



MKA
ECOLOGY

Preliminary Roost Assessment

Radcliffe House, The Priory, Hitchin

Site	Radcliffe House, The Priory, Hitchin
Project number	262012
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Declaration of compliance

This Preliminary Roost Assessment has been undertaken in accordance with British Standard 42020:2013 "Biodiversity, Code of practice for planning and development". The information which we have provided is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.



MKA Ecology Ltd is a CIEEM Registered Practice. This means that MKA Ecology Ltd are formally recognised for high professional standards, working at the forefront of our profession.

Validity of data

Unless stated otherwise the information provided within this report is valid for a maximum period of 18 months from the date of survey. If works at the site have not progressed by this time an updated site visit may be required in order to determine any changes in site composition and ecological constraints.

CONTENTS

1. EXECUTIVE SUMMARY	3
2. INTRODUCTION	4
2.1. Aims and scope of the report.....	4
2.2. Site description and context	4
2.3. Proposed development.....	4
2.4. Legislation and planning policy.....	5
3. METHODOLOGY	7
3.1. Desktop study	7
3.2. Preliminary Roost Assessment.....	7
3.3. Surveyor, author and reviewer	10
3.4. Date, time and weather conditions	10
3.5. Constraints.....	11
3.6. Assessment	11
4. RESULTS.....	13
4.1. Desktop study	13
4.2. Preliminary Roost Assessment.....	14
5. EVALUATION AND RECOMMENDATIONS	19
6. CONCLUSIONS.....	21
7. REFERENCES.....	22
8. APPENDICES	23
8.1. Appendix 1: Relevant wildlife legislation and planning policy	23
8.2. Appendix 2: Site photographs	27

1. EXECUTIVE SUMMARY

In April 2026, MKA Ecology Ltd was commissioned to undertake a Preliminary Roost Assessment at Radcliffe House, The Priory, Hitchin. A site visit was undertaken on 28 April 2026.

The Site comprises one building, five trees, modified grassland, introduced shrub, non-native hedgerows and developed land. The proposed development involves onsite landscaping enhancements and external alterations to Radcliffe House including impacts to the roof structure. No trees will be removed; however, two trees will be pruned to facilitate the proposed development.

The purpose of the survey was to identify bat roosts or bat roost suitability associated with the development site, evaluate likely ecological impacts and provide recommendations for any required further survey work, mitigation and/or habitat enhancements.

The survey comprised a desktop study, an internal and external inspection of Radcliffe House and ground-level assessments of the onsite trees.

Although no evidence of bats was found during the inspection of Radcliffe House, multiple potential roost features (PRFs) were identified, and the building was assessed as containing moderate potential to support roosting bats. Trees TB1-5 were assessed as containing no potential to support roosting bats.

Due to containing moderate potential to support roosting bats, it is recommended that two Bat Emergence Surveys are undertaken in order to determine the presence or likely absence of roosting bats in Radcliffe House. The surveys should be undertaken within the optimal survey period (May – August inclusive) and be at least three weeks apart. Should bats be found to be roosting at the Site during the recommended survey effort, additional surveys may be required in order to obtain sufficient information to support a Natural England bat licence application.

Due to the onsite tree all containing no potential to support roosting bats, no further survey work or mitigation is required in regard to the onsite trees and roosting bats.

Light pollution should be minimised both during and after the construction phase and a sensitive lighting scheme should be developed to allow for suitable roosting and foraging areas for bats within and adjacent to the Site.

Opportunities exist to enhance the Site's suitability to support roosting bats. It is recommended that provisions are made for roosting bats at the Site post-development, with the extent to be defined following the outcomes of further survey work.

2. INTRODUCTION

2.1. Aims and scope of the report

In April 2026, MKA Ecology Ltd was commissioned to undertake a Preliminary Roost Assessment at Radcliffe House, The Priory, Hitchin by Metric and Maker in order to support a planning application for onsite landscaping enhancements and external alterations to Radcliffe House.

The aims of the Preliminary Roost Assessment were to:

- Undertake a Preliminary Roost Assessment to establish the suitability of the buildings and trees at the site for roosting bats, and record any evidence of bat presence;
- Identify likely ecological impacts relating to the proposed development;
- Assess the need for further survey effort, a European Protected Species Licence or mitigation, if required; and
- Propose any suitable habitat enhancements for bat species, if required.

This report must be read in conjunction with the Preliminary Ecological Appraisal (MKA Ecology, 2026), with respect to bats, this report supersedes the findings and recommendations given in MKA Ecology (2026).

2.2. Site description and context

The survey area is shown on the map in Figure 1. Within this report this area is referred to as the Site or Radcliffe House, The Priory, Hitchin. The 0.71ha Site (centred around grid reference TL18220 28772) is located in the south-west of Hitchin and falls under the jurisdiction of North Hertfordshire District Council.

One building (Radcliffe House) and five trees (TB1-5) are present onsite. Four of the onsite trees are Cockspur Thorn *Crataegus sp.* (TB1-4). and the other is a Norway Maple *Acer platanoides* (TB5). Other onsite habitats include modified grassland, introduced shrub, non-native hedgerows and developed land. The River Hiz is located approximately 30m south-east of the boundary, and the A602 Park Way is located to the south-west.

2.3. Proposed development

The proposed development involves onsite landscaping enhancements and external alterations to Radcliffe House including impacts to the roof structure. No trees will be removed; however, two trees (TB1 and TB2) will be pruned to facilitate the proposed development.

2.4. Legislation and planning policy

This Preliminary Roost Assessment has been undertaken with reference to relevant wildlife legislation and planning policy.

Relevant legislation considered within the scope of this document comprised the following:

- The Conservation of Habitats and Species Regulations;
- The Wildlife and Countryside Act 1981; and
- The Natural Environment and Rural Communities (NERC) Act 2006.

Further information is provided in Appendix 1.

In addition to obligations under wildlife legislation, the revised National Planning Policy Framework (NPPF) updated on 12 December 2024 requires planning decisions to contribute to conserving and enhancing the local environment. Further details are provided in Appendix 1.

North Hertfordshire District Council has produced an adopted Local Plan (North Hertfordshire District Council, 2022) which covers policies relating to biodiversity and habitat conservation, including:

- Policy SP1: Sustainable development in North Hertfordshire
- Policy SP9: Design and Sustainability
- Policy SP12: Green infrastructure, landscape and biodiversity

Where relevant these are discussed in further detail in Section 0. Relevant excerpts from each policy are set out in more detail in Appendix 1.

Figure 1: UK Habitat Classification map of Radcliffe House, The Priory, Hitchin



3. METHODOLOGY

3.1. Desktop study

A data search was conducted for the Site and the surrounding area within 2km. Data was retrieved from the sources listed in Table 1. A Preliminary Ecological Appraisal was conducted on 10 March 2026 (MKA Ecology, 2026).

Table 1: Sources of data for desktop study

Organisation	Data collected	Date collected
Multi-agency Geographic Information for the Countryside (MAGIC) www.magic.gov.uk	Information on local, national and international statutory protected areas.	12/03/2026
Herts Environmental Record Centre	Information on protected and notable sites and species within 2km of the Site (TL18220 28772).	12/03/2026
Ordnance Survey maps and aerial photography	Information on habitats and connectivity between the Site and the surrounding landscape	12/03/2026

3.2. Preliminary Roost Assessment

The Site contained one building and five trees. Inspected buildings and trees were Radcliffe House, TB1, TB2, TB3, TB4 and TB5 and are shown in Figure 1.

An internal and external inspection of Radcliffe House and ground-level assessments of trees TB1-5 were undertaken following guidance set out in *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)* (Collins, 2023). The survey was conducted using a variety of equipment including a ladder, digital video endoscope, inspection mirrors, binoculars, high-powered torches and a digital camera.

The following features were recorded for buildings:

- Location;
- Type;
- Dimensions;
- Age;
- Construction materials; and
- Current use.

Descriptions of potential and actual access points and roosting places were recorded (including height above ground level and aspect), as well as descriptions of evidence of bats found. The following types of evidence of use by bats were recorded:

- Location and number of any live bats;
- Location and number of any bat corpses or skeletons;
- Locations and number of bat droppings;
- Notes on relative freshness, shape and size of bat droppings;
- Location and quantity of any bat feeding remains;
- Location of clean, cobweb-free timbers, crevices and holes;
- Location of characteristic staining from urine and/or grease marks;
- Location and quantity of bat-fly (Nycteribiidae) pupal cases;
- Location of known and potential access points to the roost; and
- Location of the characteristic smell of bats.

The building was assessed for its bat roost suitability according to the scheme presented in Collins (2023). These categories are shown in Table 2.

Table 2: Categories to assess roost suitability in buildings (adapted from Collins, 2023)

Roost suitability	Description
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 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 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 (i.e., unlikely to be suitable for maternity and not a classic hibernation site).
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 – the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed).

Roost suitability	Description
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 potential for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have potential to support high conservation status roosts e.g., maternity or classic hibernation site.

*For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance.

The following features were recorded for trees:

- Species; and
- Diameter at breast height.

Descriptions of suitable and actual roost features were recorded (including height above ground level and aspect), as well as descriptions of evidence of bats found. Potential roost features (PRFs) recorded were:

- Woodpecker holes;
- Rot holes;
- Hazard beams;
- Other vertical or horizontal cracks and splits (such as frost-cracks) in stems or branches;
- Partially detached plated bark;
- Knot holes arising from naturally shed branches, or branches previously pruned back to the branch collar;
- Man-made holes (e.g. cavities that have development from flush cuts) or cavities created by branches tearing out from parent stems;
- Cankers (caused by localised bark death) in which cavities have developed;
- Other hollows or cavities, including butt-rots;
- Double-leaders forming compression forks with included bark and potential cavities;
- Gaps between overlapping stems or branches;
- Partially detached ivy with stem diameters in excess of 50mm; and
- Bat, bird or dormouse boxes.

The following types of evidence of use by bats were recorded for trees:

- Presence of bats;
- Bat droppings in, around or below a potential roost feature;
- Odour emanating from a potential roost feature;
- Audible squeaking at dusk or in warm weather; and

- Staining below the potential roost feature.

The overall potential of each tree to support roosting bats and each PRF found within a tree were assessed for their bat roost suitability according to the schemes presented in Collins (2023). These categories are shown in Table 3 and Table 4.

Table 3: Guidelines for categorising the potential suitability of trees for bats (Collins, 2023)

Roost suitability	Description
None	Either no PRFs in the tree or highly unlikely to be any.
FAR	Further assessment required to establish if PRFs are present in the tree.
PRF	A tree with at least one PRF present.

Table 4: Guidelines for categorising the potential suitability of PRFs on trees (Collins, 2023)

Roost suitability	Description
PRF-I	PRF is only suitable for individual bats or very small numbers of bats, either due to size or lack of suitable surrounding habitats.
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony.

3.3. Surveyor, author and reviewer

The survey was undertaken by Alfie Bunting and Marielle James MCIEEM. Alfie is a Consultant Ecologist at MKA Ecology Ltd with over five years' experience as a consultant ecologist. Marielle is a Principal Ecologist at MKA Ecology Ltd with over ten years' experience as a consultant ecologist and holds a Level 2 bat licence issued by Natural England. The report has been written by Alfie and reviewed by India Wedge ACIEEM Senior Ecologist at MKA Ecology with over six years' experience as a consultant ecologist and holds a Level 1 bat licence from Natural England.

3.4. Date, time and weather conditions

See Table 5 below for details of the date, time and prevailing weather conditions recorded during the Site visit.

Table 5: Date, time and weather conditions of survey visit

Date	Time of survey	Weather conditions*
28/04/2026	09:30	Wind: 3 Cloud: 4

Date	Time of survey	Weather conditions*
		Temp: 9 Rain: None

*Wind as per Beaufort Scale / Cloud cover given in Oktas.

3.5. Constraints

It should be noted that a single visit cannot categorically ascertain the presence or absence of bats. However, an assessment is made of the likelihood for protected species to occur based on habitat characteristics and the ecology of each species. Where there is suitable habitat for bats, additional survey work may be required to ascertain their presence or absence.

3.6. Assessment

The guidelines for categorisation of bats in England by distribution and rarity (adapted from Reason and Wray 2023) are shown in the tables below.

Table 6: Categorising bats by rarity (South-eastern/East Anglia to The Wash)

Rarity within England	Species
Rarest Annex II species and very rare	- Alcathoe's Bat <i>Myotis alcathoe</i> - Barbastelle <i>Barbastella barbastellus</i>
Rarer or restricted distribution	- Whiskered Bat <i>Myotis mystacinus</i> - Brandt's Bat <i>Myotis brandtii</i> - Leisler's Bat <i>Nyctalus leisleri</i> - Nathusius' Pipistrelle <i>Pipistrellus nathusii</i> - Serotine <i>Eptesicus serotinus</i>
Widespread in many geographies, but not abundant in all	- Noctule <i>Nyctalus noctula</i> - Daubenton's Bat <i>Myotis daubentonii</i> - Natterer's Bat <i>Myotis nattereri</i>
Widespread	- Common Pipistrelle <i>Pipistrellus pipistrellus</i> - Soprano Pipistrelle <i>Pipistrellus pygmaeus</i> - Brown long-eared Bat <i>Plecotus auritus</i>

Table 7: Level of importance of roost type

Geographic frame of reference	Roost type
Site, District, Local or Parish	Feeding perches

Geographic frame of reference	Roost type
	Non-breeding day roosts Mating sites (excluding individual trees and swarming sites) Small numbers of hibernating bats Larger transitional roosts Maternity sites (for widespread species, unless colony atypically large)
County	Hibernation sites (excluding rarest Annex II species) Maternity sites (for widespread but not abundant in all geographies species unless colony atypically large) Autumn swarming sites (can reach regional importance depending on assemblage)
Regional	Maternity sites (depending on rarity and value of assemblage) Hibernation sites (for rarest Annex II species, depending on assemblage and size)
National/UK	Sites meeting SSSI guidelines*
International	SAC sites

*Sites meeting SSSI (Sites of Special Scientific Interest) selection guidelines include Barbastelle maternity roosts and mixed species hibernacula assemblages

4. RESULTS

4.1. Desktop study

The ecological desktop study completed by Hertfordshire Environmental Record Centre (HERC) in a 2km radius surrounding the Site returned 176 bat records, which included both roost records and activity records. These records consisted of eight bat species; Common Pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, Natterer's bat *Myotis nattereri*, Daubenton's bat *Myotis daubentonii*, Noctule *Nyctalus noctula*, Serotine *Eptesicus serotinus*, Barbastelle *Barbastella barbastellus* and Brown Long-eared Bat *Plecotus auritus*. Additionally, the search returned records of unidentified bat species and Pipistrelle species. This is considered to be a high diversity of species for this location.

Almost all of the records provided by the search did not contain accurate location data. Of the two records with accurate location data, the closest dated from 2020 and was of a Pipistrelle bat not identified to species level that was observed foraging approximately 0.78km north-west of the Site.

A search of Defra's MAGIC website returned no European Protected Species Licences granted for bats within 2km of the Site boundary.

4.2. Preliminary Roost Assessment

Roosting bats

Although no evidence of bats was found during the inspection of Radcliffe House, multiple PRFs were identified and the building was assessed as containing moderate potential to support roosting bats. Trees TB1-5 were assessed as containing no potential to support roosting bats.

Table 8 and Table 9 below outline the results of the Preliminary Roost Assessment in more detail. These results are also presented in Figure 2.

Table 8: Building inspection results

Building	Bat roost suitability	Description	Bat roost evidence and potential	Photographs
Radcliffe House	Moderate	A three-storey building constructed of brick. The third story has had the ceiling removed and now extends up to the roof where wooden and metal support beams are present. The building has a complex roof structure across several sections. Each roof section consists of a central shallow-pitched hipped top, steep pitched sides and an area of flat roof around its perimeter. The top of each	No direct evidence of bats was recorded. <i>External (Photographs 1-6, Appendix 2)</i> A large number of external PRFs were recorded within Radcliffe House. The majority of these PRFs are weep vents which are present within the brickwork along the top of almost every external wall of the building (TN1, Figure 2; Photograph 7, Appendix 2). A large cavity is present on the south-western aspect where a vent cover is missing and allows direct access internally (TN2, Figure 2; Photograph 8, Appendix 2). The majority of the brickwork and concrete blocks are well-sealed, however, several small gaps are present around the building where different building materials are	

Building	Bat roost suitability	Description	Bat roost evidence and potential	Photographs
		section consists of well-sealed metal sheeting, and the steep pitched sides consist of slate tiles. An ornamental concrete feature is present in the centre of roof of the largest section of the building. A basement is present which consists of a well-sealed former car park.	not flush to each other (TN3, TN4 and TN8, Figure 2; Photograph 11, Appendix 2). There are also multiple gaps present where lead flashing has been lifted on the roof and around windows (TN3, TN5, TN6 and TN7, Figure 2; Photographs 9-10, Appendix 2). The majority of the slate tiles on the roof are secure and well-sealed. However, there is a gap under one section of slate tiles where a wooden board beneath them has slipped (TN9, Figure 2; Photograph 12, Appendix 2). <i>Internal (Photographs 13-14, Appendix 2)</i> Internal access is possible for bats through several open, broken and missing windows. Additionally, daylight can be seen from the inside to the north of the building, indicating gaps within the roof that allow access inside (TN9, Figure 2). PRFs are present throughout the interior of most of the building as there are small gaps between joists of the wooden support beams (Photograph 15, Appendix 2).	 

Table 9: Tree inspection results

Tree	Species	Roost suitability	Descriptions of potential/actual roost features
TB1	Cockspur Thorn	None	No PRFs present (Photograph 16, Appendix 2).
TB2	Cockspur Thorn	None	No PRFs present (Photograph 16, Appendix 2).
TB3	Cockspur Thorn	None	No PRFs present (Photograph 16, Appendix 2).
TB4	Cockspur Thorn	None	No PRFs present (Photograph 17, Appendix 2).
TB5	Norway Maple	None	No PRFs present (Photograph 18, Appendix 2).

Foraging and commuting bats

The modified grassland, introduced shrub and trees have limited suitability for foraging and commuting bats. The adjacent habitats to the south and south-east of the Site such as the woodland and the River Hiz provide a higher suitability for foraging and commuting bats. The suitability of the Site to support foraging and commuting bats is considered low.

Figure 2: Preliminary Roost Assessment results map for Radcliffe House, The Priory, Hitchin



Target notes for Figure 2:

Target note	Description
1	Weep vents in brickwork at the top of the wall
2	Large cavity where a vent cover is missing
3	Small gaps present at the top of the wall
4	Small gap between blocks at the top of the wall
5	Gap between board and flashing on dormer window
6	Lifted flashing around window
7	Lifted flashing on roof
8	Gap between concrete and brick wall
9	Gap under the tiles where a wooden board has dropped
10	Internal access through the roof, can see daylight from inside

5. EVALUATION AND RECOMMENDATIONS

The following evaluation and recommendations are based on the Preliminary Roost Assessment carried out on 28 April 2026.

Roosting bats - buildings

The Preliminary Roost Assessment of Radcliffe House identified that it has moderate potential to support roosting bats.

All bat species are protected under Schedule 5 of the Wildlife and Countryside Act 1981 and Schedule 2 of Conservation of Habitats and Species Regulations 2017. It is an offence to deliberately disturb a bat, damage or destroy a bat roost, intentionally or recklessly disturb a bat at a roost, or obstruct access to a roost.

If bats roosts are present within Radcliffe House, then any impacts will likely result in the damage/destruction of a roost and/or disturbance of a bat at a roost. Impacts include demolition or partial demolition, repair or restoration works, artificial lighting, noise and vibration.

Further survey work is recommended to assess the full potential impact of the proposed development. In accordance with best practice guidelines (Collins, 2023), buildings with moderate potential to support roosting bats require a minimum of two Bat Emergence Surveys to determine the presence or likely absence of roosting bats. The surveys should be undertaken within the optimal survey period of between the months of May and August inclusive. Bat Emergence Surveys should be undertaken at least three weeks apart.

Should bats be found to be roosting at the Site during the recommended survey effort, additional surveys may be required in order to obtain sufficient information to support a Natural England bat licence application.

Recommendation 1

Undertake two Bat Emergence Surveys of Radcliffe House, in accordance with best practice guidelines, to determine the presence or likely absence of roosting bats.

Roosting bats - trees

The five trees present onsite (TB1-5) were all assessed as having no potential to support roosting bats. No trees will be removed; however, two trees (TB1 and TB2) will be pruned to facilitate the proposed development. No further survey work or mitigation is required in regard to the onsite trees and roosting bats.

Foraging and commuting bats

Bat commuting and foraging activity, in addition to roosting behaviour, can be dramatically affected by artificial lighting (ILP, 2023). It is strongly recommended that any proposed exterior lighting on the new buildings is designed and managed appropriately to ensure that the area remains suitable for foraging bats. In particular, the woodland and river habitats to the south-east of the Site should remain unlit. A sensitive lighting scheme should be developed to allow suitable roosting and foraging areas for bats.

Recommendation 2

Light pollution from any lighting should be minimised both during and after the construction phase. A sensitive lighting scheme should be developed and secured through a planning condition to allow for suitable roosting and foraging areas for bats within the Site.

The wider landscape has the potential for use by foraging bats. With this in mind, enhanced opportunities for roosting bats should be provided at the Site through installation of bat boxes. Recommendations regarding the extent of bat box provision will be made following the completion of the recommended further survey work.

Recommendation 3

Provisions should be made for roosting bats at the Site post-development. This will be defined further following the outcomes of further survey work.

6. CONCLUSIONS

The Preliminary Roost Assessment of Radcliffe House identified that it has moderate potential to support roosting bats. It is recommended that two Bat Emergence Surveys of Radcliffe House are undertaken to determine the presence or likely absence of roosting bats. The surveys should be undertaken within the optimal survey period (May – August inclusive) and be at least three weeks apart. Should bats be found to be roosting at the Site during the recommended survey effort, additional surveys may be required in order to obtain sufficient information to support a Natural England bat licence application.

Trees TB1-5 were all assessed as having no potential to support roosting bats. No further survey work or mitigation is required in regard to the onsite trees and roosting bats.

The habitats on and adjacent to the Site are suitable to support foraging and commuting bats and some adjacent habitats may also have potential to support roosting bats. It is recommended that light pollution is minimised both during and after the construction phase and a sensitive lighting scheme is developed to allow for suitable roosting and foraging areas for bats within and adjacent to the Site.

Opportunities exist to enhance the Site's suitability to support roosting bats. It is recommended that provisions are made for roosting bats at the Site post-development, with the extent to be defined following the outcomes of further survey work.

7. REFERENCES

BCT and ILP (2023). *Bats and artificial lighting at night. Bats and the Built Environment series, Guidance Note 08/23*. Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP).

British Standards Institution (2013) *British Standard 42020:2013, Biodiversity – Code of practice for planning and development*. British Standards Institution: London.

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MKA Ecology Ltd. (2026) *Radcliffe House, The Priory, Hitchin – Preliminary Ecological Assessment*. MKA Ecology: Cambridge.

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8. APPENDICES

8.1. Appendix 1: Relevant wildlife legislation and planning policy

Please note that the following is not an exhaustive list and is solely intended to cover the most relevant legislation pertaining to species commonly associated with development sites.

Subject	Legislation (England)	Relevant criminal offences
Bats (all UK species)	Schedule 2 of Conservation of Habitats and Species Regulations (2017)	• Deliberately capture, injure or kill a bat; • Deliberately disturb a bat (disturbance is defined as an action which is likely to: (i) Impair their ability to survive, to breed or reproduce, or to rear or nurture their young; (ii) Impair their ability to hibernate or migrate; or (iii) Affect significantly the local distribution or abundance of the species); • Damage or destroy a bat roost; • Intentionally or recklessly disturb a bat at a roost; or • Intentionally or recklessly obstruct access to a roost. In this interpretation, a bat roost is <i>"any structure or place which any wild [bat]...uses for shelter or protection"</i>. Legal opinion is that the roost is protected whether or not the bats are present at the time.

	Wildlife and Countryside Act 1981 (as amended) All bat species are listed on Schedule 5 and are therefore subject to parts of the provisions of Section 9 (Sections 9(4)(b) and (c) and Section 9(5)).	• Intentional or reckless disturbance of a bat while it is occupying a roost; • Intentional or reckless obstruction of access to a roost; • To sell, expose for sale, possess or transport for the purpose of sale, any live or dead bat or any part of, or anything derived from a bat; or • Publishing or causing to be published any advertisement likely to be understood as conveying that an individual buys or sells, or has an intention to buy or sell bats. In this interpretation, a bat roost is "<i>any structure or place which any wild [bat]...uses for shelter or protection</i>". Because bats tend to reuse the same roosts, bat roosts are considered to be protected whether or not the bats are present at the time.
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The Conservation of Habitats and Species Regulations 2017 (as amended)

Full legislation text available at: [The Conservation of Habitats and Species Regulations 2017 \(as amended\) \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2017/69/contents)

The Wildlife and Countryside Act 1981 (as amended)

Full legislation text available at: <http://www.legislation.gov.uk/ukpga/1981/69/contents>.

Section 41 of Natural Environments and Rural Communities (NERC) Act 2006

Full legislation text available at: <http://www.legislation.gov.uk/ukpga/2006/16/section/41>

Several bat species are listed as species of principal importance for the purpose of conserving biodiversity under Section 41 of the NERC Act 2006.

The NERC Act 2006 places a legal obligation on public bodies, including those considering planning applications, to maintain, and where possible enhance, the conservation status of any Section 41 species found on a site. Species included on Section 41 were also included on the UK Biodiversity Action Plan (BAP) and remain an integral part of the Post-2010 Biodiversity Framework.

These species are:

- Barbastelle *Barbastella barbastellus*;
- Bechstein's Bat *Myotis bechsteinii*;
- Brown Long-eared Bat *Plecotus auritus*;
- Greater Horseshoe Bat *Rhinolophus ferrumequinum*;
- Lesser Horseshoe Bat *Rhinolophus hipposideros*;
- Noctule *Nyctalus noctula*; and
- Soprano Pipistrelle *Pipistrellus pygmaeus*.

National Planning Policy Framework (NPPF)

Full text is available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>.

The revised NPPF was updated on 12 December 2024 setting out the Government's planning policies for England and the process by which these should be applied. The policies within the NPPF are a material consideration in the planning process. The key principle of the NPPF is a presumption in favour of sustainable development, with sustainable development defined as a balance between economic, social and environmental needs.

Policies 187 to 201 of the NPPF address conserving and enhancing the natural environment, stating that the planning system should:

- Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes;
- Recognise the wider benefits of ecosystem services; and
- Minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.

Furthermore, there is a focus on re-use of existing brownfield sites or sites of low environmental value as a priority, and discouraging development in and around National Parks, Sites of Specific Scientific Interest, the Broads, and National Landscapes other than in exceptional circumstances.

Where possible, planning policies should also:

- Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas

identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

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

Local policy

North Herts Council has produced an adopted Local Plan which covers a number of policies relating to biodiversity and habitat conservation, including:

- Policy SP1: Sustainable development in North Hertfordshire - Grant planning permission for proposals that, individually or cumulatively: (iv) protect key elements of North Hertfordshire's environment including biodiversity, important landscapes, heritage assets and green infrastructure (including the water environment); and (v) secure any necessary mitigation measures that reduce the impact of development, including on climate change.
- Policy SP9: Design and Sustainability – (C) Require Strategic Masterplans and planning applications for Strategic Housing Sites and significant development to (as applicable): (vi) create and accessible multi-functional green infrastructure network that provides: a high-quality integrated network to support ecological connectivity, biodiversity net gain, climate adaptation and mitigation linking into the wider Ecological Network.
- Policy SP12: Green infrastructure, landscape and biodiversity – States that it will accommodate significant growth during the plan period whilst ensuring the natural environment is protected and enhanced and will:
 - Protect, identify, manage and where possible enhance a strategic multi-functional network of green infrastructure;
 - Consider and respect landscape character, scenic beauty and locally sensitive features, particularly in relation to the Chilterns Area of Outstanding Natural Beauty;
 - Protect, enhance and manage designated sites in accordance with the following hierarchy of designations and features:
 - Internationally designated sites
 - Nationally designated sites
 - Locally designated sites;
 - Non-designated sites that include important habitats and species
 - Protect, enhance and manage biodiversity networks including wildlife corridors, ancient woodlands and hedgerows, wetland and riverine habitats, Local Geological Sites, protected species, priority species and habitats, and non-designated sites of ecological value and ensure measurable net gains for biodiversity;
 - Protect other open spaces and support provision of new and improved open space.

8.2. Appendix 2: Site photographs

Photograph 1: Radcliffe House (south-east aspect)



Photograph 2: Radcliffe House (west aspects)



Photograph 3: Radcliffe House (north-west aspect)



Photograph 4: Radcliffe House (north-east aspect)



Photograph 5: Central section of roof



Photograph 6: North-eastern section of roof



Photograph 7: TN1 – Weep vents in brickwork at the top of the wall



Photograph 8: TN2 – Large cavity where a vent cover is missing



Photograph 9: TN5 – Gap between board and flashing on dormer window



Photograph 10: TN6 – Lifted flashing around windows



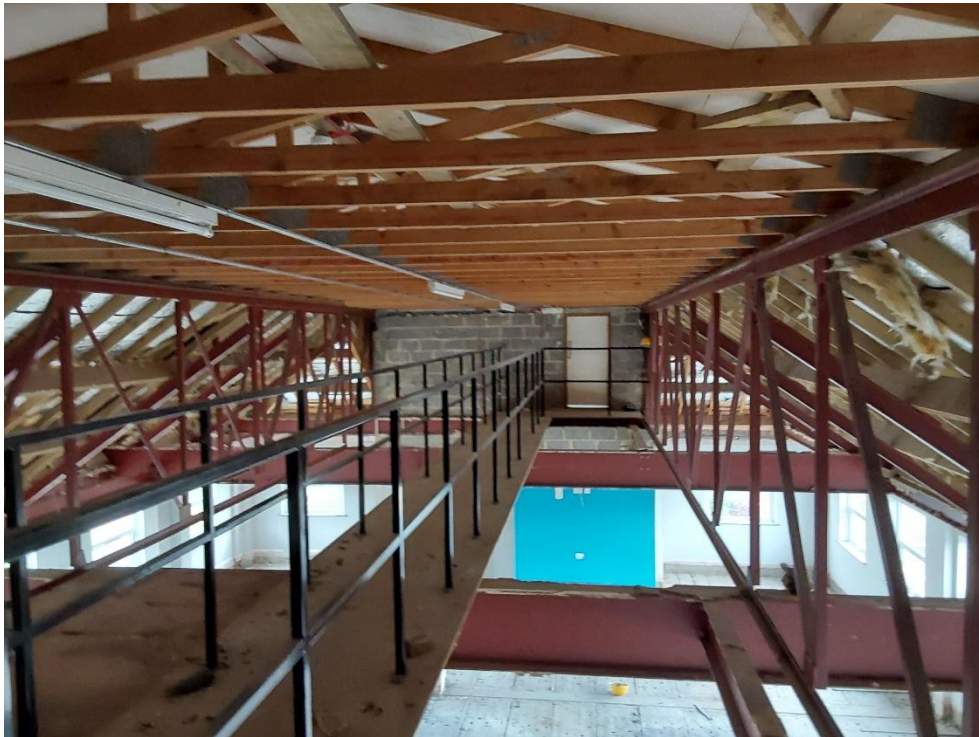
Photograph 11: TN8 – Gap between concrete and brick wall



Photograph 12: TN9 – Gap under the tiles where a wooden board has dropped



Photograph 13: Internal view of the main central roof cavity



Photograph 14: Internal view of the main central roof cavity



Photograph 15: Example of gaps present between wooden support beams



Photograph 16: Trees TB1-3



Photograph 17: Tree TB4



Photograph 18: Tree TB5





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