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Ecological Impact Assessment

78 High Street
Dilton Marsh
Westbury
Wiltshire
BA13 4DY

August 2026

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1.	EXECUTIVE SUMMARY	4
2.	INTRODUCTION AND BACKGROUND	6
	Site Overview	6
	Scope of Assessment	6
3.	LEGISLATION & POLICY	9
	General Wildlife Legislation	9
	Bat Legislation	9
	National Planning Policy	10
	Local Planning Policy	12
	Wiltshire Biodiversity Action Plan	14
4.	METHODOLOGY	16
	Desk Study	16
	Building Inspection	16
	Emergence Surveys	17
	Evaluating Bat Roosts	18
	Limitations	20
5.	SURVEY RESULTS	22
	Desk Study	22
	Building Inspection	24
	Emergence Survey Results	25
6.	IMPACT ASSESSMENT	28
	Designated Sites	28
	Evaluation of Bat Roosts on Site	28
	Roost Impact Assessment	28
	Mitigation	28
	Compensation	30
	Post-works Monitoring	31
	Evaluation of Nesting Birds on Site	31
7.	ENHANCEMENT RECOMMENDATIONS	33
	Bats	33
	Birds	33
8.	REFERENCES	34
	APPENDICES	36

QUALITY CONTROL		
The information which we have prepared and provided is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct.		
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This report remains valid for 2 years from date of issue. Survey data are valid for 12-18 months from the date the survey was undertaken.		

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The views and opinions contained within the document are based on a reasonable timeframe between the completion of the survey and the commencement of any works. If there is any delay between the commencement of works that may conflict with timeframes laid out within this document, or have the potential to allow the ingress of protected species, a suitably qualified ecologist should be consulted.

It is the duty of care of the landowner/developer to act responsibly and comply with current environmental legislation if protected species are suspected or found prior to works.

1. EXECUTIVE SUMMARY

- 1.1. Darwin Ecology Ltd was commissioned by Ms Rebecca Miller to undertake an Ecological Impact Assessment (EclA) of proposals for the building at 78 High Street, Dilton Marsh, Westbury, Wiltshire, BA13 4DY. The assessment was required to support a planning application for a two-storey flat roof extension and an extension to the single-storey toilet extension and was informed by a desk study, internal and external building inspection and emergence surveys for bats.
- 1.2. During the building inspection several external potential roosting features were recorded, including gaps around exposed rafters and at the eaves of the main roof and WC extension. These features were suitable for crevice-dwelling bats and potentially provided access to the main loft void.
- 1.3. During the emergence surveys, seventeen common pipistrelles emerged from a gap beneath a verge tile on the toilet extension, confirming the building as a common pipistrelle maternity roost. A common pipistrelle emerged from the verge of the western gable, and a long-eared emerged from the apex of the southern gable, confirming day roosts for both species on the building.
- 1.4. The proposed plans show the works will directly impact common pipistrelle maternity roost within the building and will cause disturbance to bats roosting within the building. An appropriate licence will be required to permit the above actions.
- 1.5. Mitigation and compensatory measures to ensure the Favourable Conservation Status (FCS) of bats is maintained will include:
 - Works are required to avoid the main maternity season (May to August inclusive) and the winter hibernation season (November to February inclusive);
 - Education of contractors on protection afforded to bats through a Tool Box Talk;
 - Ecological supervision and soft strip of features suitable for use by bats by hand and using hand tools prior to the rest of the building works;
 - Provision of a Greenwoods two-crevice bat box. This is to be installed in a location determined by a licensed bat ecologist to ensure likelihood of uptake is increased;
 - To compensate for the loss of the existing common pipistrelle maternity roost within the toilet extension, a fascia-board access feature and bespoke roosting feature will be incorporated into the western elevation of the new extension. The existing roost space will be inspected when the verge is removed, allowing the replacement feature to replicate the roost's current design and location as closely as possible.
 - A fascia-board access feature and bespoke roosting feature will be incorporated into the western elevation of the second-story flat roof.

- Any new external lighting will be fitted with downward-facing baffles and will be directed to avoid light spillage.
 - A minimum of two years of post-development monitoring will be undertaken to confirm use of the compensation roost for breeding. Monitoring will be conducted on Years 2 and 4, with each monitoring year including at least one emergence survey during the latter part of the breeding season and an annual inspection.
- 1.6. Recommendations for enhancements have also been made which include two internally linked integrated bat bricks and an integrated double-chamber bird nest box.

2. INTRODUCTION AND BACKGROUND

- 2.1. Darwin Ecology Ltd was commissioned by Ms Rebecca Miller to undertake an EclA of proposals for the building at 78 High Street, Dilton Marsh, Westbury, Wiltshire, BA13 4DY (hereafter referred to as 'the site')¹. The assessment was required to support a planning application for a two-storey flat roof extension and an extension to the single-storey toilet extension. It was informed by a desk study, internal and external building inspection and emergence surveys for bats.
- 2.2. The proposed drawings on which this assessment is based are provided at **Appendix 1, Proposed Plans**.
- 2.3. The internal and external building inspection and emergence surveys follow the Bat Conservation Trust (BCT) Good Practice Guidelines (2023). The subsequent EclA follows the roost assessment methodology set out by Wray *et al.* (2010) and the CIEEM Guidelines for EclA in the UK and Ireland (2018).

Site Overview

- 2.4. The site is a semi-detached two-storey house. To the rear of the property is a long narrow garden. It is situated on 'High Street', a busy road. Immediately adjacent to the property on all sides are residential properties with associated gardens (see **Figure 1**).
- 2.5. The site is situated in the centre of a residential area to the west of Dilton Marsh. To the north of this residential area is a meadow and agricultural fields. South of the residential area is a farm and stable with associated fields. There is also an area of grassland containing large trees and ponds implemented as part of the DLL scheme (see **Figure 2**).

Scope of Assessment

- 2.6. The process of EclA aims to identify, quantify and evaluate the potential effects of development-related or other proposed actions on habitats, species and ecosystems.
- 2.7. Potential effects on the following ecologically sensitive receptors have been considered during the EclA of 78 High Street:
- Statutory designated sites; and
 - Features of potential importance (such as loft voids or external crevice features).
- 2.8. The aim of this report is to:
- Identify and describe bats roosts present within the site;
 - Classify the the type of roost present (e.g. day roost, maternity roost etc);
 - Carry out an impact assessment of the proposed works and how they will directly / indirectly affect bats and their roosts;

¹ Ordnance Survey (OS) grid reference ST 84719 49787.

- Outline the relevant legislation and protection afforded to bats; and
- Provide avoidance, compensation, mitigation and enhancement measures recommended to avoid harm / injury to roosting bats.



Figure 1: Site location within the local landscape Copyright Google Earth Pro (Jul 2026)



Figure 2: Site location within the wider landscape (Copyright Google Earth Pro (Jul 2026)

3. LEGISLATION & POLICY

General Wildlife Legislation

- 3.1. Wildlife in the United Kingdom (UK) is protected through European and national legislation, supported by national and local policy and guidance. Development can contribute to conservation and enhancement goals outlined by these various legislation and policy by retaining and protecting the most valuable ecological features within a site and incorporating enhancements to provide biodiversity net gain.
- 3.2. This section provides a brief summary of the principle legalisation and policy that triggers the requirement for PRA and further ecological assessments in the UK. The presence of protected species within a site are a material consideration during the planning process. PRAs and any necessary further ecological assessments provide an ecological baseline for a site and evaluation of the potential impact of proposals.
- 3.3. It is the responsibility of those involved with development works to ensure that the relevant legislation is complied with at every stage of a project. Such legislation applies even in the absence of related planning conditions or projects outside the scope of the usual planning process (i.e. permitted development projects or projects requiring Listed Building Consent only).

Bat Legislation

- 3.4. In England and Wales, all bat species and their roosts are legally protected under the European *Habitats Directive (1992)*; the *Conservation of Habitats and Species Regulations (2017)*; the *Wildlife and Countryside Act (1981) (as amended)*; the *Countryside and Rights of Way Act, 2000*; and the *Natural Environment and Rural Communities Act (NERC, 2006)*.
- 3.5. Barbastelle *Barbastella barbastellus*, Bechstein's *Myotis bechsteinii*, greater horseshoe *Rhinolophus ferrumequinum*, lesser horseshoe *Rhinolophus hipposideros*, brown long-eared *Plecotus auritus*, soprano pipistrelle *Pipistrellus pygmaeus*, and noctule *Nyctalus noctula* bats are all species of principal importance in England under *Section 41* of the *Natural Environment and Rural Communities Act 2006*.
- 3.6. You will be committing a criminal offence if you:
 - Deliberately capture, injure or kill a bat;
 - Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats;
 - Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time);
 - Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat; or
 - Intentionally or recklessly obstruct access to a bat roost.

- 3.7. The government's statutory conservation advisory organisation, Natural England, is responsible for administering European Protected Species (EPS) licences that permit activities that would otherwise lead to an offence.
- 3.8. A licence can be obtained if the following three tests have been met:
- Regulation 53(9)(a) - there is "no satisfactory alternative" to the derogation, and;
 - Regulation 53(9)(b) - the derogation "will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range" and;
 - Regulation 53(2)(e) - the derogation is for the purposes of "preserving public health or public safety or other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment".

National Planning Policy

- 3.9. The *National Planning Policy Framework (2024)* aims to minimise impacts on biodiversity and provide net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity. Chapter 15 'Conserving and enhancing the natural environment' details what local planning policies should seek to consider with regard to planning applications.
- 3.10. Planning policies and decisions should contribute to and enhance the natural and local environment by:
- 187 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);
 - 187 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;
 - 187 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 and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;
 - 188) Plans should: distinguish between the hierarchy of international, national and local 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;

189) Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty (AONB) 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 Broads. The scale and extent of development within all these designated areas should be limited, while development within their settings should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

3.11. Specific policies regarding habitats and biodiversity comprise:

192) To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation and
- b) Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species and identify and pursue opportunities for securing measurable net gains for biodiversity.

193) When determining planning applications, local planning authorities should apply the following principles:

- a) If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- b) Development on land within or outside of Sites of Special Scientific Interest (SSSIs), and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the feature of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs.
- c) Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees)

should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around development should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

194) The following should be given the same protection as habitats sites:

a) Potential Special Protection Areas (SPAs) and possible Special Areas of Conservation (SACs);

b) Listed or proposed Ramsar sites; and

c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential SPAs, possible SACs, and listed or proposed Ramsar sites.

Local Planning Policy

3.12. The local planning policy for the site is the Wiltshire Core Strategy, adopted January 2015. It sets out a strategic spatial vision, key objectives and overall principles for development in the county for the period up to 2026. The relevant policies regarding ecology, nature conservation and development comprise:

Core Policy 50 Biodiversity and Geodiversity

Protection

Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated 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, and secure the integrity of local ecological networks and provision of ecosystem services.

All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.

Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 above where possible, otherwise bespoke measures must be provided to demonstrate that the

proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.

Biodiversity enhancement

All development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services. Such enhancement measures will contribute

to the objectives and targets of the Biodiversity Action Plan (BAP) or River Basin/ Catchment Management Plan, particularly through landscape scale projects, and be relevant to the local landscape character.

Local sites

Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment. Damage or disturbance to local sites will generally be unacceptable, other than in exceptional circumstances where it has been demonstrated that such impacts:

- i. cannot reasonably be avoided
- ii. are reduced as far as possible
- iii. are outweighed by other planning considerations in the public interest
- iv. where appropriate compensation measures can be secured through planning obligations or agreements.

Development proposals affecting local sites must make a reasonable contribution to their favourable management in the long-term.

Core Policy 69: Protection of the River Avon SAC

In order to avoid and reduce potential environmental effects on the River Avon SAC, development will need to incorporate measures during construction and operation to avoid and prevent pollution and mitigate potential disturbance effects; appropriate measures may include consideration of suitable buffer zones along watercourses, habitat enhancements and river access management measures. All development within 20m of the river banks should submit a construction management plan to the local planning authority to ensure measures proposed during construction are satisfactory.

Where additional sewage discharges to a STW cannot be accommodated without measures to offset phosphate loading, development will be required to undertake proportionate measures (which may include contributions towards those measures

identified in the Nutrient Management Plan) to demonstrate that the proposals would have no adverse effects upon the SAC.

Wiltshire Biodiversity Action Plan

- 3.13. The Wiltshire Biodiversity Action Plan (BAP) was published in 2002 and reviewed in 2008 by the Wiltshire Wildlife Trust and over 40 delivery partners who make up the Wiltshire BAP Partnership. It includes habitat action plans for 11 of the most significant of the UK Priority Habitats in Wiltshire which include woodland, wood-pasture, parkland and ancient trees, hedgerows, calcareous grassland, neutral grassland, traditional orchards, farmland habitats, built environment, standing open water and rivers, streams and associated habitats. In addition, a bat species action plan has also been included, covering all bat species found in Wiltshire, while other priority species have been included under the appropriate habitat action plans.
- 3.14. The Wiltshire BAP species list includes both species having national priority under the UK BAP and also species having local importance in Wiltshire including county notables. A total of 260 species have been included on the Wiltshire BAP species list.
- 3.15. The Wiltshire BAPs aim to achieve the following:
 - Enable prioritisation and define actions for priority habitats and species in Wiltshire.
 - Create a plan of action that can be delivered through a partnership of statutory, private and third sector organisations.
 - Provide a baseline of current knowledge and a tool to help monitor key habitats and species.
 - To link objectives, targets and actions to report nationally and enable conservation work carried out in Wiltshire to contribute to national targets and reporting.
- 3.16. In 2012, a landscape scale framework for conservation in Wiltshire was developed, identifying 11 Landscape Biodiversity Areas across Wiltshire and Swindon, made up of a number of priority habitats, designated sites and other areas of conservation significance. This aims to encourage landscape scale planning for species and habitat conservation across Wiltshire.
- 3.17. Wiltshire County Council (WCC), Natural England (NE) and local experts and researchers have jointly prepared the Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire (2015). It is aimed at applicants, agents, consultants and planners involved producing and assessing development proposals in the landscapes surrounding Wiltshire's most sensitive bat roosting sites, which are protected by European wildlife legislation and applies to all types of developments that are subject to planning control.
- 3.18. The guidance gives details on how to mitigate any potential impacts on Wiltshire Bat SACs and to ensure that any potential issues are identified as early in the planning process as possible to prevent unnecessary delays to development projects. The guidance also

outlines the ecological documents and plans, which should be submitted in support of planning applications, so as to ensure that the council has all the information required to undertake a reliable Habitats Regulations Assessment (HRA) should one be required.

4. METHODOLOGY

Desk Study

- 4.1. A desk study was undertaken for designated sites and bat species and habitat records within 2 km of the site:
- The MagicMap website was reviewed, to obtain information on any designated sites of nature conservation interest within 2 km of the site and details of any EPS licences issued within 2 km;
 - The Wiltshire Planning Portal was searched for past and pending planning applications that may have associated ecological documents detailing results of bat surveys; and
 - Google Maps and Ordnance Survey (OS) Leisure Maps was utilised to view aerial photographs and maps to assess the ecological context of the site within the wider landscape.
- 4.2. Natural England has developed a tool to help assess the potential risks to SSSIs by proposed developments. These are known as 'Impact Risk Zones' (IRZs) and they define the area around a SSSI that could be sensitive to development, considering the particular sensitivities of the feature for which the site is designated.
- 4.3. The IRZs help inform whether a development proposal may affect a SSSI and if so, whether it is necessary for the Local Planning Authority (LPA) to seek pre-application advice from Natural England. Information on the IRZs was determined from the MAGIC website to determine if the LPA is required to seek consultation for the current development.

Building Inspection

- 4.4. West Country Ecology conducted an internal and external building inspection at the site at 78 High Street on 26th January 2026. The weather conditions at the time of the survey were dry with a light breeze and approximately 8°C. The methodology they used is as follows:
- 4.5. *The assessment was undertaken in accordance with recognised professional guidelines, including the Chartered Institute of Ecology and Environmental Management (CIEEM) and British Standard Code of Practice. 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.*
- 4.6. *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.*
- 4.7. *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.

- 4.8. *Nesting bird potential was assessed through internal and external inspection for signs including nests, feathers, eggs, fledged young, or the presence of adult birds.*

Potential to Support Roosting Bats

- 4.9. Each building was assessed for its potential to support roosting bats as detailed in **Table 1** below which is taken from the Bat Conservation Trust 2023 guidelines Table 4.1, Table 7.1 and Table 7.2.

Table 1: Roost classification from the Bat Conservation Trust (2023) guidelines.

Category	Description of roosting habitat	Number of surveys required
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).	No further surveys
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	No further surveys
Low	A structure with 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, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis by large numbers of bats.	Single survey between May to August
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, condition and surrounding habitat but unlikely to support a roost of high conservation status.	Two surveys with at least one survey between May to August.
High / Confirmed	A structure with one or more potential roost sites that are obviously suitable for use by a larger number of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts.	Three surveys with at least two surveys between May to August.

Emergence Surveys

- 4.10. Three dusk emergence surveys and a dawn re-entry survey were conducted during the 2026 survey season. Surveys were undertaken in line with BCT Good Practice Guidelines (2023), with any limitations outlined below.
- 4.11. Surveyors were positioned strategically around the building(s) in order to provide adequate coverage of all elevations. Surveyors focused on any features identified during the Preliminary Roost Assessment (PRA) as having potential to be used as bat access points. The location of the surveyors and building numbers and names are shown on **Figure 3, Bat Survey Results**.

- 4.12. Dusk surveys began 15 minutes prior to sunset and lasted 1.5 hours after sunset. Surveyors recorded bat activity using hand-held Echometer Touch detectors connected to Android or iPhone devices. Analysis of recordings was undertaken after the surveys to confirm species identification. Observations recorded during surveys included bat access points, bat species, time, and type of activity (e.g. emergence, re-entry, commuting, foraging, etc.). Incidental records of bats within the vicinity of the building (but not necessarily roosting) were also recorded.
- 4.13. Each surveyor used a night vision aid (NVA) to aid in their visibility during each survey. Equipment used consisted of Nightfox Whisker night vision binoculars/Nightfox Nova night vision binoculars/Canon XA20 video camera/Black Sun 2 B502 infra-red illuminator/Nightfox Arc infra-red floodlight/ PixFra Thermal Camera Model: PF1-A613 and these were used to film bat activity for the duration of the survey at a fixed position, see **Appendix 3**.
- 4.14. All recorded video footage was reviewed in full following the survey to identify any bat activity captured and any significant activity patterns and access points were identified and recorded.
- 4.15. A summary of the surveyors, survey dates and weather conditions are provided in **Table 2**.

Table 2: Emergence and re-entry survey dates and weather conditions

Date	Sunset time	Start weather conditions	End weather conditions	Surveyors
20/05/26	21:00	Rain: 0 Wind: 0 Cloud cover: 8 Temperature: 18.2°C	Rain: 0 Wind: 0 Cloud cover: 6 Temperature: 15.9°C	Lila Chillingworth BSc (Hons), MSc Ella Ralph BSc (Hons), MSc
15/06/26	21:26	Rain: 0 Wind: 1 Cloud cover: 8 Temperature: °C	Rain: 0 Wind: 1 Cloud cover: 8 Temperature: °C	Lila Chillingworth BSc (Hons), MSc Sarah Firmin BA (Hons)
07/07/26	21:25	Rain: 0 Wind: 0 Cloud cover: 1 Temperature: 19°C	Rain: 0 Wind: 0 Cloud cover: 0 Temperature: 18°C	Lila Chillingworth BSc (Hons), MSc Ella Ralph BSc (Hons), MSc
Rain: a scale of 0 to 5 (e.g 0 (dry) - 5 (very heavy rain), Wind: a Beaufort scale of 0 to 12. (e.g 0 (calm) - 6 (strong breeze) - 12 (hurricane)) Cloud cover: an Okta scale of 0 to 8 (e.g 0 (no cloud) - 4 (half visible sky) - 8 (no visible sky))				

Evaluating Bat Roosts

- 4.16. The value of the bat roosts on site was assessed in accordance with the article published in the CIEEM, In Practice Magazine - *Valuing Bats in Ecological Impact Assessment* (Wray, et al., 2010).

- 4.17. Roosts are assigned a relative ecological value based on the rarity of the species (**Table 3**) and categorisation of roost type (**Table 4**), informed by survey results. Once a value has been calculated, robust mitigation for any impacts identified from the proposed development can be determined.

Table 3: Categorising bat species by distribution and rarity

Rarest	Rare	Common
Greater horseshoe Bechstein's Alcahove Greater mouse-eared Grey long-eared Barbastelle	Lesser horseshoe Whiskered Brandt's Daubenton's Natterer's Leisler's Noctule Nathusius' pipistrelle Serotine	Common pipistrelle Soprano pipistrelle Brown long-eared

Table 4: Valuing bat roosts

Geographic Frame of Reference	Roost Type
District, Local or Parish	Feeding perches (common species) Individual bats (common species) Small numbers of non-breeding bats (common species) Mating sites (common species)
County	Maternity sites (common species) Small number of hibernating bats (common and rarer species) Feeding perches (rarer/rarest species) Individual bats (rarer/rarest species) Small numbers of non-breeding bats (rarer/rarest species)
Regional	Mating sites(rarer/rarest species) including well-used swarming sites Maternity roosts (rarer species) Hibernation sites (rarest species) Significant hibernation sites for rarer/rarest species or all species assemblages
National/UK	Maternity sites (rarest species) Sites meeting Sites of Special Scientific Interest (SSSI) guidelines
International	Special Areas of conservation (SAC) sites

Limitations

- 4.18. Ecological surveys are limited by factors that affect the presence of plants and animals such as the time of the year, weather, migration patterns. The survey was undertaken in May to July and therefore represents a valid sample of ecological evidence present on that date/season.
- 4.19. Ecological data is typically deemed valid for 18 months. This report remains valid for 2 years from the date of the survey, however, a walkover survey after 18 months may be required to demonstrate whether or not the habitats have remained as described.
- 4.20. The desk study does not include data from the local environmental records centre (LERC). However, following CIEEM guidelines (2017) it is possible to conduct a robust assessment without the need of LERC data, for example for small-scale projects or on sites such as;
- A field in active arable cultivation where there is no impact on any hedges, trees or water bodies;
 - A small area of cultivated garden/amenity grassland, as above; or
 - A small urban site comprising mostly asphalt or compacted hardstanding.
- 4.21. The site is a small plot set comprising a dwelling and small area of amenity garden and therefore the lack of LERC data is not considered a limitation to the ecological assessment of the site.
- 4.22. Many species of bat in the UK are crevice-dwelling, and bats or signs of bats can be difficult to find within a building.
- 4.23. It is noted that some UK bat species are easier to detect than others; for example the noctule can be detected at a significantly greater distance when compared to the quieter brown long-eared. This can result in the undercounting of some bat species when compared to others.
- 4.24. The surveys were undertaken in accordance with the best practice guidelines within the peak bat activity period (May to September inclusive). The results are therefore considered to be an accurate representation of the general use of the building(s) by roosting bats.
- 4.25. Nevertheless, bats may use roosting features intermittently throughout the year and may be present in larger or smaller numbers depending on their breeding cycle, weather conditions and in response to disturbance. Bats may be present at other times of the year and the results in this report should therefore be viewed in the context intended.
- 4.26. No dropping evidence was collected during the PRA by West Country Ecology; therefore, the long-eared bats later recorded using the site cannot be identified to a species level. However, the proposed works will not affect the bat roost or alter its access, structure, or surrounding conditions. Consequently, the absence of DNA analysis is not expected to change the assessment of impacts or the conclusion that the roost will remain unaffected.

- 4.27. No other limitations were encountered, or assumptions made during either the desk study or the field survey and it is considered that with the access gained and recording undertaken an accurate assessment of the site's ecological importance has been made.

5. SURVEY RESULTS

Desk Study

- 5.1. There are no biological statutory designations within 2km of the site. Salisbury Plain Special Area of Conservation (SAC) is the only international designation within 5km. These are detailed in **Table 3**.

Table 3: Statutory designated sites within 2km of the site at 78 High Street.

Designated sites	Name and designation type	Reason for designation	Approximate distance from site
Within Site Boundaries	There are no designated sites within the site boundaries		
Within 2km of Site	Westbury Ironstone Quarry SSSI	Non-biological designation	1.1km NE
International designation within 5km	Salisbury Plain SAC	Annex I habitats 5130 Juniperus communis formations on heaths or calcareous grasslands 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) Annex II species 1065 Marsh fritillary butterfly <i>Euphydryas aurinia</i>	3.3km E

- 5.2. There were three records of EPS licences for bats. These are detailed in **Table 4**.

Table 4: ESPL granted for bats within 2km of the site

Case reference	Licence dates	Species designation	Licensable impact	Approximate distance from site
2018-38082-EPS-MIT	01/12/2018 - 31/12/2019	Brown long-eared	Destroying a resting place	1.2km east
2016-22609-EPS-MIT	10/05/2016 - 09/05/2026	Brown long-eared	Destroying a resting place and damaging a breeding site	1.1km south west
2016-22609-EPS-MIT-1	02/05/2017 - 09/05/2026	Brown long-eared	Destroying a resting place and damaging a breeding site	1.1km south west

- 5.3. An EclA report from February 2024 for a site approximately 57m north of the site recorded habitats such as lowland meadow, hedgerows, trees, and a small flowing ditch/narrow watercourse. Bat transects recorded greater horseshoe bat, lesser horseshoe bat, common pipistrelle, soprano pipistrelle, serotine, noctule and rare occurrences of *Myotis* species. Bird species recorded included house sparrow *Passer domesticus* (identified on the UK Birds of Conservation Concern Red List), dunnock *Prunella modularis*, robin *Erithacus*

rubecula, wren *Troglodytes troglodytes*, blackbird *Turdus merula*, chaffinch *Fringilla coelebs*, great tit *Parus major*, jackdaw *Corvus monedula*, blue tit *Cyanistes caeruleus* and goldfinch *Carduelis carduelis*.

- 5.4. A planning statement outlines the proposal for two ponds to form part of Natural England's DLL scheme approximately 230m from the site.
- 5.5. An EclA report from 2025 for a site approximately 350m southeast of the site found the buildings on site contained negligible potential for bats
- 5.6. There are 46 areas of priority deciduous woodland site at with the closest being approximately 116m west of the site. This area of woodland is also registered on the National Forest Inventory (Woodland - Broadleaved). Further priority habitats within 1km of the site comprise of woodpasture and parkland BAP 150m south.
- 5.7. There are four areas of ancient woodland within 1km of the application site, comprising Chalcot woods and Black dog woods north.

Building Inspection

External Assessment

- 5.8. The building was a semi-detached, two-storey residential dwelling constructed from brick elevations beneath a cross-pitched roof clad in concrete interlocking tiles. Exposed rafter tails were present at the eaves. A two-storey gable-fronted projection was located on the rear (south) elevation and featured a bargeboard at the gable. Adjoining this projection was a single-storey mono-pitched WC extension, also clad in concrete interlocking tiles, with a door on the west-facing elevation. A brick chimney stack was present along the party wall. The building featured concrete lintels and was fitted with modern UPVC double-glazed windows.
- 5.9. Several small features were identified at the eaves that could have provided 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 represented 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 have provided 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. During the survey, the client reported that roosting bats had historically been observed accessing the roof of the WC extension. This information is based on anecdotal observation and was not corroborated by physical evidence during the survey.

Internal Assessment

- 5.10. A loft void was present within the main roof. The void 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 WC extension was also inspected internally. The door was typically kept closed, and the roof space had been fully boarded, forming a sealed internal compartment with no accessible voids.
- 5.11. No evidence of bats, such as droppings or feeding remains, was recorded within the main house void.
- 5.12. No direct evidence of bird nesting activity was observed externally or internally during the building assessment
- 5.13. Photos from the Building Inspection conducted in January 2026 can be found in **Appendix 3**.

Emergence Survey Results

- 5.14. On the first emergence survey conducted on 20th May 2026, seventeen common pipistrelles emerged from the toilet extension roof. Their access point was a gap under the verge tile. An additional three common pipistrelles were seen emerging from the neighbour's roof (southern roof, eastern side). During the survey, general bat activity was low; the roosting common pipistrelles left the site after emerging. Later on, a few passes from common and soprano pipistrelles were observed. A lesser horseshoe was heard later on in the survey.

Table 5: 20/05/26 - Dusk emergence survey.

Timing	Species	Roost type	No. of bats	Structure	Location on structure	Roost description
Start: 20:45 Sunset: 21:00 End: 22:30	Common pipistrelle	Maternity roost	17	Under verge tile	Toilet extension roof	The access point is under a verge tile; the exact nature of the internal roosting structure is unknown
	Common pipistrelle	Day	3	Exact location unknown	Southern gable roof on the eastern side	Emergences from the neighbour's roof
Observations: After emerging, the common pipistrelles left the site. A few passes from common and soprano pipistrelles later in the survey. A lesser horseshoe was heard.						

- 5.15. On the second emergence survey conducted on 2nd June 2026, no emergences were recorded. A few passes from common and soprano pipistrelles and long-eared were seen along the hedge by the road to the north of the property. There was frequent common pipistrelle foraging in the garden with some passes from some soprano pipistrelle. Later on in the survey, a common pipistrelle attempted to re-enter the toilet extension roost. Myotis sp calls were heard later on in the survey. There was a light shower which lasted from

Table 6: 15/06/26 - Dusk emergence survey.

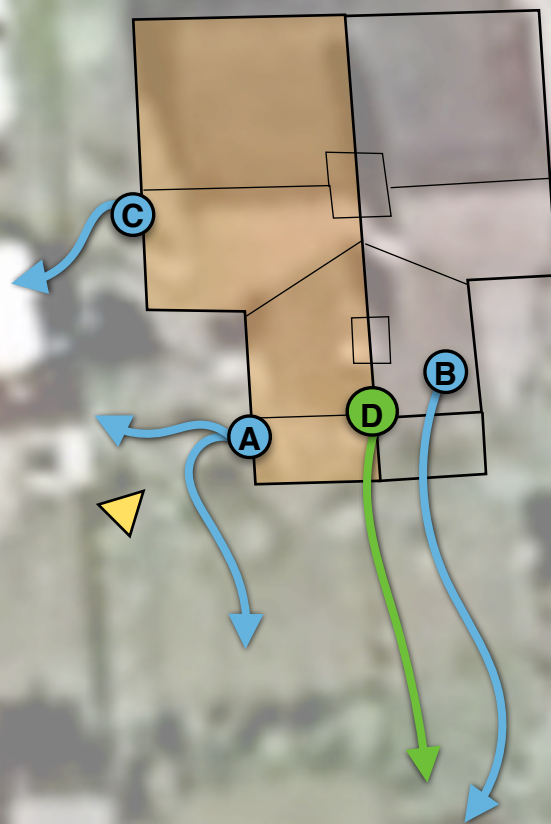
Timing	Species	Roost type	No. of bats	Structure	Location on structure	Roost description
Start: 21:11	No emergences recorded on the survey					
Sunset: 21:26						
End: 22:56						
Observations: Common and soprano pipistrelles, along with long-eared bats, were recorded commuting along the northern roadside hedge. Frequent foraging activity by common pipistrelle was observed within the garden, with occasional passes from soprano pipistrelle. A common pipistrelle was later recorded attempting to re-enter the WC extension, and Myotis species calls were detected later in the survey.						

22:20-22:27; this did not deter bat activity pre or post the shower.

- 5.16. On the third emergence survey conducted on 7th July 2026 one long-eared bat emerged from between the wall plate and the eaves up at the apex of the gable. One common pipistrelle emerged from the neighbour's roof (southern gable roof on the eastern side) and another single common pipistrelle emerged from the verge on the western gable. There was low bat activity on this survey with only a common and soprano pipistrelles foraging in the garden once it got dark.

Table 7: 07/07/26 - Dusk emergence survey.

Timing	Species	Roost type	No. of bats	Structure	Location on structure	Roost description
Start: 21:10 Sunset: 21:25 End: 22:55	Common pipistrelle	Day	1	Exact location unknown	Southern gable roof on the eastern side	Emergence from the neighbour's roof
	Common pipistrelle	Day	1	Verge	Western gable	Gap in the mortar on the verge
	Long-eared	Day	1	Between the wall plate and the eaves	Apex of southern gable	The access point is between the wall plate and the eaves
Observations: Common and soprano pipistrelles foraging in the garden once it got dark.						



Roost	Feature	Species	Date Observed
A	Under verge tiles	17x Common pipistrelle	20/5/26
B	Exact location on neighbour's roof unknown	4x Common pipistrelle	20/5/26 & 07/07/26
C	Verge	1x Common pipistrelle	07/07/26
D	Between the wall plate and the eaves	1x Long-eared	07/07/26

*NOTE Areas are indicative and are not shown to exact scale.



Building surveyed



Surveyor Location



Emergence/Re-entry Location
(coloured by species)



Bat Flight Path (coloured by species)



Area of Continuous Bat Activity
(coloured by species)



Outline of void identified as a roost
(coloured by species)

Bat Species



Common Pipistrelle



Brown long-eared



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Project: 78 High Street

Figure 3: Emergence
Survey Results

Date: July 2026

6. IMPACT ASSESSMENT

Designated Sites

- 6.1. The site is within the zone of influence (Zol) for recreational pressure impacts to one or more European Sites (habitats sites); however, as the proposal will not result in a net gain of residential units. The LPA will not be required to consult Natural England for recreational pressure from this development, and therefore a Habitats Regulations Assessment (HRA) is not required in this instance.

Evaluation of Bat Roosts on Site

- 6.2. 78 High Street is confirmed to support a common pipistrelle maternity roost, a common pipistrelle day roost and a long-eared *sp.* day roost. A peak count of seventeen common pipistrelle and one long-eared *sp.* were recorded during the surveys.
- 6.3. See **Table 8** for value of each roost in accordance with Wrey *et al.*, 2010. Impact of works.

Table 8: Value of bat roosts at 78 High Street

Species	Rarity	Roost Type	Value
Common pipistrelle	Common	Maternity	County
Common pipistrelle	Common	Day	District, Local or Parish
Long-eared <i>sp.</i>	Common or rarest	Day	District, Local or Parish or County

Roost Impact Assessment

- 6.4. The proposed plans at 78 High Street comprise a two-storey extension which will join the existing roof at the eaves level and a single-storey extension to the toilet building expanding its length to match the two-storey extension.
- 6.5. Potential impacts to bats at 78 High Street therefore include the destruction, via the removal of access, of a common pipistrelle maternity roost. There is also the potential for disturbance, injury or killing of bats in their roosts during works.
- 6.6. In the absence of mitigation, the works would therefore result in an offence under the *Conservation of Habitats and Species Regulations (2017)*.

Mitigation

- 6.7. The following mitigation strategy provides details of the mitigation measures to minimise the risk of killing or injury of individual bats during the works process. The compensation strategy demonstrates that compensatory roosts will be provided to replace the roosting opportunities present at the existing building, which will be modified.
- 6.8. In line with the Bat Mitigation Guidelines (Reason and Wray, 2023) the roost is of **high** conservation status. Therefore, the mitigation and compensation is must be a like-for-like replacement (as close as possible or better) and the bats should not be left without a roost.

An appropriate licence is required. Due to the roosts present a full EPS mitigation licence will be required.

- 6.9. *EPS Mitigation Licence:* A licence application can be submitted following planning approval by the Local Planning Authority (LPA) and a licence must be granted prior to any works commencing on site with potential to impact bats or their roosts. Licences will be issued by Natural England if the three licensing tests detailed in Section 3 are met. Whilst Natural England aim to provide licensing decisions within 30 working days, current processing times have ranged between 30 and 60 working days.
- 6.10. Please note that such licences will only be granted where it can be shown that there will be no detriment to the species of bat concerned, and therefore suitable mitigation measures are required. In order to ensure that the 'Favourable Conservation Test' can be met, a mitigation statement will need to be submitted as part of the licence application. This includes measures to minimise the risk of killing or injury of bats during the proposed works and to ensure that there is long term provision of roosting opportunities on site. Input from a licensed consultant will be required during licensable activities at the site (such as the removal of features with potential for roosting bats).
- 6.11. *Timing of Works:* The majority of works affecting summer bat roosts can take place between March and October, avoiding the winter hibernation season (November to February inclusive). As the emergence surveys have identified a maternity roost at the site, works would also be required to avoid the main maternity season (May to August inclusive).
- 6.12. *Toolbox Talk:* Before commencing any work on site, all contractors will be inducted by a licensed bat ecologist or accredited agent in a tool box talk, to ensure they are aware of the risks to wildlife on site, particularly the presence of bat roosts, their legal protection and of working practices to avoid harming bats and other species in order to ensure working practices on site follow legal requirements.
- 6.13. *Ecological Supervision:* Immediately prior to any works on site, the buildings must be subject to an internal and external survey by a suitably qualified and licensed bat ecologist to ensure as far as possible that no bats are present. In addition, hand removal / soft strip of internal features suitable for use by bats must be done very cautiously and under supervision by a bat licensed ecologist.
- 6.14. *Bat Boxes:* To provide a compensatory roosting and safe release site for bats during demolition works, at least one bat box will be installed prior to works commencing on site, comprising a Greenwoods two-crevice or similar. This box will remain on site in perpetuity. The location will be determined by a licensed bat ecologist to ensure likelihood of repeated use is increased. The bat boxes will be installed at a height of at least 4m, preferably on a southern un-cluttered aspect with good connectivity to linear features such as other mature trees and hedgerows.

- 6.15. *Roofing Membrane:* It is recommended that type 1F bitumen roofing membrane is used on any part of the building which is accessible by bats. Standard breathable roofing membrane will not be permitted as it presents a lethal entanglement hazard to bats. **If breathable membrane cannot be avoided, you must provide a certificate that proves the roofing membrane has passed a 'snagging propensity test' if you're using a non-bitumen coated roofing membrane.**
- 6.16. A snagging propensity test checks that the membrane can stand the repeated snagging actions of roosting bats. To pass, a membrane must show no change in the average number of loops per cm² as rotations are increased from 0 to 1000. At the time of writing, there is only one suitable product that conforms to these standards: TLX-Batsafe membrane.
- 6.17. You do not need a certificate for bitumen 1F felt that has a non-woven, short fibre construction.
- 6.18. *Timber Treatment:* Any use of timber-treatment or pest control treatment must be selected from the approved lists for safe use in or near bat roosts which can be provided on request.
- 6.19. *Lighting:* Any new external lighting must be directed to avoid light spillage onto vegetation, particularly linear habitat features such as woodland edges or potential roosting sites within trees and buildings. Bats are sensitive to light and could potentially avoid the area if access points or the surrounding areas become lit. Appropriate lighting options will prevent a negative impact on bats potentially using the habitats on site and should be approved by a suitably qualified and licensed bat ecologist. Lighting plans should be approved and signed off by a licensed bat ecologist prior to submission, to ensure the scheme is suitable for bats. If appropriate measures are taken to reduce light spillage from the development, it is likely that there will be no negative impacts on local bat populations.
- 6.20. See **Appendix 4** for further information on designing lighting to minimise impacts on bats.
- 6.21. *Habitats:* The proposals do not result in significant loss of foraging habitat for bats, however, a wildlife friendly landscaping scheme is recommended to enhance the site for bats and other wildlife.

Compensation

- 6.22. To compensate for the loss of the existing maternity roost on the toilet extension, a fascia board access feature will be installed on the new fascia board on the western elevation of the toilet extension. Currently, the precise nature of the feature the bats are using within the toilet extension roof is unknown. When the verge is taken off, the space shall be inspected to identify the nature of the space the bats are using. A bespoke feature matching the current feature of the maternity roost shall be installed, linking to the fascia board access feature.

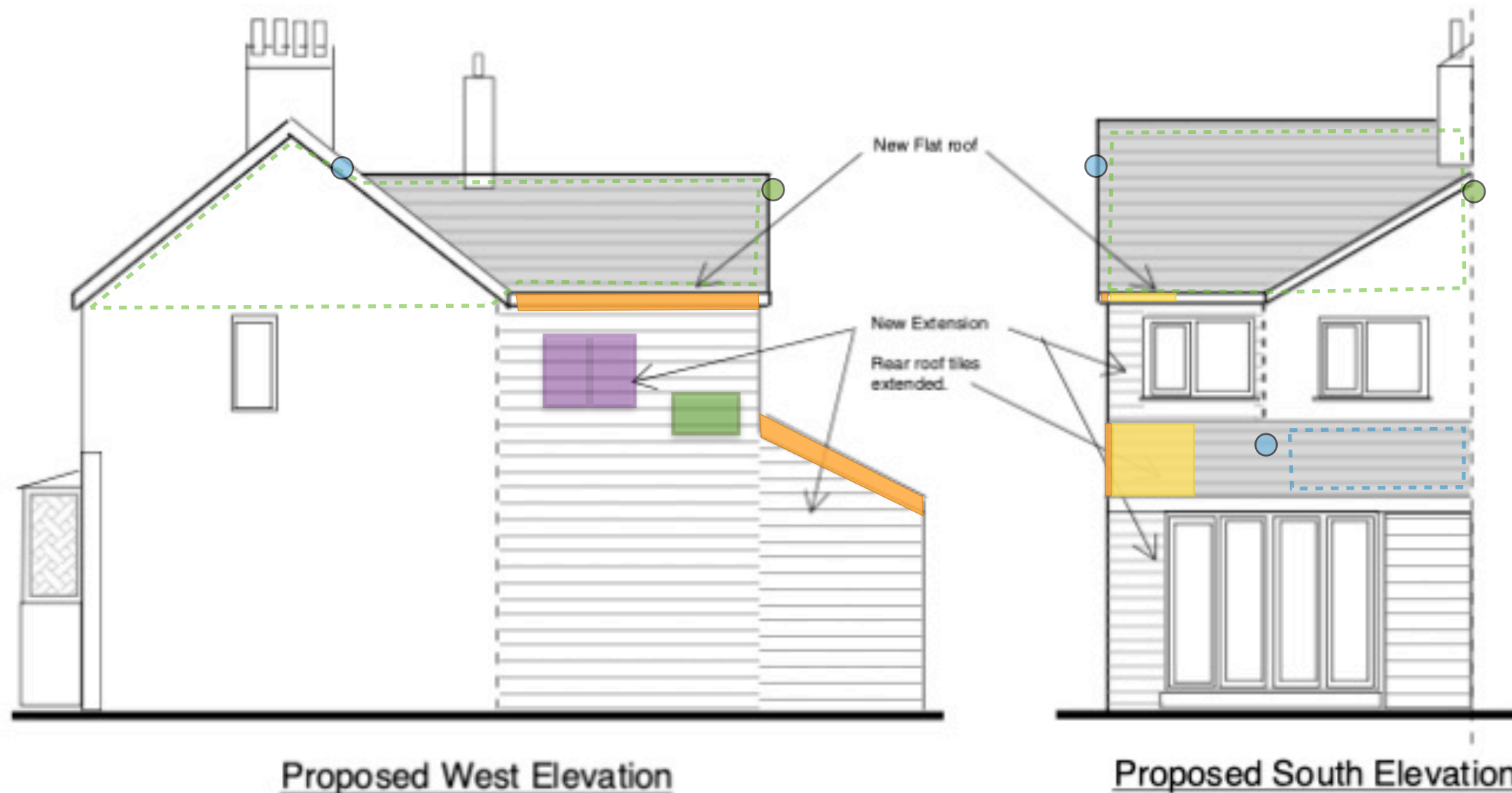
- 6.23. To provide additional maternity roosting options a fascia board access feature and bespoke roosting feature, mimicking the original feature, will be added to the western fascia board and flat roof.
- 6.24. The details and locations of the compensation are shown in **Figure 4**. Where bats are likely to come into contact with the roofing membrane/felt, breathable roofing membrane cannot be used unless it is bat safe, having passed a 'snagging propensity test'.

Post-works Monitoring

- 6.25. A minimum of 2 years of post-development monitoring will be required with the aim of demonstrating the compensation roost is being used to breed. The monitoring will be staggered between years, either with the first year being year 1 (the first activity season post-development) with more monitoring in year 3 or the first year being year 2 (the second activity season post-development) and more monitoring in year 4. A minimum of one emergence survey during the latter part of the breeding season and an annual check post maternity peak period are required as part of each year's monitoring.

Evaluation of Nesting Birds on Site

- 6.26. A great tit *Parus major* was observed using the southern gable end on the first survey conducted on 20th May 2026.
- 6.27. This gable end will not be impacted by the works; therefore, there shall be no loss in nesting opportunities. If the works are being conducted anytime between March to September, a breeding bird check should be performed. If a breeding nest is found, steps should be taken to ensure no disturbance to the bird, such as no scaffolding blocking their access and minimal human activity within 5m.



Proposed West Elevation

Proposed South Elevation

Important notes on roof design for bats:

- Type 1F bitumen felt must be used in any areas, specifically or incidentally accessible to bats. If a breathable membrane cannot be avoided, a certificate must be provided to prove that the membrane has passed a 'snagging propensity test', and does not present a hazard to bats. (e.g SIGA Majcoat "Bat-Safe" Roof Membrane)
- Wet Ridge systems are to be installed across the roof wherever possible. Dry ridge systems do not create suitable conditions for bats. Lap vents can be used where additional ventilation is required.
- Tiles will be laid onto a standard parallel-battened roof. Cross battens do not create suitable conditions for bats.
- The area of the proposed loft space should be a "cold roof" system with insulation at ceiling level, NOT between rafters.
- **If all of these conditions cannot be met, your builder must discuss with the project ecologist in advance of construction to find suitable alternatives and modifications.**

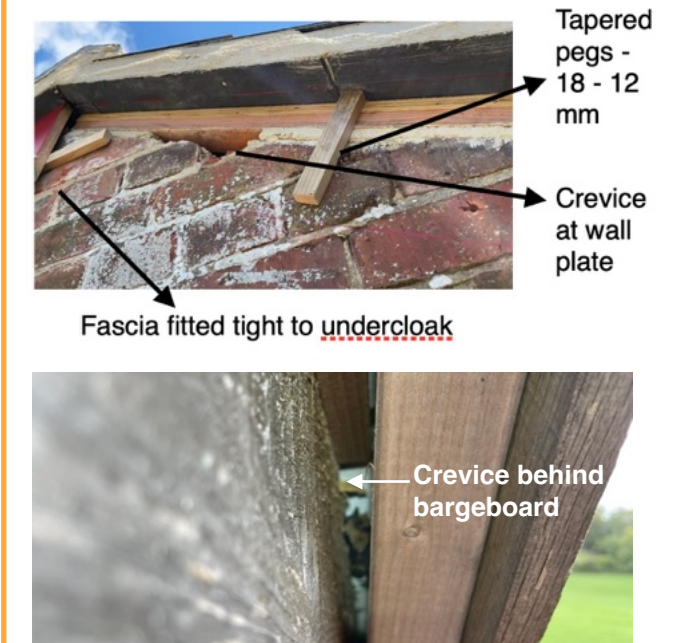
Two linked integrated bat bricks

Two integrated bat bricks, such as the Green & Blue Bat block I bat brick, will be installed side by side. Before installation, they will have access holes drilled into their sides to allow internal movement between the boxes. These boxes will provide additional maternity roosting options for common pipistrelle.



Fascia board access feature:

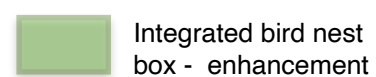
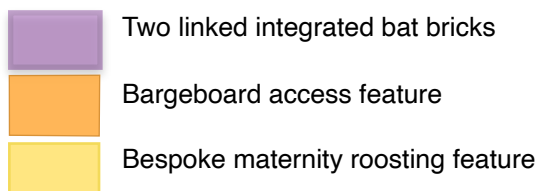
Fascia board with a crevice suitable for roosting bats to match the existing building.



Bespoke maternity roosting feature:

Bespoke maternity roosting features designed in a manner to mimic the existing maternity feature.

These will replace the existing common pipistrelle maternity roost being lost and provide additional common pipistrelle maternity roosting options.



Roost access points
(coloured by species)



Outline of void or crevice space
identified as a roost (coloured by
species)

Colours representing bat species



Common Pipistrelle



Brown long-eared

NB:- Locations and design of bat roost features as shown in this plan are illustrative only and exact location and design must be determined by a suitably qualified ecologist on site.



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Project: 78 High Street

Figure: Mitigation, compensation and enhancement plan

Date: August 2026

7. ENHANCEMENT RECOMMENDATIONS

- 7.1. National planning policy states that all developments should seek to enhance onsite biodiversity whether impacts on protected species are recorded or not. Incorporating enhancement features into new or renovated buildings should be carefully considered. These features can be simple and inexpensive, please see below for specific recommendations.

Bats

- 7.2. Two integrated bat bricks, such as the Green & Blue Bat block | bat brick, will be installed on the western elevation, side by side. Before installation, they will have access holes drilled into their sides to allow internal movement between the bricks. This will provide an additional location for a maternity roost to form on the building, enhancing the site. The details and location of this enhancement are shown in **Figure 4**.

Birds

- 7.3. An integrated bird nest box, such as the Vivara Pro WoodStone® House Sparrow Nest Box double chamber, will be installed on the western elevation to provide additional opportunities for nesting birds on site. The exact location should be determined by a suitably qualified ecologist. It will be installed at least 5m from the ground, under shade-casting eaves. The area around the brick should be kept clear to prevent access by climbing predators such as cats, squirrels, and rats. The locations are shown in **Figure 4**.

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APPENDICES

Proposed First Floor Plan

Proposed Ground Floor Plan

Existing First Floor Plan

Existing Ground Floor Plan

Proposed West Elevation

Proposed South Elevation

Block Plan (1:500 scale).

Existing West Elevation

Existing South Elevation

Notes:

GENERAL

1.This drawing is copyright.

North Elevation
(unchanged)

New Extension

All materials to roof and walls to match the existing where appropriate.

Roof: Concrete Pantiles.

walls; Brickwork.

Windows; UPVC.

STATUS	REV	DESCRIPTION	DRAWN	CHK'BY	DATE
STATUS / REVISION					
P = Preliminary, T = Tender, A = Approval, C = Construction, AB = As Built					
CLIENT					
Ms. Miller					
ARCHITECT					
N/A					
PROJECT TITLE					
78 High Street, Dilton Marsh					
DRAWING TITLE					
Existing & Proposed					

Plan-it Jupiter

Structural & Civil Engineering Design & Detail

info@plan-it-jupiter.co.uk

M: 07884 933 123

SCALE @ A3	DRAWN BY	CHECKED BY	DATE	
NTS	JRS	JS	Mar 26	
DRAWING REFERENCE				
PROJECT NUMBER	TYPE	DRAWING NUMBER	STATUS	REV.
2026-78HSDM	SK	001	P	01

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.

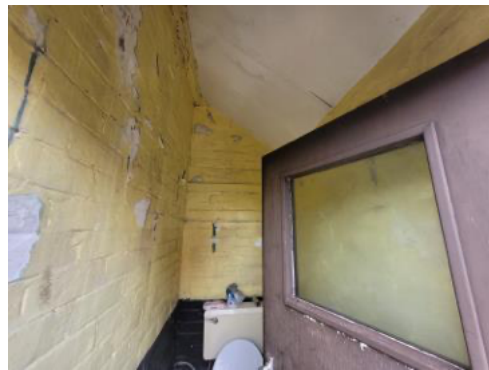


Photo 10: An internal view of the WC building showing boarded ceiling.



Photo 11: A view of the adjacent residential garden.

APPENDIX 3 - NVA



Image 1: End of survey Image. Survey 1 20/05/26



Image 2: End of survey Image. Survey 1 20/05/26



Image 3: End of survey Image. Survey 2 15/06/26



Image 4: End of survey Image. Survey 2 15/06/26



Image 5: End of survey Image. Survey 3 07/07/26



Image 6: End of survey Image. Survey 3 07/07/26



THE IMPACT OF LIGHTING ON BATS

Bats favour a dark environment for both roosting and foraging as they are adapted to low-light conditions. Artificial lighting will disturb bats if the lighting covers roost access points, flight paths or foraging habitats.

The main peak of nocturnal insect abundance occurs at dusk and a delay in emergence results in a lower foraging rate for bats.

Artificial lighting creates a 'vacuum effect' for nocturnal insects. During the night nocturnal insects use the light of the moon* to navigate. However, artificial lighting and even sky glow above cities obscures the natural moonlight as it is closer

and radiates light in multiple directions.

Some species of bats have been recorded foraging around street lights such as *Pipistrellus* species and *Nyctalus* species. However, species that are less tolerant of artificial light are at a disadvantage when foraging as insects are drawn away from these species usual foraging grounds into the zones of artificial light.

Lighting must be considered in context to any development as increased lighting may cause roost abandonment, reduced reproductive success, and reduced foraging. Mitigation to reduce the impacts of lighting for bats is therefore of great importance in bat conservation.

Table 1: Summary of predicted impact of lighting for each species/genus

Impact	High	Medium	Low
Behaviour			
Maternity roost	All species	-	-
Night roost	<i>Rhinolophus hipposideros</i> <i>Rhinolophus ferrumequinum</i> <i>Myotis</i> spp. <i>Plecotus</i> spp.	<i>Pipistrellus</i> spp. <i>Nyctalus</i> spp. <i>Eptesicus serotinus</i> <i>Barbastella barbastellus</i>	-
Emergence	All species	-	-
Foraging	<i>Rhinolophus hipposideros</i> <i>Rhinolophus ferrumequinum</i> <i>Myotis</i> spp. <i>Plecotus</i> spp.	-	<i>Pipistrellus</i> spp. <i>Nyctalus</i> spp. <i>Eptesicus serotinus</i> <i>Barbastella barbastellus</i>
Commuting	<i>Rhinolophus hipposideros</i> <i>Rhinolophus ferrumequinum</i> <i>Myotis</i> spp. <i>Plecotus</i> spp.	-	<i>Pipistrellus</i> spp. <i>Nyctalus</i> spp. <i>Eptesicus serotinus</i> <i>Barbastella barbastellus</i>
Swarming	All species	-	-
Hibernation	All species	-	-

*For more information see Warrant, E., and Dacke, M. (2016) Visual Navigation in Nocturnal insects. *Physiology*, 31, 182-196.



Sources of light that can disturb bats include; light spill via windows, sport floodlighting, car headlights, roadside lighting, security lighting, aesthetic lighting of waterways, and aesthetic illumination of buildings. Glare will affect bats over greater distance than the target area directly illuminated.

Avoidance is the most effective method, but if this is not possible the following measures should be considered.

What lighting should I use?

- Low pressure sodium lights or 'warm' LEDs
- Wavelength above 540nm
- Colour temperature below 2700K
- Shielded lights that prevent light spill above a 70 degree angle
- Passive infrared (PIR) motion sensors



What to avoid:

- Lighting roost entrances, flightpaths, and foraging or commuting routes
- Reflective surfaces beneath lighting
- High level lights
- Non-directional lighting

Lighting should be considered at an early stage allowing impacts to be minimised through the design of the site.

Key Points

- Keep lighting intensity to the minimum level required
- Limit the times that lights are on to provide some dark periods (e.g. switching installations off between midnight and 5am)
- Dim lighting according to demand
- As an alternative to lighting pathways use paving materials that reflect moonlight
- Low level lighting allows darkness to be retained within higher vegetation
- Set dark habitat buffers - lighting should always be a minimum of 25m from vegetated margins and 40m from waterbodies
- Incorporate dark corridors within the site
- Compensate for the loss of dark areas by enhancing other dark areas
- Consider building design - install internal lighting away from windows



General Mitigation for Bat Roosts

Bat Mitigation Class Licence (BMCL)

Registration for a BMCL can be submitted following planning approval. This licence permits the disturbance and/or capture of bats and/or damage/destruction of bat roosts of low conservation significance. You may apply for a BMCL in the following circumstances:

- No more than three common species of bat;
- Only individual or small numbers of bats of each species; and
- No more than three roosts in total across all structures at the site.

Natural England aim to provide licensing details in 10 working days



European Protected Species Licence (EPSL)

An application must be submitted by the local planning authority and must be granted before any works can commence on site. You must apply for an EPSL in the following circumstances:

- More than three species of bat or roosting structures are present at the site
- Rarer species are present
- Presence of a Maternity roost
- Roost present within a tree

Natural England aim to provide licensing decisions in 30 working days. Licences will only be granted where it can be shown there will be no detriment to the species of bats concerned.

Timing: If your roost is a confirmed **Hibernation** roost works cannot be carried out in **Oct-Feb**

If your roost is a confirmed **Maternity** roost works cannot be carried out in **May-Aug**



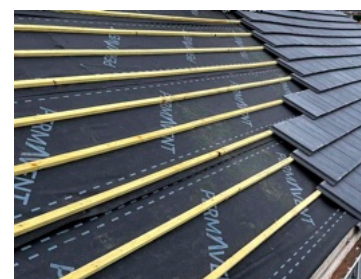
Supervision

Once you have been granted your licence, a Natural England bat-licensed ecologist will need to be on site to over see the stripping of any identified or potentially suitable roosting features. If any bats are found on site they can then be lawfully handled and placed safely into a newly provided bat box.

After the strip has taken place the provision of new roosting opportunities must be placed on site as mitigation such as bat boxes which are suitable for the roosting bat species which were found on site.

Materials

Breathable membrane (pictured on the left) should **not** be used in new loft voids as this can lead to entanglement and trapping of bats and increase the variability of the microclimate in the loft. Instead **bitumen felt** (pictured on the right) should be utilised as bats can grip onto it, helping to maintain a safe and suitable environment.





Gaps and Crevices



Crevice-dwelling bat species can utilise gaps in fascias, barge board and soffits, and potentially can gain entry to the interior roof void if the gap is large enough.

These areas of a building are often replaced or repaired which would destroy any identified roosting features. Luckily there are features that can be implemented to compensate for the loss of these features.

A simple option to compensate for a lost roosting feature in a fascia or barge board is to cut an access hole flush with the wall in which the new/replacement fascia, barge board, or soffit box is placed. It needs to be close to the wall as bats need somewhere to land before they can climb up into a gap

Alternatively, features can be created by installing wide barge boards directly on overlapping cladding, which creates suitable gaps for crevice roosting bats where natural crevices are created due to the profile of the boards. Gaps of at least 4 inches deep and approximately 15mm wide at the top are suitable for small bats such as pipistrelle species.

