

# Preliminary Bat Roost Assessment

36 Hammer Hill  
Haslemere  
October 2023



<b>Client</b>	Darren Light
<b>Application Site</b>	36 Hammer Hill, Haslemere, Surrey, GU27 3QY (the 'Site')
<b>Survey type</b>	Preliminary Bat Roost Assessment
<b>Survey date</b>	4 <sup>th</sup> October 2023
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<b>Associated reports</b>	N/A
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The contents of this report have been produced with due consideration of current best practice guidance, and in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct.

Data within this report is valid for a maximum of 18 months from the date of the survey. After this period an updated site visit will be required to determine a new ecological baseline. More up-to-date survey data may be required for a planning application or licensing, depending on conditions and impacts.

Whilst every effort has been taken to ensure the accuracy of this report and its contents, in view of potential ecological constraints to development or the likely presence or absence of species, it must only be viewed as a snapshot in time and, therefore, not be viewed as definitive. Due to external factors, such as seasonality, weather etc, having the potential to affect survey results, no liability can be assumed for omissions or changes that may, or may not occur, after the date this report was produced.





## EXECUTIVE SUMMARY

<b>PROPOSAL</b>	<ul style="list-style-type: none"><li>• Planning permission is being sought for an extension to the rear of the property on top of an existing single storey extension and the addition of a small porch to the front.</li></ul>
<b>SURVEYS COMPLETED</b>	<ul style="list-style-type: none"><li>• Preliminary bat roost assessment (PRA) encompassing an internal and external inspection of the property.</li></ul>
<b>KEY FINDINGS</b>	<ul style="list-style-type: none"><li>• The Site consists of a two-storey semi-detached property with a pitched, tiled roof and a single-storey extension to the rear.</li><li>• No bats or evidence of bats were found during the survey.</li><li>• No potential roosting features were found at the property.</li><li>• The property was found to offer <b>negligible potential</b> to support roosting bats.</li><li>• Based on the construction approach and the area of proposed direct impact, no further surveys are considered necessary for roosting bats.</li><li>• The Site has potential to support foraging and commuting bats.</li><li>• Recommendations have been given for no night-time working or lighting.</li></ul>
<b>OVERALL FINDING</b>	<ul style="list-style-type: none"><li>• If the construction approach alters or the design changes, consultation with an ecologist will be required since bat surveys may be necessary.</li><li>• Mitigation will ensure that the favourable conservation status of bats close to the Site would be maintained. Furthermore, enhancement measures could result in a net improvement in opportunities for bats.</li></ul>

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## 1 INTRODUCTION

### 1.1 Background

Deepdene Ecology Ltd was instructed by Darren Light to undertake a Preliminary Bat Roost Assessment (PRA) in support of a planning application for a proposed extension to the rear of the property and the addition of a small porch to the front of the property at ‘36 Hammer Hill, Haslemere, Surrey, GU27 3QY’ (from hereon in referred to as the ‘Site’).

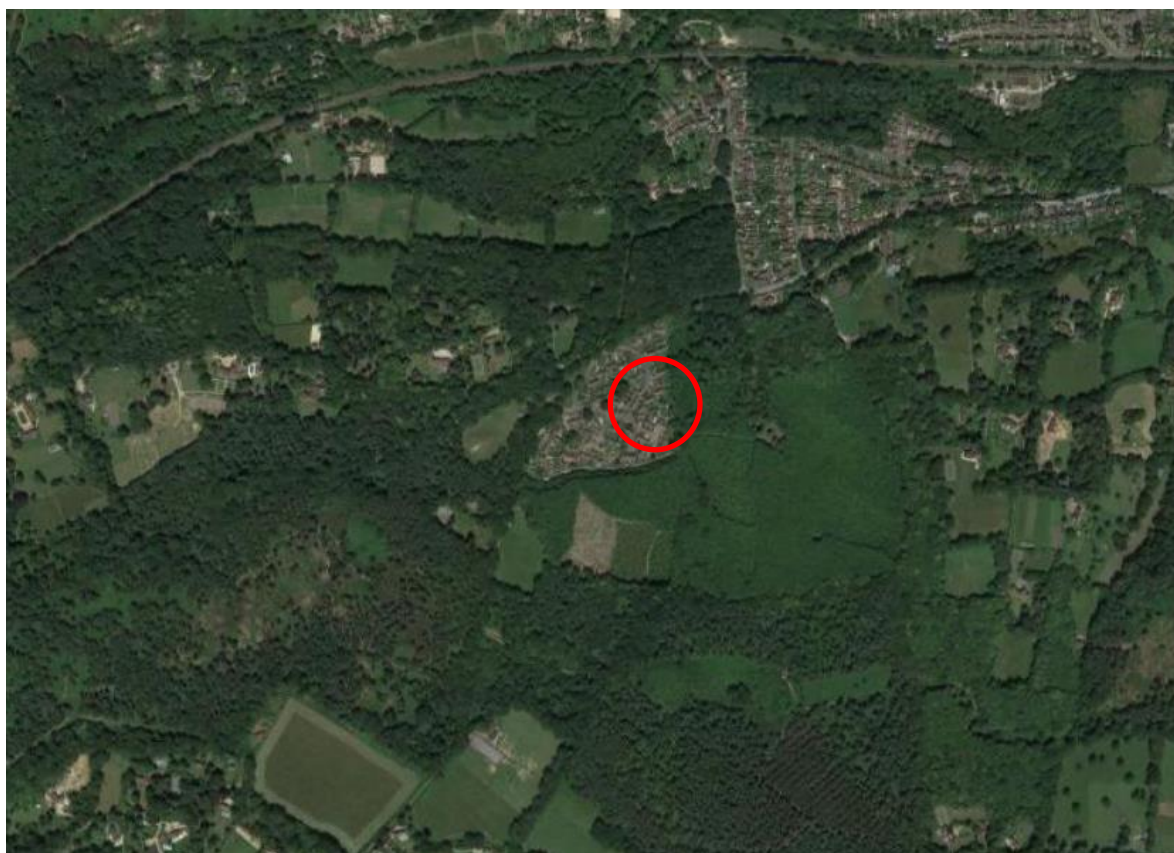
### 1.2 The Site

The Site is located at the top of a looping residential road, Hammer Hill (see **Figures 1 - 3**) to the west of the town of Haslemere, Surrey and within a residential area which is predominantly comprised of semi-detached properties set within small to moderate sized mature gardens. The Site is bordered on all sides by other residential plots and Hammer Hill. The edge of the Site gives way to woodland copses, pasture, hedgerows and parkland.

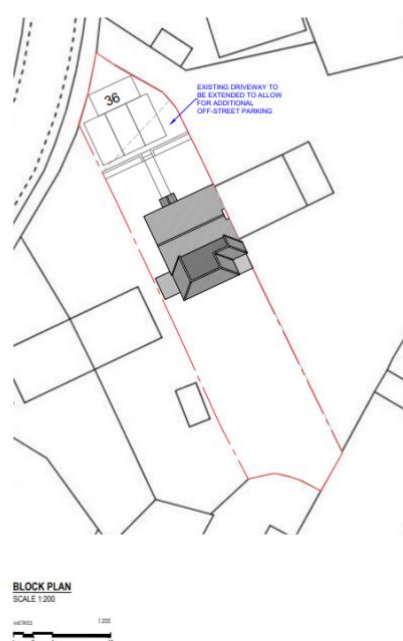


**Figure 1:** Aerial photograph of the Site (indicative only). Image taken from Google Earth. Red line illustrates the approximate boundary of the Site.





**Figure 2:** Aerial photograph showing context of Site (indicative only). Image taken from Google Earth.



**Figure 3:** Block plan of the site. Image provided by ARH Home Designs.

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### 1.3 Proposed Development

A planning application (02/01358/DOM) has been submitted to Chichester District Council (CDC) for a proposed extension the rear of the property on top of an existing single storey extension and the addition of a small porch to the front (see **Appendix B**). The rear extension will impact part of the rear roof of the property and the flat roof over the existing single storey extension. The new porch will be an addition to the front of the property.

### 1.4 Scope of the Assessment

This report presents ecological information obtained during a desk study and walkover survey undertaken in October 2023.

The aims of the PRA survey were to:

- Undertake a full bat roost assessment of the property - this included a detailed internal inspection of the accessible areas of the internal loft void and external areas of the building;
- Determine where possible the type and extent of the bat roosts within the building (if applicable); and
- Outline the mitigation, enhancement and licensing (if applicable) that would be required to ensure that the proposed development could proceed without contravening wildlife legislation.

### 1.5 Summary of relevant legislation

In the UK, all bats and their roosts are legally protected through The Conservation of Species and Habitats Regulations (2017) and the Wildlife and Countryside Act (1981) as amended. Taken together, this makes it an offence to:

- Deliberately take, injure or kill a bat;
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats;
- Damage or destroy a place used by bats for breeding or resting (roosts) (even if bats are not occupying the roost at the time); and
- Intentionally or recklessly obstruct access to a bat roost.

For any development that impacts on bats or bat roosts, in order to permit the works to legally proceed, it is necessary to obtain a European Protected Species Mitigation (EPSM) or Bat Mitigation Class Licence (BMCL) from Natural England in advance of the works taking place. EPSM Licences can be considered for up to 35 working days, while a BMCL take 10 working days. It is only possible to obtain a BMCL for low impact works.

Further details on the legislation and relevant policy can be found in **Appendix A**.

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## 2 METHODOLOGY

### 2.1 Desk study

A desk study was undertaken to inform this assessment with baseline information collated from the following sources:

- Multi-Agency Geographic Information for the Countryside (‘MAGIC’) website (MAGIC, 2023) – to identify statutory designated sites of nature conservation importance and Local Nature Reserves (LNRs) within 2km of the Site;
- MAGIC 2023 – to identify any existing granted EPSM licences for bats within a 2km buffer around the Site and notable habitats within 1km;
- MAGIC website – to determine if the Site was within a SSSI Impact Risk Zone (IRZ);
- Chichester District Council Proposals Map (Chichester District Council, 2023) – to identify non-statutory designated sites (Sites of Nature Conservation Importance (SNCI) and potential (p)SNCIs) within a 1km radius around the Site; and
- Google Earth – use and analysis of aerial photographs to consider the surrounding landscape and identify any potential features that bats may use to access the Site (including hedgerows and lines of mature trees).

### 2.2 Field survey

#### 2.2.1 Preliminary bat roost assessment (PRA)

A detailed PRA was undertaken on the 4<sup>th</sup> October 2023 to look for potential roosting opportunities and any evidence of bats at the property. The inspection was undertaken in accordance with guidance provided by the Bat Conservation Trust (Collins, 2016) and (Mitchell-Jones & McLeish, 2004).

The external inspection comprised of searching for potential access points or roosting locations such as crevices or holes within the brickwork, around windows, missing, broken or slipped tiles, gaps beneath barge boards, soffits and fascias, and any lifted flashing or roof tiles. Evidence of bats such as droppings on window sills or oil staining from bat fur was also searched for. The survey was conducted from the ground around the building and was aided by binoculars and a high-powered torch.

The internal inspection assessed the complexity and size of the roof void and daytime light levels. A search was also undertaken for potential access points and evidence of roosting bats such as bat droppings, oil staining from bat fur, feeding remains and actual bats.

The weather conditions were dry and cloudy and approximately 17°C and the survey was unconstrained.



## 2.2.2 Categorisation of bat roosting potential

Following the inspections and taking account of the habitat features, the building was then assigned a level of potential bat roost suitability based on the criteria given in the ‘*Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3<sup>rd</sup> Edition*’ (Collins, 2016) and professional judgement (see **Table 1**).

**Table 1:** Classifying the bat roosting suitability of buildings (Collins, 2016).

Level of bat roosting Potential	Rationale
Negligible	Negligible habitat features within the Site likely to be used by roosting bats.
Low	A structure with one or more features that could be opportunistically used by individual bats. Unlikely to support maternity or hibernation roosts.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat (unlikely to support roosts of high conservation status).
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 and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
Confirmed roost	Evidence of bat occupation found.

## 2.3 Surveyor information

The survey was undertaken by Laura Cook BSc (Hons), Laura has over 10 years’ experience of undertaking ecological surveys. The survey was overseen by Sally Dalrymple-Smith (Bat Class Licence holder, registration number 2018-34389-CLS-CLS). Sally is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and has over 17 years’ experience of undertaking ecological surveys.

## 2.4 Limitations

It should be noted that bats can use roosting features intermittently during the year and may be present in larger or smaller numbers depending on their breeding cycle, weather conditions, and in response to disturbance. Bats may be present at other times and the results should therefore be viewed with caution.

The survey visit was undertaken in accordance with best practice guidelines, during weather conditions that were considered suitable. The results of the ecological survey allow evaluation of potential constraints and the potential for negative impacts from the proposed works on roosting bats.

### 3 RESULTS

#### 3.1 Desk study

##### 3.1.1 Designated sites

There are two statutory designated sites within 2km of the Site. **Table 2** below provides further information on the sites.

The Site is within a SSSI IRZ but the proposed development does not meet the criteria (householder applications are exempt) required for the LPA to consult with Natural England and therefore no further consultation is necessary.

**Table 2:** Designated sites within a 2km buffer.

Site name	Distance and direction (closest point)	Citation/description
<b>International Designation</b>		
Wealden Heath Phase II Special Protection Area (SPA)	1.6km northeast	The site forms part of a complex of heathlands and comprises of distinct areas of wet and dry heathland, valley bogs, broad-leaved and coniferous woodland, permanent grassland and open water. The site supports breeding bird populations of European importance.
<b>National Designations</b>		
Lynchmere Commons Local Nature Reserve (LNR)	0.3km southwest and 0.8km southeast	This heathland site comprises of Stanley, Lynchmere and Marley Commons. The sites have diverse insect species and unusual plants such as bilberries.

Due to the small-scale size, location and nature of the Site, the proposed development is highly unlikely to have a significant effect on either of the designated sites. Therefore, no further assessments are considered necessary in relation to statutory designated sites.

##### 3.1.2 Non-statutory sites and notable habitats

There are no non-statutory designated sites within 1km of the Site. The closest non-statutory site, Kingfisher Farm Site of Nature Conservation Interest (SNCI) is located approximately 1.9km to the northeast of the Site.

Given the small-scale, location and distance between the proposals and this non-statutory designated site, the proposed development is highly unlikely to have a significant effect on the designated site as long as best practice construction methods including pollution prevention measures are followed. Non-statutory designated sites are not discussed further in this report.

There are areas of ancient woodland habitat within 1km of the Site. The closest ancient woodland is approximately 1km to the east of the site. As the proposals are only impacting the

existing property and hardstanding, it is not anticipated that there will be any direct impacts on the ancient woodland habitat.

### 3.1.3 European Protected Species Mitigation (EPSM) Licences

There are six existing EPSM licences that have been granted for bats within 2km of the Site. Details are provided below within **Table 3**.

**Table 3:** Existing EPSM Licence within 2km of the Site.

Licence number	Distance & direction	Species	Details	Dates
2018-57509-EPS-MIT	0.3km northeast	Common pipistrelle	Destruction of a breeding site	2018-2028
2018-35609-EPS-MIT	1km to the southeast	Common pipistrelle	Destruction of a resting place	2018-2023
2018-37635-EPS-MIT	0.6km to east	Common pipistrelle Serotine	Damage of a breeding site and damage of a resting place	2018-2024
2016-24164-EPS-MIT	1.9km northeast	Common pipistrelle	Damage and destruction of a resting place	2016-2021
2018-34330-EPS-MIT	1km to the southwest	Common pipistrelle Soprano pipistrelle Brown long-eared	Damage and destruction of a resting place	2018-2020
2020-47049-EPS-MIT	1.6km to the southwest	Common pipistrelle Soprano pipistrelle Brown long-eared Serotine	Damage and destruction of a resting place	2020-2026

### 3.1.4 Habitat connectivity

The Site is set in the middle of a small residential area within a small sized mature plot. Woodland habitat is located close by in all directions which is connected to the wider landscape of woodland areas and open habitats including pasture land. These areas provide good quality foraging and commuting habitat for bats.

## 3.2 Survey results

A detailed internal and external inspection of the property was undertaken during the PRA. The findings of the survey are discussed below and depicted in the photographs in **Table 4**.

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### 3.2.1 House inspection

The property was a semi-detached, two-storey building with a one-storey extension to the rear (Photographs 1-2, **Table 4**). The windows were all uPVC and well fitted throughout. The brickwork was all in good condition with no cracks observed. The building had a central hipped roof with an additional mono-pitched roof over the single-storey rear extension. The main roof was tiled with small format clay tiles. The roof tiles on the rear elevation were generally well fitting and there were no missing or slipped tiles. There were some very minor gaps under a few tiles along the side edge of the roof but the gaps were not large enough to support roosting bats and it is understood that the proposed works will not impact this area of the roof (Photograph 3, **Table 4**). There were also some minor gaps under a few of the tiles close to the ridge on the rear roof, however the proposed extension will not affect this area of the property (Photograph 4, **Table 4**).

The single storey rear extension had concrete interlocking roof tiles that presented no gaps and there were no missing or slipped tiles observed (Photograph 5, **Table 4**).

The soffits along the main rear roof line were constructed from concrete blocks that were tightly fitted and presented no gaps or features suitable for roosting bats (Photograph 6, **Table 4**). The soffits along the single storey rear extension were of wood construction that were in good condition with no gaps observed (Photograph 7, **Table 4**).

The front roof of the property was not considered as part of the survey as it will not be impacted on by the proposed works.

The front of the house, where the proposed new porch will adjoin the house, was of brick construction. The front door was uPVC and the door surround was wood (Photograph 8, **Table 4**). The area where the proposed porch will be constructed had no potential features suitable for roosting bats.

Internally, the property had a small loft space, which at the time of survey was used for storage of household items (Photographs 9-10, **Table 4**). The timber roof truss was formed from traditional rough-hewn timbers with bitumen felt under the tiles. The floor in the main void was boarded with plywood boarding. Mineral wool insulation was evident along the edges of the void and under the boarded floor. The roof appeared to be tightly sealed with no gaps noted at the eaves. Large cobwebs were present between the timber rafters and around the apex (Photograph 10, **Table 4**) which is likely to indicate a lack of internal flying activity from void-dwelling bats such as brown long-eared bats. A thorough inspection of the roof void was undertaken and no evidence of roosting bats was found within the roof void. No other areas of the property, such as the single storey extension had any loft voids.

Overall, there were some minor gaps under a few of the roof tiles along the edge and close to the ridge of the rear roof, however the gaps were very small and it is understood that the proposed works won't affect these areas of the roof. No signs of bats were observed and the property was considered to offer **negligible suitability** to support roosting bats. No further surveys are recommended.



**Table 4: Inspection photographs**



**Photograph 1:** The front elevation and part of the front garden of the property.



**Photograph 2:** Rear elevation and part of the back garden of the property.



**Photograph 3:** The rear roof of the property. Red circle illustrates some very minor gaps under a few of the roof tiles along the edge of the roof. Not considered large enough to support roosting bats.



**Photograph 4:** There were minor gaps under a few of the tiles just below the ridge line – no proposed work in this area and not considered large enough to support roosting bats.



**Photograph 5:** Part of the single storey rear extension. There were no gaps under any tiles on this part of the roof.



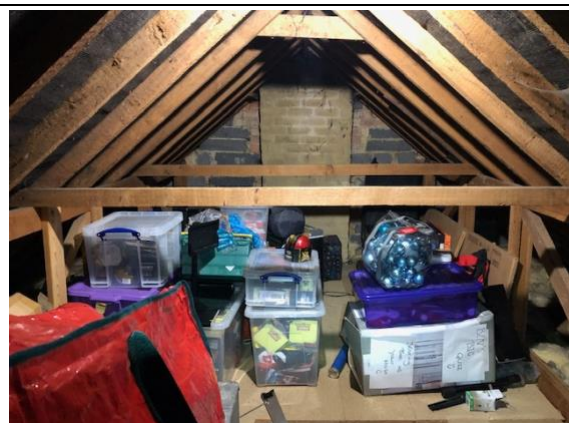
**Photograph 6:** The soffits on the rear elevation were of concrete breeze block construction and presented no gaps or potential roost features (PRFs) for bats.



**Photograph 7:** The wooden soffits on the single-storey rear extension presented no gaps or PRFs for bats.



**Photograph 8:** The uPVC front door and wooden surround at the property where the proposed porch will be constructed. No PRFs noted.



**Photograph 9:** The main loft void at the property.



**Photograph 10:** There were a huge number of cobwebs across the loft void and at the apex of the void.

## 4 ASSESSMENT AND RECOMMENDATIONS

### 4.1 Discussion of findings

The desk study identified that the Site has connectivity to nearby suitable foraging, commuting and roosting habitat in the surrounding area with suitable habitat interconnected throughout the landscape.

The survey was completed following standard survey guidelines in suitable weather conditions by a competent, experienced bat ecologist and there were no constraints to the surveys with good visibility of all potential roosting features.

No bats or evidence of bats were recorded during the inspection of the building, which included a detailed and methodical search of all accessible external and internal areas.



The exterior works involve the addition of an extension to the rear on top of an existing single storey extension and the addition of a small porch to the front of the property. No obvious potential roosting features were identified with only minor gaps noted in areas that will not be impacted on. There were no features of potential value to bats on the front elevation where the proposed porch will be constructed. Therefore, following a thorough internal and external inspection of the property, the property was considered to have **negligible suitability** to support roosting bats. No further surveys are recommended.

The rear garden has the potential to support foraging and commuting bats.

## 4.2 Potential impacts

The property had **negligible suitability** to support roosting bats and, therefore, there will be no direct impacts to bats associated with the proposed works.

The Site has potential to support foraging and commuting bats and therefore the works could result in disturbance and disruption to foraging and commuting bats through night-time working and lighting.

## 4.3 Recommendations for mitigation

### 4.3.1 Design and construction approach

Should the works alter in anyway and impact different areas of the roof, an ecologist should be consulted as further inspections or surveys may be required.

### 4.3.2 Precautionary approach

The property had **negligible suitability** to support roosting bats. There is potential for bats to be in the local area and therefore, in the unlikely event that bats are encountered during the proposed works, all works must cease immediately and a licensed bat ecologist must be contacted. It would be necessary to undertake consultation with Natural England in order to agree a lawful way to proceed with the remaining works.

### 4.3.3 Mitigation: foraging and commuting bats

The Site supports potential foraging habitat for foraging and commuting bats. Artificial lighting is known to result in the loss of foraging habitat available and can also interfere with commuting routes from roosts (Stone, 2013<sup>1</sup>). Therefore, lighting should be kept to a minimum (during construction and operation) and follow guidance from the Bat Conservation Trust '*Bats and artificial lighting in the UK*' (2023)<sup>2</sup>. This includes:

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<sup>1</sup> Stone, E. L., Jones, G. and Harris, S. (2012), Conserving energy at a cost to biodiversity? Impacts of LED lighting on bats. *Glob Change Biol*, 18: 2458–2465.

<sup>2</sup> Bat Conservation Trust & ILP, 2023. *Bats and artificial lighting at Night. Guidance Note GN08/23*. Institution of Lighting Professionals.

- Avoid artificial lighting close to any mature trees, hedgerows or woodland within the Site or close to the boundary;
- Directing any task lighting used during construction away from vegetation;
- White and blue wavelengths of the light spectrum should be avoided and the brightness should be kept as low as feasibly possible;
- All luminaires should lack UV elements and metal halide fluorescent sources should not be used;
- LED luminaires are preferred due to the lower intensity, sharp 'cut-off', colour rendition and dimming capability;
- A warm white light source (2700Kelvin or lower) should be adopted to reduce the blue light component;
- Only luminaires with a negligible or zero Upward Light Ratio, and with good optical control, should be used;
- Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt;
- Any necessary security lighting should be set on short timers (e.g. 1 minute) with a sensitivity to large moving objects only;
- Lighting times will be limited to provide dark periods; and
- The height of columns will be carefully considered to avoid light spill.

#### 4.4 Ecological enhancements

National Planning Policy Framework (NPPF) states that local planning authorities should aim to conserve and enhance biodiversity where possible when determining planning applications. The development plans should maximise opportunities for enhancement, in order to achieve a net increase in biodiversity. This is in accordance with the NERC Act (2006) which requires that *“every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat.”*

It is recommended that the following biodiversity enhancements are considered in the final development of the design:

- The addition of one bat box on a mature tree at the Site (see **Appendix C**); and
- The inclusion of native trees and shrubs of recognised wildlife value to bats within the new landscaping scheme (see **Appendix C** for planting ideas).

## 5 CONCLUSION

This report is based on an ecological desk study and PRA survey undertaken in October 2023. The property was found to have **negligible suitability** to support roosting bats. The Site and surrounding area have potential to support foraging and commuting bats. Mitigation has been recommended to minimise potential disturbance including no night-time working and lighting. Enhancements should be incorporated into the design to overall improve the Site for roosting bats.



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## 6 BIBLIOGRAPHY

Collins, J. (2016). *Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd Edition*. London: Bat Conservation Trust.

Bat Conservation Trust & ILP, 2023. *Bats and artificial lighting at Night. Guidance Note GN08/23*. Institution of Lighting Professionals.

Stone, E. L.–2. (2012). Conserving energy at a cost to biodiversity? Impacts of LED lighting on bats. *Glob Change Biol.*, 18:2458-2465



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## Appendix A - Summary of Relevant Legislation

All British bats are fully protected under the Wildlife and Countryside Act 1981 (as amended) through inclusion in Schedule 5. They are also included in Schedule II of Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 which transpose Annex II of the Council Directive 92/43/EEC 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora (“EC Habitats Directive”) which defines European protected species of animals.

Bat species are afforded further protection by the Countryside and Rights of Way (CROW) Act 2000; and the Natural Environment and Rural Communities Act 2006.

Under the above pieces of legislation, it is an offence to:

- kill, injure or take an individual;
- possess any part of an individual either alive or dead;
- intentionally or recklessly damage, destroy or obstruct access to any place or structure used by these species for shelter, rest, protection or breeding;
- intentionally or recklessly disturb these species whilst using any place of shelter or protection; or
- deliberate disturb in such a way as to be likely to impair their ability to:
  - survive, breed or reproduce, or to rear or nurture their young; or
  - in the case of animals of a hibernating or migratory species, to hibernate or migrate; or
  - to affect significantly the local distribution or abundance of the species to which they belong;
  - keep (possess), transport, sell or exchange, or offer for sale or exchange, any live or dead bat, or any part of, or anything derived from a bat.

For any proposed works that could result in an unlawful activity in relation to bats (e.g. damage to a bat roost), it is possible to obtain a European Protected Species Mitigation (EPSM) licence or Bat Mitigation Class Licence (BMCL), to allow the works to proceed lawfully. A licence will only be issued following appropriate surveys and mitigation and only if Natural England are satisfied that all of the following three tests are met:

- The proposal is for ‘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’;
- There is no satisfactory alternative; and
- The action authorised by the license will not be detrimental to the maintenance of bat populations at a favourable conservation status in their natural range.

A bat roost is defined as “the resting place of a bat” (Bat Conservation Trust, 2017). More generally, a roost can be considered to be “any structure or place, which any wild bat uses for shelter or protection.”

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## National Planning Policy Framework (NPPF) July 2021

The NPPF aims to minimise impacts on biodiversity and provide net gains where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity. Chapter 15 ‘*Conserving and enhancing the natural environment*’ details what local planning policies should consider with regard to planning applications.

Planning policies and decisions should contribute to and enhance the natural and local environment by:

**174 a)** protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

**174 d)** minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

**179 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;

**180 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; and

**180 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.

## Regional Planning Policy

Relevant regional planning policies for South East England are detailed in the following documents:

- **The South East Plan (2009)**; and
- **Biodiversity and Planning in Surrey (2019)**.

### **The South East Plan (2009)**

The South East Plan was published in May 2009. It has since been revoked with the exception of Policy NRM6 on the Thames Basin Heaths Special Protection Area (SPA). Policy NRM6 states “New residential development which is likely to have a significant effect on the ecological integrity of Thames Basin Heaths SPA will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects, such measures must be agreed with Natural England.”

### **Biodiversity and Planning in Surrey (2019)**

This document replaces the 1999 Surrey Biodiversity Action Plan and details areas in Surrey which have been identified as opportunities for biodiversity enhancement, cross-referencing



relevant policies within the NPPF. This document, together with Appendix 1 Protected Species in Surrey and Appendix 2 Statutory designated sites in Surrey, details protected sites and protected and priority habitats and species in Surrey. Surrey County Council states that the document's central purpose is "to help those involved in planning in Surrey to ensure that development within the county protects and enhances our valuable local biodiversity, which underpins our Natural Capital".

## **Local Planning Policy – Local Planning Policy**

### **Local Planning policy – Chichester District Council Local Plan (adopted in 2015 to be replaced by the Proposed Local Plan 2021 - 2039)**

The Local Plan has three principal functions which are as follows:

- It will provide the broad policy framework and a long-term strategy to manage development, protect the environment, deliver infrastructure and promote sustainable communities within Chichester District, excluding the area within the South Downs National Park.
- The Plan seeks to balance the economic, social and environmental dimensions of sustainable development.
- To make proposals for the development and use of land and to allocate land for specific purpose and to provide the main basis for making decisions on planning applications

The relevant policies related to biodiversity include:

#### **NE5: Biodiversity and Biodiversity Net Gain**

All development shall ensure the conservation, protection, enhancement and restoration of biodiversity, avoiding any adverse impact on the condition and recovery of all types of nature conservation sites, habitats and species within their ecological networks including:

- A. Internationally designated sites (SPA, SAC, Ramsar)
- B. Irreplaceable habitats, including ancient woodland and ancient or veteran trees
- C. Nationally designated sites, such as Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ)
- D. Riverine and Marine Habitats
- E. Priority Habitats and Species
- F. Biodiversity Opportunity Areas (BOA)/ Nature Recovery Networks (NRN)
- G. Locally designated sites, such as local wildlife sites and Local Nature Reserves
- H. Wildlife corridors and stepping-stones

Opportunities to conserve, protect, enhance and recover biodiversity and contribute to wildlife and habitats connectivity will be undertaken, including the preservation, restoration and recreation of priority habitats, ecological networks and the protection and recovery of priority species populations.

Development proposals will be permitted where it can be demonstrated that the following criteria have been met:



1. Development proposals adhere to the NPPF mitigation hierarchy, and in addition, demonstrate that proposals provide a minimum of 10% net gain in biodiversity against a pre-development baseline<sup>19</sup>:

- a) For major development of 10 or more dwellings or on sites of 0.5 hectares or more, the most recent national Biodiversity Metric will be used to calculate biodiversity net gain;
- b) For minor development of 1 – 9 dwellings or on sites of less than 0.5 hectares the Small Sites Metric (or future equivalent) will be applied;
- c) Net gain should be provided on-site in the first instance, and then locally off-site (as close as possible to the development site, or if that is not possible, elsewhere within Chichester District) where it should contribute towards strategic networks such as green infrastructure, wildlife corridors or nature recovery networks;
- d) Where appropriate, as a last resort, and with the agreement of the local planning authority that on or local off-site provision is not possible, applicants will be required to purchase credits for biodiversity gain through the national biodiversity credit scheme;
- e) Development will provide for the long-term management of biodiversity features retained and enhanced within the site or for those features created off-site, for a minimum period of 30 years through planning obligations; and
- f) Designated sites and irreplaceable habitats are excluded from net gain metrics as they are irreplaceable. Proposals which may impact these sites will be required to satisfy the legislative tests as set out in Section 3 below.

2. Development proposals should be accompanied by a biodiversity appraisal that assesses the level of existing ecological value of the site through adequate and proportionate information, and demonstrates that any adverse impacts are avoided or reduced in line with the mitigation hierarchy through an avoidance or mitigation plan:

- a) Where an adverse impact on biodiversity is unavoidable, and no other option is available, this will only be supported where it has been demonstrated that the impact has been minimised as far as possible and, as a last resort, appropriate compensation provided for any remaining adverse impacts;
- b) Opportunities to conserve, protect and enhance biodiversity and contribute to wildlife and habitats connectivity should be undertaken, including the preservation, restoration and recreation of priority habitats, ecological networks and the protection and recovery of priority species populations.

3. Development proposals that will have an impact on international, national, locally designated and irreplaceable habitats will be required to meet the following requirements: a) Internationally Protected Sites (as shown on the policies map), including SPAs, SACs and Ramsar sites, or candidate and formally proposed versions of these designations:

i. Development proposals with the potential to impact on one or more international site(s) will be subject to a HRA to determine the potential for likely significant effects.

Where likely significant effects may occur, development proposals will be subject to Appropriate Assessment.

- b) Nationally Protected Sites (as shown on the policies map), including SSSIs, NNRs, MCZs:
    - i. Development proposals considered likely to have a significant effect on nationally protected sites will be required to assess the impact by means of an EIA;
    - ii. Development proposals should avoid impacts on these nationally protected sites.
- Development proposals where any adverse effect on the site's notified special interest is likely



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and which cannot be either avoided or adequately mitigated will be refused, unless the benefits of the development at this site clearly outweigh the likely impact to the notified features of the site and any broader impacts on the network of nationally protected sites.

c) Irreplaceable habitats including ancient woodland (as shown on the policies map), and veteran trees:

i. Development proposals which result in the loss or deterioration of irreplaceable habitats, including ancient woodland and veteran trees, will be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists.

d) Locally protected sites, including local wildlife sites, and Local Nature Reserves (as shown on the policies map):

i. Development proposals considered likely to have a significant impact on local sites will be required to assess the impact by means of an Ecological Impact Assessment;

ii. Development proposals that will result in any adverse effect on the integrity of any local site which cannot be either avoided or adequately mitigated, will be refused, unless exceptional circumstances outweighing the adverse impacts are clearly demonstrated.

e) Outside of designated sites:

i. Development proposals should identify and incorporate opportunities to conserve, restore and recreate priority habitats and ecological networks. Development proposals should take opportunities to contribute and deliver on the aims and objectives of the relevant biodiversity strategies where possible.

## Appendix B - Existing and Proposed Plans



Figure 1: Existing elevations. Image produced by ARH Home Designs.

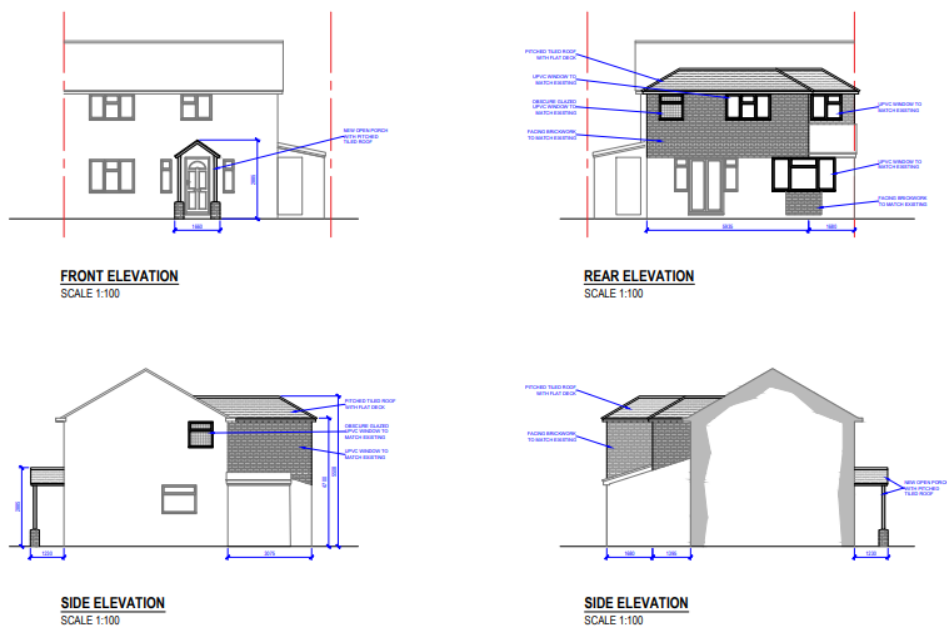
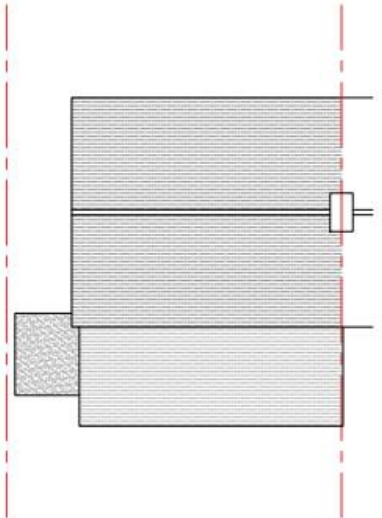
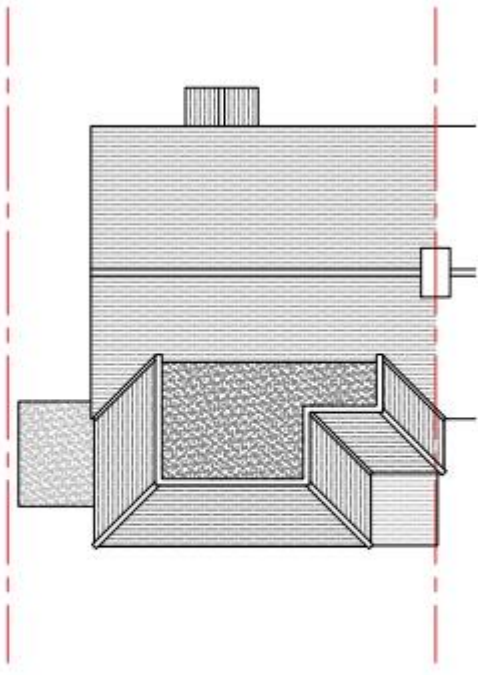


Figure 2: Proposed elevations. Image produced by ARH Home Designs.

 <p><b>ROOF PLAN</b> SCALE 1:100</p>	 <p><b>ROOF PLAN</b> SCALE 1:100</p>
<p><b>Figure 3:</b> Existing roof plan. Image produced by ARH Home Designs.</p>	<p><b>Figure 4:</b> Proposed roof plan. Image produced by ARH Home Designs.</p>

## Appendix C - Enhancement details

### Bat boxes

#### Tree boxes

- At least one bat box should be hung around the Site or incorporated into the design proposals. Examples of suitable bat boxes are the Double Crevice Box or the Schwegler 2.
- The Improved Double Crevice Box (**Figure 1**) – a good general-purpose bat box for crevice species such as pipistrelles that supports a range of species which can be hung on the retained trees around the Site.
- The Schwegler 2 (**Figure 2**) – is a double fronted bat box for crevice species such as pipistrelles that supports a range of species which can be hung on the retained trees around the Site.
- The box/es should be positioned on a mature tree in a shady position, 3-5m above ground level, and face in a south/south-westerly direction with a clear flight path to and from the entrance.



### Native and wildlife friendly shrubs

COMMON NAME	SCIENTIFIC NAME
Hazel	<i>Corylus avellana</i>
Elder	<i>Sambucus nigra</i>
Goat willow	<i>Salix caprea</i>
Hawthorn	<i>Crataegus monogyna</i>
Dog rose	<i>Rosa canina</i>
Guelder rose	<i>Viburnum opulus</i>
Gorse	<i>Ulex europaeus</i>
Broom	<i>Cytisus scoparius</i>
Wayfaring tree	<i>Viburnum lantana</i>
Shrubby cinquefoil	<i>Potentilla fruticosa</i>
Raspberry	<i>Rubus idaeus</i>
Alder buckthorn	<i>Frangula alnus</i>
Wild privet	<i>Ligustrum vulgare</i>
Barberry	<i>Berberis × stenophylla</i>
Barberry	<i>Berberis vulgaris</i>
Bell heather	<i>Erica cinerea</i>
Bilberry	<i>Vaccinium myrtillus</i>
Black currant	<i>Ribes nigrum</i>
Blackthorn	<i>Prunus spinosa</i>
Buckthorn	<i>Rhamnus catharticus</i>
Butcher's-broom	<i>Ruscus aculeatus</i>
Cowberry	<i>Vaccinium vitis-idaea</i>
Cross-leaved heath	<i>Erica tetralix</i>
New Zealand holly	<i>Olearia macrodonta</i>
Daphne	<i>Daphne odora</i>
Dogwood	<i>Cornus sanguinea</i>
Field rose	<i>Rosa arvensis</i>
Firethorn	<i>Pyracanthus angustifolia</i>
Flowering Currant	<i>Ribes sanguineum</i>
Gooseberry	<i>Ribes uva-crispa</i>
Hebe 'Midsummer Beauty'	<i>Hebe</i> sp.
Holly	<i>Ilex aquifolium</i>
Japanese quince	<i>Chaenomeles japonica</i>
Lilac	<i>Syringa vulgaris</i>
Mexican orange	<i>Choisya ternate</i>



Mezereon	<i>Daphne mezereum</i>
Midland hawthorn	<i>Crataegus laevigata</i>
Osier	<i>Salix viminalis</i>
Portugal laurel	<i>Prunus lusitanica</i>
Privet	<i>Ligustrum ovalifolium</i>
Purple willow	<i>Salix purpurea</i>
Snowy mespilus	<i>Amelanchier canadensis</i> , <i>Amelanchier lamarckii</i>
Spindle	<i>Euonymus europaeus</i>
Spurge laurel	<i>Daphne laureola</i>
Sweet briar	<i>Rosa rubiginosa</i>
Wild privet	<i>Ligustrum vulgare</i>

### Native and wildlife-friendly trees

Common Name	Scientific Name
Pedunculate oak	<i>Quercus robur</i>
Ash	<i>Fraxinus excelsior</i>
Wych elm	<i>Ulmus glabra</i>
Whitebeam	<i>Sorbus aria</i> agg.
Rowan	<i>Sorbus aucuparia</i>
Aspen	<i>Populus tremula</i>
Apple	<i>Malus domestica</i>
Bird cherry	<i>Prunus padus</i>
Common alder	<i>Alnus glutinosa</i>
Crab apple	<i>Malus sylvestris</i>
Crack willow	<i>Salix fragilis</i>
Downy birch	<i>Betula pubescens</i>
Field maple	<i>Acer campestre</i>
Hornbeam	<i>Carpinus betulus</i>
Juniper	<i>Juniperus communis</i>
Large-leaved lime	<i>Tilia platyphyllos</i>
Small-leaved lime	<i>Tilia cordata</i>
Pear	<i>Pyrus communis</i>
Scots pine	<i>Pinus sylvestris</i>
Sessile oak	<i>Quercus petraea</i>
Silver birch	<i>Betula pendula</i>
Sweet chestnut	<i>Castanea sativa</i>
Wild cherry	<i>Prunus avium</i>
Wild service-tree	<i>Sorbus torminalis</i>



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Yew	<i>Taxus baccata</i>
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**Wildlife Friendly Planting** (Natural England, 2008. Gardening with Wildlife in Mind. London: Natural England)