

Preliminary Roost Assessment

**Robin Hood & Little John PH, Rabley
Heath Road, Codicote AL6 9UB**

For Mr D. Nye

November 2025



Report: SE2570

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LIMITATIONS AND EXCEPTIONS

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This report takes account of the client's instructions and requirements. It is not intended for and should not be relied upon by any third party, and no responsibility is undertaken to any third party.

This report is prepared and written in the context of the proposals outlined in the introduction and should not be used in a different context. If any change in circumstances occurs or if 18 months have passed since the date of the report, the report should be referred to the author for reassessment and, if necessary, reappraisal.

The Summary and Recommendations sections of the report provide an overview and guidance only and should not be relied upon explicitly until considered in the context of the whole report. Interpretations and recommendations in the report represent my professional opinion, developed in accordance with accepted industry practices and current legislation at the time of writing. No responsibility is accepted for any inaccuracies in the supplied data.

Scientific survey data will be shared with the local biological records centre in accordance with professional codes of conduct.

Limitations of Surveys

This report documents the wildlife observed during the survey, along with anecdotal evidence of certain species. It does not record any animals or plants that may appear at other times of the year and were, therefore, not evident during the survey visits. The behaviour of animals can be unpredictable and may not conform to standard patterns recorded in scientific literature. Therefore, this report cannot predict with absolute certainty that animal species will occur in apparently suitable locations or that they will not occur in locations or habitats that appear to be unsuitable. Habitats outside the site boundary were visited only when considered appropriate and when access was available.

This survey is valid for 18 months. If development does not occur within this period, it is recommended that the survey be repeated as part of a comprehensive ecological reappraisal.

Andrew Palmer BSc (Hons), DipLA, MCIEEM
Sound Ecology – November 2025

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1 EXECUTIVE SUMMARY

Sound Ecology has compiled this report on behalf of Mr D. Nye. It pertains to the replacement of a storage building at the Robin Hood & Little John PH, Rabley Heath Road, Codicote AL6 9UB.

The report comprises the findings and recommendations of a Preliminary Roost Assessment (PRA) that has been extended to cover other relevant habitats and species.

Development Proposals

The 140 m² site lies to the rear of the public house in a largely paved area occupied by a dilapidated storage outbuilding. The proposal involves replacing these outbuildings with staff accommodation. The existing structures will be demolished, and a static and mobile caravan will be removed. The ground the caravans were parked on will be reinstated as a garden.

Biodiversity Net Gain Exemption

The proposal involves the loss of fewer than 25 m² of vegetated habitat, comprising poor-condition, species-poor modified grassland subject to significant foot traffic. No irreplaceable or priority habitats are present, and the proposals do not impact significant habitats, including trees. Consequently, the proposals fall within the *de minimis* exemption, and BNG does not apply.

Survey Results

No evidence of protected and notable species was recorded within the outbuildings within the red line boundary, or in those immediately adjacent to it, or in nearby mature trees. Concerning bats, the outbuilding offers negligible roosting opportunities due to an absence of suitable features. The site held negligible suitability for commuting bats and foraging behaviours, albeit this was raised to moderate when considering nearby vegetated boundaries. Additionally, the site offers negligible suitability for other protected species and is notable (NERC s41); therefore, no further surveys are merited.

Evaluation, Mitigation and Enhancement

The proposals would have negligible detrimental impacts on sites, protected habitats, and species, and would have no lasting detrimental effects on species conservation. A Precautionary Working Methods Statement (PWMS) for demolition, site clearance, and construction work will help avoid potential low-level risks to wildlife.

The proposals will incorporate new habitat opportunities for wildlife likely to occur within the local area (i.e. bat and bird boxes). Due to the new structure's unsuitability, these enhancements will be located away from areas of high disturbance.

2 INTRODUCTION AND OBJECTIVES

2.1 Introduction

Sound Ecology has compiled this report on behalf of Mr D. Nye. It pertains to the replacement of a storage building at the Robin Hood & Little John PH, Rabley Heath Road, Codicote AL6 9UB (hereinafter referred to as 'the site').

The report comprises the findings and recommendations of a Preliminary Roost Assessment (PRA) that has been extended to cover other relevant habitats and species. The assessment informs a planning application and evaluates development constraints arising from ecological issues, ensuring compliance with wildlife legislation (Appendix A1). It also allows any work that may otherwise be detrimental to protected and biodiversity species to be appropriately scheduled.

Andrew Palmer BSc (Hons), DipLA, MCIEEM, undertook the survey and produced this report (See 3.1)

2.2 Site Location, Description, and Development Proposals

The 140 m² site lies to the rear of the public house in a largely paved area occupied by a dilapidated storage outbuilding. The proposal involves replacing these outbuildings with staff accommodation. The existing structures will be demolished, and a static and mobile caravan will be removed. The ground the caravans were parked on will be reinstated as a garden.

The site is located within a primarily rural setting. It lies 1 km away from Mardley Heath LNR, the only statutory nature conservation site within a 2-km radius.

2.3 Scope and Objectives

The objectives of the survey are:

- To undertake a scoping exercise to assess potential impacts on protected habitats and species.
- To recommend follow-up species surveys as needed.
- To make recommendations to mitigate potential negative impacts arising from development proposals.
- To recommend enhancing on-site habitats and wildlife opportunities, resulting in an overall net gain in biodiversity.

2.4 Biodiversity Net Gain Exemption

The proposal involves the loss of fewer than 25 m² of vegetated habitat, comprising poor-condition, species-poor, and heavily trafficked modified grassland. No irreplaceable or priority habitats are present, and the proposals do not impact significant habitats, including trees. Consequently, the proposals fall within the *de minimis* exemption, and BNG does not apply.

3 METHODOLOGIES

3.1 Surveyor

The survey was conducted by Andrew Palmer (AP), an experienced ecologist who also meets the requirements of a Suitably Qualified Ecologist (SQE) as specified in BS 42020:2013. AP has held a Level 2 Bat Survey Licence since 2011 (Class Licence Registration Number: 2015-12285-CLS-CLS) and Great Crested Newt and Barn Owl Survey Licences (Class Licences 2017-32763 and CL29/0057).

3.2 Desk Study

A desk study was undertaken to provide an ecological context and inform an assessment of the potential ecological constraints to development. MAGIC (Multi-Agency Geographic Information for the Countryside) was searched in November 2025. Current Ordnance Survey maps and aerial photographs were used to identify features within a 500-metre radius of the site that may be used by protected or notable species. Given the modest, localised and discrete nature of the proposal, it is not considered necessary to undertake a biological records data search.

3.3 Habitat Survey

The survey involved a site visit on November 13, 2025, to record and map habitat types and ecological features. A November date is not a constraint, given the habitats present.

3.4 Protected and Biodiversity Species Assessment

The site was inspected for evidence of protected and notable (s41) species and assessed for potential to support them. This included species listed under all relevant English legislation (as Appendix A1). The following protected and notable species were considered within the assessment.

3.4.1 Bats

The buildings were thoroughly examined in accordance with the Bat Survey Guidelines (BSG) outlined in the BCT Good Practice Guidelines (Collins, 2023). The survey sought evidence of bat utilisation and roost suitability, with the findings categorised as outlined in Table 1. No trees were present, but the nearby ones were also appraised.

Table 1a: Assessment of Bat Roosting Potential in Buildings (adapted from Collins, 2023).

Suitability	Assessment of features present that potentially support roosting bats
None	An absence of suitable roost features
Negligible	Negligible habitat features - unlikely to be used by roosting bats.
Low	The few potential roosting sites are likely to be used by a <i>low number of transient</i> bats.
Moderate	Potential roosting sites, but with features <i>unlikely</i> to support maternity or hibernation.
High	Roosting sites of potential higher conservation value.

3.3.2 Bat Foraging and Commuting:

Using the BCT Guidelines (summarised in Table 2), the suitability of habitats for supporting bat foraging and commuting activities was assessed.

Table 2: Assessment of Bat Activity Suitability (Commuting and Foraging) in Surrounding Habitat—adapted from Collins (2023). [High Suitability is not relevant.]

Suitability	Commuting and foraging habitats
None	No habitat features for commuting or foraging bats were present.
Negligible	Very few habitat features are available for commuting or foraging bats.
Low	Isolated or poorly connected habitat that could potentially support small numbers of foraging and commuting bats.
Moderate	Continuous habitats connected to the wider countryside.

3.4.2 Amphibians

Great Crested Newt (GCN) surveys are only relevant where suitable breeding ponds are present within 250 m (this may be extended to 500 m where the habitat between the site and ponds is *highly suitable*). There were potentially suitable breeding habitats within a 250 m radius. However, these lay 150 m away, had previously been surveyed (as part of the Great Crested Newt Pond Surveys 2017 – 2019), and had a below-average Habitat Suitability Index (HSI). Given the site's nature and the absence of suitable habitat within the application boundary to support GCN, further consideration of risks to this species was unnecessary.

3.4.3 Other Species

The site was not considered suitable for Badgers or other widespread reptiles. However, it was assessed for suitability to support other protected and notable fauna species and assemblages, including birds and Hedgehog. Additionally, the site was searched for invasive non-native species (INNS), including Japanese Knotweed.

3.5 Limitations and Assumptions

No significant limitations were identified, and the surveys adhered to established good practice guidelines. Adjacent land was only examined closely where public access was possible.

4 RESULTS

4.1 Desk Survey - Designated Sites and Habitats

Statutory or non-statutory nature conservation designations do not cover the Site. There was one statutory site within a 2-km radius: Mardley Heath LNR. While the site falls within the Impact Risk Zones of another SSSI, it does so at a distance where impacts would not be anticipated, and no further action is required.

4.2 Desk Survey - Protected and Biodiversity Species

4.2.1 Protected Species

No European Protected Species applications were granted for Great Crested Newts within 2 km. Four EPS licences were granted for bats, but all were more than 1.5 km away and therefore not material to the proposals. No further consideration is necessary.

4.3 Habitat Survey

Figure 1 shows the distribution of measurable habitats. These are also illustrated in the photographs below. No irreplaceable or priority habitats were recorded.

Figure 1: Baseline Habitats



The site was recorded as 140 m², of which only 23 m² was vegetated with modified grassland comprising Perennial Rye-grass, Creeping Thistle, Ground Ivy, White Dead-nettle and Petty Spurge. The area was regularly cut short to maintain it as a lawn, though significant wear and bare areas were evident (Photo 5).

The two outbuildings comprised timber-clad, timber-framed sheds with bitumen felt roofs. Both were in poor condition. The larger was clad in tongue-and-groove boards (Photos 1-3, while the smaller was in horizontal weatherboard (Photos 4-6).

Adjacent Habitats: The surrounding landscape was primarily pasture. The proposals would not impact these habitats.

4.4 Protected and Notable Species Scoping Survey

4.4.1 Bats

There was no evidence of bat utilisation within the outbuildings, and they were considered to offer negligible roost suitability due to the absence of external crevices. No further bat roost assessment is required.

The site was unsuitable for bats' foraging and commuting, and it is unlikely that bats would rely on it, given the absence of taller vegetation or trees. Adjacent hedgerows with trees offer moderate suitability but will not be significantly impacted.

4.4.2 Other species

There was no evidence of other protected or notable (s41) species and no suitability to support these species. There was no evidence of nesting within the structures.

Photographs: **1** – The two outbuildings viewed from the south. **2** – The larger structure viewed from the east. **3** – The interior of the larger building. **4** – The yard adjacent to the outbuildings. **5** – The small area of grass which will be developed. **6** – The interior of the smaller outbuilding.



5 DISCUSSION

5.1 Designated Conservation Sites

The proposed redevelopment is not sufficiently close or on a scale to pose risks to local sites or more distant, nationally recognised sites of conservation value.

5.2 Potential Impacts on Biodiversity

Potential impacts on protected and S41 species are negligible, and the proposed redevelopment is not constrained by ecological sensitivity. Nevertheless, Precautionary Working Methods (PWMS) are applied to eliminate low-level risks.

5.3 Further Ecological Surveys

The nature of potential impacts is fully understood, and consequently, no further ecological surveys are required.

5.4 Opportunities for Biodiversity Enhancement

The proposals will incorporate proportionate opportunities for enhancing biodiversity.

6 RECOMMENDATIONS

6.1 Precautionary Working Methods Statement (PWMS)

PWMS applies immediately before and during construction. Therefore, a copy of this report should be retained on-site during clearance and construction work. All site operatives should be made aware of its contents where they are relevant to the tasks they are undertaking. Additionally, the contact details of a Suitably Qualified Ecologist (SQE) should be made available in case advice is required during operations.

6.2.1 Protected Species

Construction personnel will conduct a brief site walkover and check excavations each day before work commences to ensure no protected species have entered the site overnight.

At any time, if protected species are found during site clearance, demolition, or construction, work will stop and the SQE will be contacted immediately for advice. Protected species should not be handled unless they are an immediate and unavoidable danger*. If this arises, the SQE should be contacted immediately. The animal should then be secured in an escape-proof, ventilated container and stored in a shady location before being released by the ecologist. [*Bats should be handled with gloves to prevent injury to the animal and to avoid being bitten.]

6.2.2 Birds

Pre-work inspections should be conducted to ensure that nesting birds are not present. If nesting birds are found during clearance or construction, work will stop, and the SQE will be contacted immediately for advice.

All bird species are offered protection under the Wildlife and Countryside Act 1981 (as amended) when nesting or preparing nests (typically, but not exclusively, between March and August inclusive). As such, it is recommended that the workforce conduct a nesting bird check before commencing work. If active nests are observed, structures must be left alone until the SQE is satisfied that the young have successfully fledged.

6.2.3 Site Clearance

Structures - Where structures have crevices or holes, they should be checked before demolition using a torch to ensure there is no wildlife present. Additionally, when stripping roof fascias or timber cladding, constant surveillance must be applied. This work should initially be undertaken with hand tools until the operative is satisfied that it is safe to proceed with machinery. Contact the SQE for advice if in doubt.

Ground Works and Miscellaneous - Short-mown vegetation should be maintained on-site throughout the pre-demolition period to prevent it from becoming a favourable habitat for species that may be harmed during the works. Care should be taken to avoid harming Hedgehogs and amphibians. In all cases, the area should be checked before cutting commences. Once cut short, these areas should be maintained as short swards.

During debris clearance and timber and rubble pile removal, care should be taken to check these areas before moving to ensure that wildlife is not seeking refuge. Loose material piles should be dismantled manually rather than mechanically. It is advisable to bring and store only building products intended for use on the day of the site. If building products need to be stored on-site (e.g., overnight or for a few days), they should be stored on pallets or in bags on pallets to prevent the creation of refuges that attract wildlife. Where possible, building products should be placed on hard standings.

All excavations created during construction (e.g., for foundations or services) should be filled in and finished on the same day to avoid leaving any traps into which animals might fall. If this is unavoidable, then an escape route is provided overnight from the hole, which can be in the form of a wooden plank cut into the bank to provide a ramp, or the hole is entirely covered by a heavy sheet or slab flush to the surrounding ground and without holes at the sides, to exclude amphibians from crawling beneath. If in doubt, pile soil along the slab's edges to seal the edges.

Security and work floodlighting should be used only where necessary to avoid potential detrimental impacts on commuting bats during construction. These lights should not continuously illuminate boundary vegetation at night. The principles outlined below, as set out in the Institute of Lighting Professionals' Guidance Note, should also be applied to lighting during the construction phase.

6.2 **Mitigation – New Lighting**

There should be no additional light spillage onto the surrounding boundary habitats to avoid detrimental lighting impacts on bats and nocturnal wildlife using the Site. Lighting should be restricted to the minimum level of illumination necessary for safety and security, and only where necessary. The following measures should be implemented within the lighting scheme:

- New column-mounted luminaires, lighting bollards, and wall-mounted luminaires should be selected, sited, and angled to prevent unnecessary spillage of light onto areas without illumination.
- Ensure new LED luminaires have dimming capability, a warm white spectrum (ideally less than 2700 K, but below 3500 K) with peak wavelengths higher than 550 nm, and no UV output.
- Security lamps should use a trigger (e.g., passive infrared detector) and switch off after a short period (ideally 1-2 minutes) rather than remaining on all night.

Further guidance is available in 'Bats and Artificial Lighting in the UK' (ILP 2023).

6.3 Biodiversity Enhancement Proposals

6.3.1 Proposed Enhancements

The proposed staff accommodation building is unsuitable for the inclusion of bat and bird boxes. The area is highly disturbed and highly illuminated; the new building is a single storey; the most suitable elevation is the northwest, which is highly glazed, and the location of the bedrooms. Therefore, it is proposed that a bat and a bird box be fixed to trees within the gardens, well away from potential disturbance, and the far west of the site is ideal. Here, two large Oak trees could readily accommodate a durable bat box, such as a Vivara Pro CJM Woodstone Bat Box (<https://www.nhbs.com/triple-crevice-woodstone-bat-box>) and a Schwegler Little Owl Box (<https://www.nhbs.com/schwegler-little-owl-box-20b>), for example. These are proportionate to the scale of development and can deliver a meaningful benefit.

6.3.2 Programme and management of enhancement features

Installation of all features will be completed before the first residential occupancy and confirmed in writing to the Local Planning Authority. The selected non-landscape habitats (boxes and fence holes) require no maintenance.

7 REFERENCES

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

Institution of Lighting Professionals (2023). *Bats and artificial lighting in the UK*. Guidance Note 08/23.

A1 LEGISLATIVE CONTEXT

A1.1 Protected and Notable Species and Habitats

A1.1.1 European Protected Species (bats, great crested newts, otters, dormice, and others)

This information is intended solely as guidance, and the relevant Acts should be consulted for the correct legal wording.

European Protected Species (EPS) are protected under the EC Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora, also known as the Habitats and Species Directive. This legislation is enacted under the Conservation of Habitats & Species Regulations 2017 (the 2017 Regulations). Therefore, works that impact EPS will likely require a licence from Natural England.

Broadly, it is an offence to:

- Intentionally or recklessly/deliberately injure, take, or kill a bat (or other EPS).
- To possess a bat (unless obtained legally), alive or dead.
- Intentionally or recklessly/deliberately damage, destroy or obstruct access to any place that bats (or other EPS) use for shelter or protection, whether bats are present or not.
- Intentionally or recklessly/deliberately disturbs a bat (or other EPS) while occupying a structure or place it uses for shelter or protection.
- Deliberately disturb bats (or other EPS) in such a way as to be likely to affect significantly:
 - i. The ability of any significant group to survive, breed, rear or nurture their young
 - ii. The local distribution or abundance of that species.

Prosecution could result in imprisonment, fines of £5,000 per affected animal, and the confiscation of vehicles and equipment used.

A European Protected Species Licence is required before any development that may impact bats and their roosts, or other European Protected Species (EPS). An EPS licence could be required for (relevant examples):

- Demolition of a building known to be used by bats prior to the development of a site.
- When removing trees or pruning out features in which bats roost.
- When undertaking significant alterations to roof voids used by bats.

Exemptions can be granted from the protection afforded to bats under the Habitat Regulations by means of an EPS (European Protected Species) Habitats Regulations licence obtained from Natural England (NE).

Three tests must be satisfied before a licence can permit otherwise prohibited acts. In this case, only Regulation 53(2)(e) is relevant for preserving public health or safety, or for other overriding public-interest reasons. This includes social or economic ones, with beneficial consequences of primary importance to the environment.

This is subject to Natural England's satisfaction that the application additionally meets:

- Regulation 53(9)(a) that there is no satisfactory alternative.
- Regulation 53(3)(b) that the action authorised will not be detrimental to the maintenance of the species concerned at a favourable conservation status in their natural range.

A1.1.2 UK Protected Species (including EPS species, badgers, water voles, barn owls, reptiles, etc.)

In England, Scotland and Wales, all bat species are also protected under the Wildlife and Countryside Act (WCA) 1981 (as amended) through inclusion in Schedule 5. The offences under this Act, which cover the obstruction of places used for shelter or protection, disturbance, and sale, still apply to European Protected Species.

In England and Wales, the WCA is amended by the Countryside Rights of Way Act 2000 (CROW), which adds an additional offence ('or recklessly') to S9(4)(a) and (b)), makes species offences arrestable, increases the time limits for some prosecutions and increases penalties.

Other species receive protection at a national level, typically against injury and killing, but this may also include the destruction of their resting places, as well as collection and sale (the latter may also apply to selected named plants). The more common reptile species have partial protection and are also Species of Principal Importance (SPI).

Certain species are protected under other national legislation, for example, the Protection of Badgers Act 1992, which provides special protection against harm to badgers or their setts.

A1.1.3 Biodiversity Species and Habitats

Some species and habitats that do not merit national protection are nevertheless threatened or endangered at a local scale, usually at the county level, or have been found to have undergone rapid decline. These are listed on the UK Species/Habitats of Principal Importance (S41) list or in county Local Biodiversity Action Plans (BAPs) and are part of the NPPF lower tier.

A1.2 **Planning**

A1.2.1 General

The National Planning Policy Framework (NPPF) (MHCLG, 2024) outlines the Government's planning policies for England and explains how these policies are expected to be applied. The NPPF states that the purpose of the planning system is to contribute to sustainable development and minimise impacts on, while providing net gains for, biodiversity. This includes establishing coherent ecological networks that are more resilient to current and future pressures, as well as incorporating features that support priority or threatened species, such as swifts, bats, and hedgehogs.

In addition, it aims to promote the conservation, restoration, and enhancement of priority habitats and ecological networks, the protection and recovery of priority species, and the identification and pursuit of opportunities to achieve measurable net gains for biodiversity.

The Natural Environment and Rural Communities Act (OPSI 2006) (section 40(1)) states that: *"Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity."*

A1.2.2 Species/Habitats of Principal Importance and Biodiversity

A list of species and habitats of principal importance (SPI & HPI) has been produced to aid in assessing and evaluating biodiversity impacts. Natural England has produced standing advice (*Purpose and use of the England Biodiversity List*) regarding SPI as follows:

The England Biodiversity List has been developed to meet the requirements of Section 41 of the Natural Environment and Rural Communities Act (2006). This legislation requires the Secretary of State to publish a list of species of flora and fauna, as well as habitats considered to be of principal importance, for the purpose of conserving biodiversity. The S41 list will be used to *guide* decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 40 of the Natural Environment and Rural Communities Act 2006 *"to have regard"* to the conservation of biodiversity in England, when carrying out their normal functions (author's italics).

