

End Farm Marston, Wiltshire

Proposed Agricultural Barn Conversion into Residential Accommodation

Preliminary Bat Roost Assessment and BNG Applicability Assessment

Version 3 dated 25th September 2026

Report for:
Mr William Warden
End Farm
Plough Lane
Marston
Devizes
SN10 5SR
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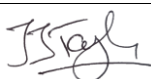
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Quality Management

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v1	13/04/2026	Kristina Wood	Initial Issue
v2	29/04/2026	Jonathan Taylor	Minor changes and BNG update
v3	25/09/2026	Jonathan Taylor	Drawing update for Full Planning Application

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1. Summary

- 1.1.1 J Taylor Ecology Consulting was commissioned by Mr William Warden to undertake a Preliminary Bat Roost Assessment (PRA) of an existing agricultural barn at End Farm, Plough Lane, Marston, Devizes SN10 5SR (grid reference ST 9701 5695), together with an assessment of whether the mandatory Biodiversity Net Gain (BNG) requirements apply to the proposals. The assessment supports a full planning application to Wiltshire Council for the conversion of the barn into two three-bedroom dwellings, with associated rear gardens, a front porch, log burners with flues, solar panels and an air-source heat-pump central-heating system.
- 1.1.2 The assessment comprised a desk study of a 2km search area, including bat records obtained from Wiltshire and Swindon Biological Records Centre and a review of statutory and non-statutory designated wildlife sites and of previously granted European Protected Species Mitigation (EPSM) licences, followed by a field survey. The PRA was carried out on 13th February 2026 and comprised a systematic external and internal inspection of the building for potential roost features (PRFs) and evidence of bats, together with an assessment of the surrounding habitat for commuting and foraging bats. The methods followed the Bat Conservation Trust's Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, J. [ed.] 2023).
- 1.1.3 No potential roost features, bats or evidence of bat use were recorded during the survey. The building was an open, steel-framed structure clad in single-thickness corrugated sheeting, with a permanently open front, unshielded windows and rooflights, no enclosed crevices, no enclosed roof void and no stable internal thermal conditions. The updated assessment therefore concludes that the building offers a negligible likelihood of supporting roosting bats, and no further survey for roosting bats is considered necessary.
- 1.1.4 The desk study confirmed that bats are widespread locally, with at least six species recorded within the 2km study area and three EPSM licences within that radius, and maternity roosts of pipistrelle bats were identified within 150m of the site. The pasture, mature trees and hedgerows around the site are considered to be of moderate value for commuting and foraging bats within a wider landscape of high suitability, and bats are likely to commute and forage across the site. No direct impacts on these habitats are proposed, but the potential for indirect disturbance arising from artificial lighting is recognised.
- 1.1.5 Mitigation, described in Section 6, includes undertaking works in daylight hours where practicable, limiting any temporary or permanent lighting to warm, downward-directed luminaires of no more than 2700K on motion sensors, and a procedure to be followed should bats be found unexpectedly during the works. Two Verona Built-In WoodStone bat boxes and two Schwegler 1B bird boxes are proposed.
- 1.1.6 In respect of BNG, the application site within the red line boundary extends to 0.0875 hectares and the application will be submitted after 6th August 2026, so the development qualifies for the exemption for sites of 0.2 hectares or less, no priority habitat being adversely affected. The biodiversity gain condition does not apply and no statutory biodiversity metric or Biodiversity Gain Plan is required. The exemption relates only to the statutory requirement and does not remove the need to comply with wildlife legislation, protected species requirements and planning policy, and the mitigation and enhancements set out in Section 6 remain appropriate.

2. Introduction

2.1 Background

- 2.1.1 J Taylor Ecology Consulting was commissioned by Mr William Warden to conduct a Preliminary Bat Roost Assessment (PRA) on an existing agricultural barn at End Farm, Plough Lane, Marston, Devizes SN10 5SR (Grid reference ST 9701 5695).
- 2.1.2 The PRA was required to support a full planning application submitted to Wiltshire Council for the conversion of the existing agricultural barn into two three-bedroom dwellings. The proposal included the creation of individual rear gardens and the installation of a front porch, log burners with associated flues, solar panels and an air-source heat-pump central-heating system. A prior-approval application under Part 3 Class Q for the conversion of the existing steel-framed barn into two dwellings was previously submitted under reference PL/2026/02855. Wiltshire Council issued the decision notice on 29 June 2026, confirming that prior approval would not be required.
- 2.1.3 In addition, through Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), Biodiversity Net Gain (BNG) is now mandatory with developers required to achieve a BNG of 10%. The legislation includes a number of exemptions, and hence the applicability of the BNG requirements in relation to the current proposals is assessed.

2.2 Building Location and Context

- 2.2.1 The existing agricultural building (photograph 1) considered in this report is situated within End Farm, located off Plough Lane on the north-eastern edge of the village of Marston, approximately 5.7 km south-west of the centre of Devizes. The site lies within the civil parish of Marston, in the ceremonial county of Wiltshire.



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

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



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

2.3 Pre-Existing Information

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

2.4 Personnel

- 2.4.1 The field survey and subsequent assessment was conducted by Principal Ecologist Jonathan Taylor BEng (Hons) PgDip MSc MCIEEM. Jonathan has over 25 years' experience as a professional ecologist and is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM). He holds a Natural England Class Licence for bats (2019-39970-CLS-CLS) and frequently designs and implements mitigation under European Protected Species Development Licences.
- 2.4.2 Jonathan adheres to the Institute's Code of Professional Conduct and professional ethics and maintains a standard of knowledge and experience in accordance with the CIEEM Continuing Professional Development Policy. This updated assessment (Version 3) was undertaken and checked by Jonathan Taylor, with the original report authored by Kristina Wood (B.Sc (Hons), M.Res, MCIEEM, CL17), Consultant Ecologist.

2.5 Purpose

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

2.6 Documentation

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

Date	Document Title
23/07/2026	LOCATION PLAN, EXISTING BLOCK PLAN, GROUND FLOOR PLAN, SECTION AND ELEVATIONS. Drawing Ref: 4143-20
23/07/2026	PROPOSED BLOCK PLAN, FLOOR PLANS AND SECTION. Drawing Ref: 4143-22

3. Legislative and Planning Context

3.1 Legislation Overview

- 3.1.1 All eighteen species of bat recorded in the UK (seventeen of which breed here), and their roosts and resting places, are protected in the UK under section 9 of the Wildlife and Countryside Act 1981 (as amended), with bats listed in Schedule 5 of that Act, and under regulation 43 of the Conservation of Habitats and Species Regulations 2017 (as amended) (the “Habitats Regulations”). The relevant sections of this legislation make it an offence to intentionally kill, injure or take a bat; to intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by a bat; and to intentionally or recklessly disturb a bat while it is occupying a structure or place, which it uses for that purpose. Offences under the 1981 Act carry, on summary conviction, a maximum penalty of imprisonment for up to six months and/or a fine (section 21). Offences under regulation 43 carry the same maximum term of imprisonment and/or a fine (regulation 43(8)). The £5,000 cap that previously applied to a level 5 fine was removed for offences committed on or after 13th March 2015, so the fine on summary conviction is now unlimited in the magistrates’ court.
- 3.1.2 Under regulation 43(1)(d) of the Habitats Regulations, damaging or destroying a breeding site or resting place is an offence of strict liability: unlike the Wildlife and Countryside Act offences described above, it does not require intent or recklessness, and the fact that the animal is not present at the time is no defence.
- 3.1.3 Disturbance however is only considered an offence when caused intentionally or recklessly. A person would be acting recklessly if they could reasonably have been expected to foresee that an operation could cause disturbance or harm to a protected species but took no action to assess the risk and consider what to do about it.

3.2 European Protected Species (Bats) and Planning

- 3.2.1 Obligations are imposed on local planning authorities and applicants by the Conservation of Habitats and Species Regulations 2017 (as amended) (the “Habitats Regulations”), which transposed the Habitats Directive into domestic law and were amended on EU exit by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. The extent of these obligations was considered by the Supreme Court in *R (Morge) v Hampshire County Council* [2011] UKSC 2, [2011] Env. L.R. 19 and in a number of subsequent decisions. The Habitats Regulations provide, in regulation 9(3), that “a competent authority, in exercising any of its functions, must have regard to the requirements of the Directives so far as they may be affected by the exercise of those functions”. The Supreme Court held that the duty of the local planning authority is limited to the duty set out in regulation 9(3). It is the function of Natural England, and not of the planning authority, to enforce compliance with the Directive, by prosecuting those who had committed offences.
- 3.2.2 The duty of a local planning authority under regulation 9(3) is simply “to have regard to the requirements of the Directives so far as they may be affected by the exercise of those functions”. As such, there is no need for a planning committee to carry out its own shadow assessment as to whether there would be a breach of Article 12(1) of the Directive, or whether derogation from that Article would be permitted and a licence granted. Instead, planning permission should ordinarily be granted save only in cases where the planning committee conclude that the proposed development would both be likely to offend article 12(1) and be unlikely to be licensed pursuant to the derogation powers.
- 3.2.3 Additionally, all Local Planning Authorities are obliged under section 40(1) of the Natural Environment and Rural Communities (NERC) Act 2006, as amended by the Environment Act 2021 (the extended biodiversity duty having come into force on 1st January 2023), to conserve biodiversity and hence are required to consider the potential ecological impacts of development proposals on habitats and species prior to granting of a planning application.
- 3.2.4 This obligation is reflected in national policy through the National Planning Policy Framework (August 2026) (NPPF), and locally within the Wiltshire Core Strategy (adopted 20th January 2015) — principally Core Policy 50 (Biodiversity and Geodiversity) and Core Policy 51 (Landscape) — which requires the protection of features of nature conservation, or demonstration that ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource. The Wiltshire Local Plan Review was withdrawn from examination by full Council on 19th May 2026 and a new Local Plan is being prepared; the Core Strategy therefore remains the adopted development plan for the site. Wiltshire Council has also published Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire, which should be considered alongside the Core Strategy.
- 3.2.5 The Wiltshire Biodiversity Action Plan (BAP) dates from 2008 and contains a bat-specific Species Action Plan with targets to ensure that planning applications affecting bats and bat roosts are consistently dealt with across development control teams. The BAP has since been superseded in practice by the Wiltshire and Swindon Local Nature Recovery Strategy (published 21st October 2025), to which the amended section 40 duty requires regard to be had.

¹ Please note that this legal information is a summary and intended for general guidance only. In all cases, the original legal documents should be consulted for definitive information.

4. Methodology

4.1 Survey Design

- 4.1.1 Survey methods followed best practice guidelines, interpreted using professional experience. The Bat Conservation Trust's fourth edition of Bat Surveys for Professional Ecologists - Good Practice Guidelines (Collins, J. [ed.] 2023) is the main source of guidance for bat surveys in the UK. The Bat Workers' Manual (Mitchell-Jones, A.J. & McLeish, A.P. [eds.], 2004) provides further guidance that has been considered when designing the survey method.
- 4.1.2 The ecological appraisal process is as defined within the Guidelines for Preliminary Ecological Appraisal (CIEEM 2017). The desk study was conducted in line with CIEEM's UK Guidelines for Accessing and Using Biodiversity Data (CIEEM, 2016).

4.2 Desk Study

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

4.3 Field Survey

- 4.3.1 The PRA, which was conducted on 13th February 2026, consisted of a non-invasive, systematic visual inspection of the external elevations and interior of the building, together with an assessment of the potential of the surrounding habitat to support commuting and foraging bats. The building was examined for signs that would indicate the presence of bats or the presence of Potential Roost Features (PRFs), that could be used by roosting bats, including:
- Bat droppings. These are found both externally in sheltered areas such as windowsills, underneath roost entrances and/or internally within a roof space.
 - Piles of insect remains such as butterfly or moth wings, indicative of regular feeding locations.
 - Staining at roost entrances or within the roost. Often urine and oil from fur can leave stains on timbers when bats are gathered for long periods.
 - Live bats, or the remains of deceased bats.
- 4.3.2 Buildings may offer potential roosting sites in a number of locations.
- Gaps and cracks in brick and/or block work, which provide access to a wall cavity or crevice.
 - At the eaves behind wooden barge boards and soffits. Bats rarely use uPVC because its surface is slippery.
 - At the top apex of gable elevations on pitched roofed buildings, where access is typically gained through gaps in the brickwork, often behind barge boards or end tiles.
 - Under lead flashing, roof and ridge tiles.
 - Within an enclosed roof space. Roof void dwelling species of bats will typically enter the roof space and gather around the ridge beam or at gable ends.
- 4.3.3 The appraisal was undertaken sensitively and, in a manner to ensure that should bats be present, no disturbance would occur. The exterior and interior of the building were examined consecutively. A standard variable output LED torch was used both externally and internally to search for PRFs or any evidence of use by bats, supplemented with a head torch to allow safe movement around the interior. Where bat (or suspected bat) droppings were found either internally or externally, these were collated with gloved hands into a sample container and labelled for submission to an approved laboratory DNA analysis to confirm species.

4.4 Evaluation

4.4.1 An evaluation of the potential suitability of the building for use by bats was then undertaken and summarised using the following potential suitability criteria (adapted from Table 4.1 within Collins J. [ed.], (2023)). Roosting and foraging habitats/flightpaths are assessed separately, noting that low-suitability roosting habitats may be present in habitats that are of high suitability for flightpaths and foraging, and vice versa.

Criteria for Assessing Structures, Flight Paths and Foraging Habitats for Bats

Potential Suitability	Roosting habitats in structures	Potential flightpaths and foraging habitats
None	No habitat features likely to be used by any roosting bats at any time of year. A complete absence of crevices or shelter at all levels.	No habitat features likely to be used by commuting or foraging bats. No continuous lines of shade or protection, and no habitats capable of generating or sheltering insect prey.
Negligible	No obvious roost features present; however, a small element of uncertainty remains because bats occasionally use very small or apparently unsuitable features.	No obvious features suitable for flight-paths or foraging, but a small element of uncertainty remains to account for non-standard bat behaviour.
Low	One or more PRFs present that could be used opportunistically by individual bats at any time of year. These PRFs lack the size, shelter, protection, conditions, or surrounding habitat needed for regular use or larger numbers of bats. Unlikely to support maternity roosts or classic cool/stable hibernation sites, though occasional individual hibernation is possible.	Habitat that could be used by small numbers of bats, e.g. a gappy hedgerow or unvegetated stream, but isolated and poorly connected to the wider landscape. Suitable but isolated habitat such as a lone tree (not in parkland) or a patch of scrub, used only by small numbers of bats.
Moderate	One or more PRFs of sufficient size, shelter, protection and conditions to be used by bats. Surrounding habitat supports use, but the structure is unlikely to support high-conservation-status roosts (maternity or classic hibernation). Categorisation is independent of species conservation status.	Continuous habitat connected to the wider landscape, e.g. lines of trees, scrub, linked back gardens. Connected habitat such as trees, scrub, grassland, or water, providing regular foraging opportunities.
High	One or more PRFs that are obviously suitable for use by larger numbers of bats on a regular basis and potentially for extended periods. Conditions and surrounding habitat support high-conservation-status roosts (e.g. maternity or classic cool/stable hibernation sites).	Continuous, high-quality, well-connected habitat such as river valleys, streams, hedgerows, lines of trees, or woodland edge, used regularly by commuting bats. Foraging: High-quality, well-connected habitat such as broadleaved woodland, tree-lined watercourses, or grazed parkland, used regularly by foraging bats. Often associated with proximity and connectivity to known roosts.

4.4.2 Suitability categories are assigned irrespective of confirmed presence. Where bats are confirmed to be present, either through the current survey or recent verified records, the relevant suitability category is annotated with 'confirmed roost' to reflect evidence of use while retaining the underlying habitat suitability grading. Hence, where bats are found to be present, in addition to the above grading, **Confirmed Roost** is added.

4.5 Limitations

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

4.5.2 The survey was undertaken outside the main maternity season, but PRA inspections are valid year-round for identifying PRFs and evidence of use.

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

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

5. Survey Results

5.1 Desk Study

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

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

- 5.1.2 Three European Protected Species Mitigation (EPSM) licences were identified within a 2km radius of the site. No additional EPSM licences were identified in the current assessment.

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

Statutory and Non-Statutory Protected Sites

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

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

- 5.1.5 With the site being within Wiltshire, the proximity to the sites within the Trowbridge and Westbury Bat Mitigation Strategy (adopted 22nd July 2025), which links to the Bath and Bradford on Avon Bats SAC, was considered. The woodlands to the east of Trowbridge town centre were more than 8km from the site, and as such they were not considered to be within the zone of impact.
- 5.1.6 The desk study confirms that bats are widespread locally, but no records relate directly to the surveyed structure.

5.2 Field Survey Results

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

External Inspection

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

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



Photograph 2. Steel corrugated panels.



Photograph 3. The front south-western elevation.

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

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



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



Photograph 5. Wooden fascia supporting the guttering.

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



Photograph 6. Windows on the south-east elevation.



Photograph 7. Permanently open access to the building.

Internal Inspection

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



Photograph 8. Internal view with free-standing livestock stalls.



Photograph 9. The building had no internal roof void.

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

5.3 Wider Area

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

6. Evaluation and Requirements

6.1 Evaluation

- 6.1.1 The results of the updated PRA concluded that the agricultural building was considered to have **negligible likelihood of supporting roosting bats**, assessed according to the criteria (Collins, J. [ed.] (2023), Table 4.1). No suitable PRFs were identified, either externally or internally, and there were no signs of use. The open, permanently lit and draughty nature of the building with a permanently open front and single-skinned construction without an enclosed roof void means the internal conditions would not be stable, greatly limiting the suitability for bats.
- 6.1.2 However, the building was located close to suitable bat foraging habitat, with areas of permanent pasture immediately to the south connected to the wider area by mature trees and hedgerows. The desk study identified maternity roosts of pipistrelle bats within 150m of the site, the closest 21m to the north, while a European Protected Species Mitigation licence relating to Brandt's (*Myotis brandtii*) and whiskered (*Myotis mystacinus*) bats, lies 145m to the north-north-west (exact locations have been withheld due to the sensitivity of the records). As such, it is highly likely that bats will commute and forage past the site, and as such the immediate surrounding habitat was concluded to be of **moderate** value for foraging and commuting bats, within a wider landscape of high suitability.
- 6.1.3 The legislation protecting bats is particularly strict, being protected under both UK and European legislation (see Section 3). In addition, all bat species are listed under Section 41 (in England) of the Natural Environment and Rural Communities Act 2006 as species of Principal Importance, which are those which the Government expects to be considered in planning applications. These are the species found in England which have been identified as requiring conservation action.
- 6.1.4 Given the desk study confirmed that bats are known to be present in the wider area, in the absence of mitigation there is the potential for low level of disturbance to occur, particularly from the use of excessive artificial light. Artificial lighting disrupts the normal 24-hour pattern of light and dark which is likely to affect the natural behaviour of bats, with excessive lighting having disrupting effects on bats (Bat Conservation Trust/ILP, 2023).

6.2 Further Survey Requirements

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

6.3 Mitigation

- 6.3.1 As a precautionary measure, the following mitigation strategy aims to minimise the potential for disturbance to any bats that may roost nearby and use the site for foraging or commuting.
- To minimise any disturbance to foraging or commuting bats, works should be undertaken in daylight hours (between sunrise and sunset) wherever practicable, particularly between March and October inclusive when bats are active.
 - Should temporary artificial lighting be required outside of this time, it must be the minimum required to safely carry out the task, with the luminaires directed downwards and switched off when not in direct use (see below).
- 6.3.2 If bats are unexpectedly found, including during adverse weather, take the following steps:
- Works will stop immediately. If an ecologist is not on site, they must be contacted immediately for advice. The bat must not be exposed or be encouraged to fly out of the roost on its own accord.
 - Bats can only be handled by licensed ecologists unless they are in immediate danger.
- 6.3.3 An experienced bat carer will temporarily care for any underweight or injured bats until they can be moved to a suitable replacement roost or released at the site in suitable weather.

6.4 Artificial Lighting

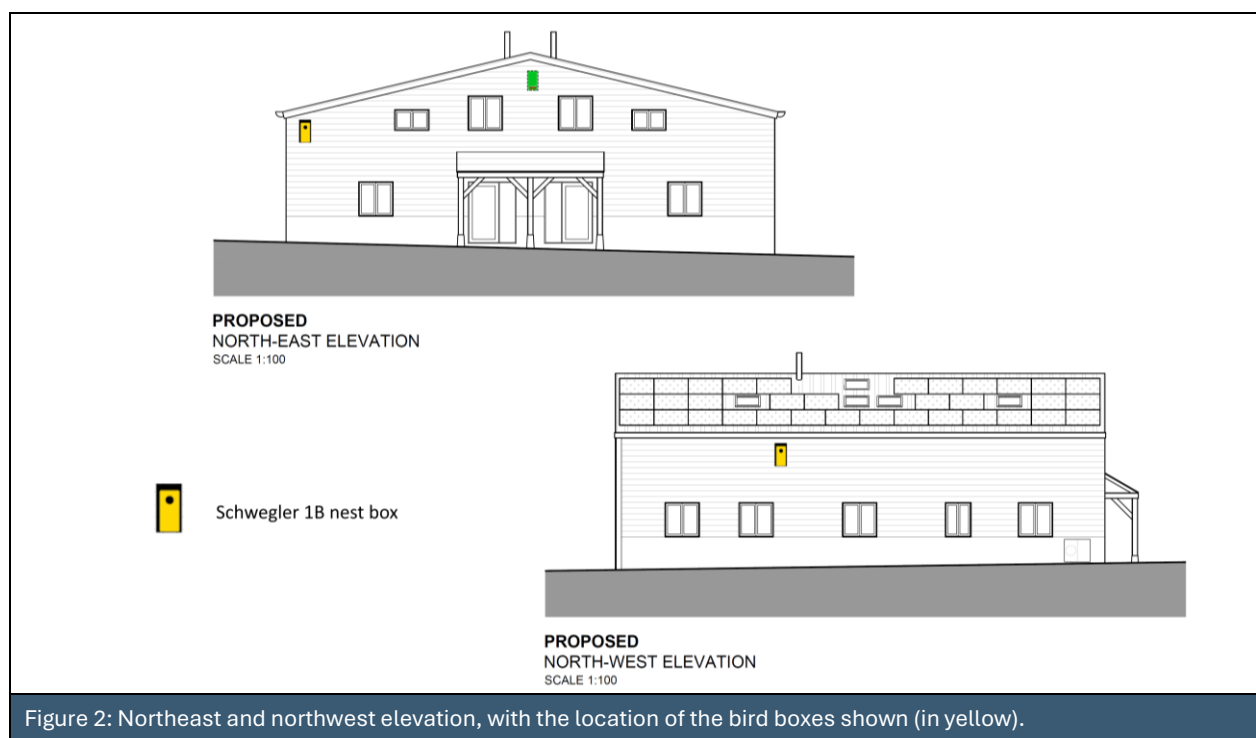
- 6.4.1 Evidence suggests that artificial lighting can cause disruption to bats, causing them to avoid or move away from suitable foraging and commuting routes (Bat Conservation Trust/ILP 2023), incurring an additional energetic burden and potentially limiting their access to their preferred foraging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

- 6.4.3 If any lighting is required, it should comprise energy-efficient directional luminaires of the warmest colour temperature available and in any event no greater than 2700K, in line with the Bat Conservation Trust/ILP guidance, that allow the light to be directed solely downwards to where it is needed, avoiding any upwards light that could impact foraging and commuting bats. The lighting should be on motion activated sensors, but set at a level that ensures they are not triggered by passing bats.
- 6.4.4 Any safety related lighting installed must be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Reduction of Obtrusive Light (GN 01/21). All lighting must be designed and installed in accordance with the Bat Conservation Trust and Institution of Lighting Professionals guidance on bats and artificial lighting (Bat Conservation Trust/ILP 2023).

6.5 Enhancements

- 6.5.1 Biodiversity enhancements on development sites are encouraged by the National Planning Policy Framework (August 2026) (NPPF) — policy N2(1)(f) of which expects development to minimise adverse impacts on biodiversity and to include features which support priority or threatened species such as nesting birds and bats— and by section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 (as amended). The new dwellings should therefore incorporate additional roost features for bats to utilise upon completion of the work, along with nest boxes for common species of garden birds. Hence the following should be incorporated into the design of the project.

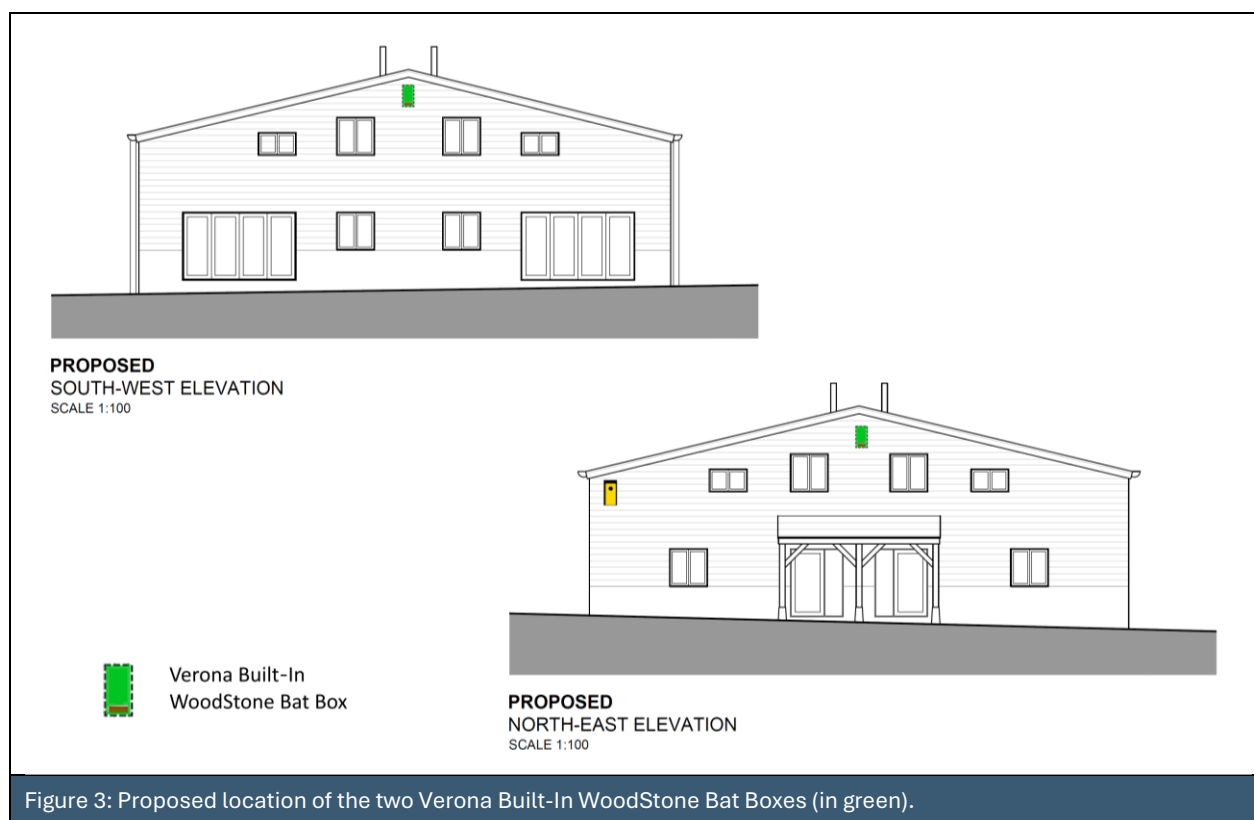
- Two single-crevice permanent woodcrete bat boxes (Verona Built-In WoodStone Bat Box) should be installed. Given the low eaves height of the building, opportunities for the installation of bat boxes were limited to the gable elevations, and hence the south-eastern gable of the south-eastern dwelling and the north-western gable of the north-western dwelling were chosen as optimal, to give a variety in roosting conditions.



- Policy N2 of the NPPF expects development proposals to incorporate integrated nest boxes (commonly known as swift bricks) into their construction, unless there are compelling technical reasons which prevent their use or would make them ineffective. However, the gable wall height of the new dwellings is 3.6m to the apex of the verge, and hence any integrated swift brick would need to be below that. In line with BS 42021:2022 and associated best-practice guidance, swift bricks should be installed at least 4m above ground level, and preferably at 5m. As the building is too low for them to function effectively, this is considered a compelling technical reason, and integrated swift bricks have therefore not been proposed.
- Two Schwegler 1B bird boxes should be installed on the new buildings. These are again of woodcrete construction, which are rot-proof and maintenance-free. The nest boxes will be orientated on two elevations, one on the northwestern facing elevation and one on the north-eastern facing elevation, to provide protection from direct sunlight, wind and rain whilst offering cover, shelter and access to foraging opportunities. Installing them on two aspects provides for a variety of conditions. The front of the nest boxes will be angled vertically or slightly downwards to prevent rain from entering the nest box. The bird boxes will be installed at least 2m above ground level. They will be attached using permanent fixings made from galvanised or stainless steel that will not rust or subsequently fail.

Details: **Schwegler 1B nest box**. 32mm entrance hole.

Internet link: <https://www.wildcare.co.uk/schwegler-1b-bird-box-32.html>



6.6 Bat PRA Validity

- 6.6.1 The lifespan of an ecological report is not fixed and is determined by the nature of the surveys undertaken, the potential for the site to change, and the presence of mobile species within the site or wider area, rather than by the passage of time alone. Applying professional judgement to those factors, and having regard to the guidance in Collins, J. [ed.] (2023), the results relied upon in this assessment are considered valid for 12 months; the 12-month period reflects professional practice rather than any fixed rule set by that guidance. The assessment is therefore considered valid for 12 months from the date of the field survey (13th February 2026), provided that the condition of the building and the proposed works remain unchanged.
- 6.6.2 Should the report be relied upon beyond that period, a suitably qualified ecologist should undertake a site visit and update the desk study information before the assessment is used, and should issue a clear statement, with justification, on the validity of the report, on which surveys require updating, and on the appropriate scope, timing and methods for any update. Factors to be considered include any change in the condition of the building — new cracks, crevices or access points may appear at any time and bats may move between roost sites throughout the year; any change to the proposals for the site; any change in the local distribution of bats or in the records held for the wider area; and any relevant change in legislation, policy or guidance.

6.7 Other Issues – Nesting Birds

- 6.7.1 A single old bird's nest was identified internally within the building, located on the internal steel building frame. Hence the work may impact breeding birds directly via injury or mortality, or indirectly by resulting in the loss of nesting opportunities. However, there are other similar agricultural buildings nearby, so it is highly unlikely to result in any significant impact upon the conservation status of birds in the local area.
- 6.7.2 All nesting birds, their nests, eggs and young receive legal protection under the Wildlife and Countryside Act 1981 (as amended). Careful timing of the works would avoid direct impacts on breeding birds, and the provision of alternative nesting opportunities would prevent long term impacts.
- 6.7.3 To avoid impacts to breeding birds the following mitigation must be implemented:
- Work to the agricultural building should take place outside of the breeding season (mid-March to August inclusive – although may extend longer depending on local conditions).
 - If there is no alternative to carrying out the conversion work during the bird nesting season, a thorough, careful and quiet examination of the affected area for wild nesting birds, their eggs, nests or young must be conducted before work commences. Should nesting activity be detected, all work must stop at that location, a qualified ecologist consulted.
- 6.7.4 Compensation for the loss of nesting bird opportunities is to be provided (Section 6.5 above).

7. BNG Applicability Assessment

7.1 Biodiversity Net Gain

- 7.1.1 Biodiversity net gain is an approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand. The Environmental Improvement Plan 2023 (EIP23), published 31st January 2023, sets out the aspiration to mainstream biodiversity net gain in the planning system and move towards approaches that integrate natural capital benefits.
- 7.1.2 National policy sets out that planning should provide biodiversity net gains where possible. Within the National Planning Policy Framework (August 2026), policy N2(1)(a) refers to this policy requirement, with plan-level standards for biodiversity net gain addressed in policy N1(2). Under the Environment Act 2021, all planning permissions granted in England within the scope of Schedule 7A are generally subject to a minimum 10% BNG requirement, unless an exemption or transitional provision applies, as of 12th February 2024 for major developments, and small sites from 2nd April 2024. Biodiversity net gain is to be measured using DEFRA's statutory biodiversity metric and habitats will need to be secured for at least 30 years through obligations or a conservation covenant. Mandatory biodiversity net gain as set out in the Environment Act applies in England through Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).
- 7.1.3 The Biodiversity Metric is designed to provide ecologists, developers, planners and other interested parties with a means of assessing changes in biodiversity value (losses or gains) brought about by development or changes in land management. The Metric is a habitat-based approach to determining a proxy biodiversity value.

7.2 Exemption

- 7.2.1 Certain types of development are exempt from the mandatory biodiversity net gain (BNG) requirements (Biodiversity Gain Requirements (Exemptions) Regulations 2024, as amended by the Biodiversity Gain (Town and Country Planning) (Amendments and Transitional Provisions) (England) Regulations 2026 (SI 2026/790), regulation 7A). From 6 August 2026, development proposals with a total site area of 0.2 hectares or less are exempt from the mandatory requirement to achieve a minimum 10% BNG, provided that the development would not negatively affect any on-site priority habitat. The application site within the red line boundary extends to 0.0875 hectares, and hence is less than 0.2 hectares, with the proposals not adversely affecting any priority habitat.
- 7.2.2 As the planning application will be submitted after 6 August 2026, the development therefore qualifies for the 0.2 hectare exemption; the biodiversity gain planning condition does not apply and submission of a statutory biodiversity metric and a Biodiversity Gain Plan is not required.
- 7.2.3 This exemption relates only to the statutory BNG requirement. It does not remove the need to comply with relevant wildlife legislation, protected-species requirements, the ecological mitigation hierarchy, or applicable national and local planning policies. Appropriate measures to avoid ecological harm and incorporate proportionate biodiversity enhancements should therefore remain embedded within the proposals.

8. References

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