
61 Upper South Wraxall

Preliminary Roost Assessment & Emergence Survey Report

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	21.06.26
Version	1.0

Quality Assurance

Prepared by	Ben Mitchell BSc (Hons) MCIEEM
On behalf of	Mr J Charles-Jones
Date	21.06.26
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 29th September 2025 and 21st March 2026 in accordance with Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th Edition (BCT, 2024).

The site comprises a four bedroom cottage (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.

Four emergence surveys (Sept 2025, May and June 2026) confirmed the presence of three distinct soprano pipistrelle (*Pipistrellus pygmaeus*) day roosts situated beneath the waney-edged timber cladding of the front-facing dormers and main entrance door.

As the proposed works will directly impact these identified roosts, a European Protected Species (EPS) Mitigation Licence from Natural England is legally required before structural works can commence to the dormers, porch or connective roof structures.

Mitigation measures required include direct supervision of roof and cladding removal by a licensed Bat Ecological Clerk of Works (ECoW), the advanced deployment of compensatory bat boxes on retained mature trees, and the integration of permanent crevice features within the new dormer architecture.

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	2
2.1	Desk Study	2
2.2	Preliminary Roost Assessment Survey	2
2.3	Emergence Surveys	2
2.3.1	Survey timing and weather conditions	1
2.3.2	Survey Personnel and Quality Assurance.....	1
2.4	Night Vision Aids (NVA)	1
2.5	Acoustic Monitoring.....	2
2.6	Roving Acoustic Monitoring	3
2.7	Media Data Analysis Protocols.....	3
2.8	Survey Limitations.....	3
3	SURVEY RESULTS	3
3.1	Desk Study	4
3.1.1	Designated Sites	4
3.2	Habitat Survey	4
3.2.1	Site Context	4
3.2.2	Habitats	6
3.2.3	Buildings and Structures.....	6
3.2.4	Building 1 – Cottage	6
3.2.5	Trees	7
3.3	Species.....	7
3.3.1	Bat Emergence Surveys.....	7
4	CONCLUSIONS	12
4.1	Further Surveys	12
4.2	Mitigation	12
4.3	Compensation.....	12
4.4	Enhancement	12
5	LEGISLATION & PLANNING POLICY	14
6	REFERENCES.....	16
6.1	Methodology and Best Practice References	16
6.2	Legislation and Policy References	16

1 INTRODUCTION

1.1 Summary of Proposals

1. 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.
2. The site is located at ST 83377 65181 and is shown in Figure 1.

1.2 Competency Statement

3. 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

4. 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.
5. 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

6. 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.
7. Planning policy requires that new developments avoid harm to wildlife, mitigate impacts where they cannot be avoided, and compensate for any remaining effects.
8. 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.

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

2 METHODOLOGY

2.1 Desk Study

10. 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

11. A PRA survey of the Site was undertaken on 29th September 2025 and 21st March 2026 by Ben Mitchell MCIEEM. The weather was dry and warm and considered ideal for both visits.
12. 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 Emergence Surveys

13. Surveys were designed and executed in accordance with Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition; Collins, 2023) and Bat Emergence Surveys with Night Vision Aids: A Technical Guide for Professional Ecologists (1st edition; BCT, 2026). The pre-survey walkover initiated exactly one hour prior to local sunset to verify potential roost features (PRFs), map predicted emergence trajectories, and deploy the static equipment array under optimal daylight conditions. Active visual and acoustic data collection initiated 30 minutes before sunset and concluded a minimum of two hours after sunset.

2.3.1 Survey timing and weather conditions

Date	Surveyor(s)	Timing Window (Sunset)	Equipment Array	Weather Conditions (Start / End)
29.09.25	Ben Mitchell	18:20 – 21:00 (18:50)	3x AudioMoth, 3x Nightfox Whisker IR	14°C, 4/8 Okta, B1, Dry / 12°C, 6/8 Okta, B1, Dry
03.05.26	Ben Mitchell	20:20 – 22:30 (20:30)	3x AudioMoth, 3x Nightfox Whisker IR, 3x Nightfox IR Flood	14°C, 6/8 Okta, B1, Dry / 11°C, 6/8 Okta, B2, Dry
28.05.26	Ben Mitchell	20:40 – 23:10 (21:11)	3x AudioMoth, 3x Nightfox Whisker IR, 3x Nightfox IR Flood	16°C, 3/8 Okta, B1, Dry / 12°C, 3/8 Okta, B1, Dry
18.06.26	Ben Mitchell	21:00 – 23:30 (21:28)	1x AudioMoth, 2x WA Minibat2, 3x Nightfox Whisker IR	16°C, 3/8 Okta, B1, Dry / 14°C, 6/8 Okta, B2, Dry

Location	Camera	Detector	Setup
A	Nightfox Whisker IR + Nightfox IR Flood Lamp	Audiomoth / Song meter Minibat2	
B	Nightfox Whisker IR + Nightfox IR Flood Lamp	Audiomoth	
C	Nightfox Whisker IR + Nightfox IR Flood Lamp	Audiomoth / Song Meter MiniBat 2	

Location	Camera	Detector	Still at darkest point
A	Nightfox Whisker IR + Nightfox IR Flood Lamp	Audiomoth	
B	Nightfox Whisker IR + Nightfox IR Flood Lamp	Audiomoth	
C	Nightfox Whisker IR + Nightfox IR Flood Lamp	Audiomoth	

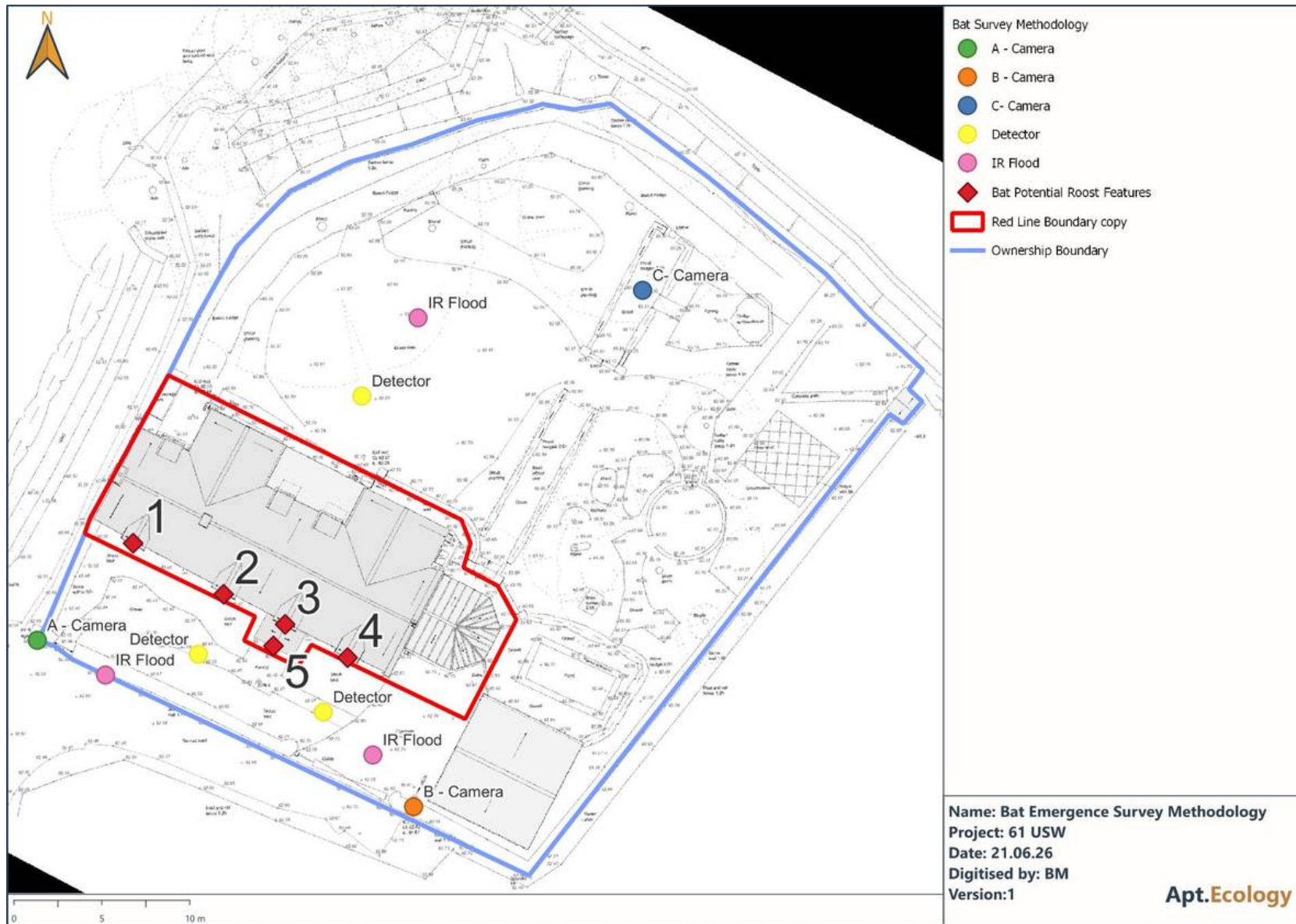


Figure 1 Bat Survey Methodology

2.3.2 Survey Personnel and Quality Assurance

14. All field data collection and subsequent digital media analysis were led and executed by Ben Mitchell BSc MCIEEM, a highly experienced and senior ecologist possessing 20 years of professional bat experience, acoustic profile tracking, and sonogram interpretation within the United Kingdom. The analyst holds valid, current Statutory Nature Conservation Body (SNCB) bat survey and research licenses across England, Wales, and Scotland. This extensive cross-jurisdictional competency fulfils the specialist technical requirements outlined in BCT guidelines for the delivery of authoritative-tier protectorate surveys and complex protected species licensing.
15. The surveyor arrived at the site exactly one hour prior to local sunset to conduct a comprehensive pre-survey walkover. This was used to verify potential roost features (PRFs) and predicted emergence trajectories identified during the Preliminary Roost Assessment (PRA) , and to deploy the static equipment array under optimal daylight conditions.
16. Visual and acoustic data collection initiated 30 minutes before sunset and concluded a minimum of two hours after sunset. Where situational indicators or historical records suggested the presence of late-emerging, quiet-calling, or light-sampling species—such as the brown long-eared bat (*Plecotus auritus*) or Natterer's bat (*Myotis nattereri*)—the active recording window was dynamically extended past the two-hour baseline to capture late flights.
17. Surveys were strictly confined to a high-probability operational envelope : baseline air temperatures remaining above 10C at survey conclusion, ambient wind velocity not exceeding Beaufort Force 3 12 mph at local level, and an absence of precipitation. Complete weather profiles were recorded at commencement and termination.

2.4 Night Vision Aids (NVA)

18. To eliminate the severe detection limitations of the human eye in declining light levels and to provide a fully auditable record of structural emergence, near-infrared (NIR) imaging frameworks were integrated into the survey architecture.
19. Nightfox Whisker near-infrared digital video cameras were deployed on heavy-duty, stabilized tripods equipped with counterweights to mitigate wind-induced framing jitter. Cameras were framed to isolate specific target PRFs, roof lines, and masonry crevices while actively minimizing excessive open sky capture to protect the digital sensor from pixel blowout or twilight exposure over-saturation.
20. Primary invisible illumination was provided by standalone Nightfox Arc 20W infrared flood lamps (emitting at an 850 nm wavelength). Following the rules of structural contrast optimization, these lamps were offset 45° to 90° relative to the camera axes. This independent multi-angle lighting

structure avoided flat front-lighting, eliminated white subject bleaching, and generated shadows that enhanced visual depth. Supplemental low-power standalone IR spot torches and focal camera-mounted emitters were targeted into deep internal architectural shadows to create an evenly lit surface plane.

21. To override activation delays caused by ambient daylight sensors on the IR arrays, photocells on the Nightfox Arc lamps were manually blacked out with opaque tape prior to sunset. Emitters were engaged at survey commencement, locking the digital cameras into native IR mode to ensure steady exposure metrics and uninterrupted focal tracking through the critical twilight phase.
22. At strict intervals not exceeding ten minutes throughout the survey, the surveyor completed rotational checks across all deployed camera units to verify structural lens focus, electrical battery depletion curves, storage buffer capacities, and framing stability. To formally validate the field of view and prove that the IR illumination was appropriate at the darkest point of the night, full-resolution digital still images were captured from each NVA feed at peak operational darkness for report inclusion.

2.5 Acoustic Monitoring

23. Automated AudioMoth ultrasonic detectors were housed in secure, weatherproof cases and mounted on stable tripods at a horizontal offset of approximately 5m from the target building facades. This distance optimizes microphone sensitivity for directional echolocation pulses and high-frequency attenuation patterns typical of quieter, low-amplitude gleaning species, including the lesser horseshoe bat (*Rhinolophus hipposideros*) and brown long-eared bat (*Plecotus auritus*).
24. Configuration arrays complied with the parameters set out in *BCT Guidelines for Passive Acoustic Surveys of Bats in Woodland* and recommendations derived from Dr. Dani Linton's acoustic sampling frameworks. Settings were locked as follows:
 - 384 kHz (Full-spectrum uncompressed recording to capture fine-scale wave parameters, high-frequency call components, and harmonic signatures up to 192kHz)
 - Gain: Medium.
 - Temporal Window: 300 seconds continuous recording blocks punctuated by a 5-second sleep interval.
 - Internal frequency bandpass filters and digital amplitude triggers were completely deactivated to prevent the software from dropping low-amplitude, distant, or quiet social call profiles.
25. Internal hardware clocks on all static AudioMoth loggers were strictly updated and synchronized to local time via the AudioMoth desktop configuration utility right before deployment. These internal

timelines were explicitly cross-matched with the master digital timestamps of the NVA recording decks to allow for correlation between ultrasonic audio files and visual emergence clips.

2.6 Roving Acoustic Monitoring

26. To maintain real-time situational awareness and intercept unexpected bat transitions outside the fixed fields of view of the static gear, the surveyor carried an Echo Meter Touch Pro handheld detector throughout all pre-survey walkovers and subsequent 10-minute automated hardware checks. The handheld unit was run continuously in auto-tuning heterodyne mode. This mobile coverage provided an immediate acoustic warning system across the wider building envelope, enabling the surveyor to dynamically track localized flight patterns and spot social chatter prior to any bat emergencies during equipment check rotations.

2.7 Media Data Analysis Protocols

27. Every acoustic wav data file collected was downloaded and archived in raw, uncompressed .WAV full-spectrum format to establish a transparent, judicially auditable record. Emergence recordings and a sample of cryptic species calls were scrutinized manually using professional sonogram analysis suites, including BatExplorer and AudioMoth Play. Visual call parameters—including start/end frequencies, characteristic knee points, pulse interval rhythms, and energy distribution—were evaluated to verify species classification where possible.
28. The BTO acoustic pipeline was also used to process the recordings to process that anecdotal bat activity recorded during the survey as context.
29. Manual Video Analysis and VLC Adjustments: Post-survey, all recorded near-infrared video footage was subjected to a full-length, manual frame-by-frame review by the licensed analyst to eliminate the false-negative drops common to automated movement trackers. To optimize target pixel changes without losing the fast movements of low-surface-area targets, footage was parsed using VLC Media Player with advanced motion-overlay modules active. To prevent the video decoder from discarding critical visual frames during high-bitrate processing or high-speed playback, frame-skipping functions were completely deactivated inside the core program configuration preferences. Playback speeds were locked at 1x native speed to guarantee subtle pixel-level micro-movements of emerging bats were fully evaluated.

2.8 Survey Limitations

30. No limitations were present that affected the survey methodology or validity.

3 SURVEY RESULTS

3.1 Desk Study

3.1.1 Designated Sites

31. 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

3.2.1 Site Context

32. 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.
33. 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.
34. 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.

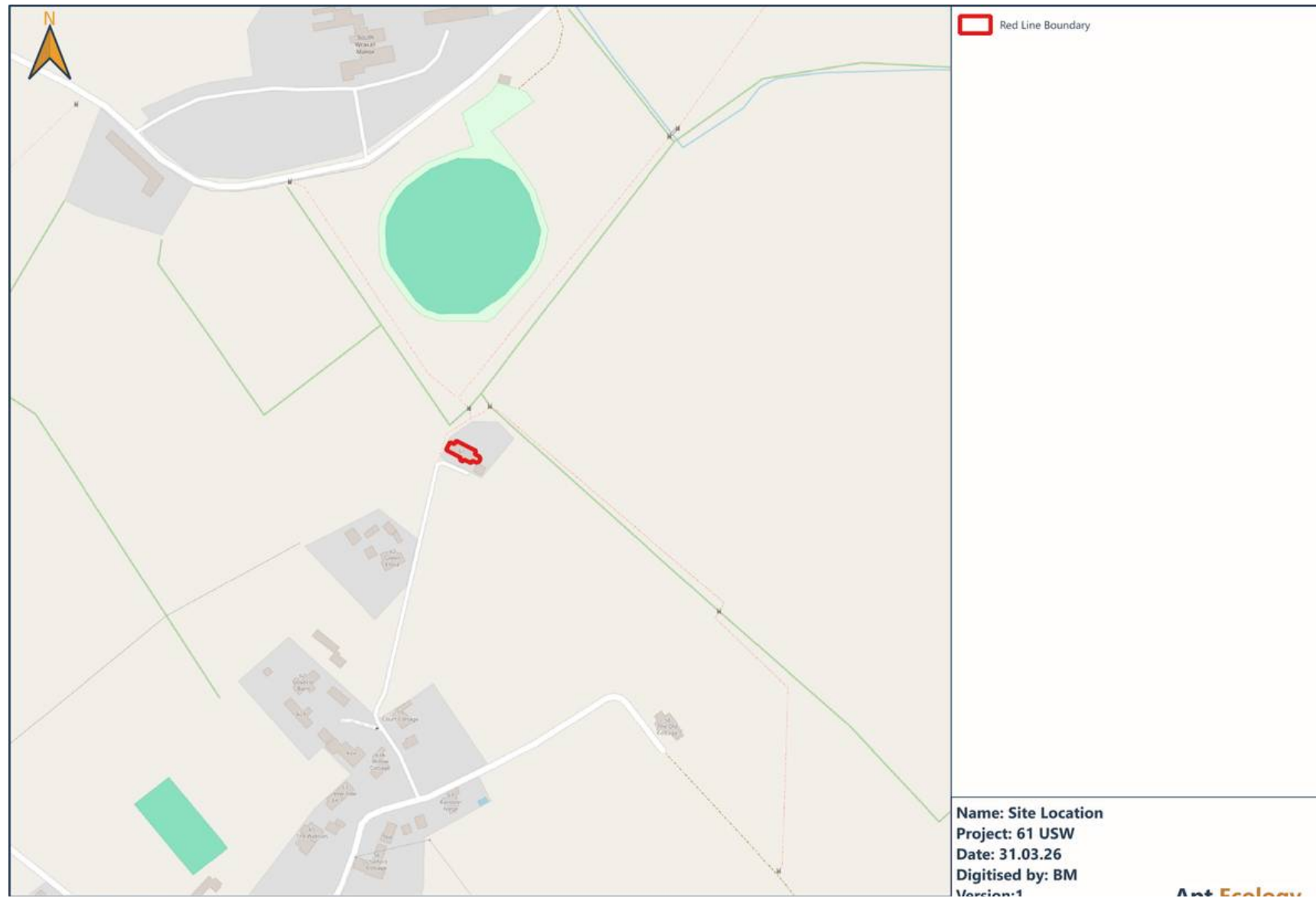


Figure 2 Site Location Plan

3.2.2 Habitats

35. 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.

3.2.3 Buildings and Structures

36. 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).

3.2.4 Building 1 – Cottage

37. 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.
38. 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.
39. 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.

40. 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).
41. The building is assessed as having high suitability for roosting bats.

3.2.5 Trees

42. 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.

3.3 Species

3.3.1 Bat Emergence Surveys

43. The building supports 3 day roosts for individual soprano pipistrelle bats.

Date	Surveyor(s)	Emerging Bats	Location	Notes
29.09.25	Ben Mitchell	3 * Soprano pipistrelle	2, 4, 5	Bat returned to roost 5 1 hour after sunset
03.05.26	Ben Mitchell	None		
28.05.26	Ben Mitchell	None		
18.06.26	Ben Mitchell	1 * Soprano pipistrelle	5	

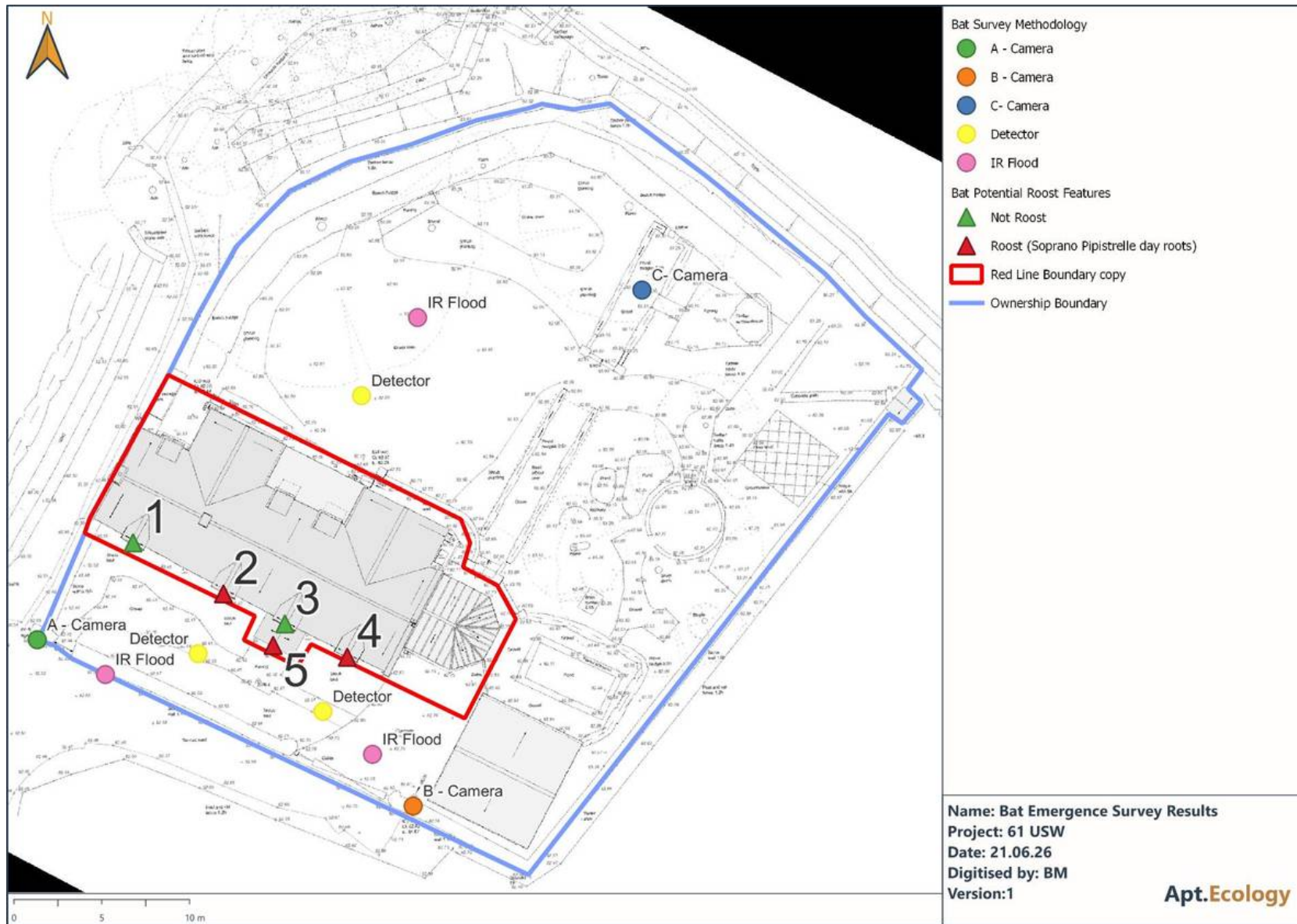


Figure 3 Bat Emergence Survey Results



Figure 4 Roost Locations

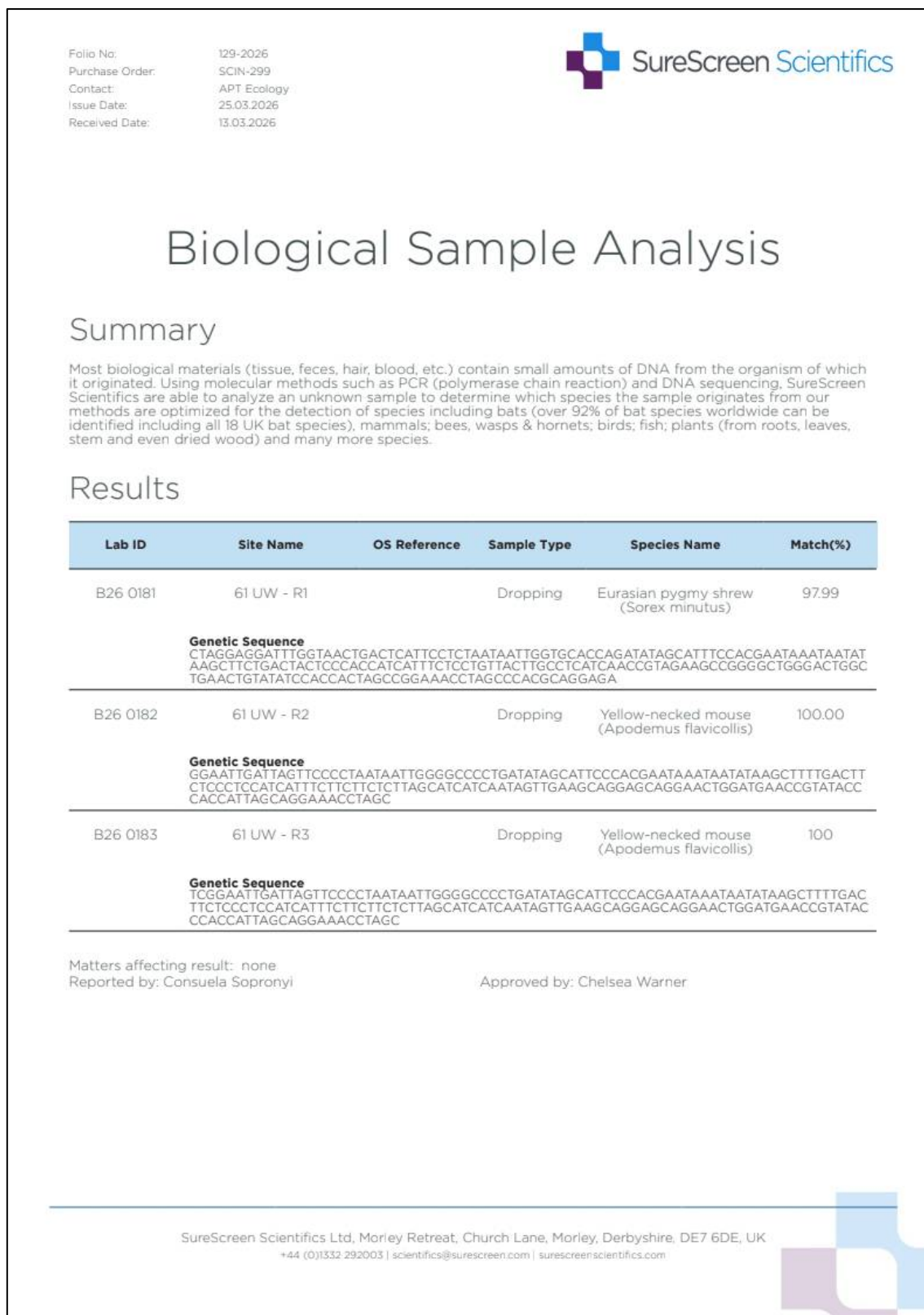


Figure 5 – Bat eDNA Analysis results.

		
<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

44. No further surveys are required prior to any works affecting the potential roost features present in accordance with BCT (2024) Good Practice Guidelines.

4.2 Mitigation

45. Three day roosts for soprano pipistrelle (*Pipistrellus pygmaeus*) bats in Building 1, a European Protected Species (EPS) Mitigation Licence from Natural England is 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.
46. The following precautionary measures are recommended:
- No works should be undertaken to the waney board cladding or roof structure of Building 1 until any an EPS Bat Mitigation Licence is obtained. This licence will require:
 - Licenced bat ECoW supervision of the hand strip of the dormer cladding and roof sections
 - Crevice dwelling bat boxes to be erected on the large retained trees to the rear of the garden
 - The incorporation of suitable crevice features into the four new dormer window designs to compensate for the dormer and porch roost losses.
 - 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

47. Compensation roost features will be included in the new dormer window design as crevices between the timber and blockwork, concealed behind the fascia boards for all four dormer windows.

4.4 Enhancement

48. In addition, bat boxes will be erected in the large trees to the rear of the garden to receive any bats encountered during licences soft demolition of the windows. These will be retained after works.
49. Bird nesting boxes suitable for house sparrow, starling and swift should be incorporated into the fabric of the building where practicable.

50. 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 (2026) Bat Emergence Surveys with Night Vision Aids: A Technical Guide for Professional Ecologists (1st Edition). Bat Conservation Trust, 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 (2nd Edition). Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM (2019) Guidelines for Ecological Report Writing (2nd Edition). Chartered Institute of Ecology and Environmental Management, Winchester.

Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition). Bat Conservation Trust, London. (Note: amended March 2024).

6.2 Legislation and Policy References

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

Ministry of Housing, Communities & Local Government (2023) National Planning Policy Framework. London: HMSO.

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

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

Wiltshire Council (2015) Wiltshire Core Strategy incorporating the Site Allocations DPD. Wiltshire Council, Trowbridge. (Specifically Core Policy 50: Biodiversity and Geodiversity).