

Ecological Appraisal (Bats & Birds)

Site location:

Holly Farm Barns, Alston

Report Date:

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Devon Wildlife Checklist (for front of Wildlife Report.)

A.1 Protected and priority species (relates to question 13a in the planning application form). A tick or cross must be placed in all boxes in column two (shaded) and then, where there is a tick, all other boxes in that row. Where species are present please email this form to Devon Biodiversity Records Centre - DBRC@dbrc.org.uk.

Location	Holly Farm, Alston, Axminster, EX11 7LG	Grid reference for the centre of the site (6 digits)	ST 3059 0241	Planning application reference	Not known
Name of surveyor & consultancy	Katie Jones – Moor to Sea Ecology	Date that surveys undertaken	28 th November 2022 (Preliminary Roost Assessment) 10 th May 2023 (Dusk Emergence Survey)	Sent to DBRC Y/N	Y

Designations / important habitats / sites of geological importance (relates to questions 13 b & c in the planning application form)

A tick or cross must be placed in all boxes in column two and then, where there is a tick, all other boxes in that row. Designation	Within site or potential impact	Name of Site	Detailed Conservation Action Statement included	Habitat balance sheet	Relevant organisation consulted & response
Special Area of Conservation & Site of Special Scientific Interest	x	River Axe	x	N/A	N/A
Site of Special Scientific Interest	x	Broom Gravel Pits	x	N/A	N/A

Species – terrestrial, intertidal or marine	Walkover shows that suitable habitat present and species reasonably likely that species will be found	Detailed survey needed to clarify impacts and mitigation required	Detailed survey carried out and included	Species Present (P) or assumed to be present (A)	Impact on species	Detailed Conservation Action Statement	EPS offence	Grid reference
Nesting birds	√	x	x	P. Former swallow, wren & blackbird nests	√	√	x	N/A
Roosting bats	√	√	√	Absent	x	Precautionary measures	x	N/A
Foraging bats	√	Undertaken in conjunction with dusk emergence survey	√	P. Common pipistrelle, lesser horseshoe, noctule, serotine and soprano pipistrelle	√ in the absence of mitigation measures	√	x	N/A

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Executive Summary

This survey report details the findings of an Ecological Appraisal focusing on the suitability of two barns located within the curtilage of Holly Farm, for roosting bats and nesting birds. The property is located on the southern outskirts of the village of Alston, Devon. The Preliminary Roost Appraisal assessed the two barns with low suitability to support roosting bats. Therefore a single dusk emergence survey was undertaken.

The two barns comprise a concrete storage shed and a stone stable. It is proposed to demolish the storage shed and convert the stable into a residential dwelling.

There are no statutory sites designated for nature conservation importance within or immediately adjacent to the two barns. Within a 2km radius of the site, there are two statutory sites, the River Axe Special Area of Conservation and Site of Special Scientific Interest and Broom Gravel Pits Site of Special Scientific Interest. However these are at sufficient distance from the site that they will not be impacted on by the proposed works.

No evidence of roosting bats was found either within the two barns or on the exterior, however there are numerous suitably sized access points which would allow bats into the barns, as well cracks in the stonework of the stable, which may be used by hibernating bats. Therefore the two barns were assessed with low suitability to support roosting bats and one further dusk emergence survey was undertaken in May 2023. No bat were identified emerging from the barns, however five species of bat were detected foraging within the habitats surrounding the barns. Precautionary measures have been recommended together with details on the avoidance of lighting around the barns.

Evidence of former birds' nests was noted in both barns, and it is likely that the barns will be used in future nesting seasons. Measures to avoid harm to nesting birds and opportunities to enhance the site for bird species have been provided.

A Conservation Action Statement (CAS) has been provided which details bird and bat mitigation and enhancement measures in line with the National Planning Policy Framework (NPPF).

This summary is an extract of the report. Please ensure the report is read in its entirety for detailed survey findings and recommendations.

1. Introduction

1.1. Background and Purpose of Document

Moor to Sea Ecology has been commissioned by Helen Arnold to carry out an Ecological Appraisal comprising a Data Search, Preliminary Roost Appraisal and Dusk Emergence Survey. The barns (hereafter referred to as 'the site') comprise a concrete storage shed and a stone stable, and are located at the southern end of the village of Alston, Devon.

The Data Search will identify any statutory sites designated for wildlife within a 2km radius which could be affected by the proposed works. The Preliminary Roost Appraisal aims to describe baseline ecological conditions and determine potential ecological constraints in the form of legally protected and notable bat and bird species and designated sites. The Dusk Emergence Survey was undertaken to confirm the presence/absence of roosting bats and if present, identify and characterise roosts, as well as determining likely impacts from proposed construction works. Refer to Appendix 1 for details of policies and legislation relating to roosting bats and nesting birds.

The assessment is undertaken in accordance with guidelines for Preliminary Ecological Appraisal produced by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2017), guidelines for Bat Surveys by the Bat Conservation Trust (Collins, 2016) and the Interim Guidance Note on Night Vision Aids (2022).

1.2. Site Location and Description

The site is located at the southern end of the village of Alston and approximately 4.5km to the north of Axminster (OS Grid Reference at approximate centre of site: ST 3059 0241). It is bound to the south by Holly Farmhouse, to the east by a road and a single residential dwelling and to the west and north by agricultural pasture bound by hedgebanks and trees. Within the wider area, habitats suitable for foraging bat species include agricultural pasture bound by hedgebanks, a tributary of the River Axe which is located approximately 0.3km to the east, the River Axe itself, which is situated approximately 1.7km to the south-east and small copses of broadleaved woodland, the closest of which is approximately 0.6km to the west.

The site comprises two barns: a concrete storage shed and a stone stable. The storage shed lies immediately adjacent to the western elevation of the stable. Detailed building descriptions are provided in Section 4.2 with images provided in Appendix 2.

1.3. Proposed Works

It is proposed to demolish the concrete storage shed and convert the stone stable into a residential dwelling with a pitched roof. At the time of writing, no proposed plans were available for review.

2. Survey Methods

2.1. Desk Study

A desk study to identify statutory designated sites of conservation importance within a 2km radius of the site was undertaken using the MAGIC website www.magic.gov.uk and the Devon County Council's Environment Viewer. These website were accessed for information in November 2022.

The data search includes records of statutory sites of nature conservation importance such as Special Areas of Conservation (SACs) and Sites of Special Scientific Interest (SSSIs). It was considered that obtaining a data search of bat records from Devon Biodiversity Records Centre (DBRC) was not proportional, considering the likely impact of the proposed works.

2.2. Preliminary Roost Appraisal

The buildings were inspected both externally and internally using a surveyor's ladder, high powered torch, frequency division bat detector (Peersonic RPA3) and video endoscope where necessary to assess the likelihood of the structure to support roosting bats or nesting birds. Evidence of roosting bats could include live animals, carcasses, droppings and feeding remains and evidence of nesting birds could include feathers, nesting material and eggs.

A rating of between negligible and high suitability was assigned to the buildings based on the likelihood of supporting roosting bats (Collins, 2016). These levels of suitability are listed below:

- **Negligible:** Negligible habitat features on site likely to be used by roosting bats;
- **Low:** A structure with one or more potential roost sites which could be used by individual bats opportunistically, but due to the size, shelter, conditions and surrounding landscape are unlikely to be used by bats on a regular basis or by large numbers of bats i.e. for maternity or hibernation;
- **Moderate:** A structure with one or more potential roost sites which could be used by bats, due to the size, shelter, conditions and surrounding landscape but are unlikely to support a roost of high conservation concern such as a maternity or hibernation roost; and,
- **High:** A structure with one or more roost sites which are obviously suitable for use by larger numbers of bats on a regular basis and potentially for a longer period of time due to size, shelter, conditions and surrounding landscape. Suitable for maternity or hibernation roosts.

2.3. Bat Survey Assessment

A single dusk emergence survey was undertaken on 10th May 2023, to confirm whether the barns are used by roosting bats.

Three surveyors, assisted by two XA60 infra-red cameras were used to observe different elevations of the two barns and identify any emerging bats.

The surveyors were equipped with either an EM Touch Pro or Peersonic RPA3 bat detectors, and marked records of bats emerging onto a site plan. General bat activity (including identified flight routes) were also recorded by the surveyors.

Analysis of recorded bat echolocation calls were undertaken by converting wav. files to Kaleidoscope and then analysing them using Analook. The camera footage was analysed using the media programme VLC.

When assigning calls to pipistrelle species, calls with a peak frequency of 42-48KHz were assigned to common pipistrelle *Pipistrellus pipistrellus*, calls with a peak frequency of >48-52KHz assigned as *Pipistrellus spp.* and calls with a peak frequency of >52KHz were assigned to soprano pipistrelle *Pipistrellus pygmaeus*.

2.4. Survey Details

Tables 1 and 2 provides surveyor details and weather conditions for the surveys undertaken:

Table 1. *Surveyor details and weather conditions*

Date:	28 th November 2022
Surveyor & Licence No.:	Katie Jones BSc. (Hons) MCIEEM (Principal Ecologist) Natural England Bat Class Licence CL18 (level 2) 2015-11763-CLS-CLS
Weather conditions:	Dry, wind force 0, 7°C, cloud cover 30%

Table 2. *Surveyor details and weather conditions*

Date:	10 th May 2023
Surveyor & Licence No's:	Katie Jones Natural England Bat Class Licence CL18 (level 2) 2015-11763-CLS-CLS Alison Johnson Kerrie Gardner
Weather conditions	Dry, wind force 0, 12°C, cloud cover 40%
Sunset :	20:47
Start time:	20:32
Finish time:	22:17
Weather conditions (finish):	Dry, wind force 1, cloud cover 60%, 9°C

3. Survey Limitations

3.1. Desk Study

Desk study results only give an indication of species presence in a location. The absence of recent records for certain species in an area may be due to low levels of biological recording or the non-submission of records, rather than absence.

3.2. Preliminary Roost Appraisal

A number of bat species roost in very small crevices such as cracks in the stonework and under the fascia, and therefore it is possible that individual bats and bat droppings may have been missed. In addition, bird nests in concealed locations may not have been visible to the surveyor.

Identification of species based on dropping morphology is challenging and does not provide a definitive identification of species.

The floor of the stone stable was very wet and covered in wet hay and leaves which made searching for bat droppings challenging.

3.3. Dusk Emergence Survey

The end temperature was 9°C which is 1°C lower than the recommended temperature of 10°C for undertaking emergence surveys (Bat Survey Guidelines, Collins, 2016). However as bat activity was still observed around the site, this is unlikely to have significantly affected the survey results.

4. Survey Results

4.1. Desk Study

There are no statutory designated sites within or immediately adjacent to the site, however there are two statutory designated sites within 2km radius of the site. These are the Rive Axe Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) and Broom Gravel Pits SSSI.

The River Axe SAC and SSSI is located approximately 1.7km to the south-east of the site (at its closest point) and designated as a watercourse of plain to montane levels supporting a variety of water crowfoots including chalk-stream water crowfoot *Ranunculus penicillatus* and river water crowfoot *Ranunculus fluitans* as well as the Annex II species: sea lamprey *Petromyzon marinus*, brook lamprey *Lampetra planeri* and bullhead *Cottus gobio*.

Broom Gravel Pits SSSI is located approximately 1.9km to the south-east and is designated for important geological features.

See Appendix 3 for a plan showing the site surveyed in relation to the location of the statutory designated sites.

4.2. Preliminary Roost Appraisal

4.2.1. Building descriptions

The site comprises a stone stable located immediately adjacent to the western side of the lane, and a concrete storage shed which lies immediately adjacent to the western wall of the stable.

Stone Stable

The stable is constructed of stone, with brick edged corners. It has wooden stable doors on the south western elevation and glazed windows on the eastern elevation. The eastern elevation also has extensive creeper coverage which has completely covered one of the windows. The remains of an old creeper root system is also present within the stones on sections of eastern wall not covered with live creepers. A small area of ivy is present on the western end of the stable. On the northern elevation, an open structure used as a log store has been constructed using the northern wall of the stable and the eastern wall of the concrete shed. The roof and eastern wall are constructed of unlined corrugated iron, the roof has a slight slope and is laid onto wooden beams.

There are several suitably sized access points that would allow roosting bats into the building such as broken window panes on the eastern elevation, gaps between the wall tops and the corrugated metal roof on all elevations, gaps around the stable doors on the western elevation, open door on the northern elevation, and holes in the roof. There also several holes and cracks in the stonework which would be suitable for bats including hibernating bats, to roost in.

Internally the stable is divided into three separate sections, by $\frac{3}{4}$ height breeze block walls. Sections of the internal wall on the western side are clad in the stems of creepers. The roof has no underlining and in several places the wooden beams are rotten and the roof is dripping with water.

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Concrete storage shed

The storage shed is constructed of rendered breezeblocks with a single glazed window on the northern elevation and a wooden door also on the northern elevation. On the southern elevation, there are two stable doors and a small glazed window. The roof is laid with corrugated metal sheets onto wooden beams and has a slight slope.

There are several suitably sized access points that would allow bats into the building including a gap above the door on the northern elevation, open stable doors on the southern elevation, gaps between the wall tops and the roof on the western elevation and an open window also on the southern elevation.

Internally the shed is divided into four sections by rendered breeze block walls. As with the stable there is no underlining to the roof, however the roof is in a better state of repair with the majority of the interior space completely dry.

4.2.2 Evidence of roosting bats

No evidence of roosting bats was identified in either the stone stable or the storage shed, although the exterior cracks in the stonework of the stable are suitable for roosting bats, including hibernating bats.

4.2.3 Evidence of nesting birds

Stone stable

A former swallow *Hirundo rustica* nest was noted above the window in the southern section of the stable. In addition within the log store at the northern end of the stable where the stems of creepers have entered the building, several former wren *Troglodytes troglodytes* and blackbird *Turdus merula* nests were noted.

Storage shed

A single former wren's nest was noted on the eastern wall of the storage shed.

4.3. Dusk Emergence Survey

No bats were detected emerging from the two barns during the survey.

Bat activity around the barns was regular and frequent with noctiule *Nyctalus noctula* being the first bat detected at 21:13, twenty-six minutes after sunset flying over the site on a west to east elevation. Lesser horseshoe bat *Rhinolophus hipposideros* calls were detected by two of the surveyors, on the road to the east of the barns and near to the lane to the south-west of the barns between 21:21 and 21:28. Common and soprano pipistrelles were detected between 21:26 and 22:16. Between 21:31 and 22:18, serotine bats *Epitesicus serotinus* were seen and detected at regular intervals foraging over the field to the west of the barns.

5. Evaluation and Recommendations

Site evaluation has been undertaken based on the current level of survey findings including a Desk Study, Preliminary Roost Appraisal and single Dusk Emergence survey. Legislation is summarised within the current section; Appendix 1 provides full details of the legislation relating to species.

Recommendations with regard to likely impacts and requirements for mitigation, compensation or protected species licensing (where necessary) have been given based on the proposals given in Section 1.3 and current best practice guidance documents where appropriate. A Conservation Action Statement (CAS) in Appendix 4, provides further detail of nesting bird and roosting bat mitigation and enhancement recommendations..

If the site or habitats within it changes (or if development proposals alter) the potential impacts on bat and bird species may change accordingly. Moor to Sea Ecology should be contacted for advice in such situations.

5.1. Designated sites for nature conservation

There are no statutory designated sites within or adjacent to the site. There are two designated sites within a 2km radius, however due to the reasons for their citations e.g. notable habitats, their distance from the site and the nature of proposed works (small scale and within the property boundary), these designated sites are very unlikely to be affected by the proposed works.

5.2. Roosting Bat Species

Evaluation

British bat species are protected under the Wildlife and Countryside Act 1981 (as amended) and Conservation of Habitats and Species Regulations 2017 (as amended). This makes it an offence to kill or injure bats or damage or destroy a place of shelter or protection. Deliberate or reckless disturbance of bats which could affect the ability of any significant group of animals to survive, breed, rear or nurture their young may also result in an offence.

Recommendations

Although no evidence of roosting bats was noted during the dusk emergence survey, there is significant bat activity in the local area. It is, therefore recognised that a single dusk emergence survey represents only a snapshot of bat activity throughout the year and whilst the buildings are present with numerous cracks and crevices, there is still a chance that bats could access these features at a later date. Therefore if the proposed works are not undertaken within 1 year of the date of this report, an updated survey will be required.

During the conversion/demolition works, a precautionary methodology will be employed, where the contractors are made aware of the very low likelihood for a roosting bats to be present. If a bat was to be found during these works, sheltering materials will be replaced around the bat and Natural England contacted for further advice.

5.3. Foraging bat species

Foraging bats

The dusk emergence survey revealed that at least five species bats use the habitats surrounding the barns for foraging and commuting. Therefore to enable bats to continue to use these habitats, any proposed external lighting must follow the guidelines set out in the Institute of Lighting Professionals (2018) Bats in the Built Environment Series ILP Guidance Note 08/18. In summary,

- LED luminaires should be used due to their sharp cut-off, lower intensity, good colour rendition and dimming capability.
- A warm white spectrum (ideally <2700 Kelvin) should be adopted to reduce blue light component.
- Luminaires should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats.
- Only luminaires with an upward light ratio of 0% and with good optical control should be used.
- Luminaires should always be mounted on the horizontal, i.e. no upward tilt.
- Any external security lighting should be set on motion-sensors and short (1min) timers.
- As a last resort, accessories such as baffles, hoods or louvres should be used to reduce light spill and direct it only to where it is needed.

5.4. Bird Species

Evaluation

Under the Wildlife and Countryside Act 1981 (as amended) it is illegal to take, damage or destroy the nests of wild birds whilst being built or in use. Bird species also listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) receive additional protection including protection from intentional or reckless disturbance when they are nesting or rearing dependant young (see Appendix 1 for more details).

Evidence of at least three different types of former bird nests were observed in the stable and storage shed, and the external cracks in the stonework of the stable may also be used by nesting birds such as house sparrow.

Recommendations

Commencement of demolition of the storage shed, and the conversion of the stone stable, has potential to harm nesting birds if present, damage active nests or exclude birds from active nests. Therefore it is recommended that demolition/conversion works avoid the main nesting period (beginning of March to mid-September), where this does not conflict with the roosting bats

recommendations. It should be noted that nesting may extend outside of this period and is dependent on weather conditions and species.

If works which have potential to damage bird nests need to be carried out during the nesting period it is recommended that a check be made for nesting birds be made, the day before works are due to commence. Any birds identified nesting, should be left to complete their breeding (i.e. until the young have fully fledged) before carrying out works where birds are nesting. The ecologist can help identify the location of any nesting positions and provide advice on avoiding impacts on nesting birds if required.

5.5. Biodiversity Enhancements

Biodiversity enhancement recommendations are required in line with the National Planning Policy Framework (NPPF) which sets out the government's policies on achieving net biodiversity gain through the planning system. Detailed enhancement recommendations for bats and birds are included within the Conservation Action Statement (CAS) in Appendix 4.

6. References

Bat Conservation Trust (2022). Interim Guidance Note: *Use of night vision aids for bat emergence surveys & further comment on dawn surveys*.

CIEEM (2017). *Guidelines for Preliminary Ecological Appraisal*. 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.

Collins, J (2016). *Bat Surveys – Good Practice Guidelines, 3rd edition*. Bat Conservation Trust.

Devon County Council (2022) Environment Viewer.

English Nature (now Natural England) (2004). *Bat Mitigation Guidelines*. English Nature, Peterborough.

Magic (2022). Available from <https://magic.defra.gov.uk/MagicMap.aspx>

Stone, E., Jones, G., and Harris, S. (2009). *Street lighting disturbs commuting bats*. Current Biology 9:1-5.

Williams, C. (2010). *Biodiversity for Low and Zero Carbon Buildings: A Technical Guide for New Build*.

Appendix 1 Summary of Relevant Policies, Legislation & Designated Site Explanations

This includes a brief summary of legislation relevant to wildlife referred to in this document. The original texts of the relevant legislation or specific legal advice should be consulted in individual cases where appropriate. This section does not constitute legal advice.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) was published on the 24th July 2018. It replaces the first NPPF published in March 2012.

Sections of the NPPF with particular relevance to biological conservation include:

Paragraph 8 and 8 c):

8. 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):

c) an environmental objective – 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.

Paragraph 170 d):

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

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;

Paragraph 171:

171. 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.

Paragraph 174:

174. To protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity⁵⁶; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation⁵⁷; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

Paragraph 175:

175. When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) 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. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) 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 reasons⁵⁸ and a suitable compensation strategy exists; and

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.

Paragraph 176:

176. The following should be given the same protection as habitats sites:

a) potential Special Protection Areas and possible Special Areas of Conservation;

b) listed or proposed Ramsar sites⁵⁹; and

c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

Paragraph 177:

177. The presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.

⁵⁶ Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system. ⁵⁷ Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of 22.103a.01 Holly Farm Barns, Alston: Ecological Appraisal (Bats & Birds)

development that may be suitable within them.⁵⁸ For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.⁵⁹ Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which Government has initiated public consultation on the scientific case for designation as a Special Protection Area, candidate Special Area of Conservation or Ramsar site.

Protected Species

Protected Species (PS) include those species present on Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended). The Conservation of Habitats and Species Regulations 2017 transpose Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora (Habitats Directive) into English Law. EPS referred to within this report include:

- **Bat species**

All PS also receive legal protection under the national legislation within the Wildlife and Countryside Act 1981 (as amended). When these two pieces of legislation are considered together, it makes it an offence to:

- Deliberately capture (or take), injure or kill any wild animal of these species.
- Possess or control any live or dead specimens or any part, or anything derived from animals of these species.
- Deliberately disturb wild animals of such species, where the disturbance is likely to:
 - a) impair their ability to
 - i) survive, breed or reproduce, or to rear or nurture their young, or
 - ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate
 - b) affect significantly the local distribution or abundance of the species.
- Intentionally, deliberately or recklessly damage or destroy the breeding or resting place of such an animal, or obstruct access to such a place.
- Sell (or offer for sale) or exchange parts of these species (alive or dead).

European Protected Species Licences

A European Protected Species Licence (EPSL) issued by the Statutory Nature Conservation Organisation (e.g. Natural England in England) is required for any activity which is considered likely to result in an offence. This includes damage or destruction to a bat roost as well as any significant disturbance to bats (see above). In order to obtain a licence for works which would otherwise result in an offence to a Protected Species (PS), Natural England (and local planning authorities) assesses applications against the following three tests:

Test 1 - **Regulation 53(2)(e)** states: a licence can be granted for the purposes of “preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment”.

Test 2 - **Regulation 53(9)(a)** states: the appropriate authority shall not grant a licence unless they are satisfied “that there is no satisfactory alternative”.

Test 3 - **Regulation 53(9)(b)** states: the appropriate authority shall not grant a licence unless they are satisfied “that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.”

Please note that Natural England take 30 working days to assess licence applications. Where planning permission is required for a project, this will be required *prior* to submission of a licence application to Natural England.

Bat Mitigation Class Licence (BMCL)

Natural England operates the Bat Mitigation Class Licence BMCL (WML-CL21). This Class Licence allows Registered Consultants to register sites which meet the criteria of the licence (e.g. roosts of small numbers of certain bat species), to allow works which would otherwise result in an offence with regard bats (e.g. damage or destruction of a roost site). Registration of sites requires up to date survey information. For latest information regarding the criteria of this licence, and whether the roost surveyed meet the criteria of this licence, please contact your Ecologist for more details.

Nesting Birds

All wild birds are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended). It is therefore an offence in the UK to:

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

In order to avoid committing an offence with regards nesting birds no works which may impact bird nests whilst in use (e.g. whilst nests are being constructed, eggs incubated or dependant juveniles).

Designated Site Explanations

Special Area of Conservation (SAC)

These are notified by Natural England because they contain species and/or habitats of European importance (listed in the Habitats Directive 1994), and are part of a network of conservation sites set up through Europe known as the Natura 2000 series. On land, almost all candidate SACs are, or will be notified as SSSIs. Natural England needs to be consulted before any operations likely to damage the special interest are undertaken. SAC is a statutory designation with legal implications.

Site of Special Scientific Interest (SSSI)

These are notified by Natural England because of their plants, animals or geological features (the latter are geological SSSIs or gSSSI). Natural England needs to be consulted before any operations likely to damage the special interest are undertaken. SSSI is a statutory designation with legal implications.

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Appendix 2 Photo Plates



Plate 1. The eastern elevation of the stone stable



Plate 2. The western elevation of the stone stable



Plate 3. The northern elevation of the stone stable, showing the log shed



Plate 4. The northern elevation of the storage shed



Plate 5. The southern elevation of the storage shed



Plate 6. The interior of the stone stable



Plate 7. The interior of the storage shed

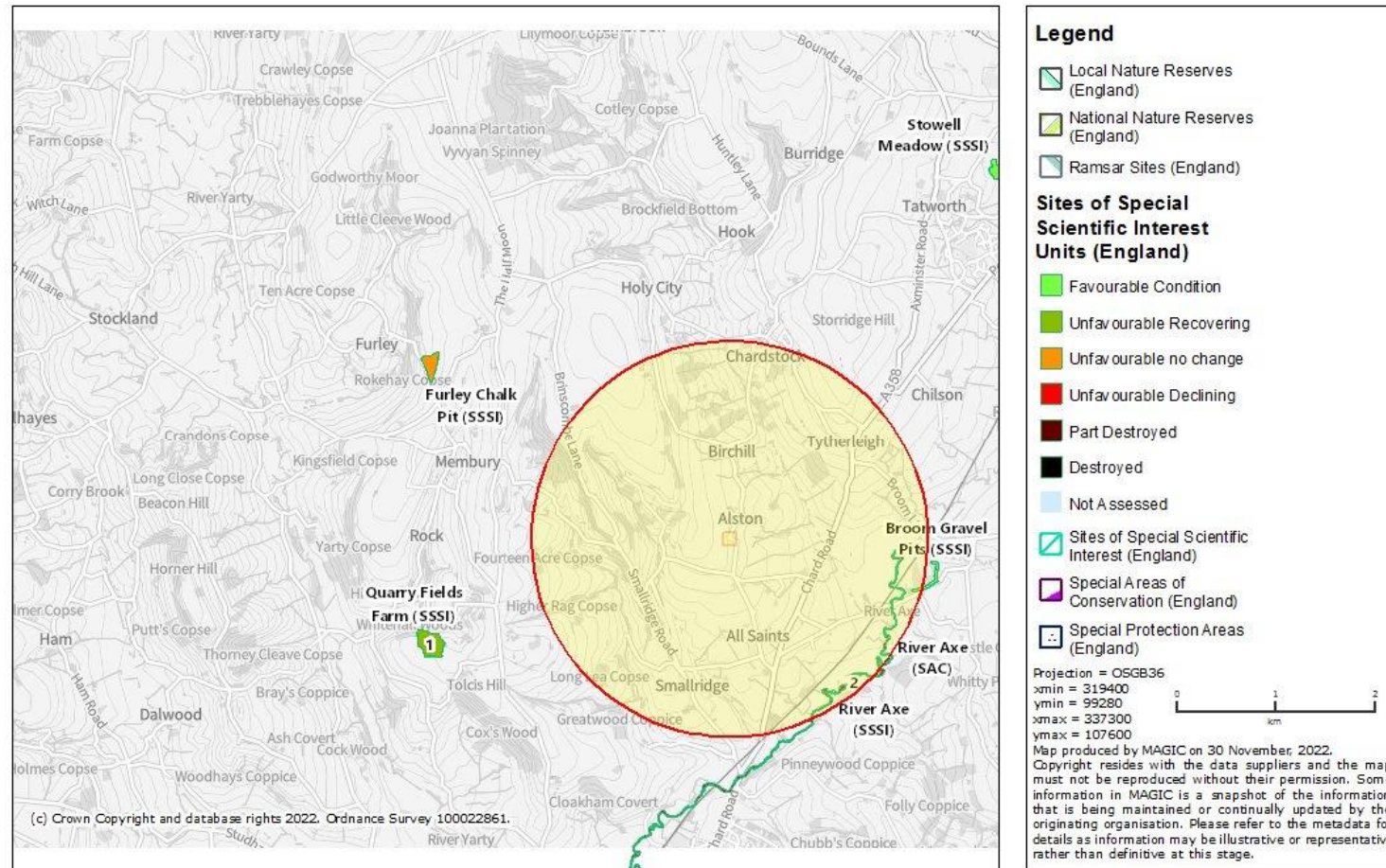


Plate 8. A former blackbird nest noted in the log store attached to the stone stable

Appendix 3 Data Search



Statutory sites of nature conservation



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Appendix 4 Conservation Action Statement

This document has been constructed following guidance provided by Devon County Council at www.devon.gov.uk/wildlife. The Conservation Action Statement (CAS) demonstrates measures to avoid, mitigate and compensate for anticipated ecological impacts to birds (where possible or appropriate). Measures relating to bats will be included following the results of the recommended further surveys. Proportionate measures to enhance the site for biodiversity in accordance with the National Planning Policy Framework (NPPF) are also given.

Site Details

Address	Holly Farm Barns, Alston, Axminster
Grid reference	ST 3059 0241
Planning Application Ref.	Not known
Drawing No.	None available at the time of writing

Measures to avoid/ mitigate/ compensate impacts

Potential Impact	Measures to avoid/ mitigate/ compensate impacts
Harm to nesting birds during construction works.	Demolition of the shed and conversion of the stone stable will impact on nesting birds and therefore will ideally be commenced during the period mid-September to end of February to avoid harm to active nests and birds whilst nesting. If construction works are required to commence outside this period (e.g. during the main nesting season) a check should be undertaken for nesting birds the day before any works are due to commence. Any birds nesting should be left to complete their breeding (i.e. until all dependant juveniles have fledged).
Harm to roosting bats during demolition	During the conversion, a precautionary methodology will be employed, where the contractors are made aware of the very low likelihood for roosting bats to be present. If a bat was to be found during these works, sheltering materials will be replaced around the bat and Natural England contacted for further advice.
Impact on foraging bats if external lighting is installed	Any proposed external lighting should follow the guidelines set out in the Institute of Lighting Professionals (2018) Bats in the Built Environment Series ILP Guidance Note 08/18. In summary, <ul style="list-style-type: none"> • LED luminaires should be used due to their sharp cut-off, lower intensity, good colour rendition and dimming capability. • A warm white spectrum (ideally<2700Kelvin) should be adopted to reduce blue light component. • Luminaires should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats. • Only luminaires with an upward light ratio of 0% and with good optical control should be used. • Luminaires should always be mounted on the horizontal, i.e. no upward tilt. • Any external security lighting should be set on motion-sensors and short (1min) timers. <p>As a last resort, accessories such as baffles, hoods or louvres should be used to reduce light spill and direct it only to where it is needed.</p>

Moor to Sea Ecology

Loss of bird nesting opportunities

At least three terrace nest boxes suitable for use by wrens, robins and blackbirds will be installed on the eastern or northern elevations below the eaves (at least 1.5-30m above ground level) within creepers such as ivy. Boxes to be used will be the Vivara Pro Barcelona Woodstone Open Nest Box (shown below) (or similar design) available from www.nhbs.com.

Further information can be provided on siting bird nest boxes.



Measures to enhance the site for biodiversity

Note: recommended nest and roost box designs can be purchased from nhbs at www.nhbs.com or 01803 865913.

Receptor	Enhancement Measure
Birds	<p>Tree and shrub species could be planted around the buildings to provide additional nesting and foraging opportunities, native species or species which bear fruit or nuts should be preferentially selected.</p> <p>An open shelter such as a log store or cycle shed could be provided to allow birds such as swallows to nest inside</p>
Bats	<div data-bbox="465 651 613 911" data-label="Image"> </div> <p>Two bat boxes such as the Improved Crevice box should be installed on the southern or western elevation of the converted barns, at a height of at least 3m from ground level to provide roosting opportunities for bats. Available from: https://www.nhbs.com/search?q=bat++box</p>