



West Country

E C O L O G Y

**Preliminary Bat
Roost Assessment
& Nesting Bird
Survey**

78 High Street, Dilton
Marsh

February 2026

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This document has been produced by West Country Ecology solely for the purpose of informing the client's planning application as a Preliminary Bat Roost Assessment and Nesting Bird Survey Report. No responsibility is accepted by West Country Ecology for its use by any other party or for purposes beyond those for which it was originally commissioned.

All survey work and reporting have been undertaken in line with current professional standards and with reference to the Code of Professional Conduct issued by the Chartered Institute of Ecology and Environmental Management (CIEEM).

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1 INTRODUCTION

- 1.1 West Country Ecology was commissioned by Rebecca Miller to undertake a Preliminary Bat Roost Assessment and Nesting Bird Survey of a residential property at 78 High Street, Dilton Marsh, Westbury, Wiltshire BA13 4DY. The building surveyed is located at approximate National Grid Reference (NGR): ST 84719 49786.
- 1.2 The survey was requested to accompany a planning application to Wiltshire Council. The proposed works are for the construction of a rear extension which will require the removal of an existing WC building. Designs are in their early stages and plans were not made available.
- 1.3 A field inspection was completed in January 2026 to examine the building for its potential to support protected species and to record any direct evidence of their presence, with a particular focus on bats and nesting birds. The survey sought to establish whether the site contains features of ecological value, to identify any constraints posed by protected species, and to determine the likely level of ecological impact associated with the proposed works. The findings also provide a basis for identifying whether further survey effort or mitigation measures are necessary. Survey results detailed within this report should be considered valid for a period of 12 months from the survey date (subject to consultation with the Local Planning Authority and/or Natural England).
- 1.4 This report has been prepared in accordance with the relevant planning and legislative framework. The National Planning Policy Framework (NPPF, December 2024) sets out the Government's planning policies for England, with Chapter 15: Conserving and Enhancing the Natural Environment being of specific relevance to biodiversity and ecology. Further statutory guidance is provided by Government Circular 06/2005, which outlines obligations for biodiversity and geological conservation in the planning process.
- 1.5 The property is located in the centre of Dilton Marsh, situated to the immediate south of the High Street (B3099). The site location is shown in Figure 1, with the survey boundary illustrated in Figure 2.

2 METHODOLOGY

Desk Study

- 2.1 A review of available desk-based information was undertaken to provide ecological context for the site. The MAGIC database (Multi-Agency Geographic Information for the Countryside)¹ was consulted to identify statutory nature conservation designations, priority habitats, and records of granted European Protected Species Licenses (EPSLs) within a 2 km search radius. Google Earth² imagery was also used to assess the surrounding landscape and its connectivity for wildlife.

Field Survey

Surveyor Expertise

- 2.2 Jason Skinner has nine years of professional ecological experience, with a particular focus on bats and reptiles through both consultancy and academic research. He has held a Natural England bat survey licence for six years, during which time he has undertaken and supervised a wide range of bat surveys and mitigation works under licence. His experience includes involvement in both small- and large-scale development projects, supervision of mitigation under multiple bat licences, and co-authorship of peer-reviewed research papers on amphibians and reptiles. He is also an active member of the Staffordshire and Wiltshire Bat Groups.

Survey Approach

- 2.3 The assessment was undertaken in accordance with recognised professional guidelines³, including the Chartered Institute of Ecology and Environmental Management (CIEEM)⁴ and British Standard Code of Practice⁵. The building was systematically examined using visual encounter techniques to identify features of potential value to bats and birds. Potential flight corridors and commuting features within the immediate landscape were also noted.

¹ Multi-Agency Geographical Information for the Countryside (MAGIC). Crown Copyright and database rights [2026]. Ordnance Survey 100022861. Available at: <http://www.magic.gov.uk/>

² https://www.google.co.uk/intl/en_uk/earth/

³ Collins J (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th edn. Bat Conservation Trust, London.

⁴ CIEEM (2017) Guidelines for Ecological Report Writing. CIEEM, Winchester.

⁵ British Standards Institution (2013) BS 42020:2013. Biodiversity – Code of practice for planning and development. British Standards Institution, London.

- 2.4 Internally, the structure was inspected with the aid of a high-powered torch to search for signs of bat presence, including droppings, staining, or feeding remains (e.g. concentrations of moth or butterfly wings). An endoscope was used where required to check cracks, crevices, and other suitable features for evidence of roosting bats.
- 2.5 Externally, all elevations were visually examined using binoculars and a telephoto lens where necessary. Attention was given to features such as gaps beneath roof tiles, missing mortar, lifted soffit boards, exposed timbers, and other entry points that may provide access for bats or nesting birds. The surrounding ground, ledges, and windowsills were also checked for droppings, feathers, or prey remains. Photographs were taken to document features of potential ecological interest.
- 2.6 Nesting bird potential was assessed through internal and external inspection for signs including nests, feathers, eggs, fledged young, or the presence of adult birds.
- 2.7 Bat roost suitability was categorised in line with industry-standard guidelines. A summary of the criteria used is presented below in Table 1.

Table 1: Guidelines summary for assessing potential bat roost suitability

Suitability	Description of building, tree or structure
None	Structure offers no access points or features suitable for roosting bats and is entirely unsuitable (e.g. modern, fully sealed, well-lit, highly disturbed).
Negligible	Structure has very limited features which are highly unlikely to be used by bats due to their condition, size or location.
Low	One or more features that could be used opportunistically by individual bats, but unsuitable for larger numbers or regular use (i.e. maternity or hibernation roosts).
Moderate	Features present that could be used by bats more regularly, though unlikely to support a roost of high conservation significance.
High	Obvious potential for regular use by larger numbers of bats or maternity/hibernation roosts.
Confirmed roost	Direct evidence of bats recorded, confirming use of the site.

2.8 Limitations

- Bat droppings deposited externally can degrade quickly in poor weather, meaning absence of droppings should not be interpreted as evidence of absence.
- Many UK bat species utilise small crevices, making them difficult to detect during daytime assessments.
- Biological records were not obtained. Owing to the limited scale of the proposed works, the absence of Local Environmental Record Centre (LERC) data is not considered to materially affect this assessment.
- For health and safety reasons, ladders were not used to inspect the upper roof structure directly.

3 RESULTS

Desk Study

Designated Sites

- 3.1 Consultation of the MAGIC online database confirmed that there is one earth heritage site located within a 2 km radius; Westbury Ironstone Quarry Site of Special Scientific Interest (SSSI), located 1.1 km to the north-east, although, this site is not designated for supporting bat populations and no statutory or non-statutory nature conservation designations were identified within a 2 km radius of the application site (see limitations).
- 3.2 The data search also revealed the presence of three internationally designated sites within 10km of the site; Salisbury Plain Special Area of Conservation (SAC) and Special Protection Area (SPA), River Avon SAC and Mells Valley SAC. None are designated for supporting significant bat populations.
- 3.3 The site lies within the Bath and Bradford-on-Avon Bats SAC consultation zone and within the 4 km Core Area for greater horseshoe *Rhinolophus ferrumequinum* bats; the nearest Core Roost associated with the SAC is located approximately 1 km to the east of the site.

Local Habitats

- 3.4 The property is situated within a village-centre setting and is immediately surrounded by medium-density residential development. The local environment comprises residential streets with associated gardens, typically supporting amenity lawn, ornamental shrubs and occasional mature trees. These features offer opportunities for bats to commute through the village and forage opportunistically along treelines and garden boundaries.
- 3.5 Beyond the village, the wider landscape becomes predominantly agricultural, comprising a mosaic of pastoral and arable fields with hedgerows which form linear features that can facilitate bat commuting and foraging. A railway corridor is located approximately 880 m east of the site and may provide additional linear connectivity within the landscape. Aquatic habitats in the wider area include minor watercourses such as the Biss Brook (c.1.2 km east), which, together with associated riparian vegetation where present, may support insect prey and provide commuting routes for bats.
- 3.6 Within the 2 km study area, several habitats of note are present that may contribute to the availability and connectivity of bat foraging and commuting resources. This includes an area of woodpasture and parkland (BAP Priority Habitat) at Chalcot Park, located approximately 200 m south, and multiple blocks of broadleaved woodland, particularly to the south-west around Black Dog Woods. The closest mapped deciduous woodland (Priority Habitat) lies approximately 130 m south-west, and three areas of ancient woodland are recorded within 2 km (including Chalcot Wood at approximately 450 m south-west, and Black Dog Woods and Round Wood further afield). A small number of traditional orchards (Priority Habitat) also occur within the wider landscape, with the closest recorded around 890 m to the west. Additional notable habitats include parcels of floodplain grazing marsh (Priority Habitat) and areas of good quality semi-improved grassland, both recorded at approximately 1.1 km north-west. No Priority Habitats are recorded on-site or within the immediate vicinity of the surveyed building.

Granted European Protected Species Licences (EPSLs) within a 2km Radius

- 3.7 A search of the MAGIC database identified two EPSLs granted for bats within a 2 km radius of the survey site. The first was granted in 2016 for brown long-eared *Plecotus auritus* bats at a site located 1.1 km to the south-west, the second was granted in 2018, also for brown long-eared bats, at a site located 1.2 km east.

Field Survey

- 3.8 A building assessment was completed on Monday 26th January 2026 by ecological consultant Jason Skinner (holder of NE Class 2 Bat Survey licence 2025-86057-CL18-BAT, NE Barn Owl licence number 2026-88685-CL29-OWL).

Table 2: Weather conditions during field survey

Date	Start	Finish	Temp °C	Wind	Cloud	Rain	Notes
26/01/2026	10:30	11:15	8	10 km/h	86 %	Dry	N/A

Building Description

- 3.9 The surveyed building comprises a semi-detached two-storey residential dwelling, classified under UKHab as u1b5 – Buildings. The building is constructed from brick elevations beneath a cross-pitched roof clad in concrete interlocking tiles. Exposed rafter tails are present at the eaves. A two-storey gable-fronted projection is located on the rear (south) elevation and features a bargeboard at the gable. Adjoining this projection is a single-storey mono-pitched WC extension, also clad in concrete interlocking tiles, with a door on the west-facing elevation.
- 3.10 A brick chimney stack is present along the party wall. The building features concrete lintels and is fitted with modern UPVC double-glazed windows. A loft void is present within the main roof and is accessed via an internal ceiling loft hatch. The two-storey rear projection contains an inaccessible enclosed roof space.

Preliminary Bat Roost Assessment

- 3.11 Externally, the brickwork of the dwelling was largely well pointed, with little evidence of cracking, mortar loss, or deterioration. The ridge tiles displayed intact bedding mortar with no gaps or crevices, and the concrete interlocking roof tiles lay flat, showing no evidence of slipping, lifting, or damage. Window and door frames were well fitted, with no visible gaps.
- 3.12 Within the proposed area of works, several small features were identified at the eaves that could provide potential roosting opportunities. These included gaps around the exposed rafter tails where some localised loose brickwork was present, and narrow gaps at the wall top between the masonry and the underside of the roof covering. Similar gaps were also noted at the eaves of the mono-

pitched WC extension, between the wall top and the roof tiles. Collectively, these represent external Potential Roosting Features (PRFs) suitable for crevice-dwelling bat species such as pipistrelles *Pipistrellus* spp., while the gaps at the eaves of the main roof could also provide potential entry points for void-dwelling species such as brown long-eared bats. No direct evidence of bat activity, such as droppings or staining, was recorded around the building exterior.

- 3.13 Internally, the main loft void was inspected. The space measured approximately 6 metres by 4 metres and comprised exposed timber rafters and purlins with wooden boarding beneath the tiles, and insulation present at floor level. The roof structure appeared to be in good condition, with no areas of daylight ingress observed, and the loft appeared generally well sealed. No evidence of bats, such as droppings or feeding remains, was recorded. The WC extension was also inspected internally. The door is typically kept closed, and the roof space has been fully boarded, forming a sealed internal compartment with no accessible voids.
- 3.14 During the survey, the client reported that roosting bats had historically been observed accessing the roof of the WC extension (B. Miller, 2026, pers. comm.). This information is based on anecdotal observation and was not corroborated by physical evidence during the survey.

Nesting Bird Survey

- 3.15 Gaps within roofing materials can provide valuable nesting opportunities for small passerine birds, including species like the blue tit *Cyanistes caeruleus*, which typically seek out cavities with small, concealed entrances for nesting. These sheltered spaces mimic the natural environments these birds prefer, such as tree hollows. However, despite the potential suitability of the site, no direct evidence of nesting activity was observed during the building assessment. This included the absence of typical indicators such as bird droppings, nesting material (e.g., feathers, twigs, or moss), or signs of frequent bird activity around the area.

Other Species

- 3.16 The area affected by the proposed extension comprises existing hardstanding immediately adjacent to the rear elevation of the dwelling. No vegetation, soft landscaping, or semi-natural habitat is present within the proposed construction footprint. As such, the area provides no suitable habitat for protected or notable species, including reptiles, amphibians, hedgehogs, or small mammals.

4 DISCUSSION AND RECOMMENDATIONS

Overview

- 4.1 A Preliminary Bat Roost Assessment (PBRA) and Nesting Bird Survey was undertaken at 78 High Street, Dilton Marsh to evaluate the building's potential to support roosting bats and nesting birds. The proposals are for the construction of a rear extension. This section summarises the significance of the findings, identifies potential ecological risks, and outlines the further survey work, mitigation, and enhancement measures required to ensure compliance with relevant wildlife legislation and planning policy.

Desk Study Context

- 4.2 A review of the MAGIC database identified two European Protected Species Licences (EPSLs) issued within 2 km of the site boundary, both relating to brown long-eared bat. These records indicate the presence of this species within the wider landscape, which is consistent with the availability of residential and semi-rural habitats that can provide roosting and foraging opportunities.
- 4.3 No statutory designated nature conservation sites occur within 2 km of the survey area. The proposed works are limited in scale and confined to the existing developed footprint, and therefore no impacts to designated sites or surrounding habitats are anticipated.
- 4.4 The site lies within the consultation zone for the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) and within the 4 km Core Area for greater horseshoe bats, situated approximately 1 km west of a Core Roost. However, the site is located within a built-up residential setting and the proposed extension will not affect any sensitive landscape features such as hedgerows, mature trees, or watercourses that could function as commuting or foraging routes. Furthermore, the building was not identified as suitable for horseshoe bats.
- 4.5 Given the site's developed context and the limited scale of the proposals, the works are not anticipated to result in adverse effects on the SAC or the nearby Core Roost, provided that sensitive lighting practices are maintained and unnecessary illumination of surrounding habitats is avoided (see Section 4.14: Lighting and Construction Safeguards).

- 4.6 The local environment provides a network of habitats that are highly suitable for sustaining bat populations. Mature trees, garden vegetation, and well-connected hedgerows in nearby residential areas serve as valuable commuting and foraging corridors. In addition, surrounding areas of deciduous woodland are likely to support abundant invertebrate prey and offer sheltered foraging conditions. The inclusion of ancient and semi-natural woodland increases the ecological value of the wider area, supplying veteran trees that may provide stable roosting features. Other habitat types in the vicinity — including wood-pasture, parkland, traditional orchards, and unimproved grassland — further contribute to habitat diversity and enhance the potential for bats to use the landscape.
- 4.7 Bat species exhibit differing ecological requirements and roosting behaviours, but the occupation of buildings typically follows a seasonal pattern. Female bats tend to establish maternity colonies in spring, dispersing into surrounding woodland once juveniles are volant and independent later in the summer. Solitary males, by contrast, make use of a range of small roosts for short periods during the active months. During the winter, both sexes usually seek out hibernation sites such as underground structures or tree cavities, often returning to established roosts in the following year.

Building Assessment

- 4.8 The dwelling was subject to a detailed internal and external inspection to assess its suitability to support roosting bats. The building was found to be generally well maintained and largely sealed, with no significant crevices, lifted roof tiles, or open roof voids that would typically offer suitable roosting opportunities. The main loft void appeared well sealed, with intact timber boarding beneath the tiles and no areas of daylight ingress or draughts noted. No bat droppings, feeding remains, staining, or other evidence of bat occupation was recorded internally or externally during the survey.
- 4.9 However, several small external Potential Roosting Features (PRFs) were identified at the eaves within the area likely to be affected by the proposed works. These comprised narrow gaps between the wall top and roof covering and gaps around exposed rafter tails, along the south facing elevation of the building and similar features at the eaves of the mono-pitched WC extension. Such features offer limited opportunities for crevice-dwelling species, such as pipistrelles, and may also provide potential entry points for void-dwelling species, such as brown long-eared bats. In addition, the client reported a historical observation of bats accessing the WC roof, although this was not supported by any physical evidence during the survey.

- 4.10 The proposals are for an extension to the rear elevation, the final design of which is yet to be confirmed. It is anticipated that the works will affect the eaves along the southern elevation of the main roof and the mono-pitched WC extension, resulting in the disturbance, loss or alteration of the identified PRFs. These features currently offer limited roosting opportunities for crevice-dwelling bats and potential access points for void-dwelling species. In the absence of appropriate mitigation or licensing, the works pose a risk of disturbing, injuring, or killing bats, and of damaging or destroying their roosts, contrary to the legal protection afforded to all bat species under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended).
- 4.11 Consideration was given to the potential for hibernation within the building; however, the identified PRFs and roof space are considered unlikely to provide the stable, cool, and humid microclimatic conditions typically required by hibernating bats.
- 4.12 The ground area of the proposed extension offers negligible ecological value and provides no suitable habitat for protected or notable species. The absence of vegetation, refuges, or connectivity to surrounding habitats means the proposed works are unlikely to result in the loss of habitat or disturbance to protected species other than those considered separately within this report.

Further Survey Requirements

- 4.13 The building has been identified as holding moderate potential to support roosting bats, therefore, before works can proceed it is recommended that two dusk emergence surveys be undertaken on the building to confirm the presence or absence of bats. These surveys should be completed during the optimal survey period between May and August. One surveyor will be required to provide adequate visual coverage of the rear elevations during each survey (see Figure 3 for the proposed surveyor position). Should bats be recorded, further survey effort may be necessary, and it is likely that a European Protected Species Licence (EPSL) from Natural England will be required before works can lawfully proceed.

Lighting and Construction Safeguards

- 4.14 Artificial lighting has the potential to disrupt bat roosting, foraging, and commuting behaviour. A sensitive lighting strategy must therefore be adopted during both construction and operation, in

accordance with Bat Conservation Trust and ILP Guidance Note 08/23 (Bats and Artificial Lighting).⁶

Key measures include:

Construction Phase:

- Works must be scheduled to avoid dusk and night-time hours;
- Machinery and generators should not be left running after dark;
- Temporary lighting, if unavoidable, must be directional and fitted with hoods or shields to prevent light spill onto vegetation, trees, or potential bat flight corridors.

Operational Phase:

- All permanent external lighting should use LED luminaires with a sharp cut-off, dimming capacity, and no UV component;
- Wavelengths above 550 nm are preferred, as these are less disruptive to bats⁷;
- Lights must be positioned to avoid illumination of roost features, bat boxes, or bird boxes;
- Placement should minimise spill onto boundary vegetation, hedgerows, or commuting routes.

Nesting Birds

- 4.15 The gaps and crevices identified within the roofing materials provide a level of suitable onsite nesting opportunities, although no evidence of nesting was discovered during the building assessment. As such, impacts to nesting birds as a result of the proposals are considered to be unlikely.
- 4.16 However, if at any point nesting birds are discovered utilising the building, these may be impacted by the development proposals if appropriate mitigation is not in place. Impacts to nesting birds can be avoided by timing works outside the bird nesting season which generally runs between February-August, or by ensuring a site visit is carried out by a suitably qualified ecologist ahead of works commencing. If active nests are found, works must cease until young have fledged.

⁶ <https://theilp.org.uk/publication/guidance-note-8/23-bats-and-artificial-lighting/>

⁷ Stone, E.L. (2013) *Bats and lighting: Overview of current evidence and mitigation*

Biodiversity Enhancement

- 4.17 The proposals form part of a householder application and are therefore exempt from the statutory Biodiversity Net Gain (BNG) requirements. In addition, the works will not result in the loss or degradation of any habitats. In line with the National Planning Policy Framework (2024), however, measures to enhance site biodiversity should still be incorporated into the development.

Bats

- 4.18 Install at least one bat box, in addition to any mitigation that may be required, such as a Schwegler 1FF or 2F (or equivalent), fixed to a mature tree, pole-mounted, or positioned on the building at least 4 m above ground level, facing south-east to south-west. Boxes must avoid northerly aspects and be positioned to allow a clear flight path.

Birds

- 4.19 Fit one or more bird nest boxes (e.g. Schwegler 1B or open-fronted equivalents) to suitable trees or building walls. Boxes must be placed above 2 m, ideally 3 m, away from windows/doors and with a clear flight line. Avoid south-westerly aspects and tilt boxes slightly forward to reduce exposure to prevailing weather.

Conclusion

- 4.20 **The building is considered to hold moderate bat roosting potential. Further dusk emergence surveys are recommended** to confirm the presence or absence of bats before works can proceed. No evidence of nesting birds was recorded, and impacts to nesting birds are considered unlikely.
- 4.21 Provided that the recommended survey work is completed and if required, appropriate mitigation and licensing measures are implemented, the proposed works can proceed lawfully without causing harm to protected species. The inclusion of biodiversity enhancement measures as part of the development will ensure continued compliance with wildlife legislation and national planning policy, contributing positively to the ecological value of the site.

APPENDIX A: LEGISLATION SUMMARY

National Planning Policy Framework December 2024

The National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, 2024) states: Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and

green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 172), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

Wildlife & Countryside Act 1981 (as amended)

The Wildlife & Countryside Act 1981 (as amended) [WCA] is the primary legislation for England and Wales for the protection of flora, fauna and the countryside. Part I within the Act deals with the protection of wildlife. Most European Protected Species offences are now covered under the Conservation of Habitats and Species Regulations (see below), but some 'intentional' acts are still covered under the WCA, such as obstructing access to a bat roost.

The WCA prohibits the release to the wild of non-native animal species listed on Schedule 9 (e.g. Signal Crayfish and American Mink). It also prohibits planting in the wild of plants listed in Schedule 9 (e.g. Japanese Knotweed and *Rhododendron ponticum*) or otherwise deliberately causing them to grow in the wild. This is to prevent the release of invasive non-native species that could threaten our native wildlife.

The provisions relating to animals in the Act only apply to 'wild animals'; these are defined as those that are living wild or were living wild before being captured or killed. It does not apply to captive bred animals being held in captivity. There are 'defences' provided by the WCA. These are cases where acts that would otherwise be prohibited by the legislation are permitted, such as the incidental result of a lawful operation which could not be reasonably avoided, or actions within the living areas of a dwelling house.

Licensing

Certain prohibited actions under the Wildlife and Countryside Act may be undertaken under licence by the proper authority. For example, scientific study that requires capturing or disturbing protected animals can be allowed by obtaining a licence – e.g. bat surveys.

Conservation of Habitats and Species Regulations 2017 (as amended)

The Conservation of Habitats and Species Regulations 2017 (as amended) (which are the principal means by which the EC Habitats Directive is transposed in England and Wales) update the legislation and consolidate all the many amendments which have been made to the Regulations since they were first made in 1994. These regulations provide for the:

- protection of European Protected Species [EPS] (animals and plants listed in Annex IV Habitats Directive which are resident in the wild in Great Britain) including bats, dormice, great crested newts, and otters;
- designation and protection of domestic and European Sites - e.g. Site of Special Scientific Interest [SSSI] and Special Area of Conservation [SAC]; and
- adaptation of planning controls for the protection of such sites and species.

Public bodies (including the Local Planning Authority) have a duty to have regard to the requirements of the Habitats Directive in exercising their function – i.e. when determining a planning application. There is no defence that an act was the incidental and unavoidable result of a lawful activity.

It is possible for actions which would otherwise be an offence under the Regulations to be undertaken under licence issued by the proper authority. For example, where a European Protected Species has been identified and the development risks deliberately affecting an EPS, then a 'development licence' may be required.

Bats

In England and Wales, bats and their roosts are protected under the Conservation of Species and Habitats Regulations 2017 (as amended), and the Wildlife & Countryside Act 1981 (as amended). Taken together, this legislation makes it an offence to:

- Deliberately capture (or take), injure or kill a bat
- Intentionally or recklessly disturb a group of bats where the disturbance is likely to significantly affect the ability of the animals to survive, breed, or nurture their young or likely to significantly affect the local distribution or abundance of the species whether in a roost or not
- Damage or destroy the breeding or resting place of a bat
- Possess a bat (alive or dead) or any part of a bat
- Intentionally or recklessly obstruct access to a bat roost
- Sell (or offer for sale) or exchange bats (alive or dead) or parts of bats

A roost is defined as being 'any structure or place that is used for shelter or protection', and since bats regularly move roost site throughout the year, a roost retains such designation whether or not bats are present at the time.

Birds

All common wild birds are protected under The Wildlife and Countryside Act 1981 (and as amended). Under this legislation it is an offence to:

- Kill, injure or take any wild bird
- Take, damage or destroy the nest of any wild bird while it is in use or being built
- Take or destroy the egg of any wild bird

Certain rare breeding birds are listed on Schedule 1 of The Wildlife and Countryside Act 1981 (and as amended). Under this legislation they are afforded the same protection as common wild birds and are

also protected against disturbance whilst building a nest or on or near a nest containing eggs/unfledged young.

APPENDIX B: MAPS

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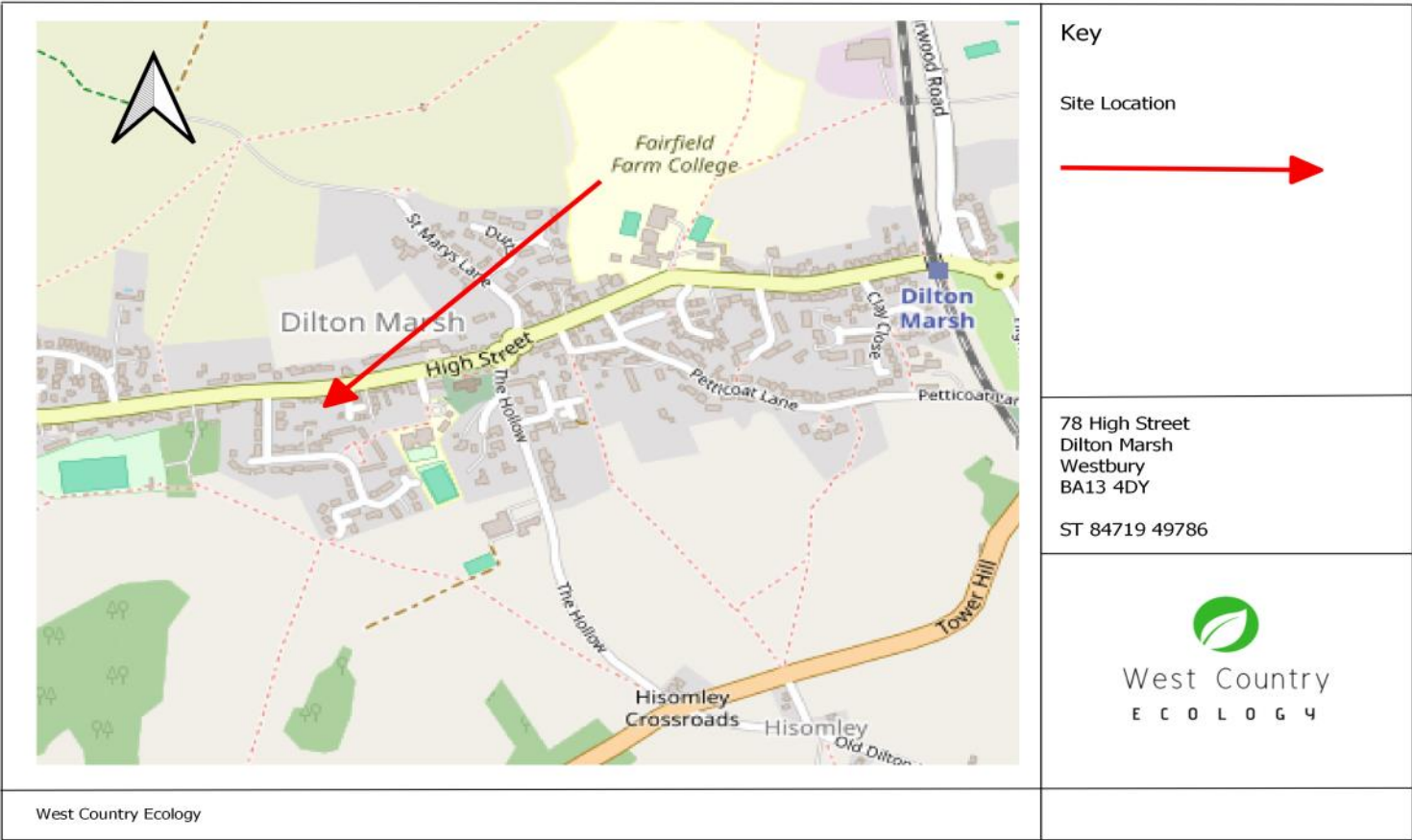


Figure 1: Site location map

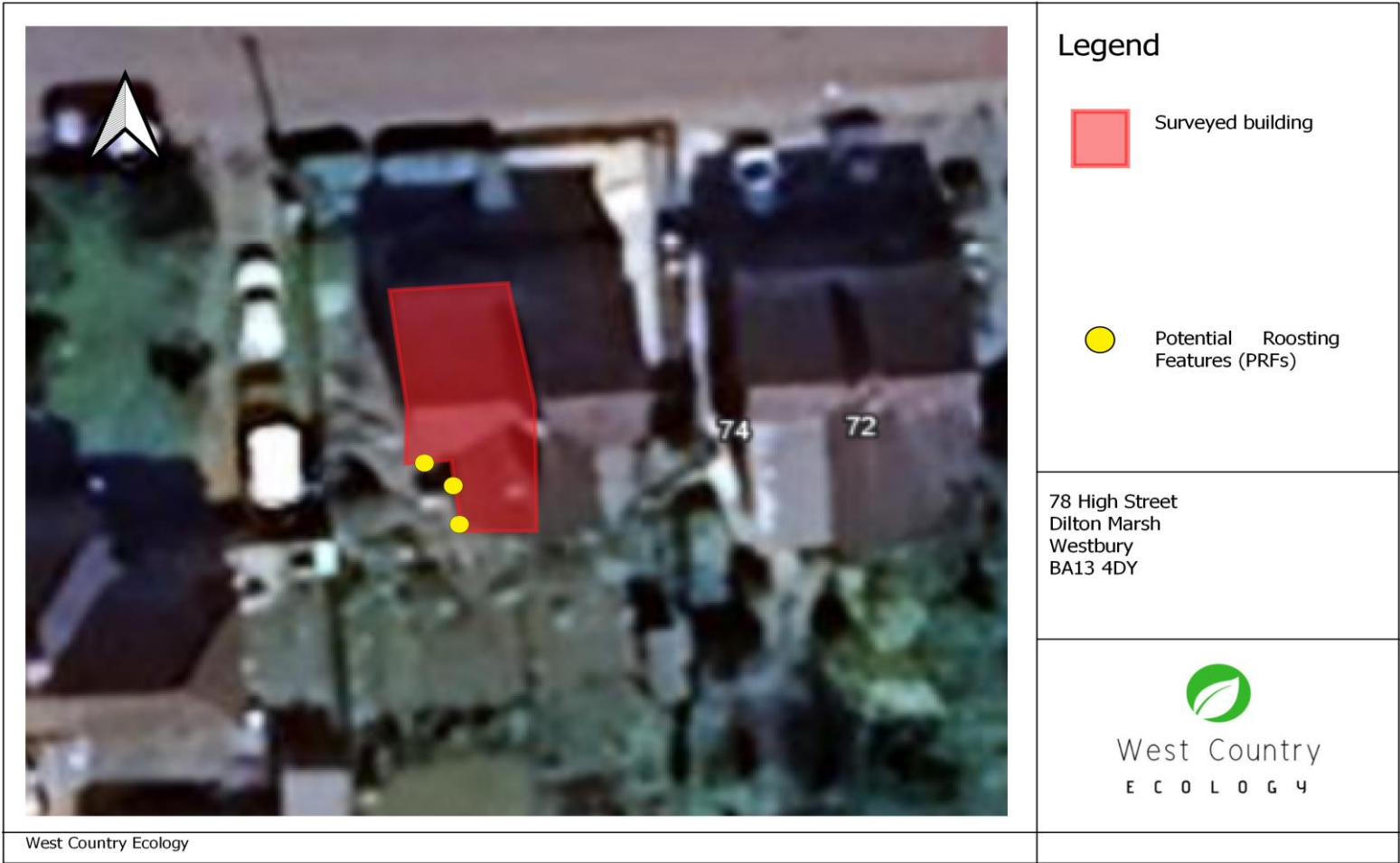


Figure 2: Site Map

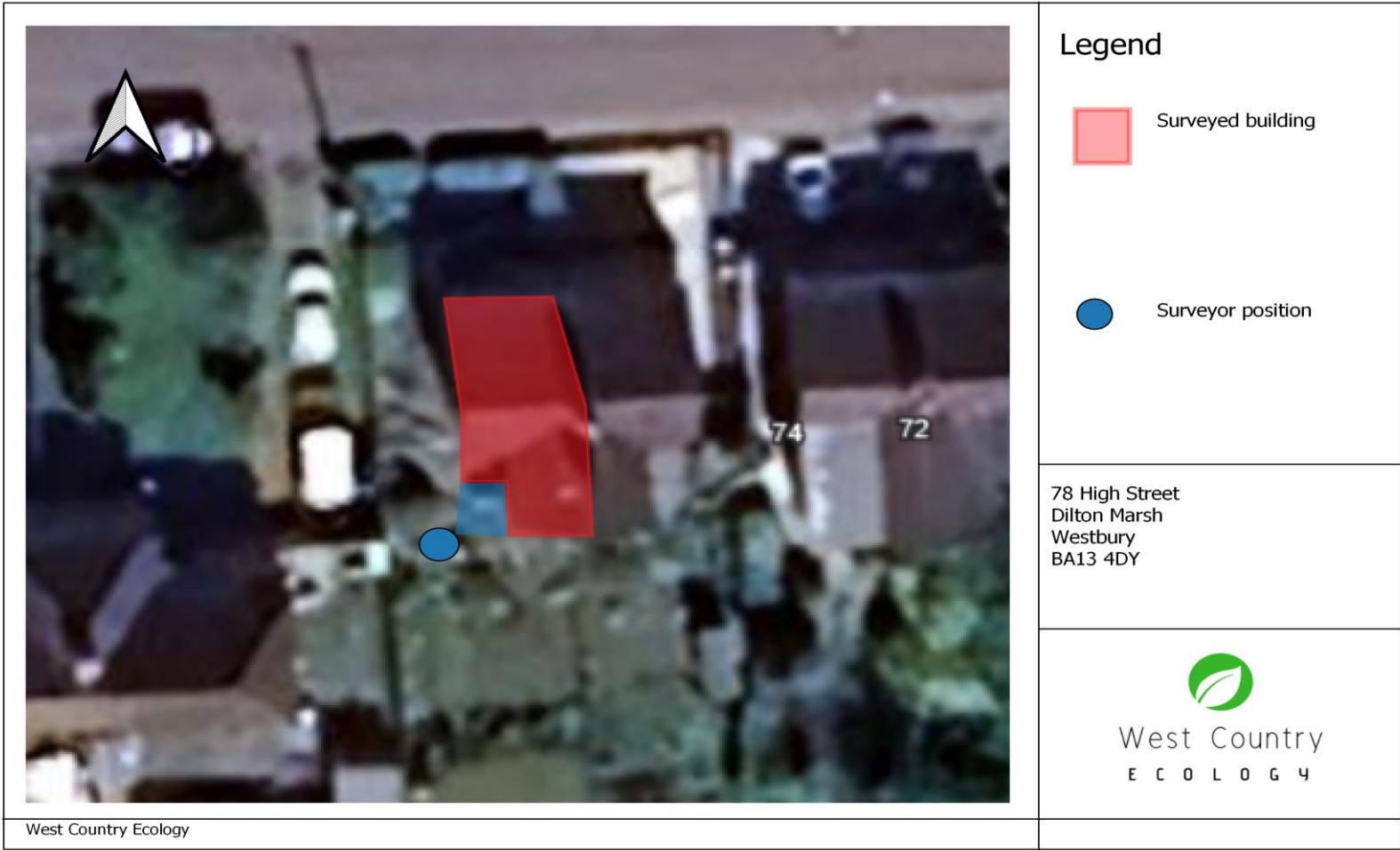


Figure 3: Proposed Survey Position

APPENDIX C: SITE IMAGES



Photo 1: View of the building from the south-west.



Photo 2: Well fitted concrete interlocking tiles.



Photo 3: View of the eaves along the southern elevations.



Photo 4: Loose brickwork around exposed rafter tail.



Photo 5: Gap between the wall top and roof.



Photo 6: An internal view of the loft void.



Photo 7: Wooden boarding beneath tiles.



Photo 8: View of the WC building which adjoins southern elevation.



Photo 9: Gap between roof tile and wall of WC building.



Photo 10: An internal view of the WC building showing boarded ceiling.



Photo 11: A view of the adjacent residential garden.