

Preliminary Roost Appraisal

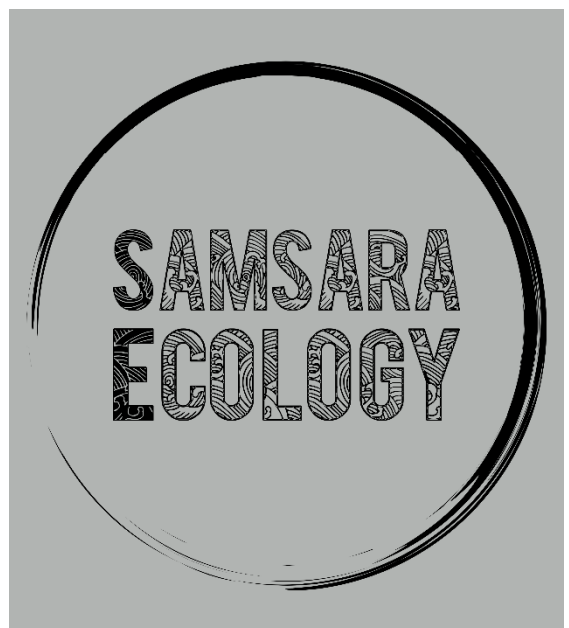
Winch Hill, Luton

Dean Eldridge

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Winch Hill, Luton

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¹ <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>

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Summary

Samsara Ecology Ltd was commissioned to undertake a Preliminary Roost Appraisal (PRA) at Winch Hill, Luton, on the 12th of October, 2023. The Site was revisited in August 2024, and the report has been updated to reflect changes to the proposed design.

The proposed development only impacts built structures, so the appropriate level of survey focuses on nesting birds and bats as the habitats are only suitable to support these species.

The survey found a site of low ecological value.

Recommendations have been made and include the following:

- Precautionary methods of work should be applied during construction to avoid an offence regarding bats.
- Sensitive timings or nesting bird checks must be undertaken to meet best practices.

There are opportunities for enhancement at the Site with the inclusion of bat and bird boxes and a hedgehog dome. The suggested enhancements aim to achieve a net gain in biodiversity in line with national policies.

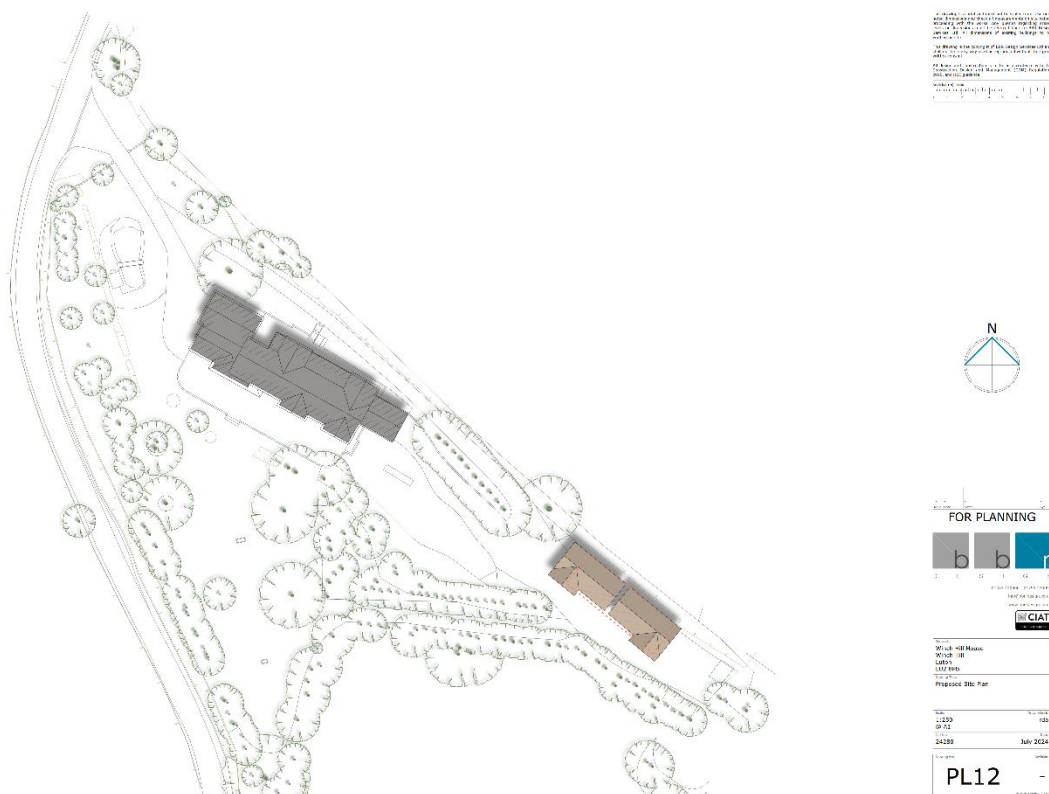
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1 Introduction

- 1.1.1 Samsara Ecology Ltd was commissioned by Dean Eldridge (the Client) in September 2023 to undertake a Preliminary Roost Appraisal (PRA) of a redundant barn at Winch Hill, Luton (the Site) [Ordnance Survey (OS) grid reference TL 13830 21573].
- 1.1.2 The Site is a redundant barn 40 metres east of Winch Hill House. The proposed block plan is presented in Figure 1.

Figure 1 - Site Boundary



- 1.1.3 The Client is submitting a planning application to convert the building into two dwellings.
- 1.1.4 As the development only affects built structures, the assessment focuses on nesting birds and bats, as the habitats are not considered suitable to support other protected or notable species.
- 1.1.5 The original PRA was undertaken on the 12th of October, 2023 and updated in August 2024. There have been no significant changes within the Site between the surveys.
- 1.1.6 The habitat to be affected is a developed; sealed surface which is 'zero-summed' and therefore exempt under the de-minimis exemption as stated in Regulation 4 of The Biodiversity Net Gain Requirements (Exemptions) Regulations 2024.

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1.2 Purpose of the Report

1.2.1 This report has been written in accordance with the Chartered Institute for Ecological and Environmental Management's (CIEEM) guidelines for Preliminary Ecological Appraisals Reports (PEAR) and aims to:

- Identify key ecological constraints from bats and nesting birds to the proposed development.
- Identify any requirements for further surveys and set out the time frame in which they can be completed.
- Inform the Client where any significant impacts to bats and/or nesting birds can be avoided or minimised in line with legal and policy implications.
- Make recommendations for enhancement where there are opportunities for the project to achieve a net gain in biodiversity in accordance with local and national policies.

1.2.2 All relevant planning policies and legislation are presented in **Appendix 1**.

1.3 Suitably Qualified Ecologist (SQE)

1.3.1 The report has been written by Hayley Farnell, BSc, MSc (Hons), an SQE with over 20 years of professional experience in environmental consultancy. Hayley is a full member of the Chartered Institute of Ecological and Environmental Management (CIEEM) and holds a Class 2 survey licence for bats [Licence Number: 2015 -15896-CLS-CLS].

2 Methodology

2.1 Desk Study

- 2.1.1 An online desk study has been undertaken using tools within the Multi-Agency Geographical Information Centre (MAGIC)². This has allowed for the identification of the location and designation information of nationally and internationally designated wildlife conservation Sites within 1 km of the Site's boundaries.
- 2.1.2 Information regarding the location of Protected Species Licences (PSL) granted by Natural England within 1 km of the Site has also been obtained using the tools within MAGIC.
- 2.1.3 Aerial mapping has been used to provide the context of surrounding habitats.
- 2.1.4 This level of desk study is considered to be proportionate to the proposed development, for which potential impacts are likely to be confined within the Site's boundaries.

2.2 Survey Methods

2.2.1 Preliminary Roost Appraisal – Bats

- 2.2.1 A Preliminary Roost Appraisal (PRA) for bats was undertaken in accordance with the Bat Conservation Trust's bat survey guidelines³. The PRA was undertaken on all suitable structures within the Site's boundaries.
- 2.2.2 The PRA identified the type and number of features within the structures that are suitable for use by roosting bats. A suitable feature will be a sheltered void or crevice in which individual bats can roost or in which a number of bats can gather. The structures have been categorised in accordance with the criteria set out within the guidelines and recreated in Table 1 for reference.

Table 1 – Bat Roost Suitability Categories

Suitability Categorisation	Description of Roosting Habitat
None	No habitat features on-site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).
Negligible	No obvious habitat features on-site are likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats

² <https://magic.defra.gov.uk/MagicMap.aspx> [Accessed 23/10/2023]

³ Reference as: Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London. ISBN-978-1-7395126-0-6

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	(i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions, and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of the species conservation status, which is established after presence is confirmed).
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation sites.

2.2.3 Evidence, such as bats in situ, droppings, and staining from urine or oils from the bat's fur, was also searched for during the preliminary survey. However, bats can roost in inaccessible areas during a preliminary survey, such as between roof tiles and lining, so this evidence may not always be found.

2.2.4 The number of further surveys and timings (if required) are based on the categorisation of the suitability of a structure to support roosting bats.

2.2.2 Nesting Birds

2.2.5 Alongside the PRA for bats, the habitats within the Site's boundaries were investigated for the presence of active or old bird's nests. An appraisal was also made of the suitability of habitats to support nesting birds and which species or group are most likely to be found within the Site's habitats.

2.3 Limitations to the Surveys

2.3.1 Any ecology assessment must be considered a 'snapshot' of the site conditions at the time of the survey. Ecological constraints will change over time. Therefore, the findings of this report are considered valid for one year, after which the report should be reviewed to assess whether the survey should be updated.

2.3.2 There were no access constraints for the survey.

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3 Baseline Ecological Conditions

3.1 Desk Study

- 3.1.1 There are no internationally or nationally designated sites for wildlife, nor has Natural England granted protected species licences within 1 km of the Site.

3.2 Habitats

- 3.2.1 The Site is located on the outskirts of Luton, approximately 0.6 km northeast of Luton Airport runway. A small block of woodland is south of the building, and small blocks are scattered around the landscape. The area surrounding the Site is predominantly arable. The Site is shown in the context of the surrounding habitats in Figure 2.

Figure 2 - The Surrounding Habitats



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3.3 Species

3.3.1 Bats

- 3.3.1 Descriptions of the building, suitable features for use by roosting bats and overall categorisations are presented in Table 2. Photographs are presented in Appendix 2.

Table 2 - Description and Categorisation of the Building

ID	Description of the Structure	Suitable Features for Roosting Bats	Categorisation
B1	A single-storey timber structure with a metal roof. The tin roof is lined with bitumen felt. A plastic sheet has been put between the tin sheets and the felt to prevent leaks. The walls are timber boards that at tightly fitted together. A 0.5 mm diameter endoscope could not be pushed between the boards. A false ceiling has been created under half of the roof. Panels are missing, and only the front half of the building has a ceiling. The space created between the roof and the ceiling was inspected with a high-powered torch. No bat droppings were found in the void. All areas in the building were inspected for droppings. Including the top of stored materials, behind stored items leaned against the wall and on top of exposed beams. No droppings were discovered. Natural light enters the building via windows.	Gaps at the top of the gable end may allow access for a bat into the building.	Low

3.3.2 Nesting Birds

- 3.3.2 No evidence of birds was found in the building. A bird could nest on top of beams if it gained entry to the building.
- 3.3.3 Nesting birds could use a line of hazel trees behind the building.

4 Ecological Constraints and Opportunities

4.1.1 The constraints, mitigation and potential further survey recommendations for bats and birds are discussed here, and enhancement opportunities are presented for the following species based on the opportunities provided by the proposed development.

- Nesting birds
- Bats
- Hedgehogs

4.2 Species

4.2.1 Bats

4.2.1 Paragraph 5.2.44 of the recently published 4th addition of the bat survey guidelines states:

If the structure has been classified as having low suitability for bats, an ecologist should make a professional judgement on how to proceed based on all of the evidence available and the balance of probabilities. Thought processes and decision-making should be adequately recorded as a paper trail. If all areas (including voids, cracks and crevices) of a structure have been inspected and no evidence found (and is unlikely to have been removed by weather or cleaning or be hidden), then further surveys are not appropriate.

4.2.2 The building was thoroughly inspected with a high-powered torch and binoculars. The timbers on the elevations are too tightly fitted to allow access for a bat to crevices or into the building. The tin roof is of negligible suitability for use by roost bats as metal gets too hot or too cold for roosting. Also, the plastic between the metal sheets and 1F roofing felt would not allow bats to grip and prevent roosting between the two materials.

4.2.3 There are two gaps in the southeast gable end and one in the northwest gable end, which could be used to access the building. However, no evidence of bats was found within the building or the partial void above the false ceiling. Therefore, a bat could use the building, but it doesn't appear to have been used. There are more suitable structures surrounding the building (the trees in the woodland and Winch Hill House) that bats could use and are more likely to use. This building is therefore categorised as low suitability for roosting bats. No further surveys are recommended, as a single survey is unlikely to provide more information than the information gathered during the inspection. The proposed mitigation will likely remain the same following a single survey as it would when assuming the worst case.

4.2.4 The worst-case scenario is that a bat could use the building occasionally or temporarily.

4.2.5 Paragraph 6.10.3 of the recently released bat mitigation guidelines⁴ states:

4.2.6 *Another example where a non-licensable approach to works can be adopted includes buildings of 'low potential' with no evidence of use but where the presence of a bat (or very low numbers of bats) cannot be ruled out even where the requisite number of*

⁴ Reason, P.F. and Wray, S. (2023). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Chartered Institute of Ecology and Environmental Management, Ampfield.

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surveys have been completed. In these circumstances, a precautionary approach to design and construction methods is sensible.

- 4.2.7 Therefore, the best and most proportionate mitigation based on the worst-case scenario would be a Precautionary Method of Work (PMW). The methods would include:
- Works only to be carried out when overnight temperatures are above 5°C
 - A check of the building by a Class 2 licenced bat ecologist.
 - A soft strip of roofing materials and door and window frames under the supervision of a licenced ecologist.
 - Provision of new roosting habitat with the finished development.
- 4.2.8 If a bat is discovered (albeit unlikely) during the checks, then work will be postponed, and advice will be sought from Natural England.
- 4.2.9 By applying mitigation measures, it is possible to minimise the risk of an offence and provide suitable compensation for roosting bats (if applicable).
- 4.2.10 It is recommended that lighting for the development be designed according to the guidance set out in the Institute for Lighting Professionals (ILP) note on bats and artificial lighting. This includes advice such as:
- Using luminaires that lack UV elements when manufactured.
 - Using LED luminaires where possible.
 - Adopting a warm white spectrum (ideally <2700 kelvin).
 - Using luminaires that feature a peak wavelength higher than 550 nm.
 - Setting any external security lighting on motion detectors and short (1 min) timers.
 - Recessing internal luminaires where installed in proximity to windows to reduce glare and light spill.
- 4.2.11 It is also recommended that the boundary vegetation not be lit by external lighting to maintain a dark corridor around the Site.
- 4.2.12 Following the application of sensitive lighting design and appropriate mitigation, the proposed development will likely have a negligible impact on bats.

Enhancement opportunities

- 4.2.13 At least four bat boxes should be attached to trees within the woodland to the south of the property. They should be built of long-lasting materials and be placed facing the four compass directions. An example of the type of box that can be used is presented in Table 3.

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Table 3 – Examples of Bat Boxes

Description of Box	Example Dimensions	Example Image
This type of box is suitable for bat species that typically roost in woodland environments. It has two entrances at the rear and front and a domed top to allow bats to roost in clusters. Due to the open bottom, the box does not require cleaning or maintenance, and the design is effective against small predators and excludes drafts.	Height: 360 mm Diameter: 160 mm Weight: 4.3 kg	 Photo courtesy of Schwegler

4.2.14 The bat boxes should be no lower than 3 m and have a clear drop zone of 2 m underneath.

4.2.2 Nesting Birds

4.2.15 No further surveys are required for nesting birds.

4.2.16 There is a low risk that nesting birds may be present in the hazel or building. Works to the building and/or cutting back the hazel should be undertaken outside the breeding season between October and March if possible. If this is not possible, a nesting bird check should be carried out by an SQE immediately prior to the works (maximum of 24 hrs). If active nests are found, then suitable buffer zones will be set up, and no clearance can be undertaken within the zone until all the birds have fledged.

4.2.17 The proposed development will have a negligible impact on nesting birds.

Enhancement opportunities

4.2.18 Two bird boxes should be attached to trees within the woodland to the south. An example of the type of box that can be used is presented in Table 4.

Table 4 – Examples of Bird Boxes

Description of Box	Example Dimensions	Example Image
A single-chambered box manufactured from WoodStone® with an entrance hole is suitable for passerine birds such as tits, sparrows, nuthatches, and flycatchers. The box can be integrated or attached to brickwork or attached to trees.	Width: 200 mm Height: 310 mm Length: 200 mm Weight: 6.9 kg	 Photo Courtesy of Vivara pro

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4.2.3 Hedgehogs

- 4.2.19 No further surveys are required for hedgehogs; they are unlikely to be breeding or sheltering within the barn. However, there is an opportunity for enhancement by installing a hedgehog dome behind the building. An example of this is presented in Table 5.

Table 5 – Example of Hedgehog Dome

Description	Dimensions	Image
A hedgehog dome will provide a safe place to hibernate or shelter. It can be constructed of natural materials such as wicker or long-lasting materials such as Woodcrete®. The shelter should provide insulation against extreme weather conditions.	Diameter: 480 mm Weight: 17.5 kg	 Photo courtesy of Schwegler

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5 Conclusions

- 5.1.1 On the 12th of October, 2023, Samsara Ecology Ltd completed a PRA and nesting bird appraisal at Winch Hill, Luton. The survey identified a building of low ecological value.
- 5.1.2 The building has been categorised as low suitability for use by roosting bats. In accordance with the 2023 survey and mitigation guidelines, no further surveys will be required, and a precautionary method of work will be a proportionate method of mitigation.
- 5.1.3 To meet best practices, sensitive timings or a nesting bird check have been recommended to protect nesting birds.
- 5.1.4 Enhancement opportunities have been recommended in accordance with national policies for biodiversity net gain (See Appendix 1).

Appendix 1 Legislation and Policy

Many active pieces of legislation aim to protect the UK's wildlife and habitats. These are summarised in Table 6

Table 6 – Summary of Primary Legislation in the UK

Legislation or Species	Description
The Wildlife and Countryside Act (WCA) 1981	The WCA is the primary piece of legislation relating to nature conservation in Great Britain. The Act is supplemented by provisions in the CRoW Act 2000 and the NERC Act 2006. It provides for the notification and confirmation of Sites of Special Scientific Interest by Natural England. It also sets out, in schedules, important and invasive species that are legally protected or require active management. The WCA consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the conservation of wild birds (Birds Directive) in Great Britain (NB Council Directive 79/409/EEC has now been replaced by Directive 2009/147/EC of the European Parliament and of the Council of the 30th of November 2009 on the conservation of wild birds (codified version)).
The Conservation of Habitats and Species Regulations 2017	The Conservation of Habitats and Species Regulations 2017 consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments. The Regulations transpose Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive) into national law. They also transpose elements of the EU Wild Birds Directive in England and Wales. The Regulations came into force on the 30th of November 2017 and extend to England and Wales (including the adjacent territorial sea) and, to a limited extent in, Scotland (reserved matters) and Northern Ireland (excepted matters).
The Countryside and Rights of Way (CRoW) Act 2000	The CRoW applies to England and Wales only received Royal Assent on the 30th of November 2000, with the provisions it contains being brought into force in incremental steps over subsequent years. Containing five Parts and 16 Schedules, the Act provides for public access on foot to certain types of land, amends the law relating to public rights of way, increases measures for the management and protection for Sites of Special Scientific Interest (SSSI) and strengthens wildlife enforcement legislation, and provides for better management of Areas of Outstanding Natural Beauty (AONB). The Act is compliant with the provisions of the European Convention on Human Rights, requiring consultation where the rights of the individual may be affected by these measures.
Natural Environment & Rural Communities (NERC) Act 2006	The NERC places a duty on authorities to have due regard for biodiversity and nature conservation during the course of their operations. The NERC Act requires the Secretary of State to publish a list of habitats and species which are of principal importance for the conservation of biodiversity in England. The list replaces the UK Biodiversity Action Plans (UKBAP) and has been drawn up in consultation with Natural England, as required by the Act. The S41 list is used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 40 of the NERC Act to have regard to the conservation of biodiversity in England when carrying out their normal functions.

Legislation or Species	Description
	Fifty-six habitats of principal importance (HPI) are included on the S41 list. These are all the habitats in England that were identified as requiring action in the UK Biodiversity Action Plan (UK BAP) and continue to be regarded as conservation priorities in the subsequent UK Post-2010 Biodiversity Framework. Of most relevance to the Site, they include ponds, open mosaic habitats on previously developed land and lowland heathland. There are 943 species of principal importance (SPI) included on the S41 list. These are the species found in England which were identified as requiring action under the UK BAP and which continue to be regarded as conservation priorities under the UK Post-2010 Biodiversity Framework.
Non-native species	Certain non-native plants and animals are recognised as invasive. The WCA makes it an offence to: • Release or allow to escape into the wild any animal which is not ordinarily resident in Great Britain and is not a regular visitor to Great Britain in a wild state, or is listed in Schedule 9 to the Act. • Plant or otherwise cause to grow in the wild any plant listed in Schedule 9 to the Act. • Sell, offer, or expose for sale, or possess or transport for the purposes of sale, non-native species that are listed in Schedule 9. Species control agreements and orders can be made by environmental authorities to ensure that landowners take action on invasive non-native species. The NERC Act allows the Secretary of State to issue or approve codes of practice on invasive species. The codes alone cannot be used to prosecute but must be taken into account by a court in any case in which they appear to the court to be relevant.
Great Crested Newts	Great crested newts are protected under The Conservation of Habitats & Species (Amendment) Regulations 2010 (Habitat Regulations), making them European Protected Species (EPS). The Regulations state that: (1) A person who— (a) deliberately captures, injures, or kills any wild animal of a European-protected species (b) deliberately disturbs wild animals of any such species (c) deliberately takes or destroys the eggs of such an animal (d) damages or destroys a breeding site or resting place of such an animal is guilty of an offence. (2) For the purposes of paragraph (1)(b), disturbance of animals includes, in particular, any disturbance which is likely— (a) to impair their ability— (i) to survive, to 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, or (b) to affect significantly the local distribution or abundance of the species to which they belong. Offences under the Habitats Regulations can be licensed by Natural England for a number of purposes, including 'imperative reasons of overriding public interest', which can include development. Licences can only be issued where full survey data is available, where there is no satisfactory alternative and where the action authorised will not adversely affect the favourable conservation status of the species involved.

Legislation or Species	Description
Reptiles	All UK native reptile species are protected by law. The Wildlife & Countryside Act 1981 (and later amendments) provides the legal framework for this protection, which makes it an offence to intentionally (or recklessly, in Scottish law) kill or injure a reptile. Sand lizard and smooth snake and their places of shelter have the greatest level of legal protection under Schedule 2 of the Conservation of Habitats and Species Regulations.
Nesting Birds	All wild bird nests are protected under The Wildlife and Countryside Act 1981 (as amended), making it an offence to: • Intentionally kill, injure, or take any wild bird or their eggs or nests (with certain exceptions). • Disturb any bird species listed under Schedule 1 to the Act or its dependent young while it is nesting. • Nests of the golden eagle, white-tailed eagle and osprey are protected year-round.
Bats	All species of bat in Britain are 'European Protected Species' (EPS) and are protected under the Conservation of Habitats and Species Regulations 2010, and the Wildlife and Countryside Act 1981, as amended by the Countryside & Rights of Way Act 2000. These pieces of legislation combine to give substantial protection to EPS and their habitats, making it an offence to: • Deliberately capture, injure, or kill a bat. • Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats. • Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time). • Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat. • Intentionally or recklessly obstruct access to a bat roost. The Natural Environment & Rural Communities (NERC) Act 2006 places a duty on authorities to have due regard for biodiversity and nature conservation during the course of their operations.
Water vole	The water vole is fully protected under Schedule 5 of the Wildlife and Countryside Act 1981 and is a priority conservation species, making it an offence to: • intentionally capture, kill, or injure water voles • damage, destroy or block access to their places of shelter or protection (on purpose or by not taking enough care) • disturb them in a place of shelter or protection (on purpose or by not taking enough care) • possess, sell, control or transport live or dead water voles or parts of them (not water voles bred in captivity)
Otters	The Eurasian otter is the only native UK otter species. It's fully protected as a European protected species (EPS) and is also protected under sections 9 and 11 of the Wildlife and Countryside Act 1981, making it an offence to: • capture, kill, disturb, or injure otters (on purpose or by not taking enough care) • damage or destroy a breeding or resting place (deliberately or by not taking enough care) • obstruct access to their resting or sheltering places (deliberately or by not taking enough care)

Legislation or Species	Description
	possess, sell, control or transport live or dead otters or parts of otters
Hazel Dormice	Hazel dormice, their breeding sites and resting places are fully protected as a European protected species (EPS) and are also protected under Schedule 5 of the Wildlife and Countryside Act 1981, making it an offence to: - deliberately capture, injure, or kill hazel dormice - damage or destroy a dormouse resting place or breeding site - deliberately or recklessly disturb a hazel dormouse while it's in a structure or place of shelter or protection - block access to structures or places of shelter or protection - possess, sell, control or transport live or dead hazel dormice or parts of hazel dormice
Badgers	Badgers and the setts (burrows) they live in are protected. Under the Protection of Badgers Act 1992, in England and Wales (the law is different in Scotland), it is an offence to: - Wilfully kill, injure, or take a badger (or attempt to do so). - Cruelly ill-treat a badger. - Dig for a badger. - Intentionally or recklessly damage or destroy a badger sett or obstruct access to it. - Cause a dog to enter a badger sett. - Disturb a badger when it is occupying a sett.
Hedgehogs	Hedgehogs are protected in England, Scotland and Wales under the Wildlife and Countryside Act 1981, Schedule 6 and in Northern Ireland under the Wildlife (NI) Order 1985, Schedules 6&7. This means they are protected from being killed or taken by certain methods under Section 11(1) of the Wildlife and Countryside Act 1981. Hedgehogs are also Species of Principal Importance (SPI) included on the S41 list (See NERC above).

Policy

National Planning Policy Framework (NPPF) (Revised – July 2021)

Chapter 15 of the National Planning Policy Framework (NPPF) aims at conserving and enhancing the natural environment. It states that planning policies and decisions should contribute to and enhance the natural and local environment. In terms of biodiversity, this should be achieved by:

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils,
- recognising the intrinsic character and beauty of the countryside, and wider benefits from natural capital and ecosystem services, and
- minimising impacts on and providing net gains for biodiversity by establishing coherent ecological networks that are more resilient to current and future pressures.

The NPPF states that to protect and enhance biodiversity, [local] plans should:

- identify and safeguard components of wildlife-rich habitats and wider ecological networks, and
- promote the conservation and enhancement of priority habitats and ecological networks and the protection and recovery of priority species.

The NPPF states that when determining planning applications, local planning authorities should refuse applications that:

- cause significant harm to biodiversity that cannot be avoided, adequately mitigated or, as a last resort, compensated for,
- plan to develop on land within or outside of a Site of Special Scientific Interest (SSSI) and which is likely to have an adverse effect on it (either individually or in combination with other developments) and/or
- result in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) unless there are wholly exceptional reasons and where a suitable compensation strategy exists.

The local planning authority should support developments whose primary objective is to conserve or enhance biodiversity, while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

HM Government – 25-Year Environment Plan

The 25-year plan to improve the environment sets out what the government intends to do to increase biodiversity, reduce climate change and secure ecosystem services. It aims to deliver cleaner air and water, protect threatened species, and provide richer wildlife habitats.

Appendix 2 Photographs

	
Photo 1 – The South Facing Side of the Building	Photo 2 – The North facing Side and the Line of Hazel
	
Photo 3 – The West Facing Gable End	Photo 4 – The East Facing Gable End
	
Photo 5 – Inside the Building	Photo 6 – The Void Above the False Ceiling

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