34 South Street, Chichester, West Sussex, PO19 1EL

Preliminary Roost Assessment Report

February 2024

Hampshire Ecological Services Ltd
Consultant Ecologists

E: enquiries@hantsecology.co.uk
W: www.hantsecology.co.uk
T: 0771 456 8361

Preliminary Roost Assessment Report

34 South Street, Chichester, West Sussex, PO19 1EL

for

East Hampshire District Council

Reference: 34 South Street, Chichester	
Revision	**Issue date:**
0	**12/02/24**

Prepared by:	**Rev 0**
[redacted] **SOPHIE STIRRAT** Ecologist	**23/01/24**
First review & Technical QA by:	
[redacted] **VICTORIA RUSSELL** Principal Ecologist	**25/01/24**
Second review & Technical QA by:	
[redacted] **JOHN POLAND** Principal Ecologist	**09/02/24**

This report represents sound industry practice; reports and recommends correctly, truthfully, and objectively; is appropriate given the local site conditions, scope of works proposed, and resources allocated to us by the client; and avoids invalid, biased, and exaggerated statements.

The author disclaims any responsibility to the client and others in respect of any matters outside the scope of the above. This report is confidential to the client and the author accepts no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at their own risk.

Contents

1 EXECUTIVE SUMMARY

1. This report provides details from a preliminary roost assessment survey carried out by Hampshire Ecological Services Ltd for East Hampshire District Council in connection with a proposal to construct a rooflight at 34 South Street, Chichester, West Sussex, PO19 1EL(approximate Ordnance Survey Grid Reference SU860045). The location of the site is shown in *Figures 1* and *2* and a plan of the building surveyed is shown in *Figure 3* in *Section 6*.

2. An internal and external survey of the building was carried out by ecologist Adam Rye BSc (Hons) accredited under bat licence 2015-11159-CLS-CLS on the 18th January 2024.

3. The building is a two-storey terraced house with the ground-floor used commercially and a residential first-floor. Full details of the building are given in *Table 4.2.1* in *Section 4.2*.

4. The roof appears well-sealed and in good condition with no visible potential bat access points into the roof void and no external features that could be used by roosting bats. Therefore, the building is classed as having negligible suitability to be used by roosting bats. In addition, no bats or evidence of bats was found. Therefore, the works may commence without further survey or constraints regarding bats (subject to any planning constraints).

5. It is unlikely that bats will forage on site because there is a lack of suitable foraging habitat in the immediate vicinity of the building due to it being in a highly lit built-up area. However, there are trees in the gardens that back onto the rear of the site that connect to trees along the River Lavant (*c.*70m to the south-west). In addition, Bishop's Palace Gardens is located *c.*235m north-west and within these gardens there are lines of mature trees and many species of shrub. While the nearby mature trees do not connect to any areas of woodland, ancient or other, they do connect a handful of lines of mature trees and woodland strips. The latter being alongside the River Lavant increases the quality of the foraging habitat for a number of different species of bat. The foraging habitat is all off-site and as such no impact to commuting and foraging bats (and hence bat populations in the local area) is anticipated.

6. Changes in lighting can affect foraging and roosting bats. Therefore, no works should take place in the hours of darkness or under artificial lighting. In addition, no lighting should be directed onto the nearby vegetation (particularly the trees), and security lights on the rear of the property should operate on a timer, to avoid any negative impact on bats.

7. It is a requirement under national planning policy to provide ecological enhancements to sites requiring planning permission in order to provide a net gain in biodiversity. Therefore, the following enhancement measures are proposed, if permitted:

   Two swift boxes, such as Ibstock Eco-habitat or similar, will be installed on the exterior of the building. Swift boxes can be supplied and installed by Hampshire Swifts https://www.hampshireswifts.co.uk and a new soffit design is also available (this box is also

suitable for house sparrows which are also an IUCN Red List Bird of Conservation Concern and listed on Section 41 of the Natural Environment & Rural Communities Act 2006).

8. The bird boxes to be erected within the site, with additional details on siting them to increase chances of occupancy, are summarised in *Table 5.6.2.1*.

9. The indicative locations of the proposed enhancement measures are shown in *Figure 4* in *Section 6*.

10. Other enhancements for wildlife that the owners of the site may choose to employ are given in *Appendix C*. However, these are not proposed as enhancements for the purposes of the planning application, but only for information purposes.

11. This survey data is valid for a maximum of 12 months. Bats frequently move around and adopt new roosting sites, therefore if more than 12 months elapse it may be advisable to conduct further survey work to obtain up-to-date information, thereby ensuring protected species compliance.

12. According to the *Multi-Agency Geographic Information for the Countryside* website (www.magic.gov.uk), there are three internationally statutory designated sites within 5km of the site, and one nationally designated site within 2km of the site. There are no areas of ancient and semi-natural woodland and ancient replanted woodland within 500m of the site. None of these areas should be affected by these small-scale works and all links will be maintained.

13. The site is within 5km of Solent Maritime SAC (*c.*2018m south-west) and the Pagham Harbour (*c.*4841m south) and Chichester and Langstone Harbours (*c.*2018m south-west) SPAs. As a result of its proximity to these designated sites, the impacts of these small-scale works on the SAC and SPAs must be considered.

14. The works are small-scale and will cause no increase to the building size, or to the number of people occupying the building, and it is staying under the same ownership. Therefore, there will be no increase in the recreational pressure, or pollution, on the internationally designated sites.

15. According to the *Multi-Agency Geographic Information for the Countryside* website (www.magic.gov.uk), there have been six bat European Protected Species (EPS) licences granted within 2km of the site. The current proposals will not impact these bat populations.

2 INTRODUCTION

2.1 General

This report provides information from a preliminary roost assessment survey carried out by Hampshire Ecological Services Ltd for East Hampshire District Council in connection with a proposal to construct a rooflight at 34 South Street, Chichester, West Sussex, PO19 1EL (approximate Ordnance Survey Grid Reference SU860045). The location of the site is shown in *Figures 1* and *2* in *Section 6*.

2.2 Site description

The site consists of a two-storey terraced building with the ground-floor used commercially and a residential first-floor. The building surveyed is shown on the plan in *Figure 3* in *Section 6*.

The site is on the west side of South Street, in the centre of Chichester city. The immediate surroundings consist of shops and residential housing. The urban area extends in all directions until agricultural fields are reached, separating Chichester city from adjacent smaller villages such as Fishbourne and Westhampnett. In addition, the River Lavant is *c.*70m to the south-west.

2.3 Proposed activities

This survey was carried out in connection with a proposal to add a rooflight onto the roof of the building.

2.4 Current planning status

Planning permission is being applied for at this site.

2.5 Objectives of the survey and report

The survey by Hampshire Ecological Services Ltd included internal and external inspections of the building to identify bat roost suitability and to systematically search for bats and evidence of bats. The aim was to identify if bats were present or likely to use the site for roosting.

The survey and the report writing were carried out in accordance with *Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th edition* (Collins, 2023). Any deviations from the guidelines are justified in the relevant sections.

Additionally, all ecological surveys should be completed in line with Natural England's *Standing Advice for Local Authorities* (http://www.naturalengland.org.uk/ourwork/planningdevelopment/spatialplanning/standingadvice/advice.aspx), which states:

Natural England will not comment on applications that are submitted without the relevant protected species surveys if there are no other issues (i.e. in relation to SSSIs or landscape).

Natural England will not comment on scoping surveys that recommend further surveys where these have not been undertaken and submitted with the scoping reports.

2.6 Structure of this report

This report is structured as follows:

Section 1 contains the executive summary;

Section 2 contains an introduction;

Section 3 describes the survey methods;

Section 4 describes the results;

Section 5 evaluates the findings;

Section 6 contains the figures including:

- *Figure 1* gives aerial photographs showing the site location;
- *Figure 2* gives an Ordnance Survey map showing the location of the site;
- *Figure 3* gives a site plan showing the building surveyed; and
- *Figure 4* gives the indicative locations of the proposed enhancement measures.

Section 7 lists the references;

Appendix A gives information on relevant legislation;

Appendix B gives information on bat ecology; and

Appendix C lists other enhancements for wildlife (for information, not part of the planning application).

3 METHODS

3.1 Desk study

The *Multi-Agency Geographic Information for the Countryside* website (www.magic.gov.uk) was used to search for designated sites on or adjacent to the site including Local Nature Reserves (LNRs), National Nature Reserves (NNRs), Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. The search area was 5km for SAC and SPA sites and 2km for LNRs, NNRs, Ramsar sites and SSSIs. The search area is also 500m for Local Wildlife Sites (LWSs) and ancient semi-natural and ancient replanted woodlands.

In addition, the *Multi-Agency Geographic Information for the Countryside* website (www.magic.gov.uk) was used to search for granted European Protected Species (EPS) licences in relation to bats within 2km of the site.

A data search from the Sussex Biodiversity Record Centre (SxBRC) has not been commissioned by the client in relation to this site.

3.2 Field survey

3.2.1 Date, time, and weather

An external and internal inspection of the building was carried out during the daytime on the 18th January 2024. The weather conditions during the survey were 4 °C and dry with 0% cloud cover and a slight breeze (Beaufort scale 1).

3.2.2 Personnel

The internal and external inspections were carried out by Adam Rye BSc (Hons), who is experienced in undertaking bat roost surveys and is accredited under Bat Class Licence Registration number 2015-11159-CLS-CLS.

This report was reviewed by John Poland CEnv MCIEEM CBiol MSB, who is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM), a Chartered Environmentalist (CEnv), a Chartered Biologist (CBiol) and multi-species licence holder with 23 years of experience in ecological consultancy and Victoria Russell MCIEEM who is also a full member of the CIEEM and multi-species licence holder with over 25 years of experience in ecological consultancy.

All staff adhere to the Chartered Institute of Ecology and Environmental Management's (CIEEM) *Code of Professional Conduct*.

3.2.3 Assessment of current bat roost suitability

Because bats are crevice-dwelling mammals it is often difficult to thoroughly inspect buildings for bats and evidence of bats. Examples are where bats roost between the roofing felt and tiles or slates, around window frames and behind bargeboards. These areas cannot be inspected, but a surveyor would know that bats might roost here because there are places where bats could gain entry. A pipistrelle bat is small enough to fit into a match box and can roost in gaps just 14-20mm wide.

The building was assessed for its **bat roost suitability** according to the following factors that influence the likelihood of bat roosting:

Surrounding habitat: whether there are potential flight-lines and bat foraging areas nearby.

Construction detail: the type and construction of architectural features such as attics, bargeboards, soffit boxes, lead-flashing, cavity walls and hanging tiles that could be used by roosting bats. Some construction details and materials are more favourable to bat occupation than others.

Building condition: whether the building has no roof or has a sound roof without any potential bat access points.

Internal conditions: bats favour sheltered locations with a stable temperature regime, protection from the elements and little wind/light/rain penetration.

Potential bat access points: whether there is flight and crawl access.

Potential roosting locations: the presence of bat-accessible voids, cracks, and crevices.

The risk of bat roosts being present will be lower where structures have:

Urban setting with little greenspace.

Heavy disturbance.

Small, cluttered roof void (particularly for brown long-eared bats).

Modern construction with few gaps or crevices that bats can fly or crawl through (although pipistrelles may still be present).

Prefabricated steel or sheet materials.

Active industrial premises.

The above list provides generic criteria and there are exceptions to consider. For example, pipistrelle roost sites are often found in modern housing estates and therefore the absence of bats from such locations should not always be assumed.

Some information on bat ecology is included in *Appendix B.*

3.2.4 Systematic inspection for bats or evidence of bats

The building was assessed for its suitability to support roosting bats using the following access and inspection equipment: high-quality 10x42 binoculars; a 1,000,000 candlepower Clulite™ CB2 torch; an LED pen torch; an Explorer Premium™ wireless inspection camera with recordable monitor; and a 3.8m surveyors' ladder. Binoculars were employed to view higher areas such as potential access points on the outside of the building. A description of the building was recorded on a survey sheet and digital photographs were taken as a permanent record.

Visual, systematic examinations were made for bats and evidence of bats in the building, both internally and externally, of the following:

roof beams, especially the ridge beam;
cracks, crevices and sheltered voids;
wall and door surfaces;
window and door frames; and
wall bases.

Evidence of roosting bats includes droppings, feeding remains and dead bats, but also staining from urine and fur-oils, scratch marks, odour, the presence of bat-fly (Nycteribiid) pupal cases, and in some cases, the absence of cobwebs.

Bat droppings can prove beyond doubt that bats use a building and can help to identify roosting locations because piles often accumulate beneath roosting sites or entrance points. The location, size, shape, texture and colour of the droppings can be used to aid species identification. DNA analysis of droppings is also possible, and samples are taken where necessary. The number and condition (age) of droppings can indicate the size of the roost and when it was last used.

Following the internal and external inspections, the building was assigned a level of suitability for being used by roosting bats. This was based on the criteria in *Table 3.2.4.1* (Collins, 2023).

Table 3.2.4.1. Bat Roost Suitability.

Suitability	Description of roosting habitats	Description of commuting and foraging habitats
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines or generate/shelter insect populations available to foraging bats).
Negligible	Negligible habitat features on site likely to be used by roosting bats	Negligible habitat features on site likely to be used by commuting or foraging bats
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (*i.e.* unlikely to be suitable for maternity or hibernation).	Habitat that could be used by small numbers of commuting bats such as a gappy hedgerow or un-vegetated stream, but isolated, *i.e.* not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland) or a patch of scrub.
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 but unlikely to support a roost of high conservation status (with respect to roost type only)	Continuous habitat connected to the wider landscape that could be used by bats for commuting, such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland, or water.
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.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses, and grazed parkland. The site is close to and connected to known roosts.

4 RESULTS

4.1 Desk study

4.1.1 Designated sites

According to the *Multi-Agency Geographic Information for the Countryside* website (www.magic.gov.uk), the site is not designated or immediately adjacent to any designated areas of nature conservation. However, there are designated sites nearby. These are listed in *Table 4.1.1.1.*

Table 4.1.1.1. Statutory designated sites; non-statutory designated sites and ancient semi-natural and ancient replanted woodlands within the designated search areas of the site.

Level of designation	**Designation**	**Name**	**Distance & direction from site**
International	SPA	Pagham Harbour	*c.*4841m south
		Chichester and Langstone Harbours	*c.*2018m south-west
	Ramsar	-	-
	SAC	Solent Maritime	*c.*2018m south-west
National	SSSI	-	-
		-	-
	NNR	-	-
County	LNR	Brandy Hole Copse	*c.*1978m north
Local	LWS	-	-
	Ancient woodland	-	-
		-	-

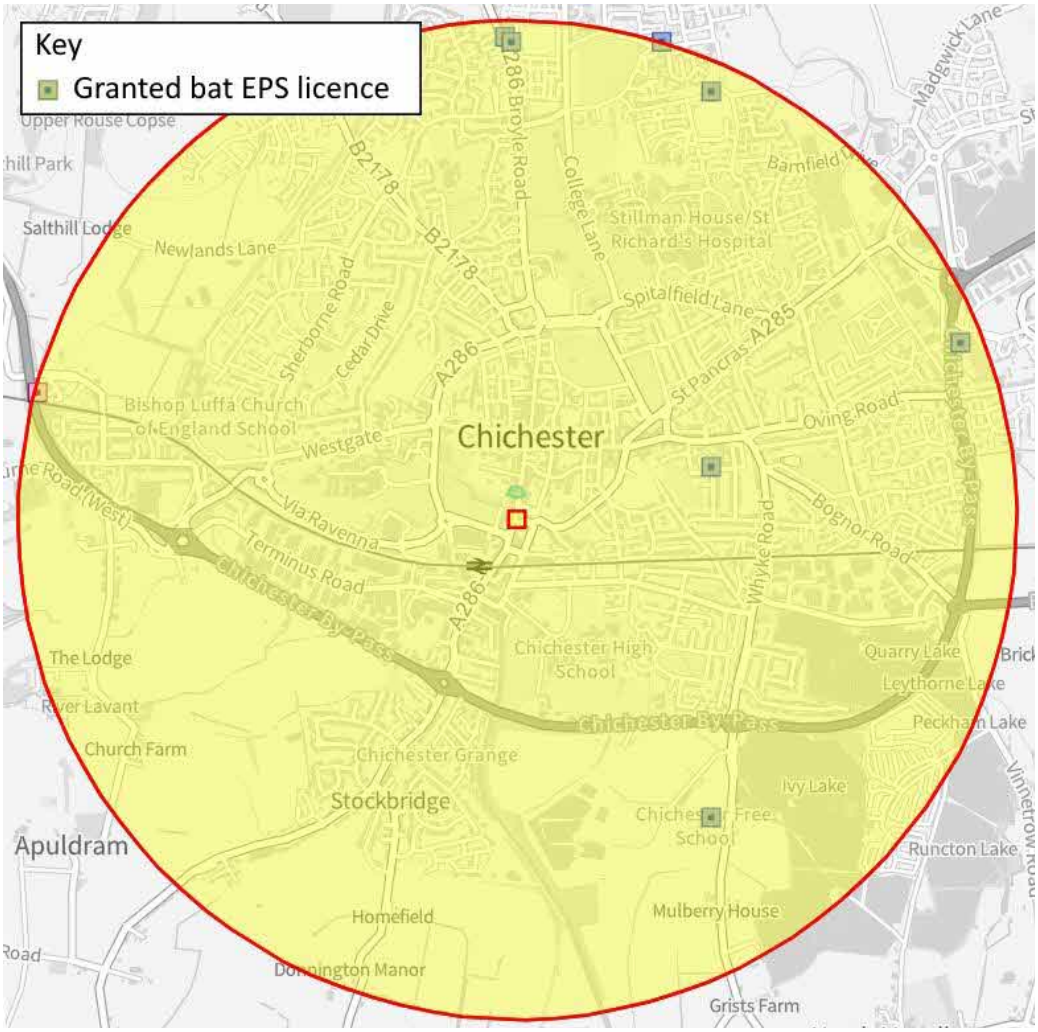
4.1.2 Bats

According to the *Multi-Agency Geographic Information for the Countryside* website (www.magic.gov.uk), there have been six bat European Protected Species (EPS) licences granted within 2km of the site. These are listed in *Table 4.1.2.1* and their locations are shown in *Figure 4.1.2.1.*

Table 4.1.2.1. Granted European Protected Species (EPS) licences within 2km of the site

Species subject of licence	Type of habitat affected	Date licence was granted	Distance & direction from site
Common pipistrelle, soprano pipistrelle	Resting place	19/11/2013	*c.*1800m north
Common pipistrelle, soprano pipistrelle, brown long-eared bat	Resting place	13/11/2012	*c.*1826m north
Common pipistrelle, soprano pipistrelle, brown long-eared bat, Natterer's	Resting place	14/12/2020	*c.*1874m north-east
Common pipistrelle	Resting place	03/03/2015	*c.*1784m north-east
Common pipistrelle, soprano pipistrelle	Resting place	28/11/2014	*c.*1870m north-east
Common pipistrelle	Resting place	09/01/2012	*c.*794m east

Figure 4.1.2.1. Location of sites with granted bat EPS licences within 2km of the site (site location marked by a red square).



Reproduced with permission of Ordnance Survey under licence no. 100049977

4.2 Survey of buildings

The construction details and photographs of the building are summarised in *Table 4.2.1*.

Table 4.2.1. Summary of the building's construction details.

Type/Name	**Building**
Description	A two-storey brick building with a pitched and hipped tiled roof.
No. of storeys	2
Roof type	Pitched and hipped
Roof cladding	Tile
Ridge	Tile
Wall type	Brick
Exterior	Four pitched roofs; large shop window on east elevation; soffits on east and west elevations.
Photos	North elevation N/A - connected to adjacent building
	East elevation 
	South elevation N/A - connected to adjacent building
	West elevation N/A – no access
Building dimensions	*c*.14m wide x *c*.31.5m long
Roof void description	Uncluttered with floor lined fibreglass insulation
Frame	Wooden rafters and ridge beam
Roof lining	Bitumen roofing felt

Roof void dimensions	*c.*7m wide x *c.*8.5m long 
Roof void height	*c.*3m
Potential roosting locations	Against the wooden rafters and under raised lead-flashing.
Bat evidence	None
Bat suitability	**Negligible**
Further surveys needed?	No

4.3 External potential bat access points

The roof appears well-sealed and in good condition with no visible potential bat access points into the roof void or external features that could be used by roosting bats. Therefore, the building is classed as having negligible suitability to be used by roosting bats. In addition, no bats or evidence of bats was found.

4.4 Commuting and foraging habitat

It is unlikely that bats will forage on site because there is a lack of suitable foraging habitat in the immediate vicinity of the building due to it being in a highly lit built-up area. However, there are trees in the gardens that back onto the rear of the site that connect to trees along the River Lavant (*c.*70m to the south-west). In addition, Bishop's Palace Gardens is located *c.*235m north-west and within these gardens there are lines of mature trees and many species of shrub. While the nearby mature trees do not connect to any areas of woodland, ancient or other, they do connect a handful of lines of mature trees and woodland strips. The latter being alongside the River Lavant increases the quality of the foraging habitat for a number of different species of bat.

Bats follow linear landscape features such as lines of trees, hedges, buildings, and waterways in order to commute from their roost sites to their feeding grounds. Likewise, they use these features to navigate between feeding areas and alternative roosts.

4.5 Evidence of bats

No bats or evidence of bats was found.

5 INTERPRETATION AND EVALUATION

5.1 Constraints

5.1.1 Constraints on survey data

Detailed searches often result in the discovery of evidence of bats. However, although such surveys can identify the presence of bats it is more difficult to prove absence due to the crevice-dwelling nature of these elusive mammals. Bat droppings may be missed where there is debris to obscure them (and also, very old droppings generally crumble away to dust).

Evidence of crevice-dwelling bats, such as pipistrelles, is often not discovered on preliminary roost appraisals.

It is often difficult to thoroughly inspect buildings for bats and evidence of bats without a destructive search, which is not generally legal, practical, or acceptable.

The site visit was undertaken in January, outside the active bat season. However, it is possible to assess the buildings and their suitability for roosting bats.

5.1.2 Constraints on the mitigation, compensation, and enhancement measures

There is a limit to the amount of enhancement measures that are possible (and reasonable) on such a small urban site. In addition, there are no trees on site that would be suitable for bird boxes to be attached.

As the building has negligible bat roost suitability no mitigation or compensation measures are needed.

5.2 Potential impacts of the proposed development on bat roosts

5.2.1 Desk study

According to the *Multi-Agency Geographic Information for the Countryside* website (www.magic.gov.uk), the site is neither designated nor immediately adjacent to any designated areas of nature conservation. However, there are designated sites nearby (see *Table 4.1.1.1* in *Section 4.1.1*). None of these will be directly affected by these small-scale works and all links will be maintained.

The site is within 5km of Solent Maritime SAC (*c.*2018m south-west) and the Pagham Harbour (*c.*4841m south) and Chichester and Langstone Harbours (*c.*2018m south-west) SPAs. The SAC is designated for its marine and estuarine habitats (including sandbanks, estuaries, mudflats, coastal lagoons, drift lines, stoney banks, Salicornia and other annuals colonising mud, Spartina swards, Atlantic salt meadows, dunes and Desmoulin's whorl snail). Pagham Harbour is a designated SPA

due to the types of wetland habitats it contains and the internationally important populations of migratory birds it supports (such as Dark-bellied brent geese). Chichester and Langstone Harbours is also designated for its wetland habitats, as well as the large numbers of breeding Common tern and Little tern it supports. As a result of its proximity, the impacts of these small-scale works on the SAC and SPAs must be considered.

The works are small-scale and will cause no increase to the building size, or to the number of people occupying the building, and it is staying under the same ownership. Therefore, there will be no increase in the recreational pressure, or pollution, on the internationally designated sites.

According to the *Multi-Agency Geographic Information for the Countryside* website (www.magic.gov.uk), there have been six bat European Protected Species (EPS) licences granted within 2km of the site. The current proposals will not impact these bat populations.

5.2.2 Commuting and foraging bats

It is unlikely that bats will forage on site because there is a lack of suitable foraging habitat in the immediate vicinity of the building due to it being in a highly lit built-up area. However, there are trees in the gardens that back onto the rear of the site that connect to trees along the River Lavant (*c.*70m to the south-west). In addition, Bishop's Palace Gardens is located *c.*235m north-west and within these gardens there are lines of mature trees and many species of shrub. While the nearby mature trees do not connect to any areas of woodland, ancient or other, they do connect a handful of lines of mature trees and woodland strips. The latter being alongside the River Lavant increases the quality of the foraging habitat for a number of different species of bat. The foraging habitat is all off-site and as such no impact to commuting and foraging bats (and hence bat populations in the local area) is anticipated.

Changes in lighting can affect foraging and roosting bats. Therefore, no works should take place in the hours of darkness or under artificial lighting. In addition, no lighting should be directed onto the nearby vegetation (particularly the trees), and security lights on the rear of the property should operate on a timer, to avoid any negative impact on bats.

The rooflight should avoid spillage of greater than 0.1 lux (typical moonlight/ cloudy sky) onto the vegetation to the rear of the site. This could be achieved through the use of blackout blinds on a timer.

5.2.3 Building

The roof appears well-sealed and in good condition with no visible potential bat access points into the roof void and no external features that could be used by roosting bats. Therefore, the building is classed as having negligible suitability to be used by roosting bats. In addition, no bats or evidence of bats was found. Therefore, the works may commence without further survey or constraints regarding bats (subject to any planning constraints).

To provide biodiversity net gain, enhancement measures will need to be incorporated into the building. A summary of the proposed enhancement measures is given in *Section 5.6*.

5.3 Alternative roosting potential

There are buildings nearby that could provide alternative roosting for bats (see *Figure 1* in *Section 6*). In addition, there are several mature trees in the vicinity which could provide bat roosting opportunities.

5.4 Survey report expiry

This survey data is valid for a maximum of 12 months. Bats frequently move around and adopt new roosting sites, therefore if more than 12 months elapse it may be advisable to conduct further survey work to obtain up-to-date information to advise work, thereby ensuring protected species compliance.

Given the mobility of bats, it is recommended that a walkover of the site to update the survey information is undertaken prior to the works commencing if this does not occur before the end of January 2025.

5.5 Further survey

No further surveys are proposed.

5.6 Enhancement measures

5.6.1 General

Under the Environment Act 2021, all planning permissions granted in England (with a few exemptions) except for small sites will have to deliver at least 10% biodiversity net gain (BNG) from January 2024. BNG will be required for small sites from April 2024. BNG will be measured using Defra's biodiversity metric and habitats will need to be secured for at least 30 years. This sits alongside:

a strengthened legal duty for public bodies to conserve and enhance biodiversity,

new biodiversity reporting requirements for local authorities, and mandatory spatial strategies for nature: Local Nature Recovery Strategies or 'LNRS'.

From the 20th July 2021, the Government published the revised National Planning Policy Framework (Ministry of Housing, Communities and Local Government, 2021). The document sets out the government's planning policies for England and how these are expected to be applied. This replaces a previous version which was published in June 2019. It states: "*at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).*"

It also states "*opportunities to incorporate biodiversity in and around developments should be encouraged*" as part of the consideration for "*presumption in favour of sustainable development*".

The updated National Planning Policy Framework (NPPF) also states (paragraph 170) that:
"*Planning Policies and decisions should contribute to and enhance the natural and local environment by… minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.*"

The updated Planning Policy Guidance (PPG) for the Natural Environment, updated in July 2019 states (paragraph 020) that:
"*Net gain in planning describes an approach to development that leaves the natural environment in a measurably better state than it was beforehand*."

The updated PPG provides examples of how biodiversity net gain can be achieved. Measures suggested include "creating new habitats" and "enhancing existing habitats".

It is proposed that the enhancements to provide biodiversity net gain will also be in the form of new bird nesting provision. These enhancements are detailed in the following section.

Other enhancements for wildlife that the owners of the site may choose to employ are given in *Appendix C*. However, these are not proposed as enhancements for the purposes of the planning application, but only for information purposes.

All proposed enhancement measures are subject to supplied plans.

5.6.2 Birds

Two swift boxes will be erected on the exterior wall of the building. Swift boxes can be supplied and installed by Hampshire Swifts https://www.hampshireswifts.co.uk and a new soffit design is also available (this box is also suitable for sparrows). These bird boxes will provide new nest sites. The bird boxes are detailed in *Table 5.6.2.1*.

Table 5.6.2.1. Bird boxes to be erected within the site with additional details on siting them to increase chances of occupancy.

Type & quantity	**Typical species**	**No.**	**Height**	**Additional information**
Ibstock Eco-habitat  or Swift boxes from Hampshire Swifts 	Swifts (can also be used by sparrows)	2	≥ 5m	Can either be incorporated into the build structure or mounted onto a building. Position out of direct sunlight (below eaves on the north elevation), away from windows and in a straight line. Should be in an open area so that it is less accessible to predators and birds are not obstructed as they leave the nest.

5.7 Requirement for Habitats Regulations licence

A bat European Protected Species (EPS) licence Bat Earned Recognition (BER) licence or Bat Mitigation Class Licence (formerly Bat Low Impact Class Licence, if qualifying) site registration from Natural England licence is not necessary. However, in the unlikely event that bats are found during works on the building, work will stop immediately, and a bat licence will be applied for.

A licence from Natural England permits activities that may otherwise be offences under the *Conservation of Habitats & Species Regulations 2017*, such as the destruction of roost sites. It cannot be applied for on a precautionary basis.

To obtain a licence, evidence is required from bat activity surveys (dusk emergence surveys) during the bat active season between May/ mid-May and August/ September in order to gather enough information about bat populations (including species, numbers, and status of roost sites) to support a bat licence application. Survey data supporting licence applications must be up-to-date *i.e.* have been conducted within the current or most recent optimal survey season (May/ mid-May to August/ September).

Natural England takes a minimum of 30-60 working days to process licence applications following receipt of all the relevant documentation. This includes an application form and a Method Statement. This includes a detailed mitigation strategy to eliminate or reduce impacts on bats.

It is not possible to apply for a licence until full planning permission has been granted and any conditions relating to wildlife fulfilled, although Local Planning Authorities usually request the information prior to determining a planning application request. Additional time will be required where any revisions to a proposed mitigation strategy are necessary to obtain the licence.

6 FIGURES

Figure 1. Aerial photographs showing the location of the site.

Figure 2. An Ordnance Survey map showing the site location, as indicated by the red arrow.

Reproduced with permission of Ordnance Survey under licence no. 100049977.

Figure 3. Plan of the site with the building surveyed highlighted in red.

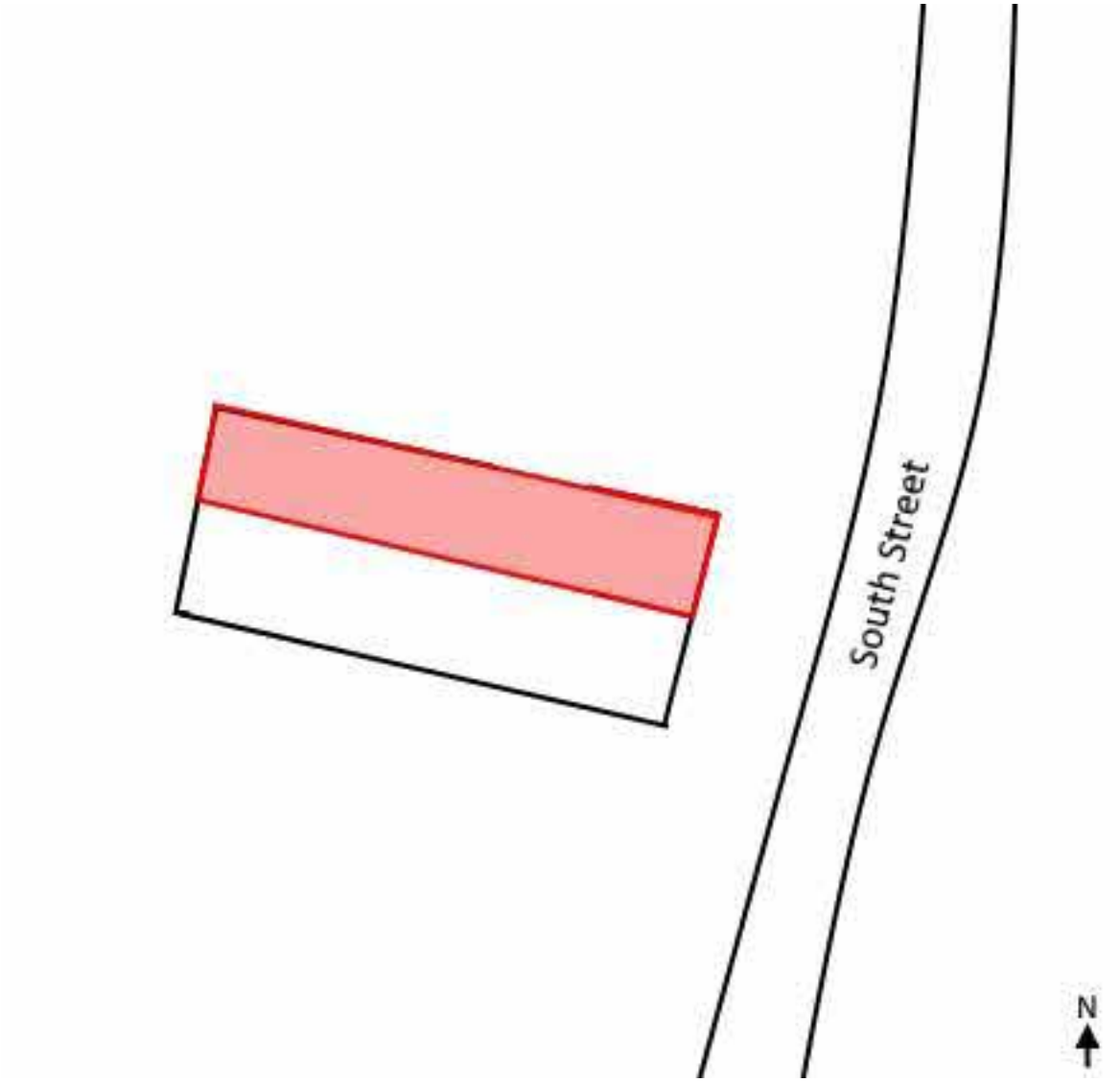
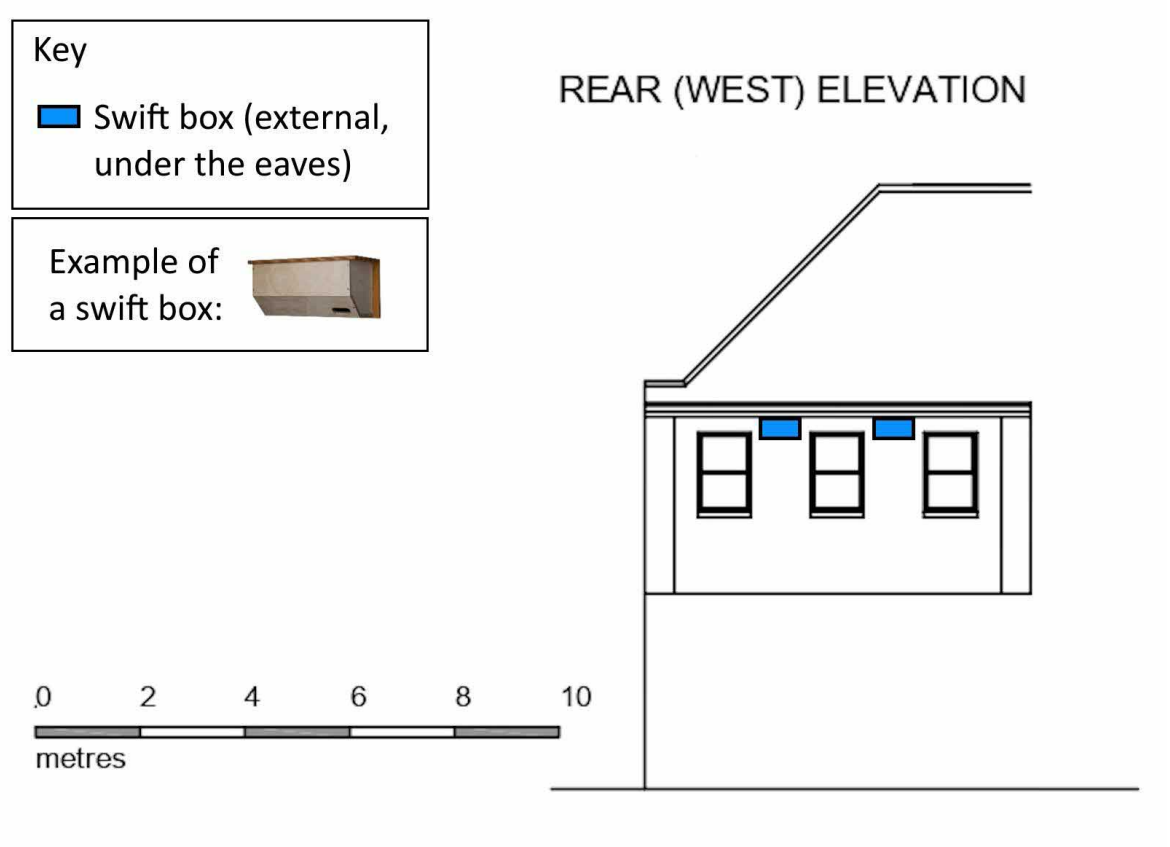


Figure 4. Plan showing the indicative locations of the proposed enhancement measures (not to scale).



7 REFERENCES

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

HMSO (1981). *Wildlife and Countryside Act 1981*. HMSO, London.

HMSO (2000). *Countryside and Rights of Way Act.* HMSO, London.

HMSO (2017). *The Conservation of Habitats and Species (Amendment) Regulations 2017*. HMSO, London.

Institute of Lighting Professionals (2018). *Bats and artificial lighting in the UK*. Institute of Lighting Professionals, Warwickshire.

Mitchell-Jones, A. J. (2004). *Bat Mitigation Guidelines*. English Nature [Natural England], Peterborough.

Multi-Agency Geographic Information for the Countryside (2008). www.magic.gov.uk. Accessed 22/01/2024.

Natural England (2013). *Remedial timber treatment products suitable for use in bat roosts.* Natural England.

Office of the Deputy Prime Minister (2005). *ODPM Circular 06/2005. Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System.* ODPM, London.

Southampton City Council (SCC) (2021). *Solent Disturbance Mitigation Project (SMDP).* https://www.southampton.gov.uk/planning/planning-permission/solent-disturbance-mitigation-project. Accessed 11/02/2022.

8 APPENDIX A: LEGISLATION

8.1 Legal context

All species of British bat are protected by the *Wildlife and Countryside Act 1981* (as amended) extended by the *Countryside and Rights of Way Act 2000*. This legislation makes it an offence to:

intentionally kill, injure, or take a bat;

possess or control a bat;

intentionally or recklessly damage, destroy or obstruct access to a bat roost; and

intentionally or recklessly disturb a bat whilst it occupies a bat roost.

Bats are also European Protected Species listed on the *Conservation of Habitats & Species Regulations 2017*. This legislation makes it an offence to:

deliberately capture, injure, or kill a bat;

deliberately disturb a bat (in such a way as to be likely to significantly affect: (i) the ability of a significant group of bats to survive, breed or rear/nurture their young; or (ii) the local distribution or abundance of the species concerned);

damage or destroy a breeding site or resting place of a bat; and

possess, control, transport, sell, exchange a bat, or offer a bat for sale or exchange.

All bat roosting sites receive legal protection even when bats are not present (bats tend to reuse the same roost).

Where it is necessary to carry out an action that could result in an offence under the *Conservation of Habitats & Species Regulations 2017* it is possible to apply for a European Protected Species (EPS) licence from Natural England. Licences are only issued where Natural England are satisfied that three derogation tests are met. These are: that the activity is for **imperative reasons of overriding public interest;** that there must be **no satisfactory alternative**; and that **favourable conservation status of the species must be maintained**.

Consideration of these three derogation tests was previously left to Natural England as part of their deliberations on whether to grant a licence for the development activity after a planning consent has been issued. However, the regulations now require that **all** public bodies, i.e. **Local Planning Authorities** (LPAs), have regard to the requirements of the European Habitats Directive when carrying out their functions. As a result, LPAs **must** address the three derogation tests when considering a planning application that could impact upon any European Protected Species (EPS).

8.2 National planning context

8.2.1 General

Surveys should be completed in line with Natural England's *Standing Advice for Local Authorities* (http://www.naturalengland.org.uk/ourwork/planningdevelopment/spatialplanning/standingadvice/default.aspx), which states:

> Natural England will not comment on applications that are submitted without the relevant protected species surveys if there are no other issues (*i.e.* in relation to SSSIs or landscape).
>
> Natural England will not comment on scoping surveys that recommend further surveys where these have not been undertaken and submitted with the scoping reports.

In addition to the above, *Section 40* of the *Natural Environment and Rural Communities Act* (2006) imposes a new duty on all public authorities to have regard for biodiversity.

8.2.2 Biodiversity Net Gain (BNG)

Under the Environment Act 2021, all planning permissions granted in England (with a few exemptions) except for small sites will have to deliver at least 10% biodiversity net gain (BNG) from January 2024. BNG will be required for small sites from April 2024. BNG will be measured using Defra's biodiversity metric and habitats will need to be secured for at least 30 years. This sits alongside:

- a strengthened legal duty for public bodies to conserve and enhance biodiversity,
- new biodiversity reporting requirements for local authorities, and mandatory spatial strategies for nature: Local Nature Recovery Strategies or 'LNRS'.

From the 20th July 2021, the Government published the revised National Planning Policy Framework (Ministry of Housing, Communities and Local Government, 2021). The document sets out the government's planning policies for England and how these are expected to be applied. This replaces a previous version which was published in June 2019. It states: "*at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).*"

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- an economic objective;
- a social objective; and
- an environmental objective.

The environmental objective is to "*contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy"*.

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

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.

Development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted.

Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

It states that "*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*".

It should be noted that the "*presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site*".

The NPPF also encourages "*minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures*" and aims to "*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*". This applies to non-statutory designated sites including Sites of Importance for Nature Conservation (SINCs) and equivalent county wildlife sites.

Early engagement with all necessary stakeholders, including expert bodies, is encouraged by the NPPF.

9 APPENDIX B: BAT ECOLOGY

Bats use different roosting sites throughout the year according to their life cycle requirements.

Hibernation during the winter months requires roosting sites that are cool and humid. As conditions improve through the spring, bats become increasingly active and tend to use transitional roosting sites. During the summer months, females give birth in maternity roosts. Maternity roosts tend to be warm and temperature-stable, which aids rapid development of the young, which are weaned in late summer. In the autumn, adult bats congregate in mating roosts and use transitional roosting sites. Autumn is the time when both adults and juveniles must build up fat reserves in preparation for hibernation through the winter months.

Bats also use roosts during the night as feeding perches. Species that catch large prey items such as moths (*e.g.*, brown long-eared bat) often enter buildings to hang up and eat their prey before emerging again to forage. Such feeding perches tend to be obvious from scatterings of bat droppings with moth wings, which the bats discard.

Bats are at their most vulnerable during the summer in their maternity roosts, when disturbance can jeopardise their breeding success. Bats give birth to only one pup per year and young do not breed until the second or third year after birth. This means that if maternity colonies are disturbed there can be serious implications for the conservation status of populations.

Bats are also vulnerable during the winter hibernation period, when disturbance can reduce their chance of survival through the winter at a time when food is in short supply.

This is why there are often only narrow timeframes for bat survey and mitigation work.

10 APPENDIX C: OTHER ENHANCEMENTS FOR WILDLIFE

These are not proposed as enhancements for the purposes of the planning application, but only for information purposes.

10.1 Bird boxes

It is not advisable to place many boxes with identical dimensions, because individuals of the same species may not tolerate each other's presence, especially in built-up areas with limited food resources.

Table 10.1.1. Bird boxes with additional details on siting them to increase chances of occupancy.

Type/ example	Typical species	Height	Additional information
Vivara Pro WoodStone House Sparrow Nest Box  	House sparrows	≥ 2m	Can either be incorporated into the build structure or mounted onto a building. Should be fixed onto a sturdy building, not onto fences or garden sheds due to its weight. Position away from windows. Position out of direct sunlight (below eaves on the north elevation), especially if not built into the build structure.
Ibstock Eco-habitat  or Swift boxes from Hampshire Swifts 	Swifts	≥ 5m	Can either be incorporated into the build structure or mounted onto a building. Position out of direct sunlight (below eaves on the north elevation), away from windows and in a straight line. Should be in an open area so that it is less accessible to predators and birds are not obstructed as they leave the nest.
Vivara Pro Seville 32mm Woodstone Nest Box 	Blue tits, great tits	2-4m	Position on a building or tree, angled north-east (away from prevailing winds) and tilt forward slightly. Chances of occupation can be increased by positioning boxes near vegetation.

Vivara Pro Barcelona WoodStone Open Nest Box 	Robins, wrens	≤ 2m	Mount on a tree or large shrub Conceal amongst foliage to keep well-hidden from predators.
Vivara Pro Seville 28mm Woodstone Nest Box 	Blue tits, coal tits	2-4m	Position on a building or tree, angled north-east (away from prevailing winds) and tilt forward slightly. Chances of occupation can be increased by positioning boxes near vegetation.
WoodStone Swallow Nest Bowl (Plywood board mounted) 	Swallows	≥ 2m	Mount within a building with an open door or window ● Leave a distance of at least 6cm between the top of the nest and the ceiling.
Vivara Pro WoodStone House Martin Nest 	House martins	≥ 5m	Position out of direct sunlight (below eaves on the north elevation), away from windows and in a straight line. Should be in an open area so that it is less accessible to predators and birds are not obstructed as they leave the nest.
Integrated barn owl roost/ false dormer box 	Barn Owl	≥ 3m	Integrated into the sloped roof ideally as a false dormer. The base of the internal space must be flat and a least 45cm below the entrance hole. There must be an easy-to-grip platform outside the hole for fledglings to stand. The box must not allow owls access into the garage/ carport inside the building to prevent disturbance by human activity. A closed access hatch into the box from inside the building is advised, to allow essential clearance of built up nest material or waste.
Barn Owl Trust Nest Box	Barn Owl	≥ 5m	Mounted on a ‘telegraph style’ pole.

			Best positioned facing open grassland for foraging opportunities and away from the prevailing weather.

10.2 Insects

Insect boxes (hotels or towers) and bricks should be installed in a sunny location close to vegetation. Bee-friendly and insect friendly plants should be located nearby so that the bees and insects using the boxes have food. Lavender, honeysuckle, and buddleia are all pollinator-friendly plants. The boxes suggested in *Table 10.2.1* (especially the BeePot planter) have been chosen so that they form an attractive feature as part of the landscaping. Solitary bees are non-aggressive and as such are suitable for gardens with pets and children.

Table 10.2.1. Examples of insect boxes that could be erected on site.

Type	**Species**	**Height**	**Additional information**
Bee Brick 	Solitary bees	>1m from the ground	The Bee Brick should be positioned in a warm sunny spot, in a south-facing wall, with no vegetation in front of the holes
BeePot Bee Hotel 	Solitary bees	>1m from the ground	The BeePot should be positioned in a warm sunny spot, preferably on a south-facing wall, with no vegetation in front of the holes
Insect Tower 	Butterflies, solitary bees, lacewings, and ladybirds	>1m from the ground	The different sections of the Insect Tower have been designed to provide a habitat for a variety of insect species. Suitable for mounting on buildings, tress, or fences.
Urban Bee Nester 	Solitary bees and a range of other insects	Between 0.75m and 1.5m above ground	The selected canes and the holes are the optimum size for solitary bees, but other insects may overwinter in the nester.

Urban Insect Hotel 	A wide range of insects	Between 0.75m and 1.5m above ground	Adding natural materials such as drilled canes, hollow stems or bark in the triangular spaces will encourage more insects to the hotel.
Bee and Bug Biome 	A wide range of insects	>1m from the ground	Best placed near vegetation. Provides plenty of nooks and crannies for insects such as ladybirds, earwigs, and lacewings.