

End Farm Marston, Wiltshire

Proposed Agricultural Building Conversion into Residential Accommodation

Preliminary Bat Roost Assessment and BNG Applicability Assessment

Version 2 dated 29th April 2026

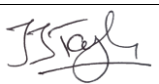
Report for:
Mr William Warden
End Farm
Plough Lane
Marston
Devizes
SN10 5SR
Project reference:
2026/5790

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Quality Management			
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v1	13/4/2026	Jonathan Taylor	Initial Issue
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1. Introduction

1.1 Background

- 1.1.1 J Taylor Ecology Consulting was commissioned by Mr William Warden to conduct a Preliminary Bat Roost Assessment (PRA) on an existing agricultural building at End Farm, Plough Lane, Marston, Devizes SN10 5SR (Grid reference ST 9701 5695).
- 1.1.2 The PRA was required in conjunction with submission of a Q Class conversion application to Wiltshire Council for the conversion of the existing agricultural building into accommodation. The plans comprise of two semi-detached dwellings with three bedrooms, with individual gardens to the rear. As a Q Class conversion, the frame of the existing structure will remain and therefore the footprint of the new living accommodation proposed is identical to that of the existing building.
- 1.1.3 In addition, through Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), Biodiversity Net Gain (BNG) is now mandatory with developers required to achieve a BNG of 10%. The legislation includes a number of exemptions, and hence the applicability of the BNG requirements in relation to the current proposals is assessed.

1.2 Building Location and Context

- 1.2.1 The existing agricultural building (photograph 1) considered in this report was situated within End Farm located off Plough Lane in the north-eastern edge of the village of Marston, located approximately 5.7 km south-west from the centre of Devizes. The site lays within the civil parish of Marston, and was part of Wiltshire, a local government ceremonial county.

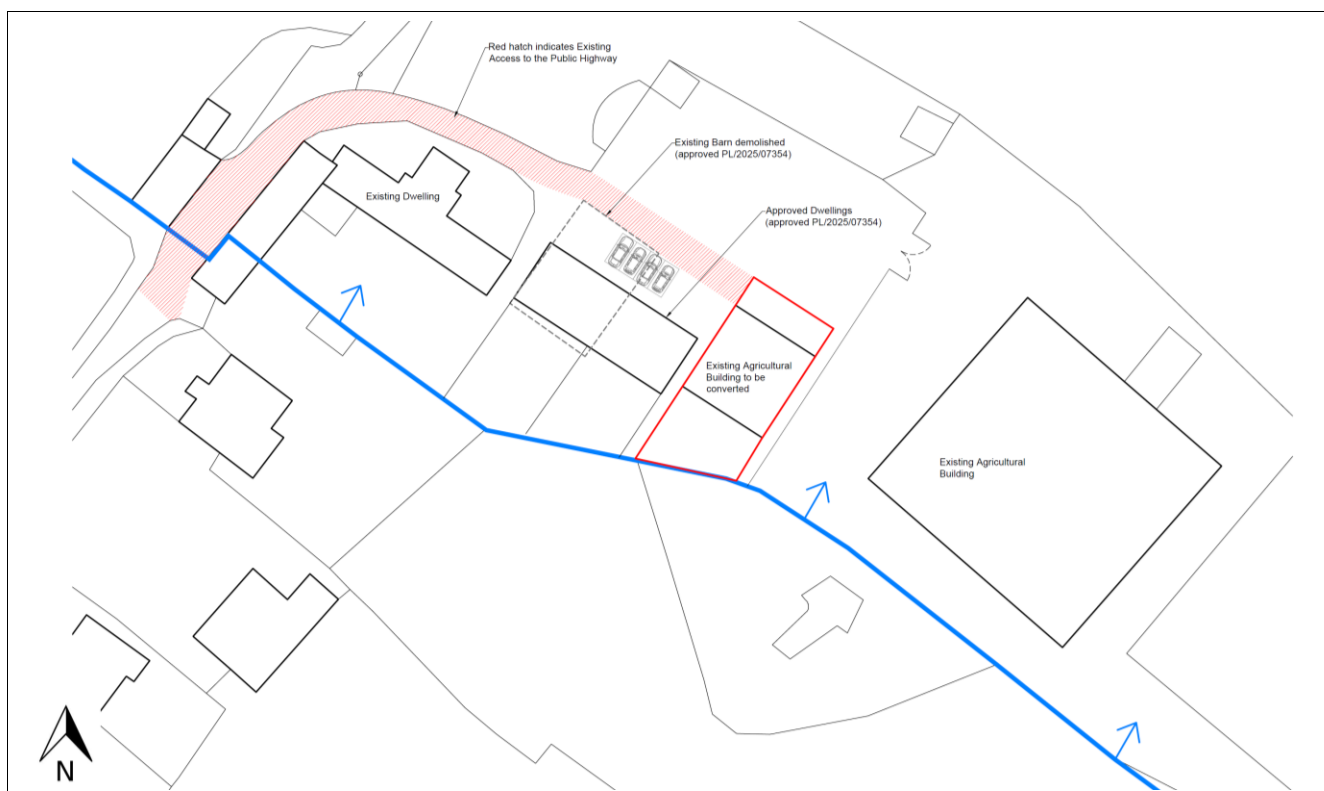


Figure 1. Location Plan, with the site highlighted in red, and ownership boundary in blue.

- 1.2.2 The existing structure comprised of an agricultural building. A metal frame supported the building, which was clad on the side elevations with corrugated metal cladding panels. At the front south western elevation the gable elevation had been partly enclosed with corrugated cement fibre corrugated panels, narrowing the entrance. Around the base of the building inside the cladding was a low concrete block wall, approximately 1.6m and 0.7m high, which ran around the interior of the building. No door was present, and the building was open.
- 1.2.3 Glazed windows were present on the north western and south eastern elevation, which were covered with metal bars. The roof was formed from corrugated cement fibre sheeting, with integral fibreglass roof lights. At the time of the visit, the interior contained stand alone animal stalls, along both lengths of the building. A small store room was present in south eastern corner of the building.
- 1.2.4 Immediately surrounding the building was hardstanding, along with additional agricultural buildings. Beyond the ownership boundary was areas of permanent pasture, mature trees and woodland blocks.



Photograph 1. The agricultural building subject to survey, viewed looking north.

1.3 Pre-Existing Information

- 1.3.1 No previously identified ecological or bat survey information has been identified associated with building.
- 1.3.2 An additional agricultural building on site immediately to the south was subject to a PRA over two visits on 13th March 2024 and 17th April 2024. The building was found to offer negligible bat roosting potential, and no bats or evidence of bats were identified on site. The subsequent planning application (PL/2025/07354) for the conversion of the building with Class Q permission into 2 dwellings with associated hard and soft landscaping and storm and foul water drainage, was granted on 15th December 2025.

1.4 Personnel

- 1.4.1 The field survey and subsequent assessment was conducted by Principal Ecologist Jonathan Taylor BEng (Hons) PGCert MSc MCIEEM. Jonathan has over 25 years' experience as a professional ecologist and is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM). He holds a Natural England Class Licence for bats (2019-39970-CLS-CLS) and frequently designs and implements mitigation under European Protected Species Development Licenses.
- 1.4.2 Jonathan adheres to the Institute's Code of Professional Conduct and professional ethics and maintains a standard of knowledge and experience in accordance with the CIEEM Continuing Professional Development Policy.

1.5 Purpose

- 1.5.1 The purpose of the PRA was to identify the potential presence of bat roosts and/or bat activity associated with the agricultural building. This was to enable an assessment to be made of the likely impact that the proposed work would have on any bat species that may be present and to determine the need for any further survey work. In addition, the value of the surrounding habitats for roosting, commuting and foraging bats was also assessed. Any associated potential ecological constraints relating to bats were then identified, with appropriate mitigation measures and opportunities for ecological enhancement identified.

1.6 Documentation

- 1.6.1 The following documentation has been provided by the client and has been used in this report.

Date	Document Title
20/02/2026	PLAN, EXISTING BLOCK PLAN, GROUND FLOOR PLAN, SECTION AND ELEVATIONS. Drawing Ref: 4143-05
27/02/2026	PROPOSED BLOCK PLAN, FLOOR PLANS AND SECTION. Drawing Ref: 4143-06

2. Legislative and Planning Context ¹

2.1 Legislation Overview

- 2.1.1 All seventeen species of bat, their roosts and resting places are protected in the UK under Schedules 5 & 6 of the Wildlife and Countryside Act 1981 (as amended), and the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) 2019. The relevant sections of this legislation make it an offence to intentionally kill, injure or take a bat; to intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by a bat; and to intentionally or recklessly disturb a bat while it is occupying a structure or place, which it uses for that purpose. Offences under this legislation carry a maximum penalty of imprisonment for up to six months and/or a fine not exceeding Level 5 on the standard scale (currently up to £5000), or both.
- 2.1.2 Causing ‘damage’ to a roost, even when the animal is not present, is an absolute offence, with no defences available in law. Disturbance however is only considered an offence when caused intentionally or recklessly. A person would be acting recklessly if they could reasonably have been expected to foresee that an operation could cause disturbance or harm to a protected species but took no action to assess the risk and consider what to do about it.

2.2 European Protected Species (Bats) and Planning

- 2.2.1 Obligations are imposed on local planning authorities and applicants by the Conservation of Habitats and Species Regulations (Habitat Directive), which were most recently consolidated with minor amendments into The Conservation of Habitats and Species Regulations (Amendment) (EU Exit) 2019. The extent of these obligations was considered by the Supreme Court in *R. (Morge) v Hampshire CC* [2011] Env. L.R. 19 and in a number of subsequent decisions. The 2019 Regulations provide, in Regulation 9(3), that “a competent authority, in exercising any of their functions, must have regard to the requirements of the [Habitats Directive] so far as they may be affected by the exercise of those functions”. The Supreme Court held that the duty of the local planning authority is limited to that set out in Regulation 9(5). It is the function of Natural England, and not of the planning authority, to enforce compliance with the Directive, by prosecuting those who had committed offences.
- 2.2.2 The duty of a local planning authority under reg. 9(5) is simply “to have regard to the requirements of the directives so far as they may be affected by the exercise of those functions.” As such, there is no need for a planning committee to carry out its own shadow assessment as to whether there would be a breach of Article 12(1) of the Directive, or whether derogation from that Article would be permitted and a licence granted. Instead, planning permission should ordinarily be granted save only in cases where the planning committee conclude that the proposed development would both be likely to offend article 12(1) and be unlikely to be licensed pursuant to the derogation powers.
- 2.2.3 Additionally, all Local Planning Authorities are obliged under Section 40(1) of the Natural Environment and Rural Communities (NERC) Act 2006 to conserve biodiversity and hence are required to consider the potential ecological impacts of development proposals on habitats and species prior to granting of a planning application. This obligation is implemented through the National Planning Policy Framework 2023 (NPPF) and locally within the Wiltshire Core Strategy (adopted in 2015), which requires the protection of features of nature conservation, or demonstration that ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource.
- 2.2.4 The Wiltshire Biodiversity Action Plan (BAP) contains a bat-specific Species Action Plan with targets to ensure that planning applications affecting bats and bat roosts are consistently dealt with across development control teams.

¹ Please note that this legal information is a summary and intended for general guidance only. In all cases, the original legal documents should be consulted for definitive information. Further information related to the protection afforded to specific species is provided in the Appendix.

3. Methodology

3.1 Survey Design

- 3.1.1 Survey methods followed best practice guidelines, interpreted using professional experience. The Bat Conservation Trust's fourth edition of Bat Surveys for Professional Ecologists - Good Practice Guidelines (Collins, J. [ed.] 2023) is the main source of guidance for bat surveys in the UK. The Bat Workers Manual (Mitchell-Jones, A.J. & McLeish, A.P. (eds.), 2010) provides further guidance that has been considered when designing the survey method.
- 3.1.2 The ecological appraisal process is as defined within the Guidelines for Preliminary Ecological Appraisal (CIEEM 2017). The desk study was conducted in line with CIEEM's UK Guidelines for Accessing and Using Biodiversity Data (CIEEM, 2016).

3.2 Desk study

- 3.2.1 A desk study was undertaken as part of the initial PRA to identify the presence of any statutory or non-statutory designated wildlife sites and records of bat species within the 2km study area.
- Basic initial information about the site and surrounding area and contextual information about the setting of the site within the landscape was obtained using QGIS v3.16 (Hannover), which is a desktop geographic information system (GIS). Up to date Natural England GIS Digital Boundary Datasets of UK and European designated wildlife sites were imported as Shape files under an Open Government Licence (OGL) and viewed on QGIS to identify their location and extent in relation to the site (<https://data.gov.uk/>).
 - Information on the location and extent of non-statutory protected wildlife sites was also obtained from the Wiltshire Council Core Strategy.
 - Bat records were obtained for 2km search area from Wiltshire and Swindon Biological Records Centre. A search was also undertaken to identify previously granted European Protected Species Mitigation (EPSM) licences for bats, using information published by Natural England, although it should be noted that the most recent update was 5th August 2025.
 - All records were viewed on QGIS to identify their location and distribution in relation to the site.
- 3.2.2 Whilst the desk study is invaluable in identifying past records and nature conservation designations, it is not likely to be exhaustive and is intended mainly to set a context for the study.

3.3 Field Survey

- 3.3.1 The PRA, which was conducted on 13th February 2026, consisted of a non-invasive, systematic visual inspection of the external elevations and interior of the building, together with an assessment of the quality of the surrounding environment for bats. The building was examined for signs that would indicate the presence of bats or the presence of Potential Roost Features (PRFs), that could be used by roosting bats, including:
- Bat droppings. These are found both externally in sheltered areas such as windowsills, underneath roost entrances and/or internally within a roof space.
 - Piles of insect remains such as butterfly or moth wings, indicative of regular feeding locations.
 - Staining at roost entrances or within the roost. Often urine and oil from fur can leave stains when bats are gathered for long periods.
 - Live bats, or the remains of deceased bats.
- 3.3.2 Buildings may offer potential roosting sites in several locations.
- Gaps and cracks in brick and/or block work, which provide access to a wall cavity or crevice.
 - At the eaves behind wooden barge boards and soffits. uPVC does not tend to be used by bats given the slippery surface.
 - At the top apex of gable elevations on pitched roofed buildings, where access is typically gained through gaps in the brickwork, often behind barge boards or end tiles.
 - Under lead flashing, roof and ridge tiles.
 - Within an enclosed roof space. Roof void dwelling species of bats will typically enter the roof space and gather around the ridge beam or at gable ends.
- 3.3.3 The appraisal was undertaken sensitively and, in a manner to ensure that should bats be present, no disturbance would occur. The exterior and interior roof voids of the assets were examined consecutively, so that any external features identified could be inspected internally.

- 3.3.4 A standard variable output LED torch was used both externally and internally to search for PRF's or any evidence of use by bats. Where bat (including suspected bat) droppings were found either internally or externally, these were collected with gloved hands into a sample container and labelled.

3.4 Evaluation

- 3.4.1 The assessment of the quality of the surrounding environment for bats was based on the likely levels of artificial lighting around potential roost entrances, the expected levels of disturbance to any potential roosts from nearby activities, and the quality of habitat for roosting bats in the immediate area, focussing on the potential bat foraging habitats and/or commuting routes in accordance with the following categories.

- **High quality** - the exterior of the structure is expected to be unlit by artificial lighting, and there is continuous habitat within 30m that is well connected to the wider landscape and is likely to be used regularly by commuting and/or foraging bats (e.g. broadleaved woodland, intact or species-rich hedgerows, vegetated streams and water bodies, or other habitats likely to be rich in invertebrate prey);
- **Moderate quality** - the exterior of the structure is unlit by artificial lighting on at least one aspect, and there is continuous habitat within 100m that is connected to the wider landscape that could be used by bats for foraging and commuting; and
- **Low quality** - the exterior of the structure may be lit by artificial lighting on all aspects, and/or it is isolated, with the surrounding habitat suitable only for use by small numbers of commuting and/or foraging bats (any moderate or high quality habitat within 100m is separated from the structure by a barrier, such as medium to high levels of artificial lighting).

- 3.4.2 An evaluation of the likelihood of bat presence was then undertaken and summarised using the following potential suitability criteria (adapted from Collins J. [ed.] 2023).

- **None** – no habitat features on site likely to be used by any roosting, commuting or foraging bats at any time of the year.
- **Negligible** – while presence cannot be absolutely discounted, no obvious habitat features on site likely to be used by roosting, commuting or foraging bats. A small element of uncertainty remains in order to account for non-standard bat behaviour.
- **Low** – on-site habitat of poor quality and isolated but could be used by a small number of foraging bats. The structure has one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger number of bats.
- **Moderate** – on-site habitat is continuous and connected to the wider landscape that could be used by foraging and commuting bats. The structure has one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but are unlikely to support a roost of high conservation status.
- **High** – on-site habitat is continuous, high quality and connected to the wider landscape that is likely to be used regularly by foraging and commuting bats. The structure has one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. They have the potential to support high conservation status roosts.
- **Confirmed Roost** - In addition to one of the above grading assessments, presence is confirmed from the current survey or by recent records.

- 3.4.3 The likelihood of use is then used to inform the requirement for any further surveys, needed where the likelihood of bat presence is greater than negligible.

3.5 Limitations

- 3.5.1 It should be acknowledged that bats are highly mobile and may move between different roost sites throughout the year. In addition, new features such as cracks, crevices or openings may appear at any time. Hence the results of this survey are valid only at the time the survey was conducted. Furthermore, building inspections may not consistently reveal evidence of bat activity, as droppings and other field indicators can rapidly deteriorate under adverse weather conditions.

- 3.5.2 Bat records obtained from the Wiltshire and Swindon Biological Records Centre were commissioned in 2024 as part of previous survey work undertaken at the site. An updated data search has not been requested for the current assessment, as the costs associated with obtaining updated records are considered disproportionate to the limited scope of the proposed works. It is considered unlikely that any additional bat records generated between 2024 and 2026 would materially alter the findings or conclusions of the current survey.

- 3.5.3 The entire site was accessible and no constraints to the survey within the site boundary were experienced. The weather conditions were satisfactory at the time of the survey, and hence not considered to pose a constraint to the appraisal.

4. Survey Results

4.1 Desk Study

- 4.1.1 Based on the records provided by Wiltshire & Swindon Biological Records Centre (2024), bats were known to be widespread across Marston and the neighbouring villages, with at least six species recorded within the 2km study area. A total of forty-seven records were provided, dating from 1978 to 2019, comprising records of brown long-eared (*Plecotus auritus*), common pipistrelle (*Pipistrellus pipistrellus*), noctule (*Nyctalus noctula*), serotine (*Eptesicus serotinus*), soprano pipistrelle (*Pipistrellus pygmaeus*) and western barbastelle (*Barbastella barbastellus*) bats.

Species	Record Details
<i>Chiroptera</i> Bat species	7 records, closest 822m NE, Worton
<i>Eptesicus serotinus</i> Serotine	3 records, closest 446m NW, Marston
<i>Nyctalus noctula</i> Noctule bat	1 record 446m NW, Marston
<i>Pipistrellus</i> Pipistrelle bat species	3 records, closest 21m N, Marston (maternity roost, 2002)
<i>Pipistrellus pipistrellus</i> Common pipistrelle	11 records, closest 446m NW, Marston
<i>Pipistrellus pygmaeus</i> Soprano pipistrelle	4 records, closest 21m N, Marston (maternity roost, 2008)
<i>Plecotus auritus</i> Brown long-eared	17 records, closest 1569m W, location withheld (roost, 2004)
<i>Barbastella barbastellus</i> Western barbastelle	1 record 446m NW, Marston

- 4.1.2 Three European Protected Species Mitigation (EPSM) licences were identified within a 2km radius of the site. No new EPSM licences were identified as part of the update.

Licence reference	Species	Roost type	Distance from site
2017-29350-EPS-MIT	Brandt's, common pipistrelle, whiskered	Resting place	145m NNW
2019-40255-EPS-MIT	Brown long-eared, common & soprano pipistrelle, serotine	Resting place	425m WSW
2016-22924-EPS-MIT	Brown long-eared, common pipistrelle	Resting place	1998m N

Statutory and Non-Statutory Protected Sites

- 4.1.3 Statutory sites are those protected under primary legislation and include Sites of Special Scientific Interest (SSSI), Special Protection Areas (SPA), Special Areas of Conservation (SAC), Ramsar Sites and National and Local Nature Reserves (NNR and LNR). Non-statutory designated wildlife sites, known as County Wildlife Sites (CWS) in Wiltshire, are protected through the planning system.
- 4.1.4 The selection is based on the presence of important habitats or if they contain legally protected species or species that are rare and/or important within the county. Hence the proximity of these site indicates the presence of habitat that may be used by bat species. The following sites were identified within a 2km radius:

Site	Designation	Location (closest point)	Grid Reference (central)
Chervell Woods	CWS	1160m SE	ST 97418 55806

- 4.1.5 With the site being within Wiltshire, the proximity to the sites within the Trowbridge Bat Mitigation Strategy, which links to the Bath and Bradford on Avon Bats SAC, was considered. The woodlands to the east of Trowbridge town centre were more than 8km from the site, and as such they were not considered to be within the zone of impact.

4.2 Field Survey Results

4.2.1 The PRA survey and nesting bird appraisal was conducted on 13th February 2026, during fine and dry weather conditions. All external elevations were accessible and could be inspected from ground level, with the pitched roof viewed from the ground level with high powered binoculars. An internal inspection for the presence of evidence of use by bats was also undertaken.

External Inspection

4.2.2 The existing agricultural building was a large structure, supplied by Mole Valley Farmers of South Molton in Devon. The external walls were inspected, which were clad on the end and side elevations with corrugated metal cladding panels (photograph 2). The cladding was single thickness painted sheet steel, with a single sheet running vertically from the ground to the eaves. No potential roost features (PRFs) were found, with thin sheet steel not generally utilised by bats, given the wide variation in temperature and the slippery surface.

4.2.3 At the front south western gable elevation the original corrugated metal cladding had been extended on either side with corrugated cement fibre sheets, to partly enclose the open entrance to the building (photograph 3). The sheeting was again single thickness, and run under the metal sheeting above. Whilst this created an overlap, it was limited in size and opened directly into the interior of the building, lacking any enclosed crevices (photograph 4). Inspections of these areas with a high-powered torch did not identify any bats or bat evidence, such as urine staining.



Photograph 2. Steel corrugated panels.



Photograph 3. The front south western elevation.

4.2.4 At the base of the front elevation of the building there was some damage to the corrugated cement fibre sheeting. This was inspected and considered not to provide any opportunities for bats, given the damage opened directly into the interior of the building, with no associated PRFs.

4.2.5 Along both side elevations a timber fascia board was fixed to the top of the external walls, which supported the guttering system (photograph 5). The board was fixed to the higher corrugation, resulting in a gap between the lower corrugation and the back of the board. However, the gap was wide and shallow, and given it would require bats to grip and be against sheet steel, it was not considered suitable, and no evidence of use was found.



Photograph 4. Overlap of panel type on the front elevation.



Photograph 5. Wooden fascia supporting the guttering.

- 4.2.6 Glazed windows were present on the north western and south eastern elevation, which were covered with metal bars (photograph 6). The windows were glazed with polycarbonate and one on the south eastern elevation was broken. The large entrance on the front south western elevation was permanently open, with doors or roller shutters absent (photograph 7).
- 4.2.7 The roof consisted of a large sloping structure clad in corrugated metal sheeting and incorporates several clear fibreglass rooflights. Central ridge vents were present, moulded from cement fibre. At both gable ends was a cement fibre verge. Again it was fixed to the high corrugated sections of the metal sheeting resulting in a gap, which was again not considered a suitable PRF.



Photograph 6. Windows on the south east elevation.



Photograph 7. Permanently open access to the building.

Internal Inspection

- 4.2.8 Internally, the building contained a large open area with free standing livestock stalls installed along the two long internal walls (photograph 8). A cast concrete floor was present. The internal structural steel frame was visible, as was the low block wall around the inside of the building. The internal roof structure was supported by timber purlins, with the underside of the single thickness corrugated cement fibre sheeting seen (photograph 9).
- 4.2.9 A thorough inspection of all accessible features and areas of the building was undertaken, with all horizontal and vertical surfaces inspected for evidence of bats, such as droppings, staining, feeding remains. No bats were observed and no evidence of bat roosting was identified.



Photograph 8. Internally view with moveable livestock stalls.



Photograph 9. The building had no internal roof void.

- 4.2.10 It was noted that the building was internally well lit, due to the permanently open front, uncovered windows and rooflights. Bats need a dark place to roost, and together with a lack of enclosed crevice features inside the building, this significantly lowers the likelihood of use. The building was also observed to be draughty, particularly given the permanently open door, which leads to rapid variations in temperature and humidity, further lowering the likelihood of use by bats during all stages of their lifecycle, as a stable temperature is unlikely to be maintained for both summer and winter use. The building was also subject to regular day and night time use.
- 4.2.11 The adjacent horse walker comprised of an open structure constructed from steel framing, and hence there was no suitable features for use by roosting bats.

4.3 Wider Area

- 4.3.1 With regards to the wider area, the immediate surroundings comprised of hardstanding a single dwelling, along with further agricultural buildings in the wider yard, along with permanent pasture, mature trees, a large pond and woodland blocks.
- 4.3.2 Further afield, Marston is a rural village surrounded by permanent pasture, arable field, mature hedgerow and woodland. The structural diversity of the local area provided an area with high suitability for foraging and commuting bats. In addition, the species records and previous EPSM licences indicate that bats are present in the area surrounding the site. It is highly likely that bats will utilise the site as part of their wider network. Therefore, indirect impacts could occur if the habitats are illuminated by new lighting associated with the proposed works.

5. Evaluation and Requirements

5.1 Evaluation

- 5.1.1 The results of the updated PRA concluded that the agricultural building was considered to have **negligible likelihood of supporting roosting bats**, assessed according to the criteria (Collins, J. [ed.] (2023), Section 3.4). No suitable PRF's were identified, either externally or internally, and there were no signs of use. The open, permanently lit and draughty nature of the building with a permanently open front and single-skinned construction without and enclosed rood void means the internal conditions would not be stable, greatly limiting the suitability for bats.
- 5.1.2 However, the building was located within suitable bat foraging habitat, with areas of permanent pasture immediately to the south connected to the wider area by mature trees and hedgerows. The records identified known roosts of soprano pipistrelle, common pipistrelle, Brandts (*Myotis brandti*) and whiskered (*Myotis mystacinus*) bats within 150m of the site (though exact locations have been withheld due to the sensitivity of the records). As such, it is highly likely that bats will commute and forage past the site, and as such it was concluded that the immediate surrounding habitat was of moderate value for foraging and commuting bats.
- 5.1.3 The legislation protecting bats is particularly strict, being protected under both UK and European legislation (see introduction). In addition, all bat species are listed under Section 41 (in England) of the Natural Environment and Rural Communities Act 2006 as species of Principal Importance, which are those which the Government expects to be considered in planning applications. These are the species found in England which have been identified as requiring conservation action.
- 5.1.4 Given the desk study confirmed that bats are known to be present in the wider area, in the absence of mitigation there is the potential for low level of disturbance to occur, particularly from the use of excessive artificial light. Artificial lighting disrupts the normal 24-hour pattern of light and dark which is likely to affect the natural behaviour of bats, with excessive lighting having disrupting effects on bats (Bat Conservation Trust/ILP, 2023).

5.2 Further Survey Requirements

- 5.2.1 Since the agricultural building has been classified as having negligible suitability for roosting bats and there will be no direct impact to the surrounding habitats, in accordance with the recognised guidance (Collins, J. [ed.] (2023)), no further survey effort regarding roosting bats is considered necessary, subject to the following mitigation relating to lighting being adhered to.

5.3 Mitigation

- 5.3.1 As a precautionary measure, the following mitigation strategy aims to minimise the potential for disturbance to any bats that may roost nearby and use the site for foraging or commuting.
- To minimise any disturbance to foraging or commuting bats, works should only be undertaken in daylight hours (between sunrise and sunset) between March and October inclusive.
 - Should temporary artificial lighting be required outside of this time, it must be the minimum required to safely carry out the task, with the luminaires directed downwards and switched off when not in direct use (see below).
- 5.3.2 If individual bats are discovered unexpectedly, including during periods of adverse weather, then the following steps must be taken:
- Works will stop immediately. If an ecologist is not on site, they must be contacted immediately for advice. The bat must not be exposed or be encouraged to fly out of the roost on its own accord.
 - Bats can only be handled by licenced ecologists unless they are in immediate danger.
- 5.3.3 Any underweight or injured bats will be taken into temporary care by an experienced bat carer and looked after until such time that the bat can be transferred to a suitable replacement roost at the same site, or weather conditions are suitable for release at the same site.

5.4 Artificial Lighting

- 5.4.1 Evidence suggests that artificial lighting can cause disruption to bats, causing them to avoid or move away from suitable foraging and commuting routes (Bat Conservation Trust/ILP 2023), incurring an additional energetic burden and potentially limiting their access to their preferred foraging habitat.
- 5.4.2 Although no lighting is currently proposed as part of the proposals, a lighting strategy is recommended ensure that no impacts to foraging and commuting bats, during both the construction phase and the occupation phase. Artificial lighting is commonly installed on newly converted buildings. It will be necessary to minimise the use of artificial exterior lighting in the area of the proposed dwelling(s) to ensure that the existing foraging and commuting areas are maintained where possible. There must be no increase to the existing lighting installed, especially on the southern elevations.

- 5.4.3 If any lighting is required, they should comprise energy efficient directional luminaires, of low colour temperature (3k or less), that allows the light to be directed solely downwards to where it is needed, avoiding any upwards light that could impact foraging and commuting bats. The lighting should be on motion activated sensors, but set at a level that ensures they are not triggered by passing bats.
- 5.4.4 Any safety related lighting installed must be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Reduction of Obtrusive Light (GN 01/21). All lighting must be designed and installed in accordance with the Bat Conservation Trust and Institution of Lighting Professionals guidance on bats and artificial lighting (Bat Conservation Trust/ILP 2023).

5.5 Bat PRA Validity

- 5.5.1 Owing to the highly mobile nature of bats, and the inherently unpredictable nature of their roosting habits, it is considered that this assessment will be valid for 12 months. The 12-month period is considered acceptable where the condition(s) of the building on site remain unchanged since the survey and the proposals for the site are unchanged.
- 5.5.2 The PRA only provides a 'snapshot' in time and do not account for seasonal variation, as bats may have not been identified due to seasonal constraints. Beyond this the preliminary bat roost assessment would require repeating to ensure that the findings still present an accurate account of conditions within the site and the species that use it.

5.6 Other Issues – Nesting Birds

- 5.6.1 A single old bird's nest was identified internally within the building, located on the internal steel building frame. The loss of the building may impact breeding birds directly via injury or mortality, or indirectly by resulting in the loss of nesting opportunities. However, there are other similar agricultural buildings nearby, so it is highly unlikely to result in any significant impact upon the conservation status of birds in the local area.
- 5.6.2 All nesting birds, their nests, eggs and young receive legal protection under the Wildlife and Countryside Act 1981 (as amended). Careful timing of the works would avoid direct impacts on breeding birds, and the provision of alternative nesting opportunities would prevent long term impacts.
- 5.6.3 To avoid impacts to breeding birds the following mitigation must be implemented:
- Conversion work to the agricultural building should take place outside of the breeding season (mid-March to August inclusive – although may extend longer depending on local conditions).
 - If there is no alternative to carrying out the conversion work during the bird nesting season, a thorough, careful and quiet examination of the affected area for wild nesting birds, their eggs, nests or young must be conducted before work commences. Should nesting activity be detected, all work must stop at that location, a qualified ecologist consulted.
- 5.6.4 To compensate for the loss of nesting bird opportunities, provision of alternative nesting opportunities is required. A minimum of two bird boxes suitable for a wide variety of common bird species should be erected least 2m above ground level, which should be attached to the a nearby established tree or boundary wall as appropriate. The boxes should be of woodcrete construction, such as the Schwegler 1B, 2M or 1MR Avianex box which are rot-proof and maintenance free (www.schwegler-natur.de).
- 5.6.5 Although the nest boxes can be installed at any time, it is essential that the installation of the bird boxes is programmed into the work schedule and the boxes procured and available for installation when needed. Bird boxes available in the autumn can provide much needed winter refuges for roosting birds and significantly increases the chance of them staying and nesting in the spring. Bird boxes available before the end of February generally have a high likelihood of use, provided they are in the optimum location.

6. BNG Applicability Assessment

6.1 Biodiversity Net Gain

- 6.1.1 Biodiversity net gain is an approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand. The Government's 25 Year Environment Plan sets out the aspiration to mainstream biodiversity net gain in the planning system and move towards approaches that integrate natural capital benefits.
- 6.1.2 National policy sets out that planning should provide biodiversity net gains where possible. Within the National Planning Policy Framework (December 2024), Paragraphs 187(d) and 193(d) refer to this policy requirement.
- 6.1.3 Under the Environment Act 2021, all planning permissions granted in England (with some exemptions – see below) have to deliver at least 10% biodiversity net gain, as of 12th February 2024. Biodiversity net gain is to be measured using Defra's statutory biodiversity metric and habitats will need to be secured for at least 30 years through obligations or a conservation covenant. Mandatory biodiversity net gain as set out in the Environment Act applies in England through Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).
- 6.1.4 The Biodiversity Metric is designed to provide ecologists, developers, planners and other interested parties with a means of assessing changes in biodiversity value (losses or gains) brought about by development or changes in land management. The Metric is a habitat-based approach to determining a proxy biodiversity value.

Exemption - Class Q Permitted Development

- 6.1.5 Certain types of development are exempt from the mandatory biodiversity net gain (BNG) requirements. In relation to the Class Q application to construct two new semi-detached buildings on the footprint of the existing agricultural building, developments that are granted planning permission by a development order (including permitted development rights such as Class Q) are exempt from the 10% BNG requirement.

7. References

- Bat Conservation Trust / ILP (2023). *Guidance Note 08/23 - Bats and artificial lighting at night* (2023). Bat Conservation Trust in partnership with the Institution for Lighting Professionals.
- Collins J. [ed.] (2023). *Bat Surveys for Professional Ecologists: Good Practice Guidelines*, (4th edition). The Bat Conservation Trust London.
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- Mitchell-Jones, A.J. & McLeish, A.P. [eds.] (2010). *The Bat Workers Manual* (4th edition). Joint Nature Conservancy Council.
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