

PRELIMINARY ROOST ASSESSMENT (PRA) & NESTING BIRDS REPORT

3rd September 2026

Murhill House, Limpley Stoke, Wiltshire,
BA2 7FG

Applicant: Penelope Robinson

Agent/planner: Haydn Smith

DOCUMENT CONTROL:

Version:	1
Issue:	Final
Authored by:	Keeley Lanigan MSc
Report Quality Assurance (QA) by:	James Gooding BSc
Client:	Penelope Robinson
Planning agent:	Haydn Smith
Local Planning Authority (LPA):	Wiltshire Council
Note to LPA:	n/a

VERSION HISTORY:

Version:	Date:	Author:	Description of change from previous version:
-			

DISCLAIMER:

The copyright of this document remains with ABR Ecology Ltd. The contents of this document therefore must not be copied or reproduced in whole or in part for any purpose without the written consent of ABR Ecology Ltd. This report remains the property of ABR Ecology Ltd until payment for the agreed services has been received in full.

ABR Ecology Ltd shall not be liable for the use of this report for purposes other than those for which the report was prepared and provided.

This report has been prepared to identify the presence of bats and nesting birds within the site, where this falls within the scope of the agreed works.

This report has been produced using all reasonable skill and care, and a Quality Assurance (QA) review process has been undertaken prior to issue of this report. If the reader identifies any inaccuracies or discrepancies, this should be brought to the attention of ABR Ecology immediately.

It is at the discretion of the Local Planning Authority (LPA) to determine whether the information and data on protected species contained within this report is made publicly available.

SURVEY DATA LIFESPAN AND VALIDITY:

Survey data is considered valid for 12-18 months from the survey date in accordance with the CIEEM Advice note (CIEEM, 2019), due to the presence of and/or potential for mobile species to be present within the site. The 12–18-month period is taken where the condition(s) of the building(s)/structure(s) on site remain unchanged since the survey and the proposals for the site are unchanged. If any changes to the plans occur, this report may not be valid, and any conclusions provided may not be appropriate. In this event, it is the responsibility of the applicant to contact ABR Ecology to determine whether an amended report or resurvey of the site is required.

If the required further activity surveys of the property are undertaken and a bat roost is subsequently identified, a total of three bat activity surveys will be required, and survey data will be required to inform a bat European Protected Species (EPS) licence application. The building inspection (PRA) is considered valid for 3 months and activity data from the then current survey season (May – August/September) to inform a bat licence application.

This document has been prepared in accordance with CIEEM's Guidelines for Ecological Report Writing 2nd ed (CIEEM, 2017a) and the Bat Conservation Trust (BCT) Good Practice Guidelines 4th ed (Collins, 2023).

ABR Ecology Ltd cannot accept responsibility for third party data supplied within this report.

At the time of writing, standard methodologies have been used which are accepted by Natural England and other statutory bodies. No responsibility will be accepted where standard methodologies change and where Government, national bodies and industry subsequently modify standards.

The results of the surveys and this assessment are representative at the time of the surveys taking place.

	ABR Ecology Ltd	T: 01202 821 325
	First Floor Offices, 35 Black Moor Road,	E: abrecology@gmail.com
	Ebble Industrial Estate, Verwood, BH31 6AT	W: www.abrecology.com

Contents

Non-technical summary	3
1. Introduction	5
2. Methodology	7
3. Results	12
4. PRA outcome and further survey recommendations	19
5. References	23
Appendix A: Proposed roof plans	25
Appendix B: Relevant legislation and planning policy.....	29
Appendix C: Photographs.....	32
Appendix D: Bat evidence map.....	36

Non-technical summary

- ◆ ABR Ecology Ltd were commissioned by Penelope Robinson to undertake a Preliminary Roost Assessment (PRA) and nesting birds survey at Murhill House, Limpley Stoke, Wiltshire, BA2 7FG to advise on the presence/absence of bats and nesting birds at the property.
- ◆ This report was requested to support a listed building application for the re-roofing and renovation of the property.
- ◆ The PRA was undertaken on the 24th June 2026 by Natural England class 1 licensed bat ecologist James Gooding and seasonal surveyor Nick Mahoney.
- ◆ The PRA identified bat droppings within the loft space, confirmed to belong to brown long-eared and soprano pipistrelle bats by DNA analysis. The building therefore supports '**confirmed**' bat roosts for these species.
- ◆ The building has been assessed and determined to have 'high' potential to support roosting bats, based on the presence of suitable roosting features (PRFs) and the quality of nearby habitat.
- ◆ Roost characterisation surveys are now required upon the building as bat presence has been confirmed. The roost characterisation survey must be undertaken to inform the impact assessment of the works upon the roost. Roost characterisation surveys can include dusk emergence surveys, hibernation surveys, static monitoring through the summer months etc with the aim of the surveys being to determine the type of roosts present, the number of bats, the locations of each roost and whether any additional species are present.
- ◆ A number of bat activity (dusk) surveys are now required upon the building to determine the roost type(s), entry/exit points for the roost and roosting locations and will also identify if any additional species of bat are roosting within the building. Once the roost has been sufficiently characterised, surveys may conclude. The ecologist will determine whether two surveys provide adequate information or whether a third survey is required to confirm patterns of bat use. These surveys will inform a final bat mitigation report.
- ◆ A minimum of two of the three surveys must be conducted between May and August and must be spaced a minimum of three weeks apart; the third survey may be

conducted in September in suitable weather conditions. If a maternity roost is identified, the subsequent survey must be spaced a minimum of four weeks apart.

- ◆ Para 99 of Circular 06/2005 states: *'It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before planning permission is granted'*. Therefore, the surveys must be conducted prior to the planning determination stage and cannot be conditioned as part of the consent.
- ◆ The building has been assessed for its potential to support classic hibernation features such as underground sites/tunnels/cellars and the property supports a cellar with an open vent highly suitable for hibernation roosts. As a result, it is classified as having 'high' hibernation potential. The cellar will be unaffected by the proposals, and no further surveys are required on the cellar.
- ◆ The site was identified to fall within the Bath and Bradford-on-Avon Bats SAC. Within a 2000m buffer for a lesser horseshoe core roost and within the 4000m buffer of a greater horseshoe core roost. Impacts on the Bath and Bradford-on-Avon Bats SAC and core horseshoe roosts will be discussed following results of the further surveys.
- ◆ Bats are likely foraging and commuting across the site; measures for lighting reduction will be provided in the final report to minimize impacts of obtrusive lighting on bats.
- ◆ No evidence of nesting birds was recorded during the visit. However, there is potential for nesting birds to be present within the property due to the presence of ingress points around the property. Mitigation for nesting birds will be provided in the final report
- ◆ A biodiversity enhancement, such as a minimum of one built-in bat tube or bird nesting box, must be provided to ensure the application is compliant with planning policy; this will be detailed in the final report following completion of the surveys.

1. Introduction

- 1.1 ABR Ecology Ltd were commissioned Penelope Robinson to undertake a Preliminary Roost Assessment (PRA) and nesting birds survey at Murhill House, Limpley Stoke, Wiltshire, BA2 7FG (central grid reference: ST 79590 60633) to advise on the presence/absence of bats and nesting birds at the property. This report was requested to support a listed building application for the re-roofing and renovation of the property.
- 1.2 The PRA was undertaken on the 24th June 2026 by Natural England class 1 licensed bat ecologist James Gooding and seasonal surveyor Nick Mahoney.
- 1.3 Proposed plans are provided in Appendix A.

Site context

- 1.4 Lies within the Bath and Bradford on Avon bat SAC, designated for a network of underground sites supporting rare Bechstein's bats, greater horseshoe bats and lesser horseshoe bats. The application site comprises a grade II listed building constructed of bath stone within a rural area. The site is surrounded by woodland on all sides, and the building is approximately 230m north of the River Avon. The wider surrounding landscape comprises rural residential development, woodland, and arable land and pasture. The surrounding areas are considered to provide excellent foraging opportunities and commuting corridors for bats.

Aims and scope of the PRA and report

- 1.5 The principal aim of a PRA survey is to determine the actual and potential presence of bats within the building(s)/structure(s). This report is based on the results of the PRA and records of bats and bat roosts as supplied by Wiltshire & Swindon Biological Records Centre (WSBRC, 2026).
- 1.6 The results of the PRA and the data search were principally aimed at determining if a bat roost is present within the property and/or whether the building(s)/structure(s) hold the 'potential' to support roosting bats in line with The BCT Good Practice Guidelines 4th ed (Collins, 2023). The results of the data search were also used to determine the Zone of Influence (ZoI) for bats associated with the project.
- 1.7 This report aims to establish whether the proposed works will likely impact roosting bats and identifies if there are requirements for activity (dusk) surveys, hibernation surveys and/or static monitoring surveys, which may inform the requirement for a bat

European Protected Species (EPS) licence or Bat Mitigation Class Licence (BMCL) from Natural England to allow the works to proceed lawfully following planning approval.

- 1.8 The aim of the nesting birds survey was to determine if there is any recent or historical evidence of nesting birds within the building(s) onsite.

Relevant planning policy and legislation

- 1.9 Full details of relevant planning policy and legislation are provided in Appendix C of this report; the following policy and legislation in respect of bats and nesting birds is applicable to this application:

- ◆ The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019
- ◆ The Wildlife and Countryside Act 1981 (as amended) – Section 1 and Schedule 1 (birds) and 5 (bats)
- ◆ The Natural Environment and Rural Communities (NERC) Act 2006 – Sections 40 and 41
- ◆ The Environment Act 2021
- ◆ The National Planning Policy Framework (NPPF) 2024 – Section 15
- ◆ National Planning Practice Guidance Natural Environment (para 10-35)
- ◆ Circular 06/05: Biodiversity and Geological Conservation – Statutory Obligations and Their Impact Within the Planning System
- ◆ The Wiltshire Core Strategy: Core Policy 50 - adopted 2015

- 1.10 **It is the responsibility of the applicant(s) to ensure that the proposed development proceeds in full compliance with legislation, national and local policy, and in accordance with all conditions of the obtained planning consent(s). It is also the responsibility of the applicant(s) to request a report amendment / reassessment of the site for roosting bats and nesting birds where the scale/nature of the proposed plans subsequently change.**

2. Methodology

Desktop data search – bat records

- 2.1 The Multi-Agency Geographical Information for the Countryside (MAGIC) website (MAGIC, 2026) was accessed to determine if the application site falls within the consultation zone for any Special Areas of Conservation (SACs), and Sites of Special Scientific Interest (SSSIs) designated for the presence of bats.
- 2.2 Wiltshire & Swindon Biological Records Centre (WSBRC, 2026) was contacted to provide records of bats and bat roosts within a 2km radius of the application site. These records were used to inform the assessment of the site in its potential to support roosting bats and identifying any potential cumulative impacts on bats from the proposed development.

Zone of Influence (Zol) for bats

- 2.3 The results of the desktop data search and the proposed plans were used to determine a Zone of Influence (Zol) for bats; the Zol is defined by CIEEM (2017b) as *‘the areas/resources that may be affected by the biophysical changes caused by activities associated with a project’*.
- 2.4 Due to the localised and small-scale nature of the proposals (as shown in Appendix A), the Zol for roosting bats is confined to the site boundary. The Zol for foraging bats may extend just beyond the site boundary where artificial lighting is concerned, however, this is considered to be minimal if lighting mitigation is implemented, and therefore the survey area was confined to the building only.

Preliminary Roost Assessment (PRA)

- 2.5 Conditions for the PRA of the building(s) and surveyor competencies are provided in Tables 1 and 2 below:

Table 1: Weather conditions, equipment and timings for PRA survey

Survey date	Time of survey	Surveyors	Equipment available to use	Weather conditions		
24/06/2026	20:00pm	James Gooding and Nick Mahoney	High-powered torch, mirrors, sealable bags, FFP3 face masks, gloves, extendable ladder,	Temp:	Okta cloud cover:	Beaufort wind force:
				30°C	1/8	0-1/12

			endoscope, binoculars			
--	--	--	--------------------------	--	--	--

Table 2: Surveyor qualifications / competencies

Qualifications	Bat licence	Barn owl licence	Ecologist level	Accredited agent
Surveyor				
James Gooding	Class 1	-	Ecologist	-
Nick Mahoney	-	-	Seasonal surveyor	-

- 2.6 The surveying ecologists have received training in Working at Heights (and in-house training in the use of ladders for PRA surveys), Manual Handling, and Emergency First Aid At Work to ensure compliance with Health and Safety legislation (The Work at Height Regulations 2005, Manual Handling Operations Regulations 1992, The Health and Safety (First-Aid) Regulations 1981).
- 2.7 The PRA was undertaken in accordance with The Bat Conservation Trust (BCT) Good Practice Guidelines 4th ed (Collins, 2023). A systematic search was made of any internal building areas / loft spaces and exterior building areas. Where present, information was compiled on the potential and actual bat entry/exit points (where possible); potential and actual bat roosting locations; and any evidence of bats found.
- 2.8 The internal inspection involved a search of internal building areas and where loft spaces were present, the ecologists undertook a search of areas such as beams/felt; fibreglass insulation/flooring; crawl boards; water tanks; internal chimney stacks; gable ends; and stored materials etc.
- 2.9 The external building assessment included an inspection of the ground/flooring, and where present, any windowsills, windowpanes, behind peeling paintwork/lifted render, brick/block work, chimneys, eaves, lead flashing, tiles and soffits etc.
- 2.10 Evidence of roosting bats can include:
- ◆ The presence of physical live/deceased bats
 - ◆ Bat droppings (distinguished from rodent droppings by their crumbly texture)
 - ◆ Fur-oil staining around entry/exit points
 - ◆ Urine splashing
 - ◆ Feeding remains, such as insect wings and casings

- 2.11 If bat droppings were identified within the building, the droppings were sent for DNA analysis by Swift Ecology Ltd to confirm the species of bat present; in the event bat droppings/physical bats were recorded, the building was identified as a 'confirmed' bat roost.
- 2.12 Most native bats in England are crevice-dwelling species, with bats roosting in remote areas, such as under roof tiles; behind cladding; in cavities; soffits; and behind lead flashing etc, and evidence of these species is often concealed and/or inaccessible. Therefore, where no evidence of roosting bats was recorded, an assessment on the availability of potential roosting areas and bat exit/entry points around the building(s) was conducted. The building(s) was then assigned a category based on a sliding scale of potential for bats, ranging from 'none' to 'high' as shown in Table 3 below (Collins, 2023):

Table 3: Guidelines for assessing the potential suitability of buildings for bats (Collins, 2023)

Bat roosting potential	Description
'High'	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis & potentially for longer periods of time due to their size, shelter, protection, conditions (temperature, humidity, height above ground level, adverse light levels, or high levels of disturbance), and surrounding habitat. The structure has the potential to support high conservation status roosts for example maternity or classic cool/stable hibernation sites.
'Moderate'	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions (temperature, humidity, height above ground level, adverse light levels, or high levels of disturbance), and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity & hibernation and this is made irrespective of species conservation status, which is established after presence if confirmed via the PRA).
'Low'	The building features one or more potential roosting features that could be used by bats opportunistically at any time of year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions (temperature, humidity, height above ground level, adverse light levels, or high levels of disturbance) and/or suitable surrounding habitat to be used on a regular basis or by a larger number of bats.

‘Negligible’	There are no obvious habitat features likely to be used by bats, however there is a small element of uncertainty as bats can use small and apparently unsuitable features on occasion. (*negligible is defined as ‘so small or unimportant as to be not worth considering, insignificant’. This category may be used where there are places that a bat could roost or forage (due to one attribute), but it is unlikely that they would (due to another attribute).
‘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).

- 2.13 All building(s) were then assessed for their potential to support roosting bats during the hibernation period (notably between December and February). Hibernation roosts are traditionally located in tunnels, cellars, and underground sites where the temperature is cool and the humidity is high, and especially where both attributes are stable. Non-classic hibernation sites such as houses, commercial buildings and outbuildings should be assessed to determine whether they too can support potential hibernation sites where temperatures and humidity are within suitable realms.
- 2.14 Where roosts are recorded in non-hibernation times, and suitable conditions exist for hibernation to occur, a suite of further hibernation surveys would need to be undertaken. Further presence/absence surveys, roost characterisation surveys and hibernation surveys should be undertaken after the initial PRA where evidence is found, or the likelihood of bats roosting has been recorded.

Nesting birds

- 2.15 A search was conducted for evidence of barn owl (*Tyto alba*) and other nesting birds within and around the building(s) during the site visit. Evidence of nesting birds can include the physical presence of chicks and/or adult birds, nesting material, eggs and/or egg casings, feathers, white splashing (droppings), and pellets (for barn owls).

Survey limitations

PRA and nesting bird surveys

- 2.16 Bats and nesting birds are highly mobile species, and it is therefore possible for bats and nesting birds to occupy the property at any time in the future, particularly if any alterations/changes occur to the property. The PRA only provides a ‘snapshot’ in time and does not account for seasonal variation; some bat species and nesting birds may have been overlooked due to seasonal constraints. As such, it is not possible to have

complete certainty that bats and nesting birds are not present, rather, there was no indication of bat/nesting bird presence at the time of survey.

- 2.17 Potential evidence of bats, in particular crevice-dwelling species, may have been overlooked due to access restrictions to remote areas of the building(s). Binoculars were used to help identify any potential bat droppings on the exterior features of the building(s).
- 2.18 Often bats leave no visible sign of their presence on the outside of a building, and even when they do, wet weather can wash evidence away.

Reporting and survey data lifespan

- 2.19 The data within this report should not be seen as comprehensive. Data obtained from the WSBRC (2026) data search is highly unlikely to be representative of the bat species and roosts existing within the area. It is therefore possible that bat species/bat roosts may occur that have not been recorded in the area by the local records centre.
- 2.20 This report is considered valid for 12-18 months from the survey date in accordance with the CIEEM Advice note (CIEEM, 2019) for planning purposes only; and is only intended for the proposed plans outlined within this report. If any material changes to the building(s)/site occur or if the nature and/or extent of the proposed development changes, an update visit to reassess the building(s) will be required, as any conclusions provided herein may not be valid.
- 2.21 **This report is not valid to inform a planning decision.** Para 99 of Circular 06/2005 states: *'It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before planning permission is granted'*. Further bat activity (dusk) surveys must be conducted prior to the planning determination stage as these surveys cannot be conditioned as part of the consent.

3. Results

Desktop data search

- 3.1 The site was identified to fall within the Bath and Bradford-on-Avon Bats SAC. Within a 2000m buffer for a lesser horseshoe core roost and within the 4000m buffer of a greater horseshoe core roost. Impacts on the Bath and Bradford-on-Avon Bats SAC and core horseshoe roosts will be discussed following results of the further surveys.

Local records centre – bat records

- 3.2 WSBRC (2026) provided records of bats and bat roosts within a 2km radius of the site as presented in Table 4 below:

Table 4: Records for bats and bat roosts around the site

Common name	Scientific name	Number of records	Most recent record	Nearest record to site
Alcathoe bat	<i>Myotis alcathoe</i>	1	2018	Within 2km
Barbastelle	<i>Barbastella barbastellus</i>	28	2025	940m south
Bechstein's bat	<i>Myotis bechsteinii</i>	6	2024	900m east
Brandt's bat	<i>Myotis brandtii</i>	7	2021	110m northwest
Brown long-eared bat	<i>Plecotus auritus</i>	34	2025	420m northeast
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	127	2025	130m northeast
Daubenton's bat	<i>Myotis daubentonii</i>	88	2025	945m south
Greater horseshoe bat	<i>Rhinolophus ferrumequinum</i>	323	2025	110m northwest
Horseshoe bat species	<i>Rhinolophus sp.</i>	1	2017	Within 2km
Leisler's bat	<i>Nyctalus leisleri</i>	6	2023	945m south
Lesser horseshoe bat	<i>Rhinolophus hipposideros</i>	273	2025	110m northwest
Long-eared bat species	<i>Plecotus sp.</i>	39	2025	940m south
Myotis bat species	<i>Myotis sp.</i>	66	2024	130m northeast
Nathusius's pipistrelle	<i>Pipistrellus nathusii</i>	1	2018	1.4km northeast
Natterer's bat	<i>Myotis nattereri</i>	46	2025	110m northwest
Noctule	<i>Nyctalus noctula</i>	75	2025	130m northeast
Nyctalus bat species	<i>Nyctalus sp.</i>	9	2021	945m south
Pipistrelle bat species	<i>Pipistrellus sp.</i>	11	2021	Within 2km
Serotine	<i>Cnephaeus serotinus</i>	82	2025	130m northeast
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>	132	2025	130m northeast
Whiskered bat	<i>Myotis mystacinus</i>	23	2025	110m northwest

Whiskered/brandt's bat	<i>Myotis mystacinus/brandtii</i>	13	2025	940m south
------------------------	---------------------------------------	----	------	------------

3.3 There are records for light-sensitive barbastelle, myotis bat species, long-eared bat species, and horseshoe bat species within the area.

3.4 There is potential for changes in artificial lighting to impede foraging and commuting bats that may be using the general site; therefore, specifications for lighting in accordance with the Bats and Artificial Lighting At Night' Guidance Note BN08/23 (BCT & ILP, 2023) will need to be implemented. These specifications will be detailed in the final report version.

Bat survey results

Preliminary Roost Assessment (PRA)

3.5 A description of the buildings surveyed for roosting bats is provided in Table 5 below and photographs of the building are provided in Appendix D:

Table 5: Building description

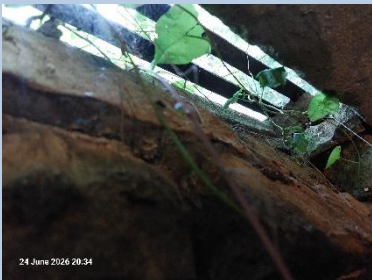
Building	Description
House ('B1')	◆ The house is two-storey and constructed of bath stone elevations. ◆ The roof is multi-pitched and constructed of a clay roof tiles, with a lead flat roof centre. ◆ Stone window and door frames are present. ◆ Closed stone eaves are present. ◆ Three dormer windows with pitched clay roofs are present on the western elevation. ◆ Four internal stone chimneys with lead flashing are present. ◆ Three internal loft voids are present within the house and descriptions are provided below: <u>Loft 1 in North</u> - The loft in the north is rectangular and measures approximately 13.5m in length, 4.8m in width, and 2.2m in height to the apex. - The roof is partially lined with bituminous 1F felt. - The roof is constructed of a ridge beam, purlins, and a truss. - The loft is full boarded. - Internal dividing walls are present. - A water tank is present. - Skylights are present. - A door to the flat area of roof is present. <u>Loft 2 in South</u> - The loftspace was only accessible in the east due to a partitioning wall internally. The east loft is rectangular and measures approximately 4.2m in length, 3.6m in width, with a height of approximately 2.2m.

	- The roof is constructed of a ridge beam, purlins, and queen posts. - Fibreglass insulation is present. - No loft lining is present. - Skylights are present.
	<u>Loft 3 in West</u>
	- The loft in the west is rectangular and measures approximately 12m in length, 3.5m in width, and 1.9m in height to the apex. - Fibreglass insulation is present. - The roof is constructed of a ridge beam and purlins.
	<u>Cellar</u>
	- The cellar is rectangular and measures approximately 4.4m in length, 2.3m in width, and 1.8m in height. - The cellar is constructed of bath stone. - A well is present inside. - An grated cellar vent is present in the west leading to the outside.
	<i>Evidence of bats recorded (see Appendix E for map):</i>
	- Approximately 50 brown long-eared bat droppings were recorded in the loft void 1. - One brown long-eared bat was recorded roosting within loft void 1 behind the felt lining. - Approximately 30 soprano pipistrelle droppings were recorded around the loft hatch in loft void 3. - A low number of moist and degraded droppings were recorded in the cellar suspected to belong to bats. The sample failed to yield DNA of sufficient quality/quantity upon multiple extraction attempts and thus failed qPCR and DNA sequencing analyses.
	<i>DNA analysis of dropping sample (as tested by Swift Ecology Ltd):</i>
	- Brown long-eared bat (<i>Plecotus auritus</i>) in loft 1. - Soprano pipistrelle (<i>Pipistrellus pygmaeus</i>) in loft 2.
	<i>Roost status / potential of the building for bats:</i>
	'Confirmed' roost for brown long-eared bats and soprano pipistrelle bats

3.8 The property contains classic hibernation features in the cellar, which meet the criteria set out in the Bat Conservation Trust Guidelines (Collins, 2023). However, no works are proposed for the cellar. **If this changes, and works will be undertaken on the cellar, then hibernation surveys must be undertaken on the cellar to determine if the cellar is in use by hibernating bats.**

Table 6: Justification for categorisation of the building's bat roosting potential

Bat roosting potential	Definition	Justification
'High'	A structure with one of more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis & potentially for longer periods of time due to their size, shelter, protection, conditions (temperature, humidity, height above ground level, adverse light levels, or high levels of disturbance), and surrounding habitat. The structure has the potential to support high conservation status roosts for example maternity or classic cool/stable hibernation sites.	There are gaps present in the mortar at the ridgeline. These gaps allow access into the lofts as well as provide crevices for crevice-dwelling bats. An example of one of these gaps is pictured below:  There are gaps between the clay roof tiles all over the roof and dormers suitable for crevice-dwelling bats.   There are gaps around the chimneys that are suitable for loft-dwelling bats to access the loft through and crevice dwelling bats to roost in.

		 There is grated access into the cellar which provides access into a void suitable for hibernation.   The surrounding habitat is noted to comprise deciduous woodland and a river 230m south of the building and within The Bath and Bradford on Avon bat SAC. The surrounding area is highly suitable for commuting and foraging bats.
--	--	---

- 3.9 As the presence of bats has been confirmed, bat activity (dusk) surveys must now be conducted upon the building(s) in accordance with the BCT Guidelines (Collins, 2023); the surveys are required to establish the presence of bats. Further information is provided in Section 4.
- 3.10 In accordance with the BCT Guidelines, roost characterisation surveys must be repeated until the following information has been reliably obtained

- Are bat roosts present or likely to be absent?
- Which bat species use the site for roosting?
- How many bats do these roosts support?
- Where are the bat roost access points?
- Where are the bat roosts?
- At what times of year are bats present? How does use change seasonally?
- What type of bat roosts are present?
- What flight-lines do the bats use after emerging from the roost?

3.11 As a starting point, three dusk emergence surveys are recommended. However, if bats are recorded emerging and the results of the first two surveys are consistent, it may be appropriate to conclude the survey effort after two visits. Conversely, if no bats are observed emerging and species presence has already been confirmed through DNA analysis, the assessment may proceed using the data collected to date, with Policy 4 licensing applied where necessary.

Indirect impacts upon bats

Artificial Lighting at Night (ALAN)

3.12 It is possible that bats are commuting and foraging across the general property and within the gardens. Bats are very sensitive to artificial lighting, which can impede their ability to successfully forage and can alter flightpaths (BCT & ILP, 2023). As bats may be using the property during nocturnal hours, it is essential that new lighting is designed to minimise impacts on foraging bats, particularly around areas with mature vegetation such as trees and hedges. Light spill can extend beyond the site boundary and may therefore also impact bats using neighbouring land.

3.13 Specifications for new lighting design will be detailed in the final report version.

Loss of foraging/commuting habitat

3.14 Severance and removal of vegetation that could be acting as navigational tools must be assessed where the removal of these will impact any roosts or important commuting and foraging habitats. There is limited risk of navigational routes to and from the roost being impacted upon and due to the small scale of renovation works impacts upon foraging/commuting lines are not considered likely.

Nesting birds

- 3.15 A dead bird was recorded in loft void 3. Therefore, mitigation will be required for nesting birds and will be detailed in the final report version.

4. PRA outcome and further survey recommendations

PRA outcome

- 4.1 The PRA of Murhill House was undertaken and a brown long-eared bat was recorded along with physical evidence of bat droppings recorded, the building therefore supports 'confirmed' roosts for brown long-eared bats and soprano pipistrelle bats, based on DNA analysis of the bat droppings.

Further survey(s) now required to inform planning

- 4.2 In accordance with the BCT Good Practice Guidelines (Collins, 2023), bat activity (dusk) surveys must now be conducted upon the building. These surveys involve a nocturnal observation of the building around dusk using specialised bat recording equipment and are required to determine the presence/likely absence of bats.

Bat SSSI/SAC consultation zones - impacts

- 4.3 The site was identified to fall within the Bath and Bradford-on-Avon Bats SAC. Within a 2000m buffer for a lesser horseshoe core roost and within the 4000m buffer of a greater horseshoe core roost. Due to falling within the SAC, further impacts upon the potential use of the site by the SAC bat species must be assessed.
- 4.4 Any potential impacts of on-site lighting will need to be assessed. Any required mitigation or compensation measures will be outlined in the final bat activity report.

Survey timings and weather conditions

- 4.5 Dusk emergence surveys must be repeated until the required information has been reliably obtained. Appropriate methods and equipment should be used to minimise the need for repeat visits, ensuring survey effort remains proportionate to the potential impacts.
- 4.6 The standard approach for roost characterisation surveys is to undertake three dusk emergence surveys, with at least two surveys completed between May and August, when bats are most active. A third survey may be carried out in September if weather conditions are suitable. Surveys must be spaced at least three weeks apart. If the results of the first two surveys are consistent and it is unlikely that additional species or roosts would be detected during a third visit, survey effort may conclude after the second survey. In line with BCT Guidelines, surveys should only continue until sufficient information has been gathered to support a robust impact assessment and appropriate mitigation strategy.

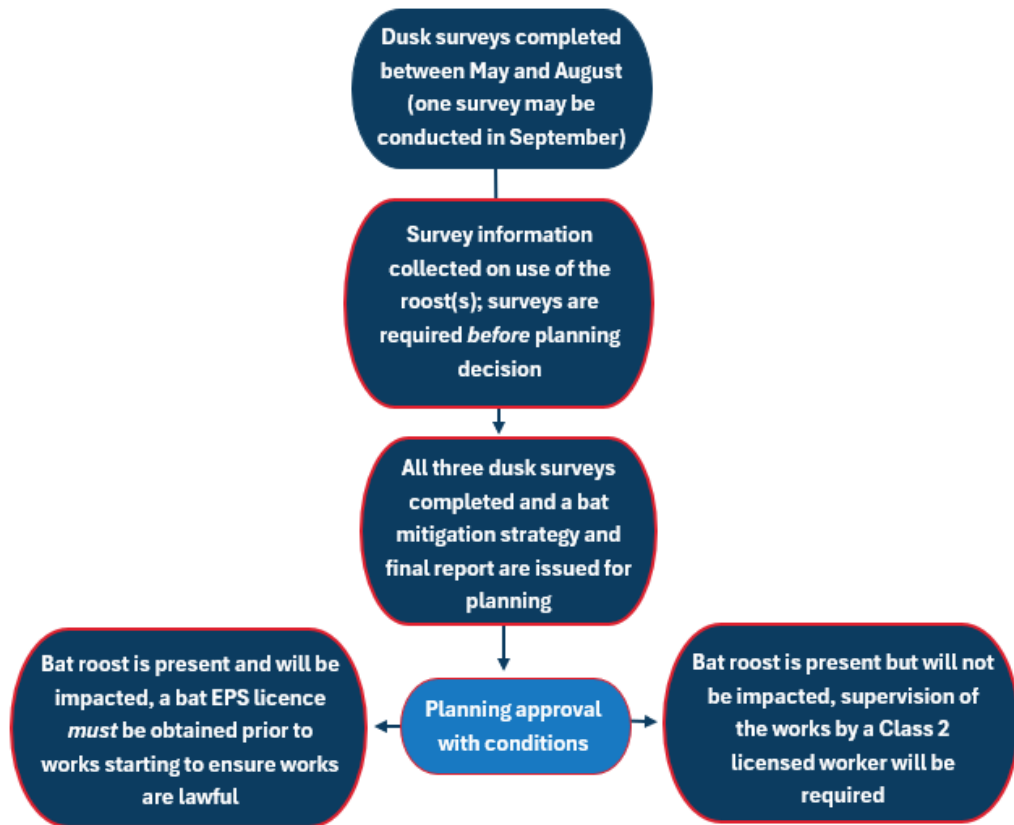
- 4.7 If a maternity roost (mother and juvenile bats) is identified, the subsequent surveys must be spaced a minimum of four weeks apart (these surveys should ideally include one survey in May/early June (pregnant females), one survey in late July/August (to get an accurate count of juvenile bats flying independently of their mothers) and one survey in September (to cover the mating period)).
- 4.8 The surveys can only be conducted during suitable weather conditions (minimum 10°C from sunset with no precipitation / strong winds). The surveys will commence 15 minutes before sunset and terminate between 1.5-2 hrs after sunset.

Methodology

- 4.9 The ecologists will undertake a direct external observation of the building aiming to identify any bats exiting/re-entering the building. The ecologists will be stationed around the building to allow the best possible view of the roof and elevations.
- 4.10 Each ecologist will operate a Night Vision Aid (NVA) (a specialised camera that allows for night vision) and an automated bat detector. Information will be compiled on the locations of any bat exit/entry points, any species encountered, and the behaviour of any bats. The ecologists will also collect information on foraging bats that are using the general site, such as bats commuting across the garden.
- 4.11 The surveys will be conducted in accordance with the BCT Good Practice Guidelines (Collins, 2023).

Bat surveys and determination of planning

- 4.12 Para 99 of Government Circular 06/2005 states: *'It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before planning permission is granted'*. Therefore, the further surveys must be conducted prior to the planning determination stage and cannot be conditioned as part of consent.



4.13 To ensure the proposed development is compliant with Section 15 of the National Planning Policy Framework (NPPF) and local planning policy, the inclusion of a biodiversity enhancement, such as a minimum of one built-in bat roosting tube or one integrated bird nesting box, will be specified in the final report version. Examples of bat tubes and nest boxes are shown in Figures 1 and 2 below:

Figure 1: Example of built-in bat roosting tubes

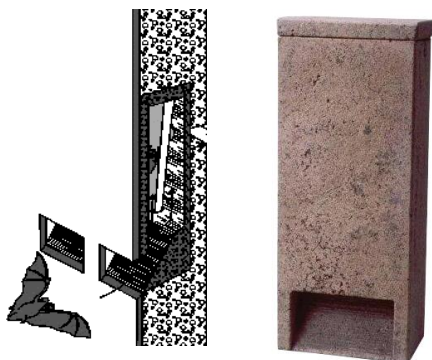


Figure 2: Example of a built-in bird nest box



Nesting birds

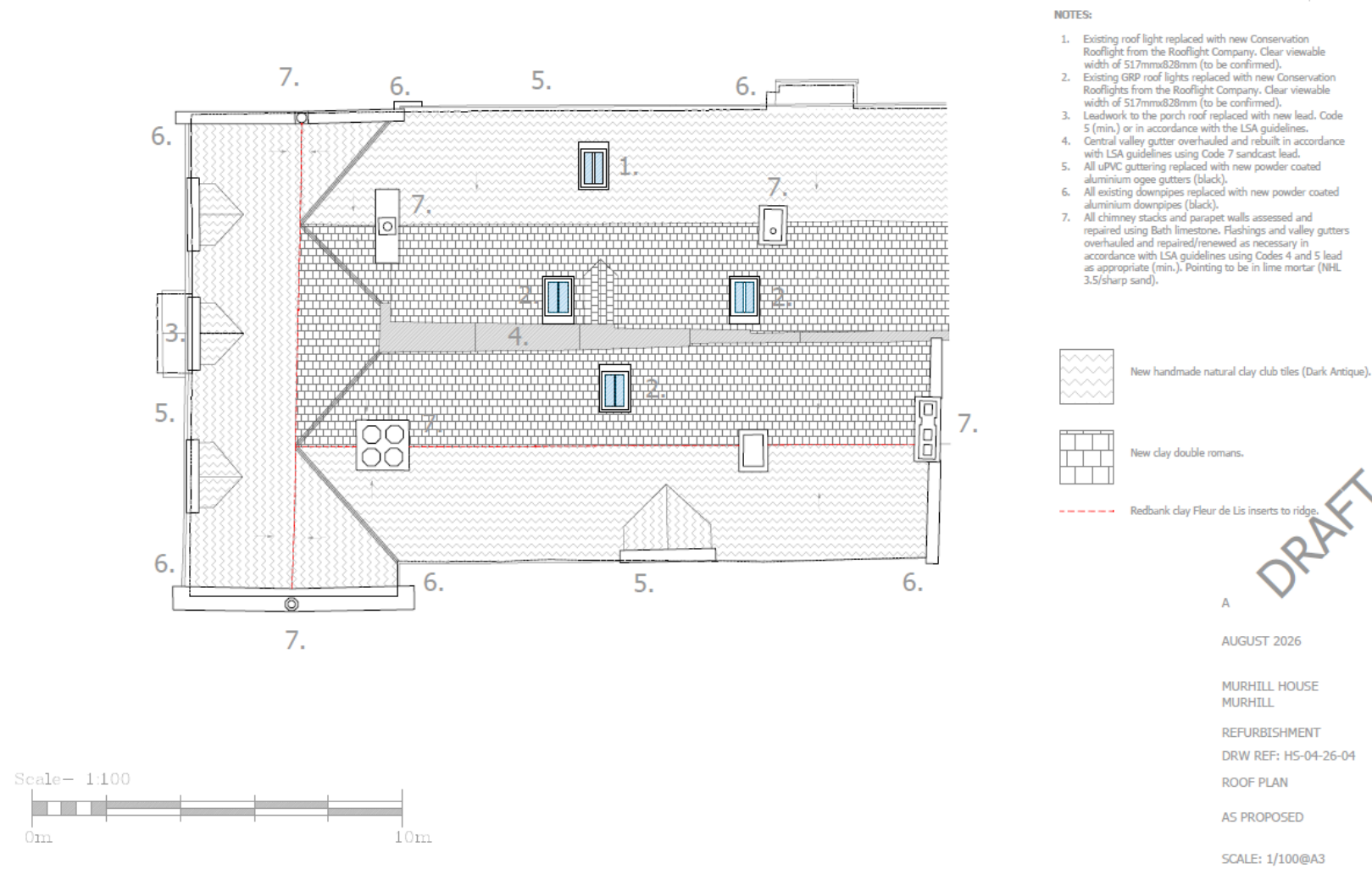
- 4.14 A dead bird was recorded in loft void 3. Therefore, mitigation for nesting birds will be detailed in the final report following the further required surveys.

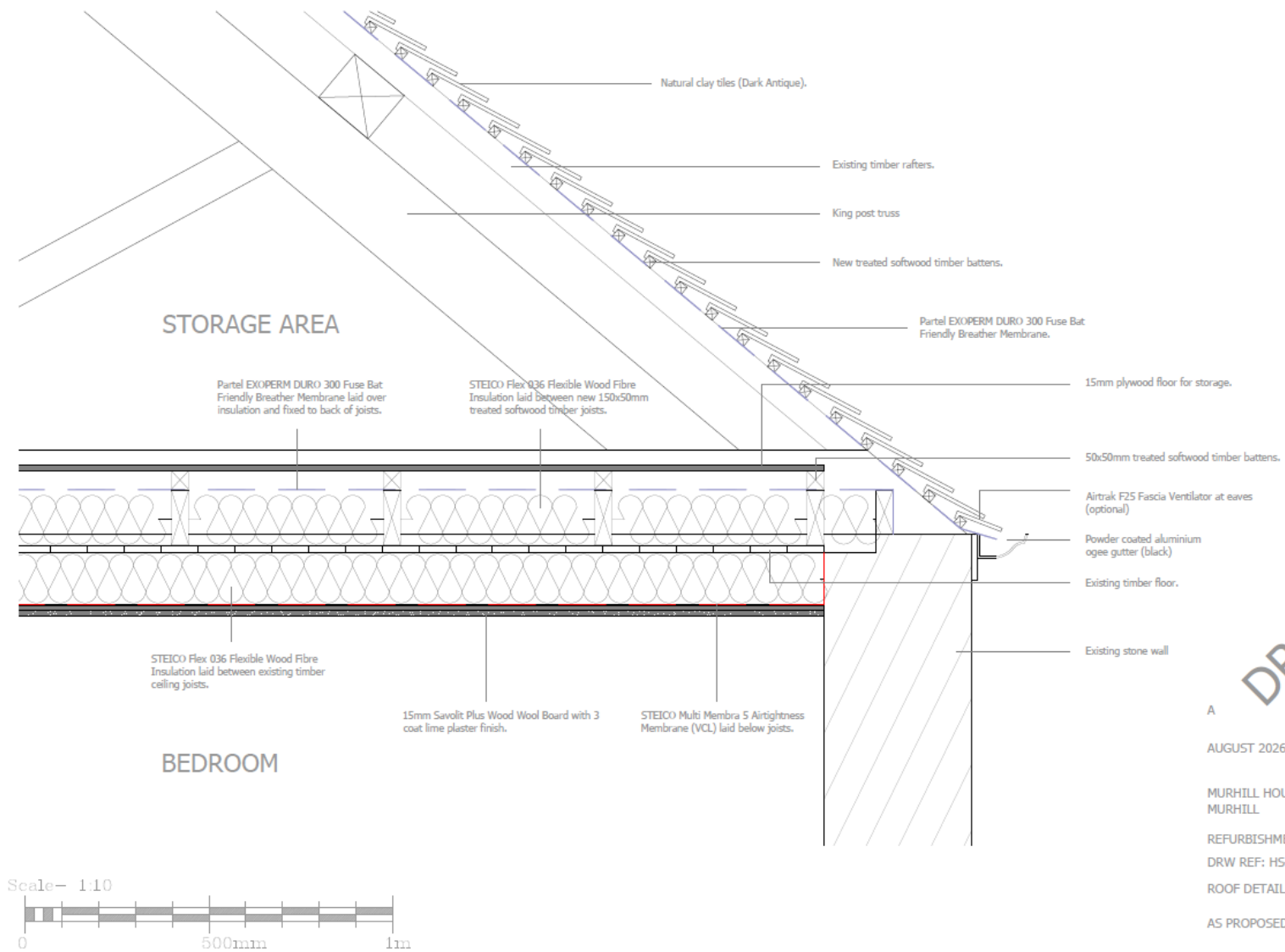
5. References

- Bat Conservation Trust (BCT) and Institute for Lighting Professionals (ILP) (2023). *Bats and Artificial Lighting At Night' Guidance Note BN08/23*. BCT, London. Accessed from: <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>
- CIEEM (Chartered Institute of Ecology and Environmental Management) (2017a). *Guidelines for Ecological Report Writing (2nd ed)*. CIEEM, Winchester. Accessed from: <https://cieem.net/resource/guidelines-for-ecological-report-writing/>
- CIEEM (Chartered Institute of Ecology and Environmental Management) (2017b). *Guidelines for Preliminary Ecological Appraisal (2nd ed)*. CIEEM, Winchester. Available from: <https://cieem.net/resource/guidance-on-preliminary-ecological-appraisal-gpea/>.
- CIEEM (Chartered Institute of Ecology and Environmental Management) (2019). *Advice Note On The Lifespan Of Ecological Reports & Surveys*. CIEEM, Winchester. Accessed from: <https://cieem.net/resource/advice-note-on-the-lifespan-of-ecological-reports-and-surveys/>
- Collins, J (ed) (2023). *Bat Surveys for Professionals Ecologists: Good Practice Guidelines (4th Ed)*. BCT, London. Accessed from: <https://www.bats.org.uk/resources/guidance-for-professionals/bat-surveys-for-professional-ecologists-good-practice-guidelines-4th-edition>
- Department for Communities and Local Government (2005). *Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System*.
- Department for Levelling Up, Housing and Communities (2024). *The National Planning Policy Framework (NPPF)*.
- Dorset Council (2026). *Dorset Explorer*. Accessed from: <https://gi.dorsetcouncil.gov.uk/dorsetexplorer#map=11.06/50.79691/2.31539/0&basemap=1/100/100>
- JNCC (The Joint Nature Conservation Committee) (2016). *UK BAP priority terrestrial mammal species*.
- MAGIC (2026). *Search for SACs and SSSIs designated for the presence of bats around Murhill House*. Accessed from: <https://magic.defra.gov.uk/MagicMap.aspx>
- Wiltshire and Swindon Biological Records Centre (WSBRC) (2026). *Murhill House - bats only data search 2km radius*.
- Wiltshire Council (2015). *The Wiltshire Core Strategy (Adopted January 2015)*. Accessed from: <https://www.wiltshire.gov.uk/planning-policy-core-strategy>
- Wiltshire Council, (2015). *Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire*. Accessed from: <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.wiltshire.gov.uk/media/992/Bat->

S-A-C-developers-guidance-inc-Bath-Bradford-on-Avon-Chilmark-and-Mottisfont-/pdf/Bath-and-bradford-on-avon-september-2015-bat-sac-guidance.pdf

Appendix A: Proposed roof plans





A

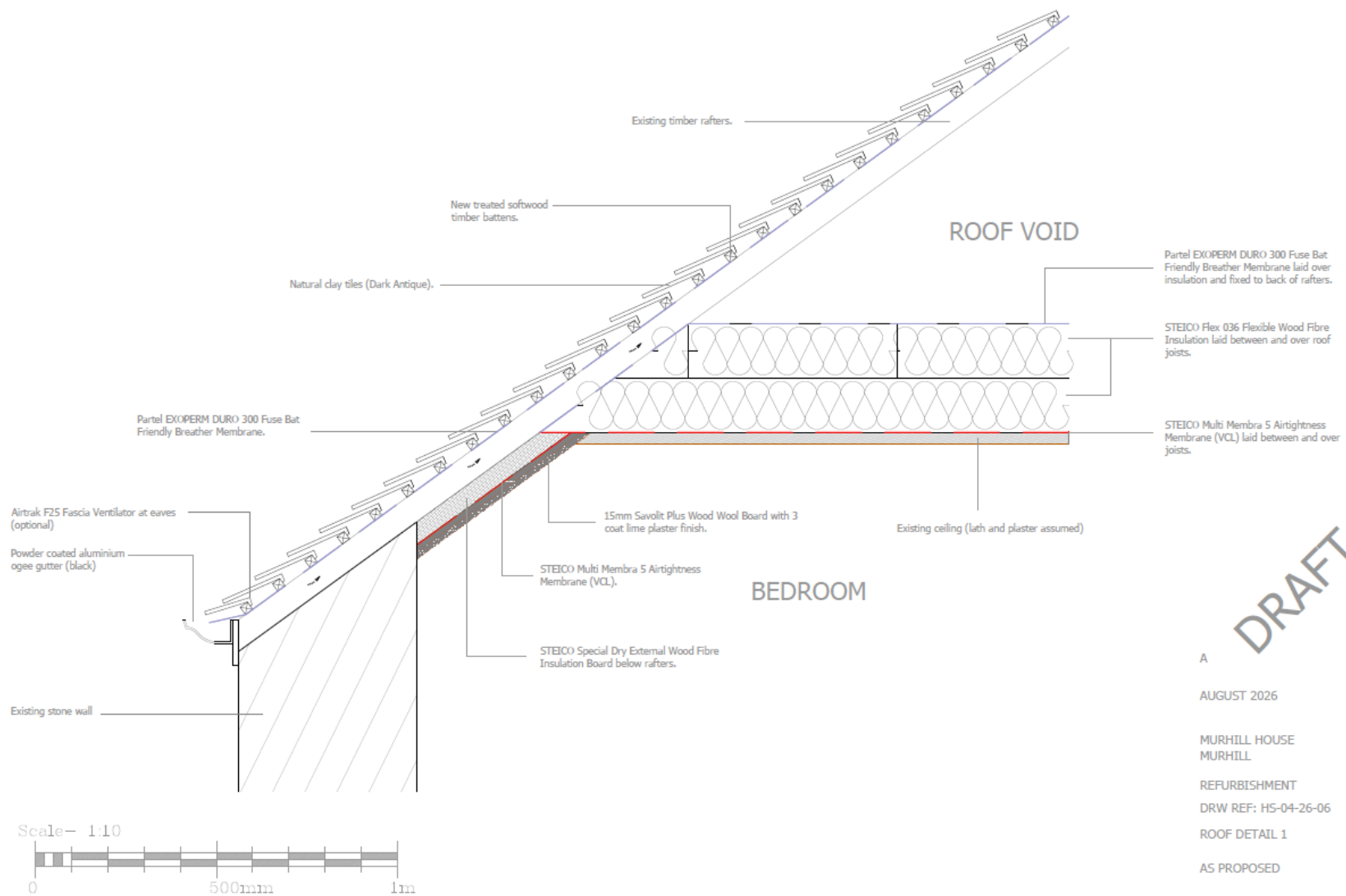
AUGUST 2026

MURHILL HOUSE
MURHILL

REFURBISHMENT
DRW REF: HS-04-26-07
ROOF DETAIL 2

AS PROPOSED

SCALE: 1/10@A3





NOTES:



Steico Special Dry External Wood Fibre Insulation Board below rafters. See Roof Detail 1.

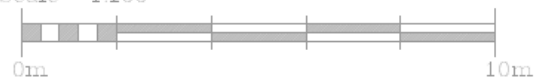


Steico Flex 036 Flexible Wood Fibre Insulation Board laid at ceiling level. See Roof Detail 2.

--- Airtrak F25 Fascia Ventilator (optional)

--- Airtrak Ridge Tile Ventilator (optional)

Scale- 1:100



A

AUGUST 2026

MURHILL HOUSE
MURHILL

REFURBISHMENT

DRW REF: HS-04-26-05

ROOF INSULATION

AS PROPOSED

SCALE: 1/100@A3

DRAFT

Appendix B: Relevant legislation and planning policy

Legislation and UK BAP priority species

Legislation – bats

In England, all bats are legally protected under Schedule 5 of the Wildlife and Countryside Act (WCA) (1981) (as amended). Additionally, all bats are fully protected under Annex IV of the EC Habitats and Species Directive (1992), which is transposed into UK law under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

The legislation protects bats from many acts, including to:

1. Deliberately take, injure or kill a wild bat.
2. Intentionally or recklessly disturb a bat in its roost or deliberately disturbing a group of bats.
3. Destroy or damage a place used by bats for breeding or roosts (even if bats are not occupying them at the time).
4. Intentionally or recklessly obstruct access to a bat roost.
5. Possess or advertise/sell/exchange a bat species found in the wild in the EU (dead or alive) or any part of a bat.

Several species of bat are afforded additional protection under Annex II of the EC Habitats and Species Directive (1992) due to their rarity. These species include lesser horseshoe (*Rhinolophus hipposideros*), greater horseshoe (*Rhinolophus ferrumequinum*), Bechstein's bat (*Myotis bechsteinii*) and barbastelle bat (*Barbastella barbastellus*).

Legislation – birds

In England and Wales, all wild birds, their young, nests and eggs are legally protected under Section 1 of the WCA (1981) (as amended). This legislation protects birds from the following acts:

1. To kill, injure or take any wild bird.
2. To take, damage or destroy the nest of a wild bird.
3. To take, damage or destroy the nest of any wild bird while that nest is in use or being built.
4. Takes or destroys an egg of any wild bird.

Some wild bird species, such as barn owls (*Tyto alba*) are afforded additional protection under Schedule 1 of the WCA (1981) (as amended). This legislation makes the following illegal for Schedule 1 species:

1. Disturbance of any wild bird included in Schedule 1 while it is building a nest or is in, on or near a nest containing eggs or young; or
2. Disturbs dependent young of such a bird.

UK BAP priority bat and bird species

Several species are listed under the UK Biodiversity Action Plan (UK BAP) (JNCC, 2016) as priority species due to their vulnerability or rarity as listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006), and Section 40 places a duty on all public authorities to conserve biodiversity.

Bats include barbastelle, Bechstein's bat, brown long-eared bat (*Plecotus auritus*), both species of horseshoe bat (*Rhinolophus spp.*), soprano pipistrelle (*Pipistrellus pygmaeus*) and noctule (*Nyctalus noctula*).

Birds that commonly nesting in buildings include house sparrow (*Passer domesticus*) and common starling (*Sturnus vulgaris* subsp. *vulgaris*).

National and local planning policy

The National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) (Department for Levelling Up, Housing and Communities, 2024) sets out the Government's planning policies for England and how these should be applied. In the context of this report, Section 15 of NPPF is relevant and applicable, Section 15 states:

'Planning policies and decisions should contribute to and enhance the natural environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.'

New developments and projects are supported where plans promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue measurable net gains for biodiversity.

To ensure this application is compliant with Section 15 of NPPF, enhancements for biodiversity, such as the inclusion of bat roosting and/or bird nesting boxes, are required as part of the development.

The Wiltshire Core Strategy

The Wiltshire Core Strategy (2015) (Wiltshire Council, 2015) Core Policy 50 'Biodiversity and geodiversity' states the following:

'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'.

Core Policy 50 also states that 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.

It is the applicant's/landowner's responsibility to ensure that the proposed development proceeds in full compliance with this report and/or any update version report thereafter, that works are undertaken lawfully, in compliance with national and local policy, and in accordance with all conditions of the obtained planning consent(s).

Appendix C: Photographs



Photo 1: West elevation of the house.



Photo 2: North elevation of the house.



Photo 3: Adjoining property to the east.



Photo 4: South elevation of the roof.



Photo 5: South elevation of the roof.



Photo 6: West elevation of the roof.



Photo 7: Gaps between the roof tiles.



Photo 8: Gaps at the chimney.



Photo 9: Gap at southernmost dormer window.

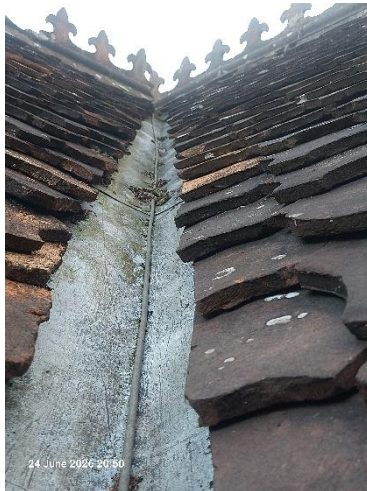


Photo 10: Lead gulleys on roof.



Photo 11: Gaps below chimneys.



Photo 11: Well and stone features within the cellar



Photo 13: Cellar.



Photo 14: Cellar.



Photo 15: Cellar.



Photo 16: Suspected droppings in the Cellar.



Photo 17: Loft void 3.



Photo 18: Loft void 3.



Photo 19: Loft void 3.



Photo 20: Loft void 1.



Photo 21: Loft void 2.



Photo 22: Brown long-eared bat recorded in Void 1.

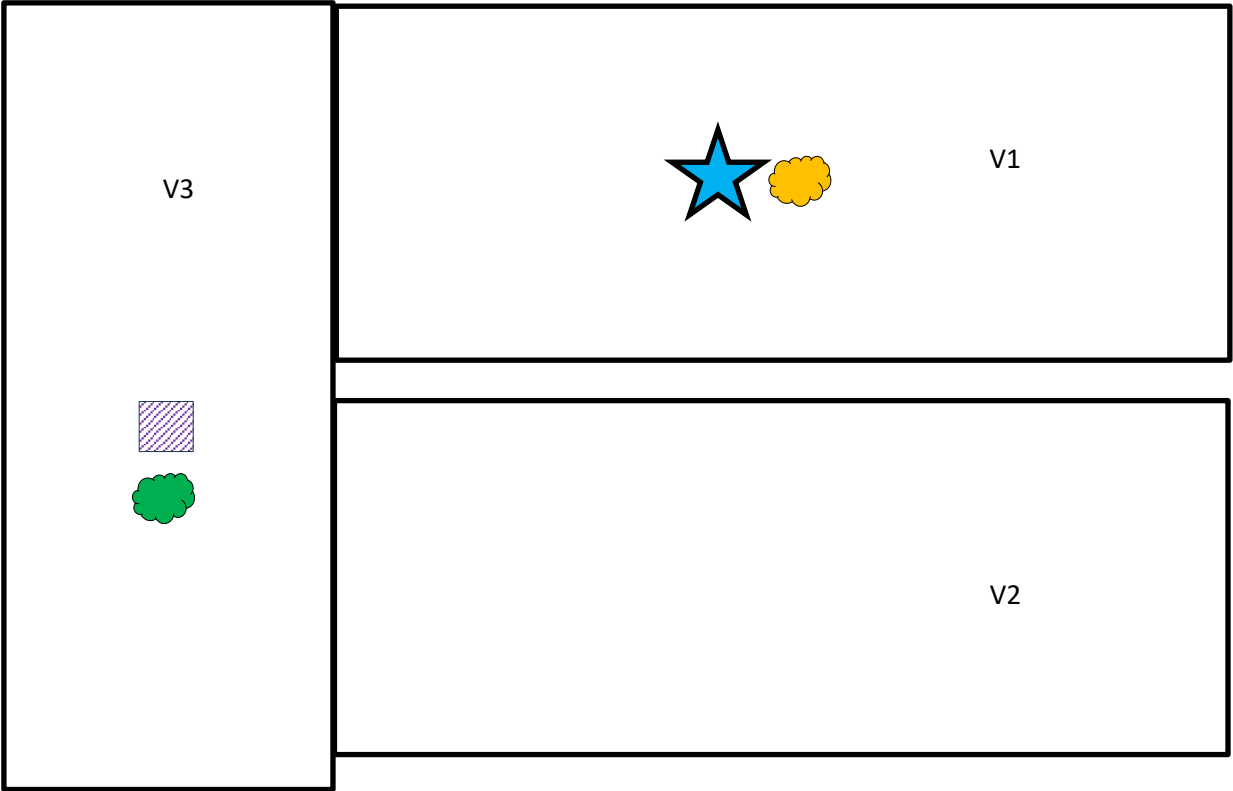


Photo 23: Droppings within void 1.



Photo 24: Lead centre of the roof.

Appendix D: Bat evidence map



LEGEND:	
Key:	Description:
	Loft hatch
	Water tank
	50 brown long-eared (BLE) bat droppings below ridge
	30 soprano pipistrelle droppings around loft hatch
	Brown long-eared bat in situ

