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Report prepared for: Gill Hudson Homes Ltd

For the Site of: Pirton Hall, Shillington Road, Pirton, Herts, SG5 3HB

Version:	Written by:	Checked by:	Final:
Draft	Susie Handley 08/05/2026	Sarah Kennard 03/07/2026	
Final	Julian Newman 02/07/2026	Martin O'Connor 03/07/2026	Sarah Kennard 03/07/2026

Cherryfield Ecology has prepared this report for the client. Please see our T&C's.

Ecological reports are limited in shelf life, Natural England usually expect reports for licences to be from either the most current season, e.g. May 2026 to May 2027, or the most recent season for bats e.g May 2025 to May 2026. Therefore, should the project not proceed within 12-18 months of this report an updated survey should be undertaken in order to check for changes that may have occurred on site. Information is believed to be accurate at the time of the survey; recommendations are made without bias based on good practice guidelines within the industry. However, species presence and ecological parameters can change over time.

Julian Newman BSc (Hons), MRSB
Bat Licence Level 1, GCN Level 1
julian@cherryfieldecology.co.uk
07546 987312

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Emergence and Activity Bat Survey (EBS)

0.0 Non-Technical Summary

0.1 Background

This report follows national guidelines Collins (2023) allowing for dusk and dawn surveys and recommends mitigation and compensation if considered necessary. If a deviation from the guidelines has been made, this will be detailed in the Method Section.

The following report details the findings and recommendations for the site of Pirton Hall, Shillington Road, Pirton, Herts, SG5 3HB, where proposals include for demolition of part of B1 and a new residential development.

Following a Stage 1 Ecological Assessment undertaken on 13/10/2025 (Cherryfield Ecology, 2025), B1 is a **confirmed** bat roost as several hundred droppings were found across the two internal loft voids and B3 offers **moderate** potential for roosting bats, therefore further surveys were recommended.

The client has commissioned Cherryfield Ecology to undertake the EBS, which includes three dusk emergence surveys.

0.2 Results and Findings

- The surveys have shown the presence of two day roosts for common pipistrelle, one under the hung tile on the northern side of the middle dormer and one at the gable apex of the righthand (western) of the three dormers.
- The surveys have also shown one day roost for brown long-eared bat, also at the gable apex of the righthand (western) of the three dormers.
- Due to the placement of the emergences being from the apex of the dormer, this is likely to be connected to the remaining area of the roof and the location where droppings were found within the interior loft voids. As such, the droppings within the loft is not considered to be a separate roost location.

- All the surveys show that the surrounding grounds are being used for foraging and commuting by bats.
- A bird, likely a pied wagtail, was observed brooding on a nest on B1.

0.3 Impact Assessment and Recommendations

Bats (B1) - Two day roosts for common pipistrelle and a day roost for brown long-eared bat will be lost when works are carried out.

Breeding Birds - No further surveys are recommended; however, the development should take place outside the nesting season (March to August). If this is not possible, **it is recommended that a qualified ecologist is on-site to ensure the buildings are not occupied by breeding birds, prior to works.** Should an occupied nest be found, a buffer zone would need to be created until the nest is no longer in use.

A bat mitigation class licence will be required post-grant of planning in order to allow the works to proceed lawfully. (Please refer to **Section 4.3** of this report for further details).

The findings outlined in this report are valid for one year, after which updated surveys will be required.

Enhancements and mitigation are recommended (please see Section 4.3 for further details).

1.0 Introduction

1.1 Aim

The aim of this survey is to gather additional information from the site to establish species, population and entry/exit points of bats to aid in the design of mitigation and compensation for bats in the development. The information is used to help inform a licence application (if required) and to inform the client and their architect/planner of necessary changes in the design that may be required to ensure bats are protected during works. It should be read in conjunction with any Stage 1 survey such as a Preliminary Roost Assessment (PRA) that may have been undertaken.

1.2 Background Information

The client, Gill Hudson Homes Ltd, has commissioned Cherryfield Ecology to undertake an EBS for the site of Pirton Hall, Shillington Road, Pirton, Herts, SG5 3HB. Planning permission is being sought for demolition of part of B1 and a new residential development.

This survey has checked all buildings, trees (from ground level only) or structures due to be affected by the proposals for bats, signs of bats or habitat value e.g. crevices, gaps or holes that cannot be checked for a variety of reasons. In addition, surveyors have been positioned around the building, tree or structure to allow for emerging/re-entering bats to be watched for.

The inspections were conducted on 07/05/2026, 28/05/2026, and 18/06/2026.

The survey can only ever provide a 'snapshot' of the site at the time of the survey and circumstances may change following this report. Health and Safety restrictions or obstructions may limit the ability to find or see emergence, re-entry and/or evidence. Biological records have been requested to give the report context and allow a study of the surrounding area. The information is often sensitive and, therefore, a synopsis is provided.

The survey can be conducted between May and September with the optimal season for surveying maternity colonies limited to mid-May to August inclusive, however, it can also be limited due to bad weather, when bats are less active.

All 18 species of bat common in the UK (17 known to be breeding) are fully protected under the Wildlife and Countryside Act (as amended) 1981 through inclusion in Schedule V of the Act. All bat species in the UK are also included in Schedule II of The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, which transpose Annex II of the Directive 92/43/EEC 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora ("Habitats Directive") which defines United Kingdom protected species of animals.

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

This combined legislation makes it an offence to:

- Intentionally or deliberately kill, injure or capture bats.
- Deliberately disturb bats, whether at roost or not.
- Damage, destroy or obstruct access to bat roosts.
- Possess or transport bats, unless acquired legally.
- Sell, barter or exchange bats.

A bat roost is well-defined by the legislation as the 'resting place' of a bat. However, the word roost is used to describe this resting place and is generally accepted as the word describing where a bat or bats rest, feed or sleep.

1.3 Roost definitions

Roost definitions from Natural England's licensing documents (NE, 2024).

Day roost - a place where individual bats, small groups of males, rest or shelter in the day but are rarely found by night in the summer.

Night roost - a place where bats rest or shelter in the night but are rarely found in the day. May be used by a single individual on occasion or it could be regularly by the whole colony.

Feeding Roost - a place where individual bats or a few individuals rest or feed during the night but are rarely present in the day.

Transitional/occasional roost - used by a few individuals or occasionally small groups for generally short periods of time on waking from hibernation or in the period prior to hibernation.

Swarming site - where large numbers of males and females gather during late summer to autumn. Appear to be important mating sites.

Mating sites - sites where mating takes place from late summer and can continue through winter.

Maternity roost - where female bats give birth and raise their young to independence.

Hibernation roost - where bats may be found individually or together during winter. They have a constant cool temperature and high humidity.

Satellite roost - an alternative roost found in close proximity to the main nursery colony used by a few individual breeding females to small groups of breeding females throughout the breeding season.

Other - roosts not meeting the above definitions.

2.0 Methods

The survey follows the national guidelines Collins (2023) and Interim Guidance Note: Use of night vision aids for bat emergence surveys and further comment on dawn surveys (Bat Conservation Trust, May 2022) the following equipment is available for the inspection:

- Torches (e.g. LED Lensar type).
- Ladders (Standard 4m telescopic surveying ladder).
- Endoscope where holes, cracks and crevices are accessible.
- Mirrors (extendable and movable mirror face).
- Binoculars (Pentax close focus).
- Thermometer/hygrometer.
- Camera.
- Sample bags for collecting dropping and feeding evidence.
- Echo Meter Touch, EM3, and Pettersson D240X.
- IR night vision HD Camcorder, 12v IR flood lights or Nightfox whisker.

Night Vision Aids (NVAs) are used to cover the building alongside surveyors. These are not designed to replace surveyors, rather provide night vision, allowing for more accurate survey effort and when found, roost locations. **The cameras may not always capture bats entering/exiting roosts due to the size of the building, terrain, narrower field of view and other factors.** Video is processed in a video editor and checked in the office after the survey is completed, stills and snapshots are taken and used in reports, as per the guidelines.

Surveyors are positioned around the building(s), tree or structure in order to cover all elevations. The survey then observes emerging or entering bats from suitable features such as holes, cracks and crevices. Notes on commuting and foraging bats are also made in the surrounds.

2.1 Limitations

This survey provides a snapshot of the site at the time of the survey(s) only. Bats are highly mobile and can turn up from time to time unexpectedly. All care has been taken to ensure the results and recommendations are suitable to the context of the development and the information gathered on surveys.

If a deviation from the guidelines has been made, the reason and justification will be explained below:

No deviation from the standard guidelines has been made for this survey set.

Table 1: Roosting features (likelihood) of bat presence assessed against Collins (2023) guidelines *Source: Adapted from Collins (2023, pp44, table 4.1).*

Likelihood of bat presence (Habitat Value)	Features that bats can use, regardless of evidence being present.
Confirmed Bat Presence	Bats are found to be present during the survey. Evidence of bats is found to be present during the survey.
Higher likelihood of bat presence.	Pre-20th century or early 20th century construction. Agricultural buildings of traditional brick, stone or timber construction. Large and complicated roof void with unobstructed flying spaces. Large (>20 cm) roof timbers with mortice joints, cracks and holes. Entrances for bats to fly through. Poorly maintained fabric providing ready access points for bats into roofs, walls, bridges, but at the same time not too draughty and cool. Roof warmed by the sun, in particular south-facing roofs. Weatherboarding and/or hanging tiles with gaps. Low level of disturbance by humans. Bridge structures, follies, aqueducts and viaducts over water and/or wet ground.
Moderate and Lower likelihood of bat presence.	Modern, well-maintained buildings or built structures that provide few opportunities for access by bats. Small, cluttered roof space. Buildings and built structures comprised primarily of prefabricated steel and sheet materials. Cool, shaded, light or draughty roof voids. Roof voids with a dense cover of cobwebs and no sections of clean ridge board. High level of regular disturbance. Highly urbanised location with few or no mature trees, parkland, woodland or wetland. High levels of external lighting.

Negligible likelihood of bat presence.	No obvious features suitable for roosting, minor foraging or commuting.
None	No features suitable for roosting.

3.0 Results

The following section details the results of the desk study, inspection and survey; it includes MAGIC information, biological records data and map/aerial photo information. The results detail the building, structure or tree (numbered for reference) description of any evidence found and habitat value if no evidence has been located.

3.1 Desk Study

The desk study is centred on Grid Reference - TL 12561 32893 and Postcode - SG5 3HB.

3.2 MAGIC

The following statutory sites and Natural England Protected Species (NEPS) have been located within the 2km search area (Figure 1).

Table 2: MAGIC search results

Receptor	Distance and Direction to Nearest (m/km)	Description
Statutory sites	~1691m S	Knocking Hoe SSSI
	~1691m S	Knocking Hoe NNR
	~727m S	Chilterns AONB
Granted protected species licenses	~1643m SE	2010-1822 - common pipistrelle <i>Pipistrellus pipistrellus</i> , brown long eared <i>Plecotus auritus</i>
	~1633m SE	2013-5820 and 2018-37658 - common pipistrelle, brown long eared, natterer's <i>Myotis nattereri</i> , soprano pipistrelle <i>Pipistrellus pygmaeus</i>
Priority habitat	~1981m SW	Wood-Pasture and Parkland
	~1518m SE	Traditional Orchard
	On site	Deciduous Woodland
	~511m SW	Ancient & Semi-Natural Woodland
	~801m N	Lowland Meadows
	~367m SSE	Lowland Calcareous Grassland

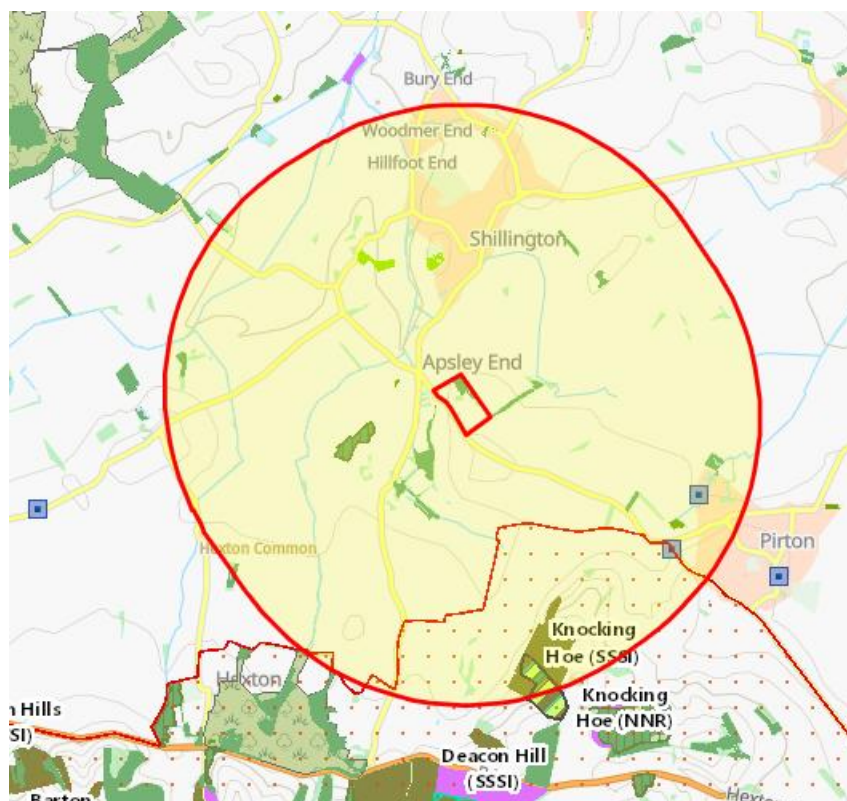


Figure 1: MAGIC Map Search.

3.3 Biological Records Data

A standard search of existing records for protected species and nature reserves has been commissioned, below details the results and site context. *Data older than 10 years old will not be included.*

Biological records were obtained from Bedfordshire & Luton Biodiversity Recording & Monitoring Centre (2025) and Herts Environmental Records Centre (2025). No records of bats were recorded within the last 10 years.

3.4 Site Location and Surrounds

The site is located in Shillington, Hertfordshire and is surrounded by arable fields in the immediate locale. Table 4 details the commuting, feeding and habitat features in a 1km radius of the site.

Table 4: Habitat features suitable for bat use.

Feature	Description
Watercourses	There is a large tributary of the River Hit that runs throughout the search area, ~155m west at its closest point. There is also a large network of additional tributaries and drains present within the search area.
Waterbodies	A pond is located ~5m from the site. There is a moat ~59m west, a pond ~76m west and a waterbody ~98m west. There are three ponds to the west northwest, the closest is ~432m. There are two ponds and a moat northwest, the closest is ~274m. There are five ponds to the north, the closest is ~504m. There is a pond ~865m south. There is a waterbody ~615m southwest.
Woodland	Priority deciduous woodland can be found on site. Additional areas can be found ~19m east and ~439m west. Wesley Spinney ~380m east, Lowerpiece Spinnies ~79m west and Aspleybury Wood ~513m west.
Linear e.g. hedgerows	Field margin hedgerows are abundant throughout the search area.
Pasture/arable/grassland	Arable fields and pasture dominate the search area.
Other	Allotments ~798m north.

3.5 Building, Tree or Other Structure

The following section details the structure(s) reference, bats located, evidence located and observed emergence/re-entry (see Figure 30 for Site Plan).

Building reference - B1 (Main House), B3 (Coach House).

Table 5: Weather Records

Date	Survey	Time: from/to	Weather: Start	Weather: Finish
07/05/2026	Dusk	20:20 to 22:20 SS: 20:35	Temp: 12 °C Humidity: 72% Cloud: 40% Wind: 2/12 Precip: None	Temp: 9 °C Humidity: 75% Cloud: 40% Wind: 2/12 Precip: None
28/05/2026	Dusk	20:40 to 22:40	Temp: 23 °C	Temp: 22 °C

		SS: 20:55	Humidity: 57% Cloud: 40% Wind: 3/12 Precip: None	Humidity: 61% Cloud: 10% Wind: 2/12 Precip: None
18/06/2026	Dusk	21:09 to 23:09 SS: 21:24	Temp: 21°C Humidity: 72% Cloud: 0% Wind: 2/12 Precip: None	Temp: 19°C Humidity: 79% Cloud: 0% Wind: 2/12 Precip: None

3.6 Observations

Table 6: Results and observations of the building, tree or structure.

Surveyor	Building, Tree or Structure	Dates, Times and Survey Type	Bat Activity Observed
TH	B1	07/05/2026 20:20 to 22:20 SS: 20:35	Five common pipistrelle passes were heard but not seen between 21:08 and 21:50.  Figure 2: Surveyor IR image.
DB	B1	As above	Three common pipistrelle passes were seen between 21:00 and 21:23. Seven common pipistrelle passes were heard but not seen between 21:15 and 21:50.

			 05/07/2020 22:03:54 Figure 3: Surveyor IR image.
KP	B1	As above	Two common pipistrelles were observed emerging from hung tiles on the northern side of the middle dormer at 21:03 Six common pipistrelle passes were seen between 21:00 and 21:50. Seven common pipistrelle passes were heard but not seen between 21:14 and 21:49. A brown long-eared pass was heard but not seen at 21:09.  05/07/2020 22:02:32 Figure 4: Surveyor IR image.
AWK	B1	As above	A common pipistrelle was seen foraging over the centre of the roof at 20:57. Four common pipistrelle passes were heard but not seen between 21:00 and 21:38, with constant social calling activity between 21:38 and 21:42.

			 05/07/2026 22:08:50 Figure 5: Surveyor IR image.
SD	B1	As above	A soprano pipistrelle pass was heard but not seen at 21:23.  05/07/2026 22:07:58 Figure 6: Surveyor IR image.
JN	B2	As above	A soprano pipistrelle pass was heard but not seen at 21:30. A common pipistrelle pass was heard but not seen at 21:35.  05/07/2026 21:58:18 Figure 7: Surveyor IR image.

ER	B2	As above	Three passes of foraging common pipistrelle were seen between 21:05 and 21:12. Four common pipistrelle passes were seen between 21:14 and 21:29. Common pipistrelle passes were heard but not seen at 21:00 and at 21:51. A soprano pipistrelle pass was seen at 21:35.  05/07/2028 22:01:08 Figure 8: Surveyor IR image.
MF	B2	As above	A common pipistrelle pass was seen at 21:39. Three common pipistrelle passes were heard but not seen between 21:07 and 21:51.  05/07/2028 22:01:08 Figure 9: Surveyor IR image.
AM	B2	As above	Five common pipistrelle passes were seen between 21:13 and 21:50. Nine common pipistrelle passes were heard but not seen between 21:00 and 21:47.

			 05/07/2020 22:15:07 Figure 10: Surveyor IR image.
JN	B1	28/05/2026 20:40 to 22:40 SS: 20:55	A Leisler's pass was heard but not seen at 21:48.  05/28/2026 22:00:43 Figure 11: Surveyor IR image.
DB	B1	As above	A common pipistrelle was seen emerging from underneath the fascia board above the hung tiles at the gable apex of the righthand (western) of the three dormers at 21:29. A common pipistrelle pass was seen at 22:09. Seven common pipistrelle passes were heard but not seen between 21:39 and 22:30. A Nathusius' pipistrelle pass was heard but not seen at 22:33.

			 Figure 12: Surveyor IR image.
KP	B1	As above	The same common pipistrelle emergence from underneath the fascia board above the hung tiles at the gable apex of the righthand (western) of the three dormers at 21:29 was seen. An unidentified <i>Myotis</i> sp. pass was heard but not seen at 21:36. 11 common pipistrelle passes were heard but not seen between 21:39 and 22:30. A brown long-eared bat pass was heard but not seen at 22:20. A Nathusius' pipistrelle pass was heard but not seen at 22:33.  Figure 13: Surveyor IR image.
AWK	B1	As above	Two common pipistrelles were seen foraging around the trees west of B1 between 21:53 and 22:03. Common pipistrelle feeding buzzing and social calling activity was heard but not seen between 22:06 and 22:14.

			 05/28/2028 22:43:17 Figure 14: Surveyor IR image.
AM	B1	As above	Noctule passes were heard but not seen at 21:39 and at 22:38. Six common pipistrelle passes were seen between 21:40 and 22:05, with constant foraging activity observed between 21:53 and 22:05. A common pipistrelle pass was heard but not seen at 21:40.  05/28/2028 22:43:54 Figure 15: Surveyor IR image.
RN	B2	As above	No activity observed.  05/28/2028 22:40:24 Figure 16: Surveyor IR image.

ER	B2	As above	Common pipistrelle passes were seen at 21:39 and at 21:52. A common pipistrelle was seen foraging around the building at 22:10. A soprano pipistrelle was heard but not seen at 21:54. Three common pipistrelle passes were heard but not seen between 21:56 and 22:31.  Figure 17: Surveyor IR image.
BN	B2	As above	Six common pipistrelle passes were heard but not seen between 21:29 and 22:36. A commuting common pipistrelle was seen at 21:59. A Nathusius' pipistrelle pass was heard but not seen at 22:33.  Figure 18: Surveyor IR image.
CAM	B2	As above	No activity observed.

			 05/28/2026 22:31:31 Figure 19: Surveyor IR image.
JN	B1	18/06/2026 21:09 to 23:09 SS: 21:24	Common pipistrelle passes were heard but not seen at 22:37 and at 22:43.  06/18/2026 22:41:14 Figure 20: Surveyor IR image.
DB	B1	As above	A brown long-eared bat was seen emerging from underneath the fascia board above the hung tiles at the gable apex of the righthand (western) of the three dormers at 21:48. Five common pipistrelle passes were heard but not seen between 21:59 and 22:45. Five common pipistrelle passes were seen between 22:04 and 22:22. Constant Nathusius' pipistrelle foraging activity was seen between 22:25 and 22:27.

			 Figure 21: Surveyor IR image.
KP	B1	As above	The same brown long-eared bat emergence from underneath the fascia board above the hung tiles at the gable apex of the righthand (western) of the three dormers at 21:48 was seen. A brown long-eared pass was heard but not seen at 21:50. Nine common pipistrelle passes were heard but not seen between 21:59 and 22:46. 10 common pipistrelle passes were seen between 22:05 and 22:43, with constant foraging activity observed between 22:23 and 22:34. Constant Nathusius' pipistrelle foraging activity was heard but not seen between 22:23 and 22:34. A Nathusius' pipistrelle pass was heard but not seen at 22:53.  Figure 22: Surveyor IR image.
RB	B1	As above	Common pipistrelles were seen foraging around the trees north of B1 at 22:26 and at 22:40. Five common pipistrelle

			passes were heard but not seen between 22:01 and 22:32. Three Nathusius' pipistrelle passes were heard but not seen between 22:06 and 22:33.  06/18/2028 22:52:45 Figure 23: Surveyor IR image.
AM	B1	As above	A noctule pass was heard but not seen at 21:53. Six common pipistrelle passes were heard but not seen between 21:59 and 22:54. Six common pipistrelle passes were seen between 22:05 and 22:43, with constant foraging activity observed between 22:09 and 22:38.  06/18/2028 22:51:45 Figure 24: Surveyor IR image.
RN	B2	As above	Three distant passes of unidentified bats were seen but no calls were detected between 21:57 and 22:46.

			 06/18/2026 23:02:37 Figure 25: Surveyor IR image.
ER	B2	As above	11 common pipistrelle passes were seen between 22:00 and 22:26, with constant foraging activity observed between 22:03 and 22:07 and again between 22:15 and 22:17. 14 common pipistrelle passes were heard but not seen between 21:55 and 22:46. Three Nathusius' pipistrelle passes were heard but not seen between 21:56 and 22:23. A noctule pass was heard but not seen at 22:56.  06/18/2026 23:01:23 Figure 26: Surveyor IR image.
SD	B2	As above	Five passes of foraging common pipistrelles were seen between 21:59 and 22:45. 14 common pipistrelle passes were heard but not seen between 22:044 and 22:53. Constant Nathusius' pipistrelle foraging activity was heard but not seen between 22:24 and 22:29. A serotine pass was heard but not seen at 22:56.

			 Figure 27: Surveyor IR image.
CAM	B2	As above	No activity observed.  Figure 28: Surveyor IR image.
Summary of surveys and supplementary observations: 07/05/2026 - Two common pipistrelles were observed emerging from hung tiles on the northern side of the middle dormer at 21:03. General bat activity observed in the area. 28/05/2026 - A common pipistrelle was seen emerging from underneath the fascia board above the hung tiles at the gable apex of the righthand (western) of the three dormers at 21:29. General bat activity observed in the area. 18/06/2026 - A brown long-eared was seen emerging from underneath the fascia board above the hung tiles at the gable apex of the righthand (western) of the three dormers at 21:48. General bat activity observed in the area. Any other protected species that would be affected by the development:			

18/06/2026 - A bird, likely a pied wagtail *Motacilla alba*, was observed brooding on a nest on B1 (Figure 29).



Figure 29: Brooding bird, likely a pied wagtail.

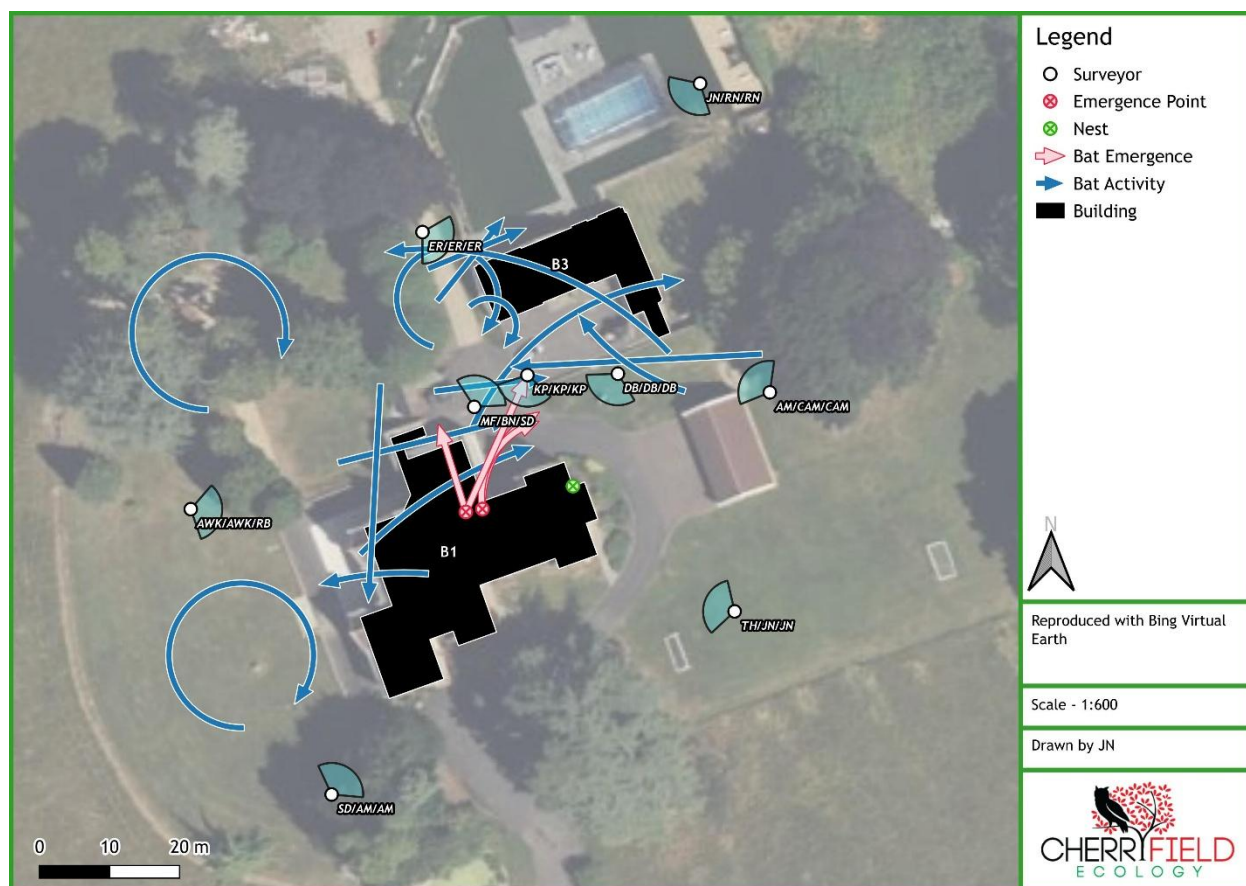


Figure 30: Site Plan.

4.0 Conclusions, Discussion, Impacts and Recommendations

The following section details the conclusions, discussion and recommendations in the context of the proposed works.

Building reference - B1 (Main House), B3 (Coach House).

4.1 Conclusion and Discussion

The proposals include for demolition of part of B1 and a new residential development.

- The surveys have shown the presence of two day roosts for common pipistrelle, one under the hung tile on the northern side of the middle dormer and one at the gable apex of the righthand (western) of the three dormers.
- The surveys have also shown one day roost for brown long-eared bat, also at the gable apex of the righthand (western) of the three dormers.
- Due to the placement of the emergences being from the apex of the dormer, this is likely to be connected to the remaining area of the roof and the location where droppings were found within the interior loft voids. As such, the droppings within the loft is not considered to be a separate roost location.
- All the surveys show that the surrounding grounds are being used for foraging and commuting by bats.
- A bird, likely a pied wagtail, was observed brooding on a nest on B1.

4.2 Potential Impact

Impact assessments must be proportionate to the scale of the development (CIEEM, 2018) and the following details a proportionate impact assessment based on current information.

Table 7: Impact Assessment.

Impact	Bats (B1) - Three day roosts will be lost in the development. Breeding Birds - Active nests may be lost in the development.
Characterisation of unmitigated	Bats (B1) - A low-level loss/impact at a local level.

impact on the feature	Breeding Birds - A low-level loss/impact at a local level.
Effect without mitigation	Without mitigation, individual bats and birds could be killed, injured or trapped during the works.
Mitigation and or enhancement	See Table 8 and 9
Significance of effects of residual impacts (after mitigation)	Bats (B1) - If lost roosts are replaced by bat boxes, the effects would be negligible. Breeding Birds - If lost habitat is replaced by bird boxes and mitigation is followed, the effects would be negligible.

4.3 Recommendations

The below details the recommended mitigation and compensation required.

License type required: Bat Mitigation Class

Roost type: 2x common pipistrelle day and 1x brown long-eared bat day

Table 8: Mitigation and Compensation

Work	Specification
General Information	A Natural England Protected Species Licence must be applied for in order to allow the works to proceed, post-grant of planning. The Three Tests to be answered before planning can be granted (NE, 2017): <i>Test 1:</i> 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 1 can be achieved via the ‘imperative reasons of overriding public interest’. Although not for the ecologist to determine the planning officer will on grant of consent. <i>Test 2:</i> Regulation 53(9)(a) states: the appropriate authority shall not grant a licence unless they are satisfied “that there is no satisfactory alternative”. Test 2 would be achieved on the grant of consent as no other sites have been considered for the development. <i>Test 3:</i> 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.” Test 3 will be achieved once full mitigation appropriate to species and population has been designed and implemented via a NEPS licence issued from the statutory authority (Natural England).
Roof and tile linings	‘When a bat roost is present and being mitigated/compensated we advise that the type of linear for the tiles/roof used is a bitumen type 1 traditional felt. The reasoning for this is twofold; firstly, bats can damage the Modern Roofing Membrane (MRM), meaning that the MRM will become useless allowing water to pass through from above and, secondly, bats will become trapped in the fibres and die from dehydration and starvation. There is no reason that building regulations will not allow a traditional ‘cold roof’ and, therefore, this should be designed into any project where bats will be able to access the roof/loft or hung tile/weatherboarding etc. However, Natural England will accept an MRM being used in a bat roost under the following circumstances - The MRM must have passed the testing regime set out in Essah <i>et al.</i> (2020) and a certificate must be provided as proof of this.’ Natural England will accept an MRM being used in a roost of any type with evidence of the MRM having passed the propensity snagging test.
Mitigation and compensation to be installed via a Bat Mitigation Class Licence application	Bat Mitigation Class Licence: Works can occur at any time under a Bat Mitigation Class Licence (BMCL) once granted by Natural England. Any demolition will require the supervision of a bat-licensed ecologist. The suitable roosting features will be stripped by hand only. All areas within the roof and dormers will be checked for bats i.e. endoscope (where possible). If bats are found, these will be removed by hand and placed in bat boxes that will be in place before works begin. Bat boxes (Figure 31) will be installed on retained trees or buildings; it is currently understood that there are trees close to B1 that can be used for this purpose.



Figure 31: Chillon Woodstone Bat Box (British-made)

A minimum of three Chillon Woodstone bat boxes will be hung on trees or the building at a minimum of 3m from ground level and face south/southwesterly. These boxes are known to be used by Brown Long-Eared bats (BLEB) and crevice-dwelling species.

No further mitigation or compensation is required under this licence.

Commuting bats were using the grounds and surrounds; therefore, any tree, hedges or linear feature should be retained if possible.

Lighting

Any lighting near or shining onto any trees will be designed to minimise the impact it has on potential bat roosting and commuting.

Lighting will be in line with the BCT lighting guidelines (Bats and Lighting in the UK (Bat Conservation Trust, 2023) <https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/>

This lighting, where possible, will be of low level, be on downward deflectors and be on PIR sensors. Using LED directional lighting can also be a way of minimizing the light spill affecting the habitat. No up-lighting should be used.

This will ensure that the roosting and commuting resources that the bats are using are maintained.

The local planning authority has a duty to impose enhancements. The following table details the affordable and simple enhancements suitable for the site (Table 9).

Table 9: Enhancements to allow a net gain for protected species.

Work	Specification
Enhancements to provide a net gain as per the LPA's duty.	Bat tubes (Figure 32) can be installed within the new buildings. These require no maintenance and can be hidden by facing the tube with the cladding/brick etc. for aesthetics.  Figure 32: Example of bat tube Alternatively, bat boxes (see Figure 31) can be installed on retained trees or buildings. These should be of the Chillon type e.g. Woodstone, be no less than three metres off ground level and face south/southwesterly. No artificial light should shine on the boxes and clear flight paths to and from the boxes should be considered.

5.0 References

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