



Preliminary Roost Assessment for Bats and Nesting Birds and Nocturnal Bat Survey Report

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Upper Coombs End Farm

Chapel Lane

Old Sodbury

Bristol

BS37 6SQ

August 2023

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Methods used to prepare this report, including those carried out in the field followed The Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct.

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Document Number:	CE001028

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1 INTRODUCTION

- 1.1 Cotswold Environmental Ltd was instructed to carry out a Protected Species Survey for bats and nesting birds, as well as subsequent nocturnal bat survey effort, at Upper Coombs End Farm, Chapel Lane, Old Sodbury, Bristol BS37 6SQ. The site is located at approximate National Grid Reference (NGR): ST 75269 80763.
- 1.2 Development proposals are described as the conversion of existing agricultural structures for residential use (See Fig 2. Site Map). A planning application will be submitted to South Gloucestershire Council in due course.
- 1.3 This report provides survey data based on field visits carried out in June and August 2023. The purpose of the daytime survey was to assess the buildings for their suitability to support protected species and to ascertain evidence of any protected species, most notably bats and nesting birds. The field visit results provide information to determine the potential ecological impact the proposed development may have on protected species, and to inform the level of further survey effort and mitigation required to comply with relevant nature conservation policies and legislation. The evaluation and findings in this report can be used by South Gloucestershire Council in their view of the planning application. Survey results should be considered valid for a period of 12-18 months, subject to consultation with the Local Planning Authority and/or Natural England.
- 1.4 The National Planning Policy Framework (NPPF) (July 2021) sets out the government planning policies for England and how they should be applied. Chapter 15: Conserving and Enhancing the Natural Environment, is of particular relevance to this report as it relates to ecology and biodiversity. The Government Circular 06/2005, which is referred to by the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.
- 1.5 Five buildings located on the grounds of Upper Coombs End Farm were surveyed during the assessment. The survey boundary is shown in Fig. 2: Site Map. The surveyed buildings are located adjacent to Chapel Lane of Coombs End, South Gloucestershire. The site location is shown in Fig. 1: Site Location Map.

Survey Objectives

- To determine suitability for protected species
- Ascertain evidence of protected species.
- Determine the potential ecological impact the proposed development will have on protected species

- Inform the level of further survey effort that is required.

2 METHODOLOGY

Desk Study

- 2.1 A records search was undertaken using desktop resources including the Multi-Agency Geographic Information for the Countryside¹ (MAGIC) resource. MAGIC was used to search for records of designated sites, habitats and granted European Protected Species Licenses (EPSLs) within a 2km radius. Google Earth² was also used to study the nearby landscape.

Preliminary Bat Roost Assessment

- 2.2 Ecological consultant Tom Charlton MSc MRSB (NE Class 2 Bat licence number 2018-34622-CLS-CLS, Class 1 GCN licence number 2020-47806-CLS-CLS, NE Barn Owl licence number CL29/00581) carried out the protected species survey on the 22nd of June 2023.
- 2.3 Survey effort was completed in line with official assessment guidelines³ and largely followed that recommended by the Chartered Institute for Ecology and Environmental Management (CIEEM)⁴ and British Standard Code of Practice⁵. The assessment followed the standard methodology. The site was searched using visual encounter survey techniques. Potential bat movement corridors and movement barriers were assessed and noted. During the site visit, where possible, all areas of the building were internally and externally examined for evidence of bats. The building survey included an internal and external assessment using a powerful torch and endoscope where required.
- 2.4 Internally, the buildings were assessed using a powerful torch beam to scan the walls and flat surfaces for droppings and other signs of bat activity. Feeding remains such as moth and butterfly wing concentrations were also surveyed for. All holes and crevices considered by the surveyor as likely to be used as a bat roost were examined to ascertain presence or absence of bats.

¹ Multi-Agency Geographical Information for the Countryside (MAGIC). Crown Copyright and database rights [2015]. Ordnance Survey 100022861. Available at: <http://www.magic.gov.uk/>

² https://www.google.co.uk/intl/en_uk/earth/

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

⁴ CIEEM (2019) Guidelines for Ecological Report Writing. CIEEM, Winchester.

⁵ British Standards Institution (2013) BS 42020:2013. Biodiversity – Code of practice for planning and development. British Standards Institution, London.

- 2.5 Externally, visual ground inspections of all elevations were undertaken using binoculars and a telephoto lens where required. Photographs were taken to capture likely features of ecological value to bats and birds i.e. missing tiles, damaged or missing mortar, exposed gable ends, gaps within soffit board, rotten timber and other potential entry points. Other external aspects of the buildings were surveyed, including windows, windowsills, external doors and the ground within close proximity of the structure was thoroughly inspected for bat droppings and feeding remains.

Table 1: Guidelines summary for assessing potential bat roost suitability

Suitability	Description of building, tree or structure
Negligible	Negligible habitat features on site likely to be used by roosting bats
Low	A structure or tree with one or more potential roost sites that could be used by individual bats opportunistically. However, potential roost sites not suitable for larger numbers or regular use (i.e. maternity or hibernation).
Moderate	A structure or tree with one or more potential roost sites that could be used by bats, but unlikely to support a roost of high conservation status.
High	A structure or tree 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.
Confirmed roost	Evidence of bats or use by bats found.

Nocturnal Bat Surveys

- 2.6 One dusk nocturnal bat survey was carried during August 2023 following recommendations from the preliminary survey. Survey effort was carried out by ecologists Tom Charlton MSc MRSB and Jason Skinner.
- 2.7 Nocturnal bat survey effort was completed in line with official assessment guidelines⁶ as well as interim guidance notes issued by the Bat Conservation Trust in May 2022⁷.
- 2.8 During the survey, surveyors took up separate static positions 15 minutes prior to and 1.5 hours after sunset (see Site Map: Fig. 2). Visual observations of bats were noted, and bat species were identified using bat detectors. The information recorded included weather, timings, whether bats emerged or re-entered the building, direction of travel, species and activity e.g. foraging, commuting. Equipment used

⁶ Collins J (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd edn. Bat Conservation Trust, London.

⁷ Interim Guidance Note: Use of night vision aids for bat emergence surveys and further comment on dawn surveys Bat Conservation Trust, May 2022 [Online] [Accessed 1st June 2022] <https://cdn.bats.org.uk/uploads/pdf/Interim-guidance-note-on-NVAs-May-2022-FINAL.pdf?v=1653399882>

during the nocturnal surveys included Echo Meter Touch II recorders coupled to Apple tablets and heterodyne bat detectors.

- 2.9 Two infrared camera systems (SANNCE models) coupled with infrared lighting (Night Fox XB5 940 nm) was used to strengthen the survey data.
- 2.10 Recorded bat calls were analysed using Kaleidoscope 5.1.9i where required.
- 2.11 Temperatures were recorded onsite using an Elitech RC-51 Temperature Logger.

Inspection for Birds

- 2.12 The survey also included an internal and external inspection of the surveyed buildings for evidence of common nesting birds as well as notable and protected species. Inside the building, artificial light was used to search for birds, dead birds, dead chicks, nesting material and eggs.
- 2.13 All accessible elements of the surveyed buildings containing nesting potential were checked to see if the development would have any adverse effects on nesting birds. The active nests of all wild birds are protected under the Wildlife & Countryside Act 1981 (as amended). An active nest is one that is being built, containing eggs or chicks, or on which fledged chicks are still dependent. Birds within Schedule 1, such as barn owl *Tyto alba*, are also protected from disturbance during the nesting period.
- 2.14 The presence of notable and protected bird species and any signs indicative of their past and present use was taken into consideration during the inspection of the building. Likely perches and nesting locations were checked, and all ledges and cavities were examined for nesting debris where accessible.

Limitations

- Bat droppings deposited in or around the exterior degrade quickly due to weather. The presence of bats or their roost must not be disregarded in the absence of droppings.
- Many bat species in the UK are crevice-dwelling bats and as such, are difficult to find during PRAs.
- Local biological records were not obtained.

- For Health & Safety purposes the roofs of the buildings were assessed from ground level

3 RESULTS

Desk Study

Designated Sites

- 3.1 The site lies within The Cotswolds Area of Outstanding Natural Beauty (AONB) and, according to the MAGIC database, no further statutory or non-statutory designated site exists within a 2km radius of the site boundary.

Local Habitats

- 3.2 Upper Coombs End Farm is located within a rural location, surrounded by grazing pasture and arable farmland bound by mature hedgerows and tree lines. Small blocks of deciduous woodland surround the site within a 2km radius, though overall habitats within this radius are considered to be poorly wooded. Other notable habitats within the same radius include a substantial area of Woodpasture and Parkland (BAP Priority Habitat) present 200 m to the south-east, as well as blocks of Good Quality Semi-Improved Grassland occurring 1.6 km to the west.
- 3.3 Onsite, the buildings comprise part of a hardstanding concrete yard accessed via a metal gated entrance from Chapel Lane. No trees or hedgerows are present within the survey boundary, though scattered shrubs and trees are present within the wider site area including upon land adjacent to the surveyed area, notably to the north-east of survey building B1.

Granted European Protected Species Licences (EPSLs) within a 2km Radius

- 3.4 According to the Magic website, one EPS licence for bats has been granted within a 2km radius of the survey site. This is shown below in Table 3.

Table 2: Granted EPSLs within 2km of survey site

Species	Distance	Direction	Year Granted
BLE, C-PIP, L HORSE, NATT, SER, WHISK	1.2 km	South-West	2019

BLE = *Plecotus auritus* C-PIP = *Pipistrellus pipistrellus* LHS = *Rhinolophus hipposideros* NATT = *Myotis nattereri* SER =
Eptesicus serotinus WHISK = *M. mystacinus*

Preliminary Bat Roost Assessment Results

Building Assessment

3.5 Five buildings located on the grounds of Upper Coombs End Farm were surveyed during the PRA. For the purpose of this report, they are referred to as Buildings 1-5 (B1-B5) (see Fig. 2: Site Map).

Building 1 (B1)

3.6 B1 is a single storey, brick- and stone-built structure supporting a pitched metal-framed roof clad with corrugated sheeting and featuring sky lights. No enclosed loft voids are present, and the roof is not underlined. The building is currently utilised for storage and can be fully accessed via doorways present at the south-west facing elevation.

3.7 Externally, features that offer value to crevice dwelling species of bat comprised:

- Low amounts of damaged/cracked stonework of sufficient depth for roosting
- Extensive ivy cover at rear south-western extent

3.8 Internally, features that offer value to perch feeding species of bat are limited to the exposed metal roof structure; however, the presence of skylights reduces the value of the structure for day roosting bats. Bats could easily gain entry to all elements of the building via open doorways/windows of the south-eastern elevation. **No bats, droppings, or further evidence of bat activity was discovered during the assessment of B1.**

Building 2 (B2)

3.9 B2 comprises a single-storey, timber-framed lean-to shed located between survey buildings B1 and B3. It comprises corrugated steel elevations and a mono-pitched roof structure clad with corrugated steel sheeting. No enclosed loft void is present, and the roof is not underlined. The building features three open doorways and is currently utilised for storage.

3.10 Externally, no features that offer value to crevice dwelling species of bat were identified. Internally, exposed timber of the roof structure would present opportunities for night-roosting bats, which could easily gain entry to the structure via the open doorways. However, **no bats, droppings or further evidence of bat presence was discovered during the assessment of B2.**

Building 3 (B3)

- 3.11 B3 comprises a single-storey stone- and concrete block- built agricultural barn supporting a pitched timber-framed roof clad with corrugated steel sheeting. The roof is open to the apex throughout with no enclosed loft void is present, and the roof is not underlined. The building is largely open at its south west-facing elevation, with open doorways and window frames.
- 3.12 Externally, stonework and mortar were in good condition without features that offer value to crevice dwelling species of bat. Internally, exposed timber of the roof structure would present opportunities for night-roosting bats, which could easily gain entry to the structure via the open frontage. However, **no bats, droppings or further evidence of bat presence was discovered during the assessment of B3.**

Building 4 (B4)

- 3.13 B4 comprises a single-storey block-built and concrete rendered structure supporting a pitched roof clad with corrugated sheeting. No enclosed loft void is present, and the roof is not underlined. The building is currently utilised for storage.
- 3.14 Externally, rendered elevations were in good condition with no cracking or damage of sufficient depth to offer value to crevice dwelling species of bat, and corrugated sheeting was tightly fitted at overlapping joints. Doors and window frames were well fitted, though an open window frame is present at the south-east gable end which would offer a potential entry point for bats to the internal elements.
- 3.15 Internally, the building is well-luminated from the presence of windows and skylights. Exposed timber of the roof structure would present opportunities for night-roosting bats, which could easily gain entry to the structure via the gable window frame. However, **no bats, droppings or further evidence of bat presence was discovered during the assessment of B4.**

Building 5 (B5)

- 3.16 B5 comprises a single-storey block-built and concrete rendered structure supporting a mono-pitched roof clad with corrugated sheeting. No enclosed loft void is present, and the roof is not underlined. The building is divided into two elements and is currently utilised for storage and for housing of livestock.
- 3.17 Externally, rendered walls were in good condition with no features that offer value to crevice dwelling species of bat, and corrugated sheeting was tightly fitted at overlapping joints. An absent window pane is present at the south-east gable end which would offer potential entry points for bats to the internal elements.

- 3.18 Internally, exposed timber of the roof structure would present opportunities for night-roosting bats, though timber doorways were closed and well fitted at the time of the survey. **No bats, droppings or further evidence of bat presence was discovered during the assessment of B5.**

Table 3: Weather conditions during the preliminary roost assessment

Date	Start	Finish	Temp °C	Wind	Cloud	Rain	Notes
22/06/2023	10:30	12:00	21	Calm	10 %	Dry	N/A

Nocturnal Bat Survey Results

Survey One - B1

- 3.19 During the first nocturnal survey, completed on the 9th of August 2023, five species of bat were recorded - common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *P.pygmaeus*, brown long-eared *Plecotus auritus*, *Myotis* sp., and noctule *Nyctalus noctula*. Activity was dominated by commuting passes and foraging by common and soprano pipistrelle, most notably over trees located at the building's north-western elevation; the first call recorded was made at 2:37 h, with activity continuing throughout the duration of the survey until 22:04 h. Additionally, seven non-visual recordings by commuting noctule were recorded over the site grounds during the early survey period, and low numbers of non-visual passes (< 5) of commuting brown long-eared and *Myotis* sp. were made. Overall activity levels were not considered to be moderate in level, though at **no point were any bats observed emerging from or re-entering the surveyed building.**

TABLE 3: WEATHER CONDITIONS DURING NOCTURNAL BAT ACTIVITY SURVEYS

Date	Start	Finish	Sunrise/ Sunset	Temp °C	Wind	Cloud	Rain	Notes
09/08/23	20:30	22.25	20:45	19	Still	10%	Dry	N/A

Bird Inspection Results

Common nesting birds

- 3.20 A total of 8 small, inactive birds' nests were discovered during the assessment, located within survey buildings B1, B3, B4 and B5. No bird nests were noted in survey building B2.

Barn Owl

- 3.21 No evidence of barn owl roosting/nesting was discovered during the assessment. No suitable ledging was present within the structure that could serve as potential nesting sites though barn owl could access the internal elements of B1 and B3 for roosting.

4 INTERPRETATION AND RECOMMENDATIONS

- 4.1 A daytime assessment was commissioned with a view to assess five agricultural structures located on the grounds of Upper Coombs End Farm, Coombs End, for their potential to support protected species, notably roosting bats and nesting birds. The survey boundary is shown in Figure 2: Site Map. Work proposals are for the conversion of the structures for residential use.
- 4.2 As part of the desk study, online resource MAGIC was checked for granted EPS licences and statutory and non-statutory designated sites. Results from the online desk study showed that one EPSL for six bat species has been granted within a 2 km radius, indicating that local bat populations exploit surrounding habitats. Furthermore, the site lies within the boundaries of The Cotswolds – AONB though no further statutory designated sites occur within the same radius. The proposals are considered small-scale and therefore, providing that surrounding ecological features are not subjected to the inappropriate use of nocturnal lighting, no impacts to nearby habitats beyond the site boundary are anticipated as a result of the development proposals.
- 4.3 The site is located within a rural location, surrounded by grazing pasture and arable farmland with nearby linear features including hedgerows and scattered mature trees that offer value as habitat links, connecting to the small blocks of woodland that surround the site which will likely support a diversity of wildlife, including bat populations of various species. No trees or hedgerows occur within the survey boundary, and it is understood that no direct impacts to nearby hedgerows or trees will occur as part of the proposed works.

Building Assessment

Building B1

- 4.4 Potential Roosting Features (PRFs) identified on building B1 during the assessment comprised low numbers of cracks and cavities within the external walls of sufficient depth to offer value to crevice dwelling species including those of the genera *Pipistrellus*, *Plecotus*, and *Myotis*, as well as substantial growth of ivy. Whilst bats could easily gain entry to the building via open frontages, and via air vent gaps along the ridgeline, no bat droppings or evidence of bats was discovered during the assessment of building B1. Additionally, the absence of underlining of the roof throughout much of the structure reduces value to crevice-dwelling species, and skylights present within the roof limits the building's potential as a day roost for void dwelling/perch feeding bats.
- 4.5 Taking into consideration the limited external PRFs, all of which would be suitable for roosting by low numbers of individual crevice-dwelling bats, **B1 was considered to hold low roosting potential.**

Therefore, it was recommended that prior to any works commencing, **one nocturnal survey should be undertaken** to ascertain presence/absence of bats, with the survey taking place during the optimal survey period.

Nocturnal Bat Survey

- 4.6 During the nocturnal survey effort, five bat species were recorded utilising the wider environment for commuting and foraging, with activity dominated by infrequent commuting common and soprano pipistrelle within habitats surrounding the surveyed building and notably over trees located to north-west of the farm yard. Results indicate that local bat populations of various species exploit surrounding habitats; however, activity levels overall were considered low. **Notably, at no point were any bats observed emerging from or re-entering the surveyed building and as such roosting can be reasonably discounted within this structure.**

Additional Buildings

- 4.7 No features suitable for crevice dwelling bat species were noted during the assessment of survey building B2, B3, B4, or B5, and whilst bats could easily gain entry to the internal elements of these structures, no evidence of bats was discovered during the daytime assessment. Furthermore, substantial light ingress through windows, open doorways, and skylights, would prevent opportunities for day roosting bats.
- 4.8 Taking the above into consideration, we conclude that bat roosting onsite can be reasonably discounted **and no further survey effort is recommended.** All workers should be vigilant and mindful of bats during works upon this building, taking extra care at all times during development. In the unlikely event that bats are discovered, work must cease immediately, and a suitably licenced ecologist contacted for further advice. It should be noted that further works would not be able to lawfully proceed without confirmation from Natural England, and bats should not be handled at any time for legal reasons. If bats are discovered during works, Natural England will potentially restrict development until further surveys have been completed and a full mitigation and compensation strategy has been designed. It is likely that, if bats are discovered, a European Protected Species Licence (EPSL) will be required from Natural England.

Outline Nocturnal Lighting Measures

- 4.9 The insensitive use of external lighting within the proposed development scheme could have a negative impact upon bats using the site for foraging and commuting activity.
- 4.10 As suitable bat habitat occurs within the nearby surrounding environment, a low-level lighting scheme should be implemented during and after construction to avoid indirect disturbance to bats and other nocturnal animal species that may exploit local habitats. Measures must be taken to ensure nocturnal

animals are safeguarded from inappropriate use of light and noise throughout the hours of night during the construction period, as well as to protect important commuting corridors for bats. Any external lighting installed as part of the development must be used in accordance with Guidance Note 8: Bats and Artificial Lighting⁸.

4.11 Sensitive lighting strategy measures during the construction period are as follows:

- Works must not be carried out after dusk and must not commence until after dawn.
- Generators and machinery that emit significant noise levels must not be left to run after dusk.
- LED lighting sources must be used, which generally have a narrower and more directional beam.
- Light spill must be controlled and if lighting is required at night, hooded shields must be fitted to prevent spill onto nearby habitats that are likely to support wildlife, including nearby trees and hedgerows.
- Lighting must not be directed towards any bat or bird compensation features.

4.12 In addition to the above, when selecting appropriate external lighting, the following specifications should be taken into consideration:

- Any external lighting incorporated into the proposed development should be LED luminaires due to their sharp cut-off, lower intensity, good colour rendition and dimming capability.
- Luminaires should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats⁹.
- All luminaires should lack UV elements when manufactured. Metal halide, fluorescent sources should not be used¹⁰

Birds

Common Nesting Birds

4.13 All surveyed structures offer value for nesting birds, and a total of 8 nests was discovered within B1, B3, B4 and B5 during the assessment. No bird nests were discovered within B2 during the assessment. Without appropriate mitigation, nesting birds may be impacted by the development proposals. Impacts to nesting birds can be avoided by timing works outside the bird nesting season which generally runs

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

⁹ Stone, E.L. (2013) *Bats and lighting: Overview of current evidence and mitigation*

¹⁰ Bat Conservation Trust & Institute of Lighting Professionals (ILP) 2018. *Guidance Note 8: Bats and artificial lighting in the UK*. Bats and the Built Environment Series.

between February-August, or by ensuring a site visit is carried out by a suitably qualified ecologist ahead of works commencing.

Barn Owl

- 4.14 No evidence of barn owl activity was discovered within any of the buildings during the daytime assessment. Survey buildings B1 and B2 present opportunities for roosting due to exposed supports of the roof structures coupled within suitable access points, though no ledges of sufficient size for nesting were identified. As such, nesting by barn owl is considered unlikely. Due to the suitability of these structures for roosting barn owl, coupled within the sites' rural location and surrounding foraging habitat, it is recommended that a pre-works inspection for barn owl is carried out prior to works commencing. Where evidence of barn owl is discovered, an appropriate mitigation strategy would be required to protect barn owl during development works.

Biodiversity Enhancement

- 4.15 The NPPF (2021) outlines obligations of Local Planning Authorities to promote Biodiversity Net Gain where possible. There are various options available with regards to biodiversity enhancement on site:

Bats

- 4.16 An option to increase biodiversity relating to bats on site would be to affix one or more bat boxes to nearby mature trees within the site boundary, ideally using either Schwegler 1FF boxes (or similar) or Schwegler 2F boxes (or similar). Alternatively, bat boxes can be installed at the apex of a gable wall, but they can also be placed along other elevations at eaves level or below the fascia and / or soffits. They may also be pole-mounted in a garden. Bat boxes should be positioned no lower than 4m above ground level and they should not face in a northerly direction.

Nesting Birds

- 4.17 An option to further increase biodiversity relating to nesting birds would be to install one or more external bird nest boxes (Schwegler 1B or similar) onsite. For maximum success, our recommendations are as follows:
- Bird boxes must be positioned away from the building's main access doors where disturbance would be likely.
 - Following British Ornithology Trust guidelines, bird boxes must be positioned no lower than 2m from ground level and preferably above 3 m to prevent possible predation.
 - The proposed placement of the bird nest boxes must allow for a clear flight path, without obstruction to the nest box entrance. It is recommended that they are installed in a north or east

facing direction to offer protection from prevailing winds and rain and should ideally be slightly tilted in a downwards position to offer further weather protection.

APPENDIX A: LEGISLATION SUMMARY

National Planning Policy Framework July 2021

The National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, 2021) states: Planning policies and decisions should contribute to and enhance the natural and local environment by:

- 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);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- 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;
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 172), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

Wildlife & Countryside Act 1981 (as amended)

The Wildlife & Countryside Act 1981 (as amended) [WCA] is the primary legislation for England and Wales for the protection of flora, fauna and the countryside. Part I within the Act deals with the protection of wildlife. Most European Protected Species offences are now covered under the Conservation of Habitats and Species Regulations (see below), but some 'intentional' acts are still covered under the WCA, such as obstructing access to a bat roost.

The WCA prohibits the release to the wild of non-native animal species listed on Schedule 9 (e.g. Signal Crayfish and American Mink). It also prohibits planting in the wild of plants listed in Schedule 9 (e.g. Japanese Knotweed and *Rhododendron ponticum*) or otherwise deliberately causing them to grow in the wild. This is to prevent the release of invasive non-native species that could threaten our native wildlife.

The provisions relating to animals in the Act only apply to 'wild animals'; these are defined as those that are living wild or were living wild before being captured or killed. It does not apply to captive bred animals being held in captivity. There are 'defences' provided by the WCA. These are cases where acts that would otherwise be prohibited by the legislation are permitted, such as the incidental result of a lawful operation which could not be reasonably avoided, or actions within the living areas of a dwelling house.

Licensing

Certain prohibited actions under the Wildlife and Countryside Act may be undertaken under licence by the proper authority. For example, scientific study that requires capturing or disturbing protected animals can be allowed by obtaining a licence – e.g. bat surveys.

Conservation of Habitats and Species Regulations 2017 (as amended)

The Conservation of Habitats and Species Regulations 2017 (as amended) (which are the principal means by which the EC Habitats Directive is transposed in England and Wales) update the legislation and consolidate all the many amendments which have been made to the Regulations since they were first made in 1994. These regulations provide for the:

- protection of European Protected Species [EPS] (animals and plants listed in Annex IV Habitats Directive which are resident in the wild in Great Britain) including bats, dormice, great crested newts, and otters;
- designation and protection of domestic and European Sites - e.g. Site of Special Scientific Interest [SSSI] and Special Area of Conservation [SAC]; and
- adaptation of planning controls for the protection of such sites and species.

Public bodies (including the Local Planning Authority) have a duty to have regard to the requirements of the Habitats Directive in exercising their function – i.e. when determining a planning application. There is no defence that an act was the incidental and unavoidable result of a lawful activity.

It is possible for actions which would otherwise be an offence under the Regulations to be undertaken under licence issued by the proper authority. For example, where a European Protected Species has been identified and the development risks deliberately affecting an EPS, then a 'development licence' may be required.

Bats

In England and Wales, bats and their roosts are protected under the Conservation of Species and Habitats Regulations 2017 (as amended), and the Wildlife & Countryside Act 1981 (as amended). Taken together, this legislation makes it an offence to:

- Deliberately capture (or take), injure or kill a bat
- Intentionally or recklessly disturb a group of bats where the disturbance is likely to significantly affect the ability of the animals to survive, breed, or nurture their young or likely to significantly affect the local distribution or abundance of the species whether in a roost or not
- Damage or destroy the breeding or resting place of a bat
- Possess a bat (alive or dead) or any part of a bat
- Intentionally or recklessly obstruct access to a bat roost
- Sell (or offer for sale) or exchange bats (alive or dead) or parts of bats

A roost is defined as being 'any structure or place that is used for shelter or protection', and since bats regularly move roost site throughout the year, a roost retains such designation whether or not bats are present at the time.

Birds

All common wild birds are protected under The Wildlife and Countryside Act 1981 (and as amended). Under this legislation it is an offence to:

- Kill, injure or take any wild bird
- Take, damage or destroy the nest of any wild bird while it is in use or being built
- Take or destroy the egg of any wild bird

Certain rare breeding birds are listed on Schedule 1 of The Wildlife and Countryside Act 1981 (and as amended). Under this legislation they are afforded the same protection as common wild birds and are also protected against disturbance whilst building a nest or on or near a nest containing eggs/unfledged young.

APPENDIX B: MAPS

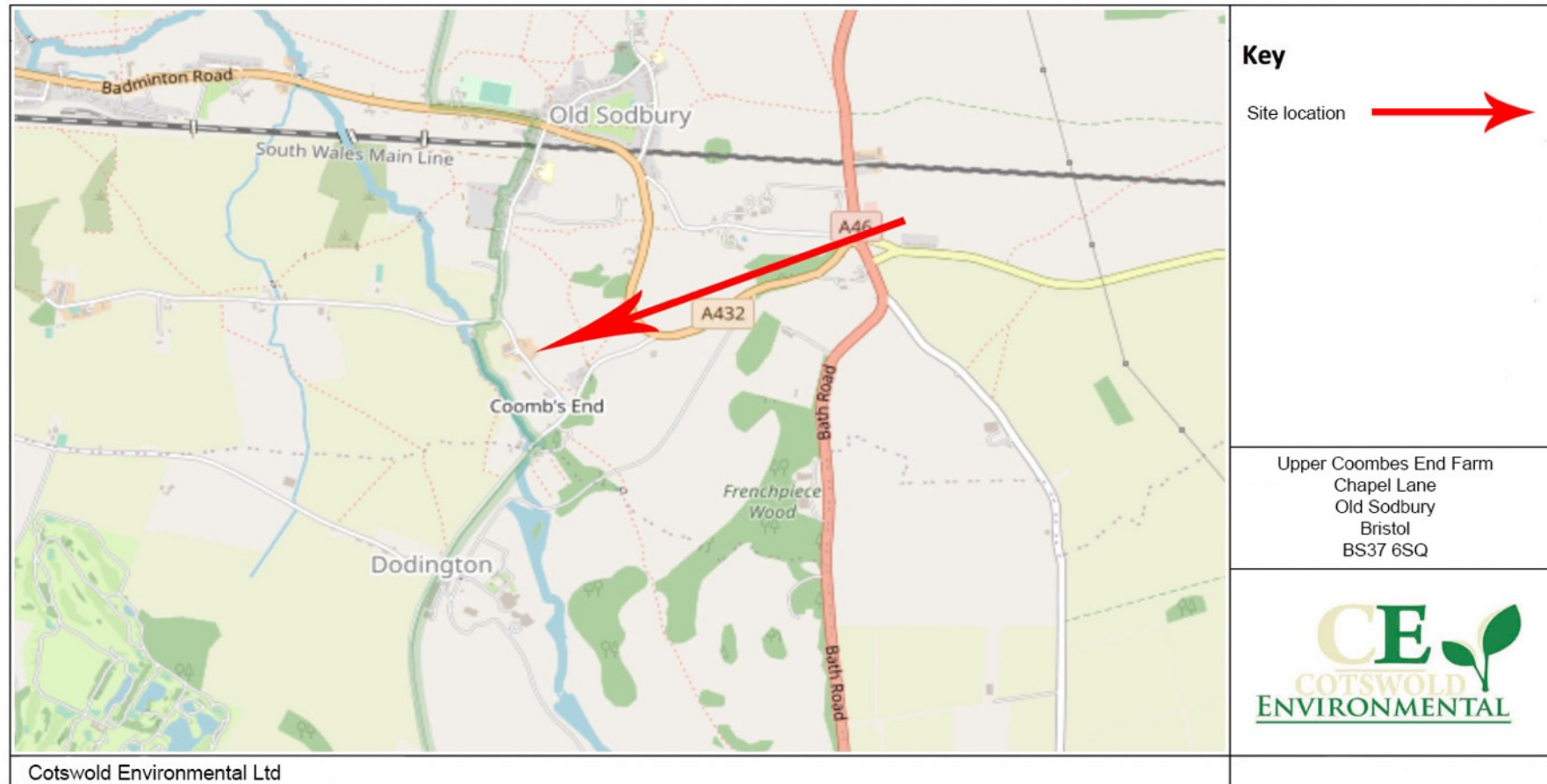


Figure 1: Site location map



Figure 2: Site Map

APPENDIX C: SITE IMAGES



Photo 1: Roadside view of gated site entrance to yard.



Photo 2: B1 – south-east facing elevation



Photo 3: B1 – south-east facing elevation showing extensive ivy cover



Photo 4: B1 – Rear north-west facing elevation



Photo 5: B1 – internal view showing skylight and metal-framed roof structure



Photo 6: B1 – internal view of roof structure with light ingress from ridgeline vents.



Photo 7: B2 - South-east facing elevation



Photo 8: B2 – Internal view showing exposed timber of roof structure.



Photo 9: B3 – front south-west facing elevation showing open doorways.



Photo 10: B3 - Internal view of roof structure.



Photo 11: B3 – internal view of roof structure showing lack of underlining, and inactive bird nest.



Photo 12: B3 – internal south-eastern gable end.



Photo 73: B4 – south-west facing elevation.



Photo 14: B4 – Internal view showing significant light spillage.



Photo 15: B4 – internal view showing skylight and exposed timber of roof structure



Photo 16: B4 - Internal roof edge



Photo 17: B4 – gap at south-eastern gable end.



Photo 18: B5 – rendered concrete elevation



Photo 89: B5 – Internal view of storage area.



Photo 90: B5 – internal view of livestock area.



Photo 21: B5 - absent window pane at south-eastern gable end.



Photo 22: B5 – rear rendered concrete elevation.



Photo 23: B5 – Roof edge without gaps or crevices suitable for roosting bats.



Photo 24: View of central yard area



Photo 23: Example infrared camera view



Photo 24: Example infrared camera view