



Preliminary Roost Assessment and Bat Mitigation Report

Spring Cottage, Winsley, Wiltshire, BA15 2JF

For *LPC (Trull) Ltd* and on behalf of Hannah Greenfield

April 2026

DOCUMENT CONTROL SHEET

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Preliminary Roost Assessment and Bat Mitigation Report

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The evidence which Herdwick Ecology has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional opinions.

1.0 Introduction

1.1 Herdwick Ecology Ltd has been commissioned by LPC (Trull) Ltd and on behalf of Hannah Greenfield to undertake a Preliminary Roost Assessment at Barn at Spring Cottage, Winsley, Wiltshire, BA15 2JF (Central Reference ST) to inform proposals for Proposed Conversion of Pigsty to Studio and Extension to Single Garage to Create Double Garage.

1.2 This report has been prepared to support a planning application and aims to:

- Describe and evaluate the building and its potential to support bats and whether further surveys are required;
- Identify potential bat mitigation/enhancement measures for incorporation into the design to ensure that the proposals maintain the favourable conservation status of the species;
- Set out further opportunities for net gain and ecological enhancements in line with relevant planning policy, legislation and other published guidance.

1.3 This report has been prepared by Ceri Griffiths, Director at Herdwick Ecology, who is a Full Member of the Chartered Institute of Ecology and Environmental Management (CIEEM). Reference is made to the Good Practice Bat Survey Guidelines¹ and BS 42020:2013 Biodiversity - Code of practice for planning and development².

2.0 Legislation and Planning Policies

2.1 In carrying out this assessment relevant legislation, planning policies, and best practice guidelines were consulted and include:

- Conservation of Habitats and Species Regulations 2017 (as amended);
- Wildlife and Countryside Act 1981 (as amended);
- Countryside and Rights of Way (CROW) Act 2000;
- Natural Environment and Rural Communities (NERC) Act 2006;
- National Planning Policy Framework 2024 (NPPF);
- Local Planning Policies and supplementary planning documents/technical guidance.

National Planning Policy Framework (NPPF) 2024

2.2 National planning policy on biodiversity and conservation is set out in the National Planning Policy Framework (NPPF). This emphasises that the planning system should seek to minimise impacts on biodiversity and provide net gains in biodiversity wherever possible as part of the Government's commitment to halting declines in biodiversity and establishing coherent and resilient ecological

¹ Collins, J (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th. Ed.) The Bat Conservation Trust, London

² BSI (British Standards Institute) BS4202:2013 *Biodiversity – A code of practice for planning and development*. BSI, London.

networks. Chapter 15: Conserving and Enhancing the Natural Environment, is of particular relevance to this report as it relates to ecology and biodiversity. Relevant policies are set out below:

- 2.3 Paragraph 185: *“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...*
- 2.4 Paragraph 186 states: “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) Relates to developments affecting SSSI
 - c) Relates to developments affecting irreplaceable habitats, such as ancient woodland
 - d) *‘Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity’.*
- 2.5 The Government Circular 06/2005, which is referred to by the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.
- 2.6 The above approach encapsulates the ‘mitigation hierarchy’ described in British Standard BS 42020:2013, which involves the following step-wise process:
- Avoidance – avoiding adverse effects through good design;
 - Mitigation – where it is unavoidable, mitigation measures should be employed to minimise adverse effects;
 - Compensation – where residual effects remain after mitigation it may be necessary to provide compensation to offset any harm; and
 - Enhancement – planning decisions often present the opportunity to deliver benefits for biodiversity, which can also be explored alongside the above measures to resolve potential adverse effects.

- 2.7 The measures for avoidance, mitigation, compensation, and enhancement should be ‘*proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development*’

Conservation of Habitats and Species Regulations 2017 (as amended)

- 2.8 In summary these regulations, also referred to as the Habitat Regulations, cover the designation and protection of European sites and the protection of European protected species (EPS).

Environment Bill and Biodiversity Net Gain

- 2.9 The Environment Bill received Royal Assent on 9th November 2021, becoming the Environment Act; this includes the provision of biodiversity gain for developments in England, which will be mandated through an amendment to the Town and Country Planning Act 1990. The two-year transition period that follows Royal Assent means that mandatory Biodiversity Net Gain (BNG) became law on 12th February 2024, with small sites being mandatory on the 2nd April 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

- 2.10 The BNG Regulations also include ‘The Biodiversity Gain Requirements (Exemptions) Regulations 2024’ which prescribe exemptions for categories of development to which biodiversity net gain does not apply. One exemption is:

- Householder applications:
- These are applications made by householders as defined within [article 2\(1\) of the Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015](#).
- It includes, for example, small projects like home extensions, conservatories or loft conversions.

Local Plan

- 2.11 The Wiltshire Core Strategy Development Plan Document ('the plan') was formally adopted on 20 January 2015. The plan provides a positive and flexible overarching planning policy framework for Wiltshire for the period up to 2026. Policy 50 ‘Biodiversity and Geodiversity’ states that: ‘*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.... All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.* The policy goes on to state that all developments should seek opportunities to enhance biodiversity.

Bath and Bradford on Avon Special Area of Conservation (SAC) Planning Guidance for Wiltshire

- 2.12 The site sits within the ‘core zone’ of the Bath and Bradford on Avon Bat Special Area of Conservation (SAC). This SAC comprises a number of individual sites across the wider landscape that support a larger population of greater and lesser horseshoe bats and Bechstein’s bats. The *Bat Special Areas of*

Conservation (SAC) Planning Guidance for Wiltshire sets out specific information on the survey and mitigation requirements for developments within the core zones.

Species Protection

- 2.13 A number of species, including all bats and great crested newts, are afforded protection under The Wildlife and Countryside Act 1981 (as amended).
- 2.14 Under this legislation, a person is guilty of an offence if a person intentionally or recklessly:
- disturbs any animal while it is occupying a structure or place which it uses for shelter or protection;
 - obstructs access to any structure or place which any animal uses for shelter or protection.
- 2.15 In addition the protection afforded through UK legislation, further protection is provided to a small group of species, commonly referred to as 'European Protected Species' under the Conservation of Habitats and Species 2017 (as amended) (also known as the Habitats Regulations), including bats and great crested newts.
- 2.16 With regards to European Protected Species listed under Schedule 2 of the Act, it is an offence to:
- Intentionally or deliberately capture or kill, or intentionally injure the animal;
 - Deliberately disturb the animal or intentionally or recklessly disturb them in a place used for shelter or protection;
 - Damage or destroy a breeding site or resting place;
 - Intentionally or recklessly damage, destroy or obstruct access to a place used for shelter or protection.
- 2.17 The Habitats Directive provides for the derogation from these above prohibitions for specified reasons and providing certain conditions are met. Those derogations are transposed into the Regulations by way of a licensing regime that allows what would otherwise be an unlawful act to be carried out lawfully. Among the reasons why a licence may be granted and the reason relied upon by developers when seeking a licence to carry out operations for the purposes of development, is that there are imperative reasons of overriding public interest why the operation should be carried out.
- 2.18 Whilst Natural England is the licensing body, the LPA must have due regard for the Habitat Regulations during the planning process and that the following three derogation tests will be met:
- Test 1: *Regulation 53(2)(e) states: a licence can be granted 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”.

- Test 2: Regulation 53(9)(a) states: *the appropriate authority shall not grant a licence unless they are satisfied “that there is no satisfactory alternative”.*
- Test 3: Regulation 53(9)(b) states: *the appropriate authority shall not grant a licence unless they are satisfied “that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range*

- 2.19 The NERC Act also listed species of principle importance under Section 41 of the Act. This places further duties on the LPA to have due regard for the conservation of these species, such as hedgehog or certain bird species, which may be present on-site.

3.0 Methodology

Data Search

- 3.1 Online sources were reviewed, such as MAGIC³, to search for designated sites, priority habitats and records of local European Protected Species (EPS) licence. In addition, the Wiltshire Council planning portal was searched for nearby applications. Given the small scale and nature of the development, a data request from the records centre was not considered necessary to support this application.

Preliminary Roost Assessment

- 3.2 The building was surveyed on 15th July 2025 by Ceri Griffiths, Director of Herdwick Ecology, with full membership of Chartered Institute of Ecology and Environmental Management (CIEEM) and a Natural England bat licence holder. Weather conditions were dry, overcast with a temperature of 21C.
- 3.3 The perimeter of the building was systematically inspected, and the exterior assessed, with the aid of binoculars (Pentax 10 X 36), endoscope and high powered torch, where necessary. A description of the building was made, and the location of any potential access points or roost locations were noted. These included:
- Suitable cracks and crevices within stone or brick work;
 - Suitable access points via head of gable end and within lintels and gaps around the barn doors etc
 - Gaps around the eaves and across the roof lines

- 3.4 The surrounding habitat was also assessed for its suitability for foraging and commuting quality.

³ <https://magic.defra.gov.uk/>

- 3.5 The internal assessment involved a search to look for bats, or evidence of bats such as droppings or staining around common roost locations. A high-powered torch and endoscope were used where necessary to inspect the building more closely.
- 3.6 Following the inspection, an assessment was made of the building's suitability to support a bat roost, following the criteria set out in Table 1 below.

Table 1 Suitability Assessment⁴

Suitability	Roosting Habitat
Negligible	Negligible habitat features on site likely to be used by roosting bats.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats
Moderate	A building with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status
High	A building with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
Roost	Bats or evidence of bats recorded.

- 3.7 In many situations it is not possible to inspect all locations where bats may be present, or any bats that may be present, may not be visible at the time of the survey. Hence, an absence of bats does not necessarily mean that a roost is not present and further activity surveys may be required to confirm presence or absence.

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

4.0 Baseline Conditions

- 4.1 The site is located in a rural location in the small village of Conkwell, approximately 3km to the west of Bradford-on-Avon. It lies within the River Avon valley with the river 780m to the west through a large area of deciduous woodland and identified as Priority Habitat. The woodland to the north is also noted as Ancient Woodland.



Plate 1: Site Location

Data Search

Statutory Designated Sites

Bath and Bradford on Avon Special Area of Conservation (SAC)

- 4.2 As stated within Section 2 above, the site sits within the core zone of the Bath and Bradford on Avon SAC. The SAC is made of small component Sites of Special Scientific Interest (SSSI), with The Winsley Mines SSSI lying 1.67km south, Brown's Folly SSSI 2.7km north and Combe Down and Bathampton Down Mines SSSI 2.8km northwest.

Habitats

- 4.3 As stated above the majority of the woodlands encompassing the property are Priority Habitats under 'deciduous woodland' with areas of Ancient Woodland. These habitats offer excellent habitat for bats.

Species

4.4 There are numerous European Protected Species (EPS) licence for bats within 4km of the site demonstrated the high value habitats. The records most relevant to this application include:

- Lesser horseshoe bat resting place (dated 2019-2029) – approx. 200m to the south;
- Greater & lesser horseshoe bat resting place (dated 2019-2029) – 1.3km west
- Lesser horseshoe bat breeding site (dated 2020-2028) – 1.4km north
- Lesser horseshoe, common & soprano pipistrelle resting place (dated 2016-2021) – 1.6km south
- Lesser horseshoe, BLE, common pipistrelle and whiskered bat resting place (dated 2018-2028) – 2.8km northeast

*Preliminary Roost Assessment*The Pigsty

4.5 The pigsty is adjacent to the driveway with the opening on the western elevation over the garden. It is externally constructed of stone with a flat roof entirely covered by False Virginia-creeper. There is a timber post/trellis 'extension' to the front, where there are two openings into the sty and one into a small store. The external wall is well sealed with no gaps or potential roost features noted within the stonework.



Plate 2: External view of northern elevation of the pigsty



Plate 3: Front (western) elevation of pigsty showing the openings into the sty and smaller store to the south

- 4.6 Internally, the pigsty is constructed partially of breeze block along the eastern wall where expanding foam runs along the wall plate. It is relatively light, with the open doorway and window in the sty. The roof has a shallow slope towards the openings and has timber joists with bitumastic felt. There is a slight recess due to the wall adjoining the adjacent store, which has created a slightly darker area but still light enough to see a lesser horseshoe bat hanging from the felt. Only a single bat was present but an accumulation of bat droppings (100s) was noted below the roosting bat. The pigsty is well used, with daily use for children storage and the bat appeared well habituated to this.
- 4.7 No other bats or evidence of bats was noted. There was a gap in the stonework on the southern wall near the window, but this inspected and did not travel far enough to offer suitable roosting. The building is considered to offer negligible potential for vesper bats.
- 4.8 In conclusion, **the pigsty is confirmed as day roost for lesser horseshoe bat used by individual/low numbers of bats.**
- 4.9 Where bats or evidence of bats have been identified during a survey, it is usually required that roost characterisation surveys (i.e. bat emergence surveys/automated statics) are carried out. However, in this instance, and as stated within the Bat Survey Guidelines, additional surveys are not required if sufficient information has been obtained to inform the impact assessment and mitigation design. It is

considered likely that further evening surveys would not provide any further information on the status of the roost and that there is 'sufficient confidence' in the status of the roost.



Plate 4: Illustrating location of LHS day roost

The Garage

- 4.16 The garage is a more modern construction of block with a double roman tile pitched roof. It has timber fascias and mortared in gables. There is an up and over garage door on the eastern elevation. There are timber windows to the northern and southern elevation, with a standard doorway also present on the southern. The block work is in a good condition and no gaps were noted along the fascia boards. Furthermore, no gaps were noted between the tiles or ridge line.
- 4.17 Internally, it is light and open and in regular use. There is no separate roof, which is open to the felt roof.
- 4.18 There is a timber 'shed' on the western elevation of the garage. This was single skin, light and open and has no potential for roosting bats.
- 4.19 In conclusion, **the garage is considered to offer negligible potential for roosting bats** and no further surveys are necessary.

Other Protected/Notable Species

- 4.20 The Virginia-creeper across the pigsty may provide nesting opportunities of common garden birds. Whilst the habitats surrounding the Application Site offer habitats for numerous species, given the small red line boundary/scale of the works and that minimal/no habitats will be impacted, no further species surveys are recommended.
- 4.21 Precautionary and best practice construction methods have been set out below, together with recommendations for enhancements for species.

5.0 Bat Mitigation Strategy

- 5.1 The pigsty has been confirmed as a low status lesser horseshoe bat day roost, used by individual/low numbers of bats. Given the light ingress, it is likely that it is transient in nature. The pigsty is to be fully converted under the proposals and hence the roost will be 'destroyed'. As such, a Natural England bat mitigation licence will be required once planning has been obtained, but prior to works starting on the pigsty. It may mean the criteria for a low impact licence (BMCL) which is a less onerous and faster process than a standard licence.
- 5.2 A detailed bat mitigation strategy has been prepared that will ensure long term roosting opportunities within the site, and in close proximity to the existing day roost (approximately 28m), but also nearer to the woodland. Furthermore, through its design, it will offer a more stable and secure roost site.
- 5.3 There is an additional pigsty to the west of the garage and timber lean to. This is in a derelict condition and does not currently offer any opportunities for bats. It is of similar size to the existing roost building, of same construction, with the entrance on the same orientation.
- 5.4 There is no permanent roof with a small area of timber and Perspex. There is a window opening to the west, which lies in close proximity to the woodland. This will be maintained with a grilled entrance i.e. metal bars placed horizontally across the opening at 30cm intervals.
- 5.5 The building will be enhanced with a new flat roof, constructed from **X** and timber joists and internally lined with Type 1F bitumastic felt. A new doorway will be placed over the current opening to secure the building but allow for monitoring. The stonework requires some remedial works to ensure viability, otherwise the building will remain relatively unaltered.
- 5.6 In conclusion, this will create a permanent, dark roosting area that will enhance the opportunities for bats. Therefore, the proposals '*...will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range*'. Furthermore, there will be no adverse effect on the integrity of the SAC as a result of the proposals.

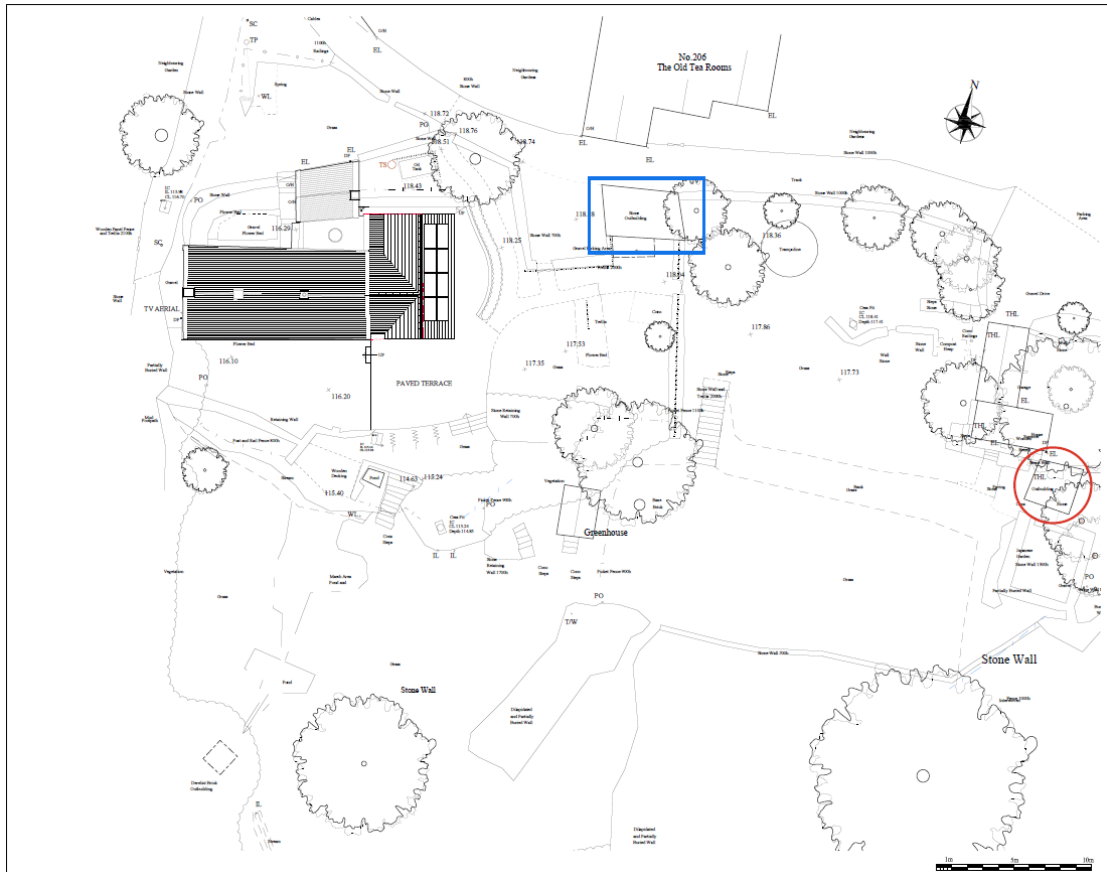


Plate 5: Showing location of existing pigsty in blue with the replacement roost in red



Plate 6: Showing replacement roost and proposed new entrance



Plate 7: Northern elevation of proposed replacement roost showing 'doorway'.

Other Mitigation Measures – Lighting

- 5.7 Any new lighting will need to be sensitively designed to avoid all impacts to the proposed replacement roost and adjacent vegetation, in particular to the scrub/tree line along the north/west to ensure a dark continuous corridor is maintained. This is of particular importance given the proximity of the designated sites. An appropriately worded condition can be attached to the planning consent with regards to any new lighting, which should adhere to the principles set out in the ILP Guidance Note 08/23 Bats and artificial lighting in the UK⁵.

Other Mitigation Measures

- 5.8 The following mitigation measures will be implemented as applicable:
- Foundation trenches and all excavations must either be covered overnight or must have scaffolding boards, or similar, placed within them to ensure that any animals that fall in are able to escape.
 - Any vegetation removal i.e. Virginia-creeper must avoid the breeding bird season, which generally runs from March to August and a building check should also be carried out. If works are to be undertaken during this time then a check for breeding birds should be undertaken

⁵ <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

by an experienced ecologist prior to works starting. If an active nest is found then works will need to wait until the chicks have fledged, or an appropriate buffer zone implemented to ensure no disturbance to the active nest.

- Raise stored materials (that might act as temporary resting places for species such as amphibians and reptiles) off the ground, e.g. on pallets.
- Any close board fencing should have occasional gaps along the base of at least 13cm x13cm to allow movement of species such as hedgehog.

5.14 Taking the above into account, whilst the Application Site lies within an ecological sensitive area primarily for bats, providing the mitigation measures stated above are implemented, it is considered the proposed development does not contravene the local planning policies (Policy 50) and will seek to deliver a net gain in biodiversity in line NPPF.

Appendix 1 Site Photographs



Plate A1: Garage



Plate A2: Eastern wall of pigsty – existing roost



Plate A3: LHS droppings below roosting bat