss

- 4.3.7 The proposed development is likely to have a negligible impact on the immediate surrounding habitats as it will be contained within the existing gravel driveway and vegetated garden around the buildings.

Lighting

- 4.3.8 It is understood that the development will result in a slight increase in glazed areas on site. In combination with an increase in external lighting onsite, light spill has the potential to cause an adverse impact on bats foraging or commuting across the site, particularly to light sensitive species, which are also qualifying features of the Bath and Bradford on Avon Bats SAC.
- 4.3.9 In the absence of mitigation, any new external lighting (if applicable), or new areas of glazing has the potential to negatively affect light-sensitive bats (like horseshoe bats) potentially utilising the site to forage and/or commute. With mitigation, through the implementation of a sensitive lighting strategy in line with the Bat Conservation Trust and Institute of Lighting Professional's 'Bats and artificial lighting in the UK' (2023), it is considered that there can be a minimal impact on bats utilising the site.
- 4.3.10 Further evaluation of any potential impacts from internal and external light spill will be assessed after the completion of the recommended bat emergence surveys and after receipt of an initial lighting plan.

4.4 Birds

- 4.4.1 All bird species within the UK are protected whilst nesting. Old evidence of nesting birds was identified on building B1 during the PRA, with none noted on B2 or B3 at the time of the survey. However, birds are highly mobile species and could establish new nests prior to works commencing.
- 4.4.2 If works are conducted during the nesting season (typically between March and August), they would have the potential to result in the killing/injury of individual birds and the destruction of active nests; both of which would constitute a contravention of the Wildlife and Countryside Act 1981 (as amended).
- 4.4.3 The destruction of nesting habitat may constitute a long-term adverse impact on the population, as such onsite mitigation will be recommended to compensate for the loss. Mitigation, including sensitive timing of works and a pre-works nesting bird check by a qualified ecologist, will avoid impacts to nesting birds during the works.

4.5 Other Protected Species

- 4.5.1 General avoidance measures to avoid impacting protected species during development will be included within the recommended further survey report.

5 Recommendations

5.1 Further Actions

- 5.1.1 The initial site survey highlighted the potential need for further actions with regards to bats and nesting birds. The table below provides a summary of the works required, whilst details are provided in the following paragraphs.

Table 4 - Table of Further Actions

Ecological Considerations	Phase	Action(s) Required
Bats	Design stage	Artificial lighting (if proposed) designed sensitively to minimise impacts of artificial lighting on offsite habitats of importance to foraging/commuting bats.
	Prior to planning determination	Two bat emergence surveys to be undertaken on the building B1 with at least one scheduled within the core active bat season of May - August.
	After planning permission granted, prior to works starting on site	Following the results of the emergences survey, a Bat Mitigation Licence (BML) may be required from Natural England in order to allow works affecting the building which would otherwise be illegal. This will include mitigation and enhancements as necessary.
Birds	Demolition/construction	It is recommended that works to the buildings are timed to take place outside of the nesting bird season (which runs from March to August inclusive). If this is not possible then a pre-works check, by an Ecological Clerk of Works (ECoW), prior to works affecting the roof will be required.
Ecological enhancements	Construction and design stage	Ecological enhancements should be included within new developments and recommendations will be compiled following the completion of the further survey work recommended on the site.
Other Protected Species	Demolition/construction	General avoidance measures to avoid impacting protected species during development will be included within the recommended further survey report.

5.2 Bats

Roosting Bats

- 5.2.1 Further bat survey work is recommended for the building B1 to confirm how bats are utilising the building and whether bat roosts are present/likely absent within the northeast extension. These should be undertaken during the active bat season of May to September inclusive with at least one undertaken in the optimal survey season, May to August inclusive. Minimum of two bat emergence surveys are recommended to assess the areas to be impacted by the proposed development. However, if a bat roost is identified, further surveys may be required to characterise the roost and inform a bat licence.
- 5.2.2 A Bat Mitigation Licence (BML) registration may be required from Natural England if bats will be impacted by the development in order to allow works to proceed legally. A bat mitigation licence from Natural England will be applied for once planning consent is granted. No works can be undertaken until the licence is granted by Natural England. The licence will detail the methods and timings of workings to ensure no bats are harmed during the works and mitigation, compensation and enhancement measures required.

Lighting

- 5.2.3 If new external lighting is proposed to be added, a sensitive lighting strategy will need to be prepared with the aim to either reduce or ensure that lighting levels affecting the existing bat roost and/or habitats of value like the nearby woodland and tree lines located around the boundaries of the site are not illuminated at all. All lighting should be designed in line with the Bat Conservation Trust and Institute of Lighting Professional's '*Bats and artificial lighting at night*' (BCT & ILP, GN8, 2023). Although the development is understood to have minor impacts, controlling lighting onsite is particularly important as the site is located within the Greater horseshoe 4000m buffer and the Lesser horseshoe 2000m buffer of the Bath and Bradford on Avon SAC, which is designated for species of bat that are known to be relatively light intolerant species.
- 5.2.4 Detailed recommendations can be made following the results of the required further bat surveys and upon receipt of an initial lighting design and elevation plans. If Horseshoe activity is identified on site consideration for increased glazing on site may also be required.

5.3 Birds

- 5.3.1 Any works to the roofs or eaves of the buildings should be undertaken outside of the breeding bird season (the breeding season is influenced by the climatic conditions of a given year but is generally taken to be between March and August). If this is not possible then any works affecting habitat suitable for bird nesting should be checked by a suitably qualified ecologist within 48 hours of works commencing, and if birds are found to be nesting, a buffer zone of at least 5m around the nest will need to be maintained until the chicks have fledged, as confirmed by the suitably qualified ecologist.

5.4 Enhancements and Planning Policy

- 5.4.1 Enhancement features for wildlife should be included in the proposed development to meet the recommendations contained within the National Planning Policy Framework (NPPF) 2024.
- 5.4.2 Enhancement recommendations will be included within the subsequent report produced following the completion of the recommended surveys. Enhancements are likely to include the addition of bat, bird and insect boxes.

5.5 Other Protected Species

- 5.5.1 General avoidance measures to avoid impacting protected species during development will be included within the recommended further survey report.

References

CIEEM. (2020). Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. Chartered Institute of Ecology and Environmental Management. Available Online: <https://cieem.net/wp-content/uploads/2016/03/Guidelines-for-Accessing-and-Using-Biodiversity-Data-March-2020.pdf>

Collins, J. (ed.) (2023). Bat Surveys for Professional Ecologists: Good Practice Guidelines 3rd edition. The Bat Conservation Trust, London.

Cotswold National Landscape (2025). *About the Cotswolds*. Available at: <https://www.cotswolds-nl.org.uk/about-the-cotswolds-national-landscape/#:~:text=The%20Cotswolds%20National%20Landscape%20has,diverse%2C%20and%20high%20quality%20landscape.>

Institute of Lighting Professionals and Bat Conservation Trust (2023), Bats and artificial lighting at Night . Guidance Note 8

UK Multi-agency Governments Countryside Geographic Information website: www.magic.gov.uk

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.

Appendix B – Site Photographs



Photograph 1: The southwest elevations of B1.



Photograph 2: The southeast elevations of B1.



Photograph 3: The northeast elevations of B1.



Photograph 4: The northeast gable and northwest elevation of B1.



Photograph 5: The northeast extension of B1 with broken tile circled.



Photograph 6: Broken tile at the base of the dormer, southwest roof pitch of B1.



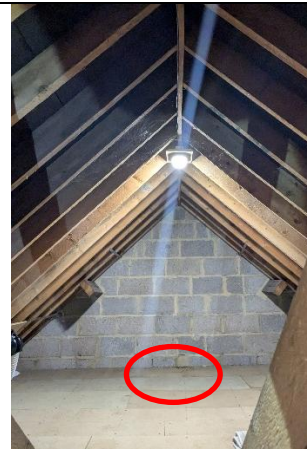
Photograph 7: An example of the gaps along the eaves of B1.



Photograph 8: Gaps around the dormer and ventilation feature noted on the southeast elevations of B1.



Photograph 9: The space under the northwest decking off B1.



Photograph 10: The loft space above B1, looking at the northwest gable with pile of bat droppings circled.



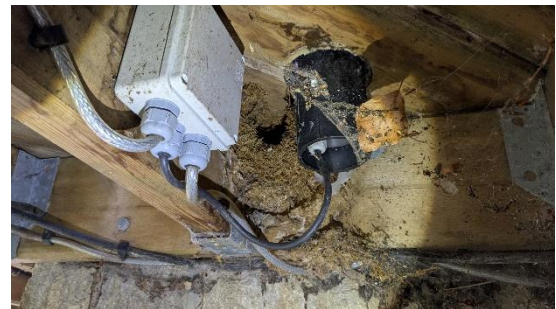
Photograph 11: An example of daylight noted along the eaves of the roof space of B1.



Photograph 12: Daylight noted from within the loft space, around the southeast dormer of B1.



Photograph 13: Bat droppings noted at the northwest gable within the loft of B1.



Photograph 14: Bird nest found under the decking off the northwest of B1.



Photograph 15: Northwest roof pitch of B2.



Photograph 16: Southeast roof pitch and northeast gable of B2.



Photograph 17: The gutterboard of B2 sitting far from the external wall.



Photograph 18: Small loft space at the northern end of B2.



Photograph 19: Internal environment within the southern section of B2.



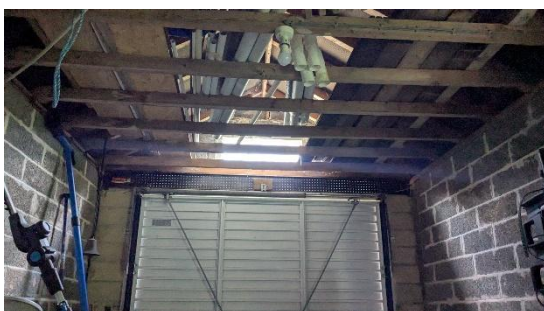
Photograph 20: Northwest roof pitch of B3.



Photograph 21: Northeast gable of B3.



Photograph 22: Southeast roof pitch of B3.



Photograph 23: Looking northeast, inside building B3.

Appendix C - Proposed Plans

