
61 Upper South Wraxall

Preliminary Roost Assessment

Job reference	799
Planning authority	Wiltshire Council
Site	61 Upper South Wraxall, South Wraxall, Bradford-on-Avon, Wiltshire BA15 2SE
Client	Mr J Charles-Jones
Date	02.04.26
Version	1.0

Quality Assurance

Prepared by	Ben Mitchell BSc (Hons) MCIEEM
On behalf of	Mr J Charles-Jones
Date	02.04.26
Version	1.0
Client approval	Mr J Charles-Jones

This report has been prepared in accordance with the CIEEM Guidelines on Ecological Report Writing (2017) and the CIEEM Code of Professional Conduct. The author declares compliance with relevant codes of professional practice. Survey methodologies follow Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th Edition (BCT, 2024).

NON-TECHNICAL SUMMARY

This Preliminary Roost Assessment (PRA) has been prepared by Ben Mitchell BSc (Hons) MCIEEM of Apt Ecology to inform a planning application for renovations to the cottage at 61 Upper South Wraxall, South Wraxall, Wiltshire. The survey was undertaken on 21 March 2026 in accordance with Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th Edition (BCT, 2024).

The site comprises a large detached farmhouse (Building 1), set within a curtilage of garden, amenity grassland and gravelled hardstanding. The site is situated in a dispersed rural settlement within an agricultural landscape of high ecological value for bats, characterised by an extensive network of hedgerows, mature trees, pastoral grassland, three on-site ornamental ponds, and a further pond approximately 270 m to the north. The site lies within the consultation zone of the Bath & Bradford on Avon Bats Special Area of Conservation (SAC).

Bat suitability was confirmed at four locations on Building 1, beneath the waney-edged board cladding above the main entrance door and at each of the four front-facing dormer windows. Building 1 is assessed as having **high** suitability for roosting bats.

The following surveys and actions are required:

- **Building 1** – Three emergence/re-entry surveys must be undertaken during the active bat season (May to October), with at least one during the core maternity period (June to July), by a licensed bat worker covering all potential roost locations simultaneously.
- No works should be undertaken to the waney board cladding or roof structure of Building 1 until surveys have been completed and any necessary European Protected Species Mitigation Licence obtained from Natural England.
- If emergency roof works and/or weatherproofing of the roof with sheeting supported on scaffold, are required prior to survey completion, a licensed bat worker must advise on design and directly supervise those works as required.
- Vegetation clearance on buildings should be undertaken outside the main bird nesting season (March to August inclusive) or following a pre-clearance check by a suitably qualified ecologist.
- External lighting should be kept to the minimum necessary and directed away from roost entry/exit points and bat commuting routes.

NON-TECHNICAL SUMMARY	1
1 INTRODUCTION	1
1.1 Summary of Proposals	1
1.2 Competency Statement	1
1.3 Purpose of this Report	1
1.4 Legislation and Planning Policy – Summary	1
2 METHODOLOGY	1
2.1 Desk Study	2
2.2 Preliminary Roost Assessment Survey	2
2.3 Survey Limitations	2
3 SURVEY RESULTS	3
3.1 Desk Study	3
Designated Sites	3
3.2 Habitat Survey	3
Site Context	3
Habitats	5
Buildings and Structures	5
Building 1 – Main Farmhouse	5
Trees	6
4 CONCLUSIONS	10
4.1 Further Surveys	10
4.2 Mitigation	10
4.3 Compensation	10
4.4 Enhancement	10
5 LEGISLATION & PLANNING POLICY	12
6 REFERENCES	14
6.1 Methodology and Best Practice References	14
6.2 Legislation and Policy References	14

1 INTRODUCTION

1.1 Summary of Proposals

Proposals include re-roofing of the main dwelling & 4no. Pitched dormer windows, rebuilding of existing front porch, removal of single storey infill extension together with fenestration alterations to the rear facades.

The site location is shown in Figure 1.

1.2 Competency Statement

Ben Mitchell BSc(Hons) MCIEEM has been a full member of the Chartered Institute of Ecologists and Environmental Managers since 2013 and has worked as a professional consultant ecologist since 2012. Prior to becoming self-employed, he was a principal ecologist at an award winning, multi-disciplinary consultancy. He holds bat, great crested newt and Schedule 1 bird survey licences in England, Wales and Scotland since 2015 (Scotland 2010) and has acted in the capacity of named ecologist on 14 Natural England Bat Mitigation licences. He also presented at the National Bat Conference in 2019 on Bats and the planning system.

1.3 Purpose of this Report

This PRA report provides an assessment of the potential effects of the scheme on bats associated with the Site, as defined by the information set out in this report.

This report provides a description of the ecological baseline, considers the potential impacts of the scheme, and makes recommendations for mitigation and enhancement measures where appropriate.

1.4 Legislation and Planning Policy – Summary

This report has been prepared in line with current UK wildlife legislation and planning policy. The law protects many species and habitats that could be present on or near the site, including bats, nesting birds, reptiles and badgers. Some species and their breeding sites or shelters are protected all year round, even when not in use.

Planning policy requires that new developments avoid harm to wildlife, mitigate impacts where they cannot be avoided, and compensate for any remaining effects.

National policy (NPPF) and local policy both require that planning decisions protect and enhance biodiversity, follow the mitigation hierarchy, and seek opportunities to improve habitats and ecological networks.

For further information on the relevant legislation and planning policies please see Section 5 – Legislation & Planning Policy.

2 METHODOLOGY

2.1 Desk Study

A review was conducted of all relevant existing information within the zone of influence of the Site to enable a full assessment of the relationship between the Sites and any records of species or habitats of conservation interest and connective habitats in a landscape context. The following sources were accessed for this purpose:

- MAGIC website (<https://magic.defra.gov.uk/MagicMap.aspx>)
- Google Earth (<https://earth.google.com/web/>)
- Wildlife Assessment Check Tool (<https://www.biodiversityinplanning.org/wildlife-assessment-check/>)

2.2 Preliminary Roost Assessment Survey

A PRA survey of the Site was undertaken on 21st March 2026 by Ben Mitchell MCIEEM. The weather was dry and warm and considered ideal.

This survey was completed in accordance with Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th Edition (BCT, 2024), Guidelines for Preliminary Ecological Appraisal (CIEEM, 2017) and BS 42020:2013 Biodiversity – Code of practice for planning and development (British Standards Institute, 2013).

2.3 Survey Limitations

No limitations were present

3 SURVEY RESULTS

3.1 Desk Study

Designated Sites

A review of the MAGIC mapping database identified the following statutory designations within a 5 km radius of the site. The site does not fall within the boundary of any statutory designated site; however, it lies within the consultation zone of the Bath & Bradford on Avon Bats Special Area of Conservation (SAC), which is of direct relevance to this assessment.

Site	Designation	Distance	Direction
Bath & Bradford on Avon Bats SAC (Box Mines SSSI)	SAC/SSSI	3.38km	North

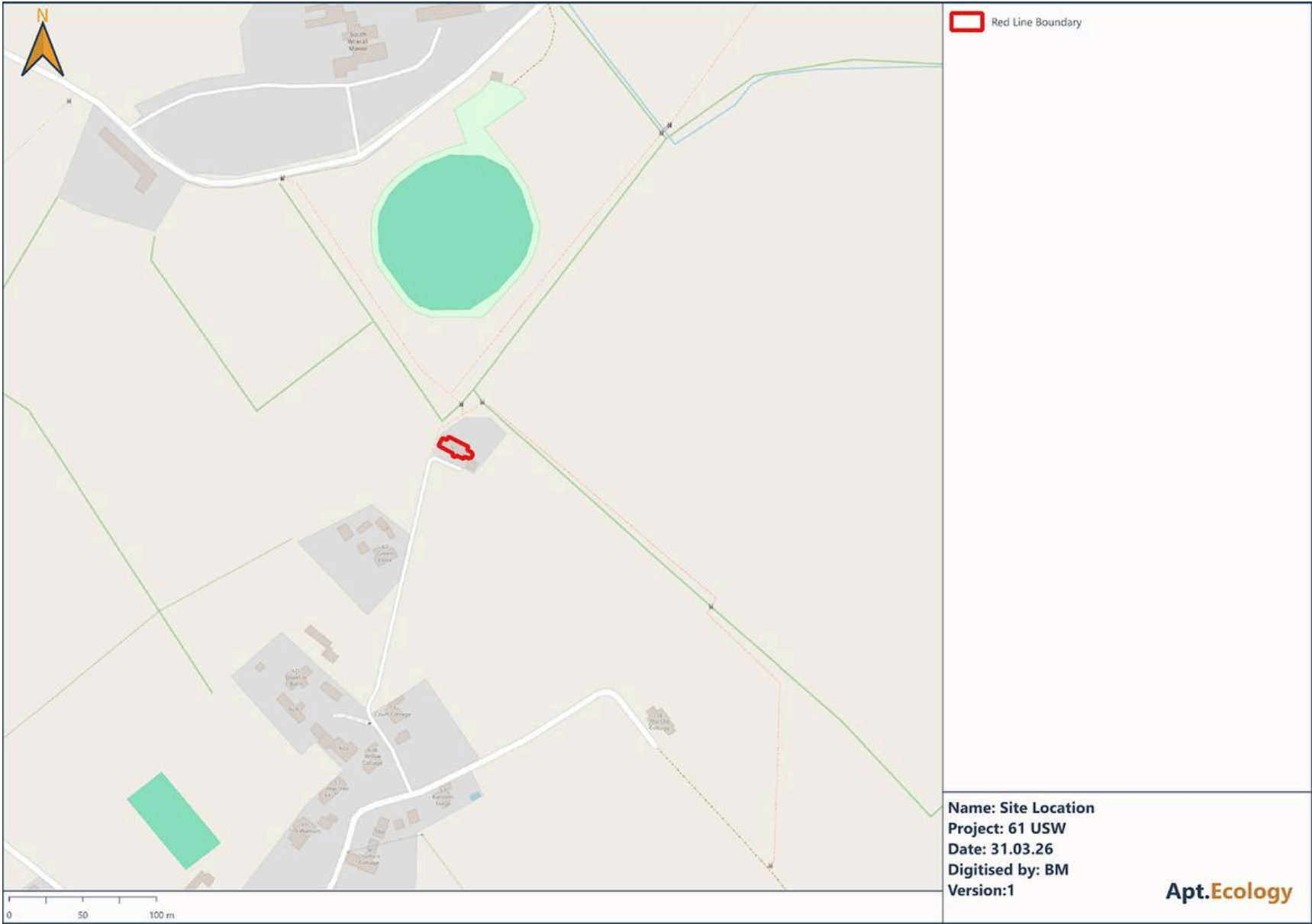
3.2 Habitat Survey

Site Context

The site comprises a domestic dwelling, comprising a 4 bedroom cottage (Building 1), together with a curtilage of mown amenity grassland, tarmaced hardstanding and an ornamental garden. The site is accessed via a single-track lane running broadly north-south, and is situated within a dispersed rural settlement in an agricultural landscape.

The wider landscape is of high ecological value for bats. The site lies within an extensive network of hedgerows that divide the surrounding land into a mosaic of pastoral grassland and arable fields, providing continuous commuting and foraging habitat directly connected to the site curtilage. Hedgerows extend outwards from the site in multiple directions, linking it to areas of broadleaved woodland, scrub and riparian habitat within the wider countryside. Scattered mature and veteran trees occur both within hedgerows and as isolated field trees across the surrounding pasture, adding structural diversity and further roosting and foraging resources. A pond is present approximately 270 m to the north of the site and is likely to function as a significant foraging resource for bat species, particularly in warm weather when emergent and terrestrial invertebrate activity is high. A country house estate with ornamental grounds, formal water features and extensive mature tree cover is situated approximately 270 m to the north-north-west and represents a further concentration of high-quality bat habitat in close proximity to the site.

The combination of buildings with confirmed roosts, a rich and connected hedgerow network, mature trees, standing water, pastoral grassland and proximity to established bat populations in the surrounding landscape means the site and its immediate context are assessed as providing habitat of **high** suitability for bats, both as a roosting resource and as a component of a wider ecological network of regional significance.



Habitats

The habitats present on site comprise a mature garden surrounded by mature trees and hedgerows that form part of significant connective features across the wider landscape. Three ornamental ponds are also present on site in various states of disrepair but do provide further habitat diversity which will increase foraging interest for bats.

Buildings and Structures

Table 1 summarises the bat roost suitability assessment for each structure surveyed.

Table 1 – Bat Roost Suitability Assessment Summary

Building	Description	Roost features noted	Suitability	Recommendation
Building 1	Large cottage; two storey stone and block construction with pantile roof. Four dormer windows to front elevation with waney-edged board cladding to dormer cheeks and gables. Conservatory to rear. Extensive climbing vegetation to rear and side elevations.	Potential roost features confirmed beneath waney board cladding above the main entrance door and at all four front-facing dormer windows. Roof void has extensive areas of absent felt and insulation; heating non-operational at time of survey.	High	Three emergence/re-entry surveys required (BCT 2024). At least one survey during core maternity season (June–July).

Building 1 – Cottage

Building 1 is a rubble-stone two-storey cottage with rendered blockwork extensions all beneath a pantile-tiled roof (Plates 1, 3, 5, 9). The building has extensive climbing vegetation – including ivy and ornamental climbers – covering much of the front elevation, which provides additional potential bird nesting habitat.

The front elevation features four dormer windows projecting through the main roof slope, each with gables clad in waney-edged timber boarding. This cladding type, particularly where boards have weathered and lifted slightly from the underlying structure, is a widely recognised and frequently occupied roosting feature for crevice-dwelling bat species. A chimney stack is present to the main roof ridge.

Internal access to the roof void was obtained at the time of survey (Plate 6, 7, 11, 12). The roof structure is of traditional cut-rafter construction with lath and plaster ceiling to the rooms below. Inspection revealed that insulation has been removed or displaced, and roofing felt has fallen away or is absent across numerous areas throughout the void, consistent with water ingress resulting from roof defects. The central heating system was not operational at the time of survey. Notwithstanding these conditions, the presence of accessible entry points via the dormer cladding means these features retain potential for use by bats independent of its internal thermal environment and are south facing so will benefit from solar gain.

Potential roost features were identified at four locations behind the waney board cladding above the main entrance door, and behind the boarding of the four front-facing dormer windows (Plates 1–2). Droppings samples were taken from within the small 'loft' voids above the dormer windows but access was not possible to the crevice feature between the waney boards on the front of the dormers or front door. EDNA analysis confirmed these as non-bat mammal species (yellow necked mouse and pygmy shrew).

The building is assessed as having high suitability for roosting bats. Given the number and distribution of potential roost locations, it is possible that a maternity colony could be present and/or a series of associated day roosts. Three emergence/re-entry surveys are required in accordance with BCT (2024) Good Practice Guidelines, to be undertaken during the active bat season (May to October inclusive), with at least one survey conducted during the core maternity period (June to July).

Trees

The trees immediately adjacent to the site do not have any potential to support roosting bats. However, they do represent foraging and commuting habitat given the sites location at a landscape intersection of linear habitats and should be managed sensitively.

Folio No: 129-2026
Purchase Order: SCIN-299
Contact: APT Ecology
Issue Date: 25.03.2026
Received Date: 13.03.2026



Biological Sample Analysis

Summary

Most biological materials (tissue, feces, hair, blood, etc.) contain small amounts of DNA from the organism of which it originated. Using molecular methods such as PCR (polymerase chain reaction) and DNA sequencing, SureScreen Scientifics are able to analyze an unknown sample to determine which species the sample originates from our methods are optimized for the detection of species including bats (over 92% of bat species worldwide can be identified including all 18 UK bat species), mammals; bees, wasps & hornets; birds; fish; plants (from roots, leaves, stem and even dried wood) and many more species.

Results

Lab ID	Site Name	OS Reference	Sample Type	Species Name	Match(%)
B26 0181	61 UW - R1		Dropping	Eurasian pygmy shrew (Sorex minutus)	97.99
Genetic Sequence CTAGGAGGATTGGTAAGTACTGCTTCTCTAATAATTGGTGCACCGATATAGCATTCCACGAATAAATAATAT AAGCTTCTGACTACTCCACCATCATTTCTCTGTACTTGCTCATCAACCGTAGAAGCCGGGGCTGGGACTGGC TGAACTGTATATCCACCACTAGCCGGAACCTAGCCACGCAGGAGA					
B26 0182	61 UW - R2		Dropping	Yellow-necked mouse (Apodemus flavicollis)	100.00
Genetic Sequence GGAATTGATTAGTTCCCTAATAATTGGGGCCCTGATATAGCATTCCACGAATAAATAATATAAGCTTTTGACTT CTCCCTCCATCATTTCTTCTCTTAGCATCATCAATAGTTGAAGCAGGAGCAGGAACGGATGAACCGTATACC CACCATTAGCAGGAACCTAGC					
B26 0183	61 UW - R3		Dropping	Yellow-necked mouse (Apodemus flavicollis)	100
Genetic Sequence TCGGAATTGATTAGTTCCCTAATAATTGGGGCCCTGATATAGCATTCCACGAATAAATAATATAAGCTTTTGAC TTCTCCCTCCATCATTTCTTCTCTTAGCATCATCAATAGTTGAAGCAGGAGCAGGAACGGATGAACCGTATAC CCACCATTAGCAGGAACCTAGC					

Matters affecting result: none
Reported by: Consuela Sopranyi
Approved by: Chelsea Warner

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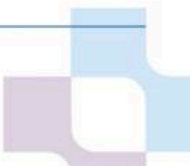
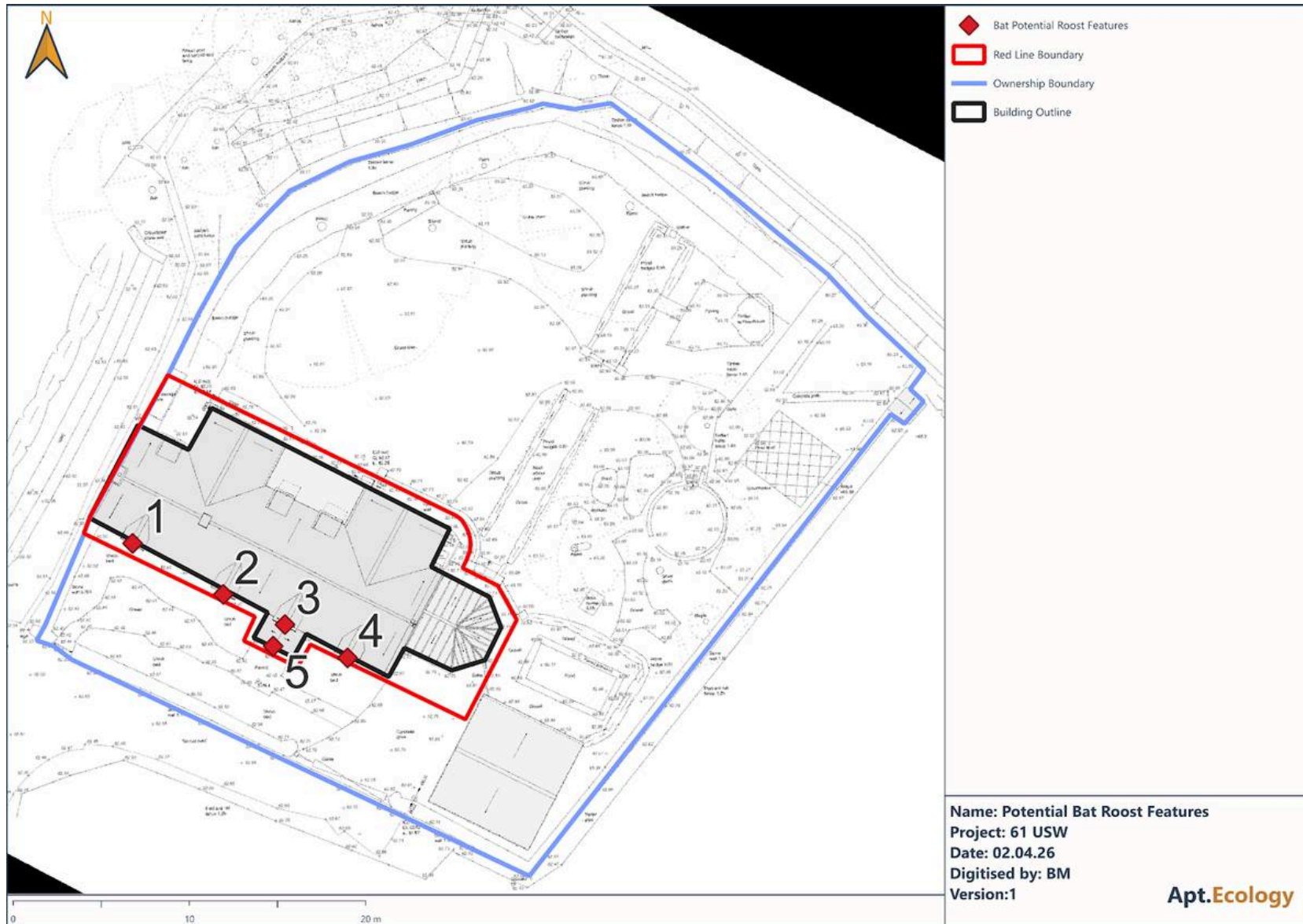


Figure 3 – Bat eDNA Analysis results.



		
<i>Plate 1 – Building 1 from s</i>	<i>Plate 2 – Building 1 – Rear</i>	<i>Plate 3 – Building 1 East gable</i>
		
<i>Plate 4 – Building 1 northern loft</i>	<i>Plate 5 - Building 1 Main loft – Western gable</i>	<i>Plate 6 – Building 1 Front facing W</i>
		
<i>Plate 7 Building 1 – Dormer Window</i>	<i>Plate 8 – Anti-wildlife screening along rear fascia</i>	

4 CONCLUSIONS

4.1 Further Surveys

Further surveys are required prior to any works affecting the potential roost features present in accordance with BCT (2024) Good Practice Guidelines.

Building 1 — Three emergence/re-entry surveys are required during the active bat season (May to October), with at least one survey conducted during the core maternity period (June to July). Surveys should be undertaken by a licensed bat worker and should cover all potential roost locations on the front elevation simultaneously. Infra red or thermal cameras should be used.

4.2 Mitigation

Given the number of potential roost features in Building 1, a European Protected Species (EPS) Mitigation Licence from Natural England may be required prior to commencement of any works that affect any roost locations. A licence application cannot be submitted until emergence surveys have been completed and a method statement prepared.

In the interim, the following precautionary measures are recommended:

- No works should be undertaken to the waney board cladding or roof structure of Building 1 until emergence surveys have been completed, results assessed, and any necessary licence obtained.
- If emergency works to the roof are required prior to survey completion (e.g. a scaffold frame roof covering to address active leaking), a licenced bat worker should advise on the risks, design of the covering and directly supervise roof works and a Natural England derogation sought if necessary.
- Vegetation clearance should be undertaken outside the main bird nesting season (March to August inclusive) or immediately following a check by a suitably qualified ecologist.
- External lighting associated with any works should be kept to the minimum necessary and directed away from roost entry/exit points and bat flight lines.

4.3 Compensation

Compensation requirements will be determined following the completion of emergence surveys and will be set out in the method statement supporting any licence application. Compensation is likely to include the provision of permanent roosting opportunities of equivalent or greater value within the development, the specification of which will be guided by the species and roost type confirmed during surveys.

4.4 Enhancement

- Bat boxes, features or integrated bat bricks should be incorporated into any new or refurbished structures on site, positioned on elevations that replicate the thermal and access characteristics of the confirmed roost features.
- Bird nesting boxes suitable for house sparrow, starling and swift should be incorporated into the fabric of the building where practicable.

- Any new planting should include native species of value to bats and other invertebrates, including night-scented species to support foraging activity.

5 LEGISLATION & PLANNING POLICY

Bath & Bradford on Avon Bats Special Area of Conservation

The SAC is designated under the Conservation of Habitats and Species Regulations 2017 for three qualifying bat species: greater horseshoe bat (*Rhinolophus ferrumequinum*), lesser horseshoe bat (*Rhinolophus hipposideros*), and Bechstein's bat (*Myotis bechsteinii*). The SAC comprises a series of abandoned limestone mines and associated supporting habitats within four SSSIs – Combe Down and Bathampton Down Mines and Brown's Folly in Somerset, and Box Mine and Winsley Mines in Wiltshire – which are used by these species for hibernation, mating and, in the case of greater horseshoe bat, as a staging post prior to seasonal dispersal. The SAC supports hibernation sites associated with approximately 15% of the UK greater horseshoe bat population and is among the most important sites for this species in England.

All three qualifying species are highly mobile and use an extensive network of roost sites, foraging areas and commuting routes across the wider landscape. They are strongly dependent on linear features – including hedgerows, woodland edges and watercourses – as navigational and foraging corridors, and are highly sensitive to the effects of artificial light at night (ALAN), habitat loss or fragmentation, and disturbance to roost sites. The pastoral and hedgerow landscape surrounding the site is consistent with the foraging and commuting habitat known to be used by all three species.

Under the Conservation of Habitats and Species Regulations 2017, the Local Planning Authority as competent authority is required to undertake a Habitats Regulations Assessment (HRA) screening for any proposal likely to have a significant effect on the SAC, either alone or in combination with other plans or projects. Where a likely significant effect cannot be excluded, an Appropriate Assessment must be completed before consent can be granted, and the LPA may not grant permission unless it can ascertain that the proposal will not adversely affect the integrity of the SAC. Natural England is a statutory consultee on all applications where HRA is required. The applicant is strongly advised to engage with the LPA and Natural England at pre-application stage to agree the scope of screening required.

Wildlife and Countryside Act 1981 (as amended)

Provides protection for all wild birds, their nests and eggs (s.1), including additional protections for Schedule 1 species; protects certain wild animals (s.9) and plants (s.13); and makes it an offence to release or allow the spread of invasive non-native species listed on Schedule 9.

Conservation of Habitats and Species Regulations 2017 (as amended)

Implements strict protection for European Protected Species (EPS) such as all UK bats, great crested newt, dormouse and otter. Offences include deliberate capture, killing, injury or disturbance, and damage or destruction of breeding sites or resting places (Reg. 43). The Regulations also govern the Habitats Regulations Assessment (HRA) process for 'habitats sites'.

Natural Environment and Rural Communities (NERC) Act 2006 & Environment Act 2021

Section 41 of the NERC Act lists species and habitats of principal importance for biodiversity. The biodiversity duty on public authorities (s.40) has been strengthened by the Environment Act 2021 (s.102) to require action to conserve and enhance biodiversity and to report on it.

Legally protected species likely to be relevant to the Site (subject to habitat presence) include:

- Bats — EPS protected under the Habitats Regulations and WCA 1981; roosts are protected year-round, even when unoccupied.
- Breeding birds — All wild birds, nests and eggs protected under WCA 1981 (s.1); additional protections apply to Schedule 1 species.

National Planning Policy Framework (NPPF, Dec 2024; amended Feb 2025)

Chapter 15 ('Conserving and enhancing the natural environment') requires planning decisions to minimise impacts and secure net gains for biodiversity (para. 187), apply the mitigation hierarchy, and protect Sites of Special Scientific Interest (SSSIs) and irreplaceable habitats (para. 193).

Local Planning Policy

Core Policy 50 of the Wiltshire Core Strategy requires that development proposals conserve, restore and enhance biodiversity and geodiversity. The policy requires that development should not result in a net loss of biodiversity and, where possible, should deliver a net gain. Development proposals must demonstrate that the mitigation hierarchy has been applied — that is, that potential impacts on biodiversity have first been avoided, then mitigated, and finally compensated for where residual impacts remain unavoidable.

The policy requires that proposals affecting protected or priority species, habitats of principal importance, or other ecological features of value must be supported by adequate ecological survey information proportionate to the nature of the proposed development and the likely ecological sensitivities of the site. Where surveys identify the presence of protected species or priority habitats, appropriate mitigation, compensation and enhancement measures must be incorporated into the scheme design and secured by planning condition or legal agreement.

Core Policy 50 also requires that development adjacent to or affecting internationally, nationally or locally designated sites — including Special Areas of Conservation, Sites of Special Scientific Interest and Local Wildlife Sites — must demonstrate that the proposal will not result in an adverse effect on the integrity or interest features of the designation, either alone or in combination with other plans or projects. Where the site lies within or adjacent to a statutory designation, proposals must be accompanied by an assessment of potential impacts and, where required, undertake a Habitats Regulations Assessment in accordance with the Conservation of Habitats and Species Regulations 2017.

The policy is consistent with the objectives of the National Planning Policy Framework and should be read alongside Wiltshire Council's Biodiversity SPD and any relevant Natural England standing advice. The application of Core Policy 50 to this proposal requires that the confirmed bat roosts at Building 1 are fully assessed through emergence survey, that any unavoidable impacts are mitigated and compensated, that the proximity of the site to the Bath & Bradford on Avon Bats SAC is addressed through the HRA process, and that opportunities for biodiversity enhancement — including the provision of bat roosting and bird nesting features — are incorporated into the development.

6 REFERENCES

6.1 Methodology and Best Practice References

Bat Conservation Trust (2024) Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th Edition (Amended March 2024). BCT, London.

British Standards Institution (2013) BS 42020:2013 Biodiversity – Code of practice for planning and development. BSI Standards Limited, London.

CIEEM (2017) Guidelines for Preliminary Ecological Appraisal (Second Edition). Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM (2019) Guidelines for Ecological Report Writing (Second Edition). Chartered Institute of Ecology and Environmental Management, Winchester.

DEFRA (2021) The Environment Act 2021. HM Government, London.

HM Government (2024) National Planning Policy Framework. Ministry of Housing, Communities and Local Government, London.

JNCC (2010) Handbook for Phase 1 Habitat Survey – A Technique for Environmental Audit. Joint Nature Conservation Committee, Peterborough.

Natural England (2021) Standing Advice for Local Planning Authorities on Protected Species. Natural England, York.

6.2 Legislation and Policy References

Conservation of Habitats and Species Regulations 2017 (as amended). SI 2017/1012. London: HMSO.

Environment Act 2021. London: The Stationery Office.

Natural Environment and Rural Communities Act 2006. London: The Stationery Office.

Wildlife and Countryside Act 1981 (as amended). London: The Stationery Office.

Wiltshire Council (2015) *Wiltshire Core Strategy: Adopted Core Strategy incorporating the Site Allocations DPD*. Wiltshire Council, Trowbridge. Core Policy 50: Biodiversity and Geodiversity, pp. 209–211.