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Bat Scoping and Emergence Survey Report

Site Name

Town House Farm, Horsham

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Client

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Author

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About the Author

This report has been prepared by Ben Small, MSc, a Consultant Ecologist at The Ecology Co-op who is an accredited agent under Rozel Hopkin's Natural England Level 1 Bat Survey Licence and has 3 years' experience. As a Qualifying member of the Chartered Institute for Ecology and Environmental Management (CIEEM) and as Chartered Ecologist through this body, he is bound by their code of professional conduct.

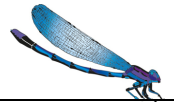
About the Reviewer

This report has been reviewed by Kate Priestman, who is a Principal Ecologist with over twenty years' experience. Kate has undertaken extensive survey work and reporting, encompassing a breadth of deliverables, and prepared European Protected Species licences for numerous schemes. As a Full member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and a Chartered Environmentalist (CEnv), she is bound by CIEEM's code of professional conduct.



Report Summary

Purpose	The Ecology Co-op was commissioned by Mr Jim Mason to undertake an updated bat scoping and emergence survey at Town House Farm, further to a proposal to extend the main property and barn structure on site.
Context	The site currently comprises a two-storey residential dwelling with several associated outbuildings, including a barn linked to storage sheds with a covered walkway to the east. A previous scoping survey of the main dwelling identified two confirmed bat roosts in the loft void and under hanging tiles, and a repeat scoping survey of the barn identified a further bat roost. Based on the above assessment (including relative zone of impact) and in line with Bat Conservation Trust Guidelines, two bat emergence survey visits were carried out on both structures between August and September 2025 to determine the presence of roosting bats and evaluate the conservation importance of the site for bats. The purpose of this survey work was to provide advice to inform a planning application/European Protected Species (EPS) licence application for extensions to the south-western corner of the dwelling, and to the covered walkway of the barn.
Key findings	The bat scoping and emergence surveys indicate that Town House Farm supports the following roosts: • a long-eared day roost in the southern side void of the house, used by at least one individual (identified via droppings during the initial scoping survey on 5th June 2025; the emergence of a brown long-eared bat during the survey on 11th August is considered to be from this roost); • a Natterer's day roost under hanging tiles on the western elevation of the house, used by at least one individual (identified via droppings during the initial scoping on 5th June 2025, confirmed via DNA analysis); • a soprano pipistrelle day roost under hanging tiles on the western elevation of the house, used by at least one individual; • a common pipistrelle day roost under the eaves of the western elevation of the house, used by at least one individual; • an unidentified pipistrelle bat day roost under hanging tiles on the western elevation of the house, used by at least one individual; • a soprano pipistrelle day roost under hanging tiles on the southern elevation of the house, used by at least two individuals; • a common pipistrelle day roost under hanging tiles on the southern elevation of the house, used by at least one individual; • an unidentified pipistrelle bat day roost under hanging tiles on the southern elevation of the house, used by at least two individuals; • an unidentified pipistrelle bat day roost under hanging tiles on the northern elevation of the house, used by at least one individual; • a brown long-eared bat day roost in the interior of the barn, used by at least one individual (identified via droppings during the scoping survey on 28th July 2025); • a common pipistrelle day roost under the eaves of the eastern elevation of the barn, used by at least one individual.
Interpretation	These surveys indicate that Town House Farm is regularly used by bats, supporting several roosts in the loft void and under hanging tiles and eaves on the house and inside and under the eaves of the barn.



Recommendations	The proposed development to the house will involve the removal of several rows of hanging tiles on the western and southern elevations of the house; a day roost shared by at least two soprano pipistrelles was identified below the proposed height of the extension and such these works will destroy the roost. The extension also has the potential to obstruct the entry passage of an unidentified pipistrelle day roost (used by one individual) on the western elevation, which in the absence of mitigation would represent disturbance of this roost. A European Protected Species (EPS) licence will therefore be required for the development to legally proceed. Based on the results of the survey and predicted scale of impact, this development will be eligible for adding to the 'bat mitigation class licence' issued by Natural England and held by certain qualified bat ecologists.
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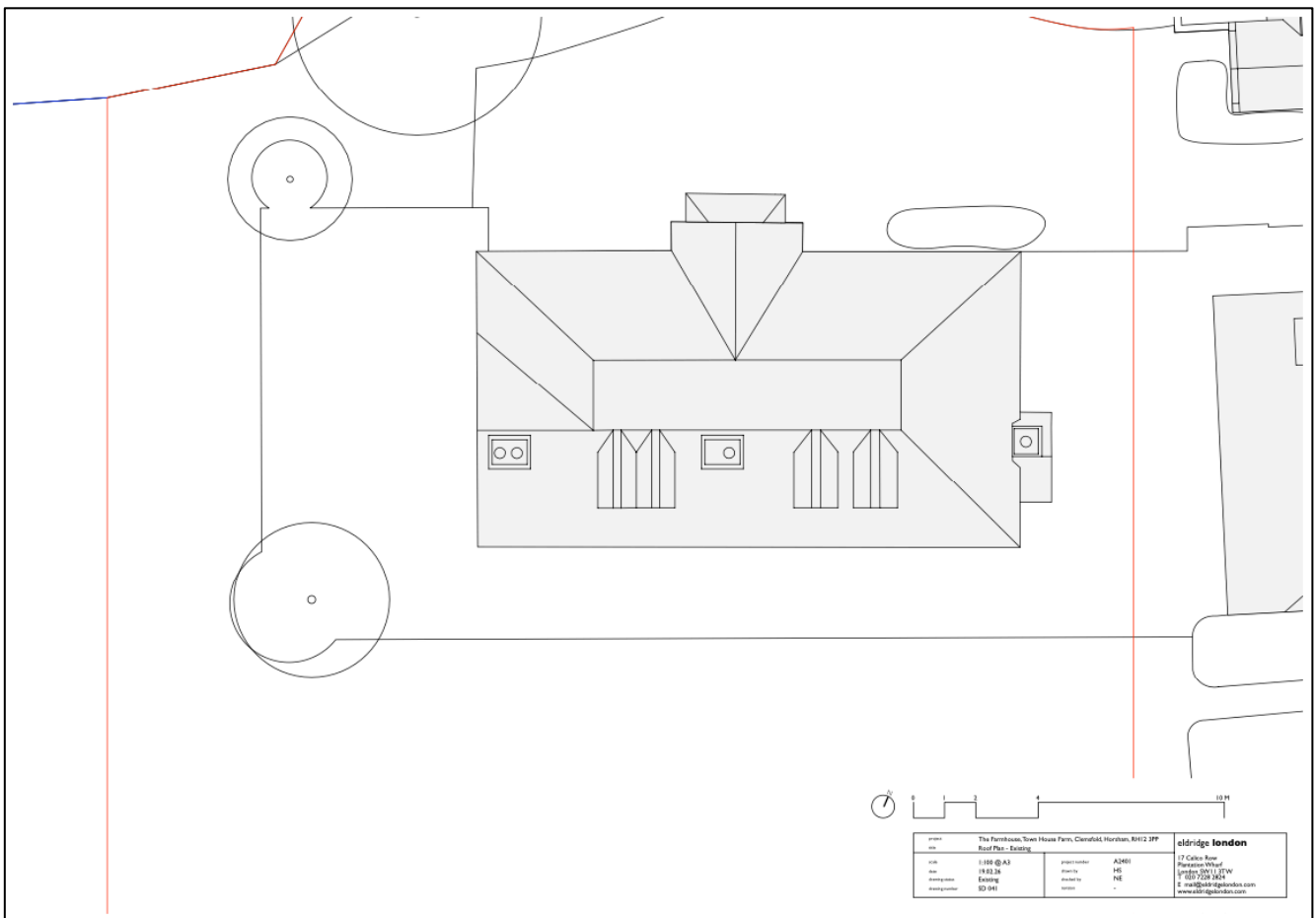


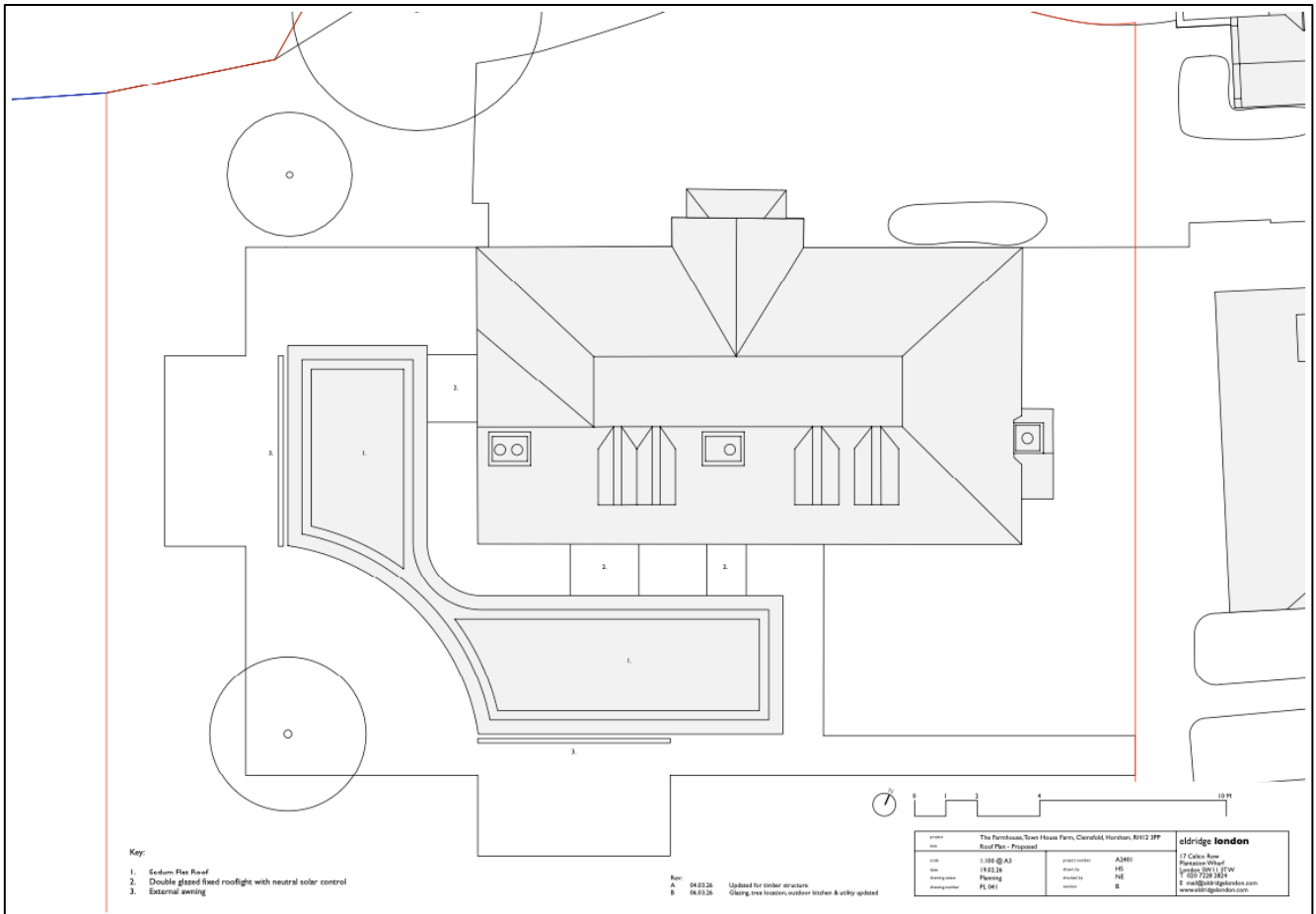
1 INTRODUCTION

1.1 Background

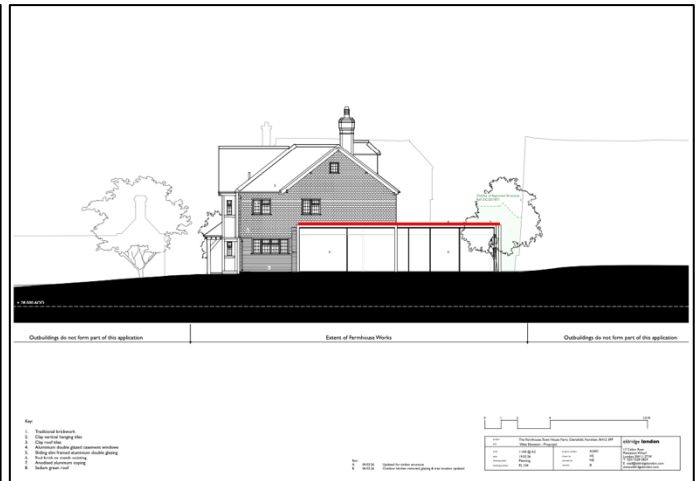
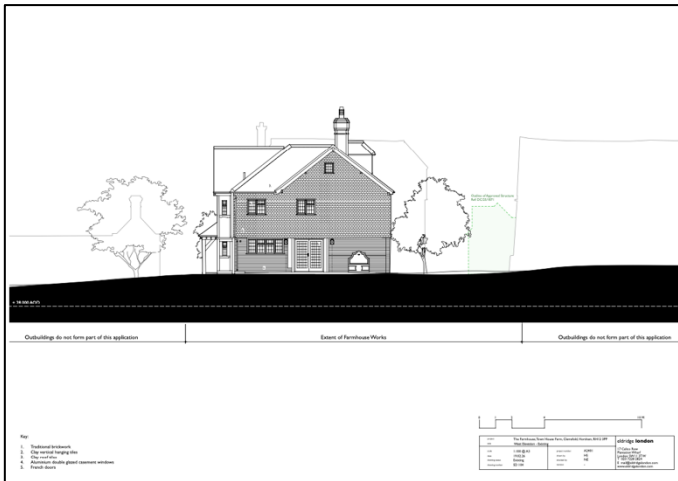
The owner of Town House Farm intends to submit a planning application for a single-storey extension on the southern and western elevations of the main dwelling on site, (Figures 1, 2, 3 & 4), as well as a separate planning application for an extension to the covered walkway associated with the barn on site to provide covered car parking (Figure 5).

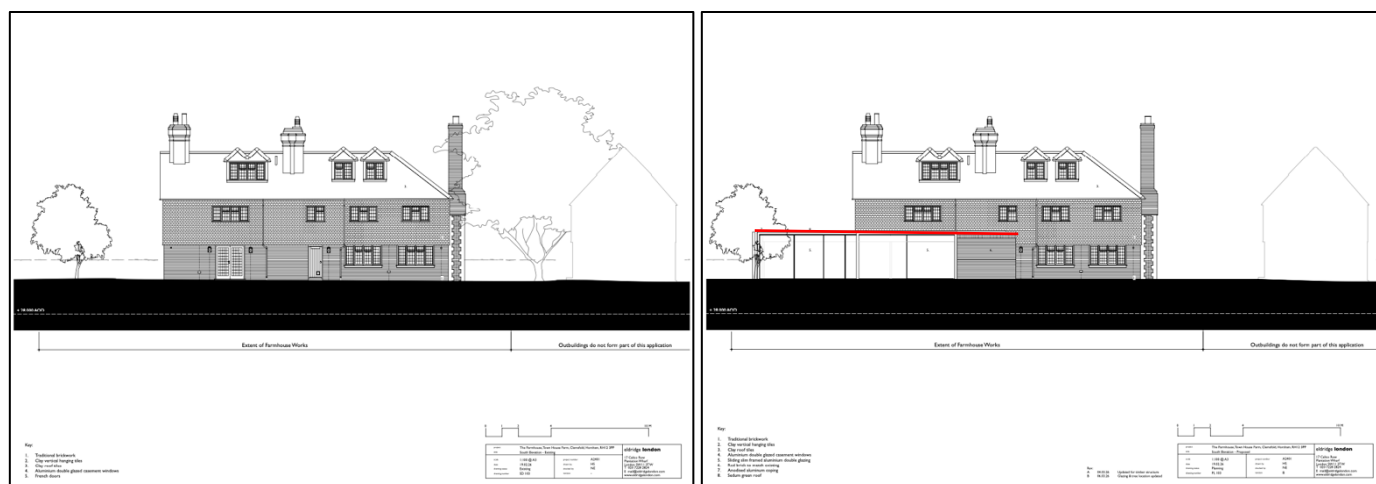
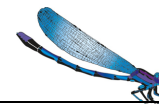
The site is located at Town House Farm, Clemsfold, Horsham RH12 3PP. The central grid reference for the site is TQ 12351 32697.





Figures 1 & 2. Existing and proposed layouts of the house at Town House Farm, highlighting the location of the proposed single-storey extension on the south-west corner. Plans provided courtesy of Eldridge London (19.02.26, drawing numbers SD 041 and PL 041).





Figures 3 & 4. Existing and proposed views of the western (left) and southern (right) elevations of the house, with the relative height of the single-storey extension indicated with a red arrow and red lines respectively. Figures adapted from plans provided by Eldridge London (19.02.26, drawing no.s SD 104, SD 103, PL 104 and PL 103).

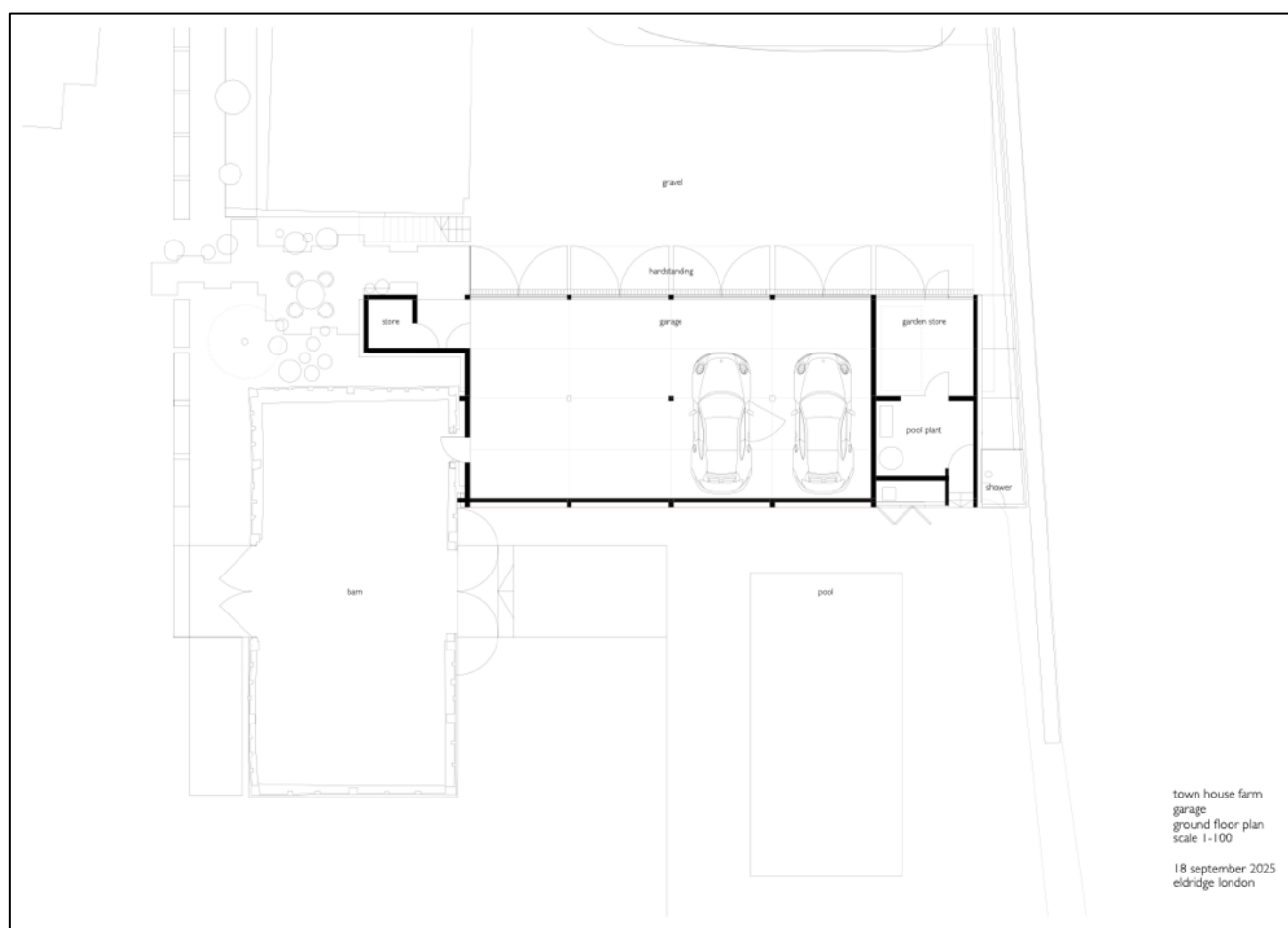
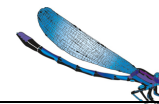


Figure 5. Proposed layout of the garage, with the existing covered walkway extended to form a new garage and store room. Plans provided courtesy of Eldridge London (18.09.25).

A Bat Scoping and Preliminary Ecological Appraisal was previously completed by The Ecology Co-op on the 5th June 2025, which identified a day roost likely belonging to a long-eared bat *Plecotus* sp. in a loft void and a Natterer's bat *Myotis nattereri* day roost (confirmed via DNA analysis) under hanging tiles on the western elevation. While the house was considered to have “high” suitability for bats overall, the zone of impact (considered to be limited to a few rows of hanging tiles on the southern and western elevations) was considered to have only “moderate” potential. A repeat visit was additionally conducted to scope the barn on the 28th July



2025 (see section 4.1) which identified droppings morphologically similar to a brown long-eared bats in the barn and gaps under roof tiles on the covered walkway, with the zone of impact (the covered walkway) considered to have “moderate” potential for roosting bats. In accordance with current best practice guidelines, a minimum of two emergence surveys were recommended on both structures to determine the presence of roosting bats and evaluate the conservation importance of the site for bats.

1.2 Purpose of the Report

In accordance with recommendations, bat emergence surveys were carried out by The Ecology Co-op between 11th August and 1st September 2025 led by Ben Small MSc, qualifying member of the Chartered Institute of Ecology and Environmental Management and accredited agent under Holly Waters’ Natural England Level 2 Bat Licence.

The purpose of this survey work was to determine presence of roosting bats and where necessary prescribe further surveys and/or appropriate mitigation advice to inform the planning application for the proposed development at the site.

These surveys and report were carried out at the request of Mr Jim Mason.

2 LEGAL PROTECTION

Details of legislation and legal protection afforded to all species of British bats are given in Appendix 1.

The results of this survey will be used to determine the need for an appropriate mitigation strategy to ensure compliance with UK and EU wildlife legislation.

3 METHODOLOGY

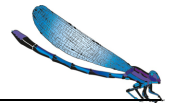
Two emergence surveys were undertaken on the dwelling and barn on 11th August and 1st September 2025 using the methodology set out in the best practice guidelines prepared by the Bat Conservation Trust.

The surveys focused upon the southern and western elevations of the dwelling (particularly hanging tiles covering these elevations) as well as the northern and southern pitches of the covered walkway of the barn, using four surveyors (two on each structure) and four cameras (upgraded to five on the second survey to cover the eastern gable end of the covered walkway of the barn) positioned according to Figures 6 and 7. From these positions, surveyors could see all features potentially suitable for roosting bats that were identified during the initial bat scoping survey. All cameras were supported with infra-red torches to improve the clarity of the footage after sunset (see darkest points in Appendix 2).

The surveyors recorded any bat activity on or around the potential roosting entry/exit features identified during the scoping survey, using full spectrum handheld bat detectors to identify species through call frequencies. The bat calls were logged and recorded as sonograms for later confirmation of species where necessary.

The following equipment was used to support this survey:

- 4 x Echometer Touch 2 Pro detectors with Apple recording devices across both surveys.



- 11th August 2025
 - 4x Nightfox Whisker
- 1st September 2025
 - 4x Nightfox Whisker
 - 1x Canon XA25.

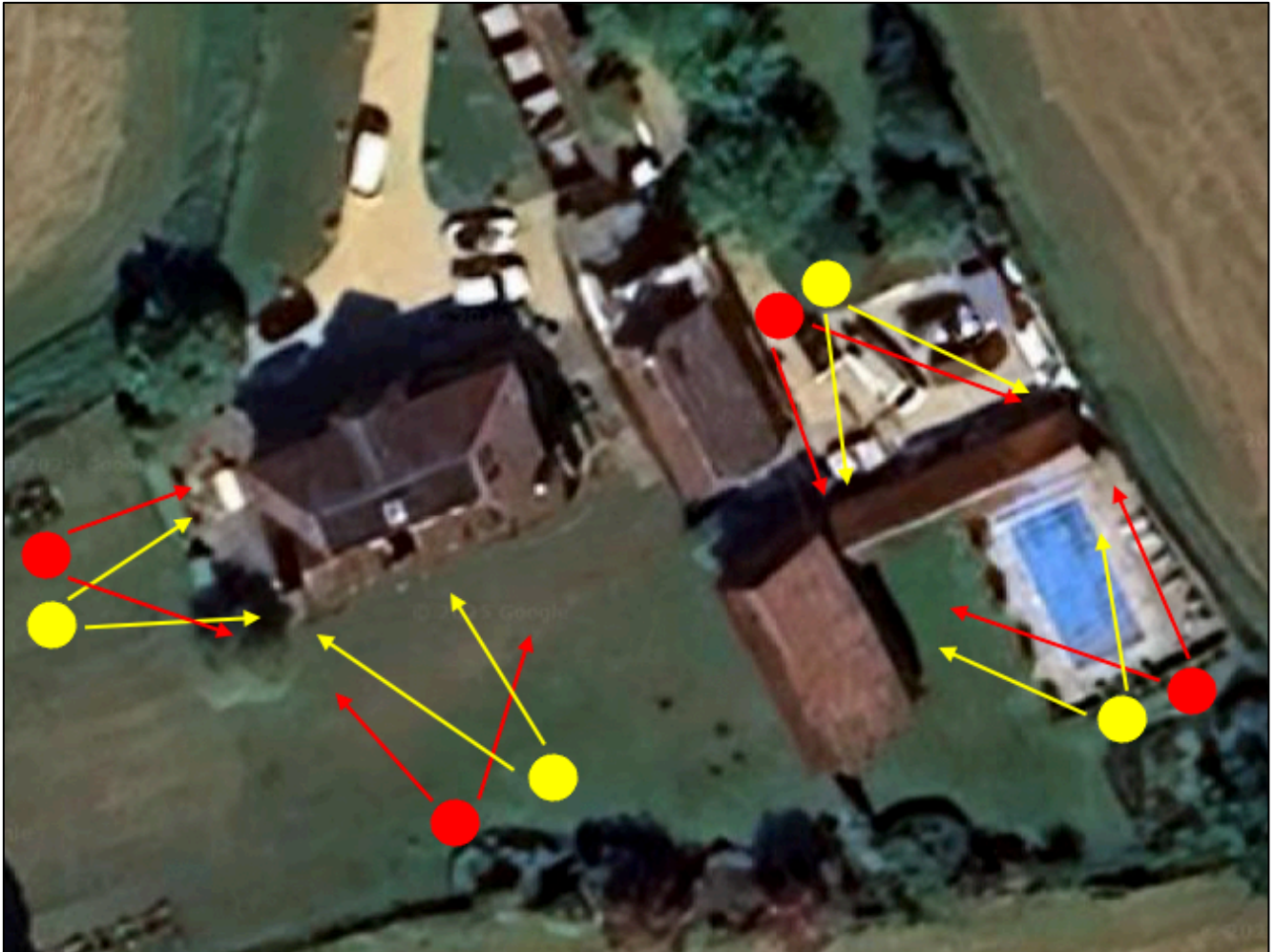


Figure 6. An aerial image of the site, showing the positions of surveyors (red dots) and night-vision cameras (yellow dots) on 11th August 2025. Images produced courtesy of Google maps (map data ©2026 Google).

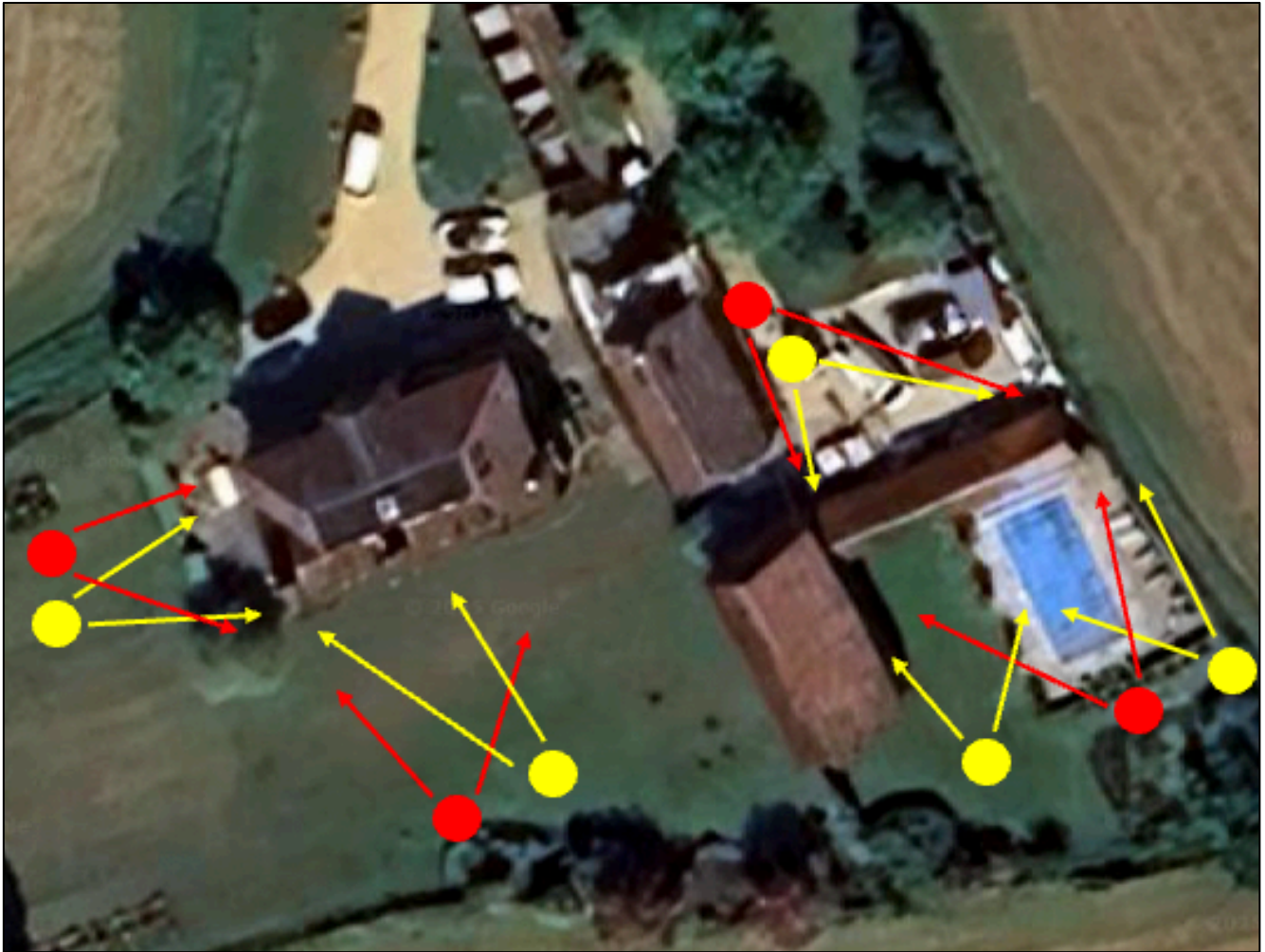


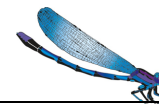
Figure 7. An aerial image of the site, showing the positions of surveyors (red dots) and night-vision cameras (yellow dots) on 1st September 2025. Images produced courtesy of Google maps (map data ©2026 Google).

3.1 Limitations to Emergence Surveys

In accordance with best practice guidelines, each survey visit was undertaken during the peak period in bat activity and during good weather conditions. The results presented here are therefore considered to be an accurate representation of the general use of the property by roosting bats.

Nevertheless, bats can use roosting features intermittently throughout the year and may be present in larger or smaller numbers depending on their breeding cycle, weather conditions, and in response to disturbance. These surveys record the emergence of bats at the time of the survey visits and therefore only provide a snapshot of bat roosting activity at the site at that time. Bats may be present at other times and the results should therefore be viewed with caution.

A darkest point for one of the cameras covering the northern pitch of the covered walkway of the barn during the emergence survey on 1st September 2025 could not be attained due to corruption of the video. This footage had been reviewed prior to corruption (with no emergences identified) and the position was also covered by a surveyor during the survey and a camera during the previous survey, so this is highly unlikely to have impacted upon the results of the surveys.



4 RESULTS

4.1 Bat Scoping – Barn

A repeat scoping survey of the barn structure in the south-east corner of the site was conducted on 28th July 2025, which consists of a large barn with a covered walkway leading from the east elevation to two storage sheds. The barn is approximately 6m high, set onto a concrete foundation with single skin walls of overlapping timber boards, with windows at the northern and southern gables of the barn that ensure the interior of the barn is well lit during the daytime.

The barn supports a pitched roof, covered in machine-made clay tiles with open eaves. Approximately 15-20 gaps were identified between weather boards, although rose *Rosa* sp. covers the majority of the wall on the northern elevation and restricts access on this side. The barn has been partially converted into a gym, as well as being used for storage, and has an open ridge with bitumen felt lining the underside of the roof. A few potential crevice features were identified in mortice joints between and in splits within timber beams, although the majority of these were likely too shallow to be suitable. Torn bitumen felt lining was also identified in the south-east of the barn, providing access to the roof and ridge tiles above. Approximately 40 droppings were found in the barn, concentrated primarily under the ridge and at the north-eastern and south-western walls (with approximately 15 droppings found in the eastern corner). The droppings found were morphologically similar to brown long-eared *Plecotus auritus* bats.

A covered walkway extends from the eastern elevation of the barn, with an open front to the south and a single wall of timber weather boarding to the north, ending in a shed housing an air conditioning unit. The roof of this section is unlined, with the remains of old swallow *Hirundo rustica* nests identified at the ridge, with several individuals identified flying around the site during the visit. No evidence of bats was identified in the shed. Another more recent storage shed has been built on the eastern end of the storage section, with plastic sheet lining the underside of the roof and spray foam insulation in between. This shed is regularly used for storage and was relatively clean at the time of the site visit, with no evidence of bats identified. On the eastern end of the newer storage shed, approximately 1-2 gaps were identified under lifted weather boarding. The roof of the walkway is double-pitched and covered in machine-made clay tiles; there are open eaves across the whole of the original build, with the more recent storage shed having timber soffits at the eaves. Multiple gaps were identified on the northern and southern roof pitches (approximately 50 on each side), with approximately 1-2 gaps additionally observed under ridge tiles on the northern elevation. The storage section holds an air conditioning unit, with no evidence of bats found.

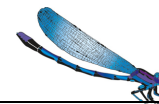
Overall, the barn was confirmed as having a confirmed bat roost, with further potential for bats identified as high. The zone of impact however is limited to the covered walkway, and this was assessed to have moderate suitability for bats.



Photograph 1a & 1b. Interior of the barn at Town House Farm (left) with some of the bat droppings identified within (right). These droppings were morphologically similar to brown long-eared bats.



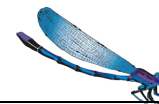
Photograph 2a & 2b. Views of the northern (left) and western (right) elevations of the barn at Town House Farm.



Photograph 3a & 3b. The southern and eastern elevations of the barn (left) where the covered walkway attaches, with a view of the open section within this walkway (right).



Photograph 4. Interiors of the two store sheds within the covered walkway, including the original shed housing the air conditioning unit (left), and the newer build used for storage (right).



Photograph 5a & 5b. The northern pitch (left) and eastern gable (right) of the covered walkway at Town House Farm.



Photograph 6a & 6b. The southern pitch (left) of the covered walkway at Town House Farm, with examples of the gaps under the roof tiles on this section (right).

4.2 Bat Emergence Surveys

4.2.1 Survey Conditions

The dates, times, weather conditions, temperatures and personnel for each survey visit are presented in Table 1 below:

Table 1. Details of surveys undertaken, timings weather conditions and personnel.

Date	Survey start time/end time	Temp. degrees centigrade, weather conditions throughout survey	Surveyors
11 th August 2025	Start time: 20:01 Sunset: 20:31 End time: 22:01	Max/min temp: 25.4–21.0°C. 90-100% cloud cover and light breeze (BF2), dry (although light rain recorded between 20:15 and 21:00).	Ben Small Meerabai Kings Lara Hulbert Eleanor Fitter
1 st September	Start time: 19:18 Sunset: 19:48	Max/min temp: 18.5–12.5°C. 10-30% cloud cover and light air (BF1), dry.	Ben Small Holly Waters



Date	Survey start time/end time	Temp. degrees centigrade, weather conditions throughout survey	Surveyors
2025	End time: 21:18		Ryan Walker Roxanne Cook

4.2.2 Bat Emergence Results

The following descriptions summarise bat activity and emergence from the building for each survey visit.

- 11th August 2025

Approximately six emergences were recorded during this survey, with five emergences from the house (Figures 8 and 9) and one from the barn (Figure 10). A soprano pipistrelle *Pipistrellus pygmaeus* was recorded emerging from underneath a hanging tile on the western elevation of the house at 20:32, before a brown long-eared bat emerged from under the eaves of the same elevation at 20:34. A common pipistrelle *Pipistrellus pipistrellus* bat also emerged from under the eaves of the western elevation at 21:01. Two likely *Pipistrellus* sp. bats emerged from under hanging tiles on the southern elevation during the survey, with the first at 20:17, and the second at 21:36. A common pipistrelle was also observed emerging from under the eaves of the eastern elevation of the barn at 20:29.

There was moderate bat activity during this survey. Foraging activity from common pipistrelle bats was recorded throughout much of the survey, with constant passes recorded between 21:15 and 21:52 and again from 21:56 until the survey's end. Frequent commuting noctule *Nyctalus noctula* passes were heard between 20:33 and 21:26, and occasional commuting passes were additionally recorded from brown long-eared and soprano pipistrelle bats.



Figure 8. Emergence points and flight paths of a common (marked in red) and soprano pipistrelle (marked in yellow) and a brown long-eared bat (marked in blue) on the western elevation of the house at Town House Farm during the survey on 11th August 2025.



Figure 9. Emergence points and flight paths of two unidentified pipistrelle bats (marked in grey) on the southern elevation of the house at Town House Farm during the survey on 11th August 2025.



Figure 10. Emergence points and flight paths of a common pipistrelle (marked in red) on the eastern elevation of the barn at Town House Farm during the survey on 11th August 2025.



- 1st September 2025

Seven emergences were recorded during this survey, all from the house on site (Figures 11 and 12). A soprano pipistrelle emerged from under a hanging tile on the western elevation at 20:05, with two pipistrelle bats also emerging from under hanging tiles on this elevation at 20:09 and 20:13. A common pipistrelle was recorded emerging from under a hanging tile on the southern elevation at 20:08, with two soprano pipistrelles also emerging from under hanging tiles on this elevation at 20:11 and 20:14. Another unidentified bat was also recorded emerging from under hanging tiles on the northern elevation at 20:10.

There was high foraging and commuting bat activity during the survey, with multiple foraging passes around the house by common and soprano pipistrelles and noctule bats between 19:48 and 20:18, with the barn also seeing constant noctule (19:42–20:22) and common pipistrelle (20:06–20:29) foraging activity during the survey. Commuting passes from brown long-eared bats, serotine *Eptesicus serotinus*, Nathusius' pipistrelle *Pipistrellus nathusii* and an unidentified *Myotis* bat were also recorded.



Figure 11. Emergence points and flight paths of a soprano pipistrelle (marked in yellow) and two unidentified pipistrelle bats (marked in grey) on the northern and western elevations of the house at Town House Farm during the survey on 1st September.



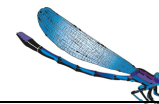
Figure 12. Emergence points and flight paths of one common pipistrelle (marked in red) and two soprano pipistrelle (marked in yellow) bats on the southern elevation of the house at Town House Farm during the survey on 1st September 2025.

5 IMPACT ASSESSMENT AND MITIGATION RECOMMENDATIONS

5.1 Interpretation of Findings

The bat scoping and emergence surveys indicate that Town House Farm supports the following roosts (Figure 13):

- a long-eared day roost in the southern side void of the house, used by at least one individual (identified via droppings during the initial scoping on 5th June 2025; the emergence of a brown long-eared bat during the survey on 11th August is considered to be from this roost);
- a Natterer's day roost under hanging tiles on the western elevation of the house, used by at least one individual (identified via droppings during the initial scoping on 5th June 2025, confirmed via DNA analysis);
- a soprano pipistrelle day roost under hanging tiles on the western elevation of the house, used by at least one individual;
- a common pipistrelle day roost under the eaves of the western elevation of the house, used by at least one individual;
- a pipistrelle bat day roost under hanging tiles on the western elevation of the house, used by at least one individual;
- a soprano pipistrelle day roost under hanging tiles on the southern elevation of the house, used by at least two individuals;
- a common pipistrelle day roost under hanging tiles on the southern elevation of the house, used by at least one individual;
- a pipistrelle bat day roost under hanging tiles on the southern elevation of the house, used by at least two individuals;
- a pipistrelle bat day roost under hanging tiles on the northern elevation of the house, used by at least one



individual;

- a brown long-eared bat day roost in the interior of the barn, used by at least one individual (identified via droppings during the scoping on 28th July 2025);
- a common pipistrelle day roost under the eaves of the eastern elevation of the barn, used by at least one individual.

Several unidentified pipistrelle roosts were identified; while occasional Nathusius' pipistrelle passes were recorded during the surveys, these are considered likely to be further common or soprano pipistrelle roosts given the presence of other roosts on the same elevations and high levels of activity from these species throughout the survey.

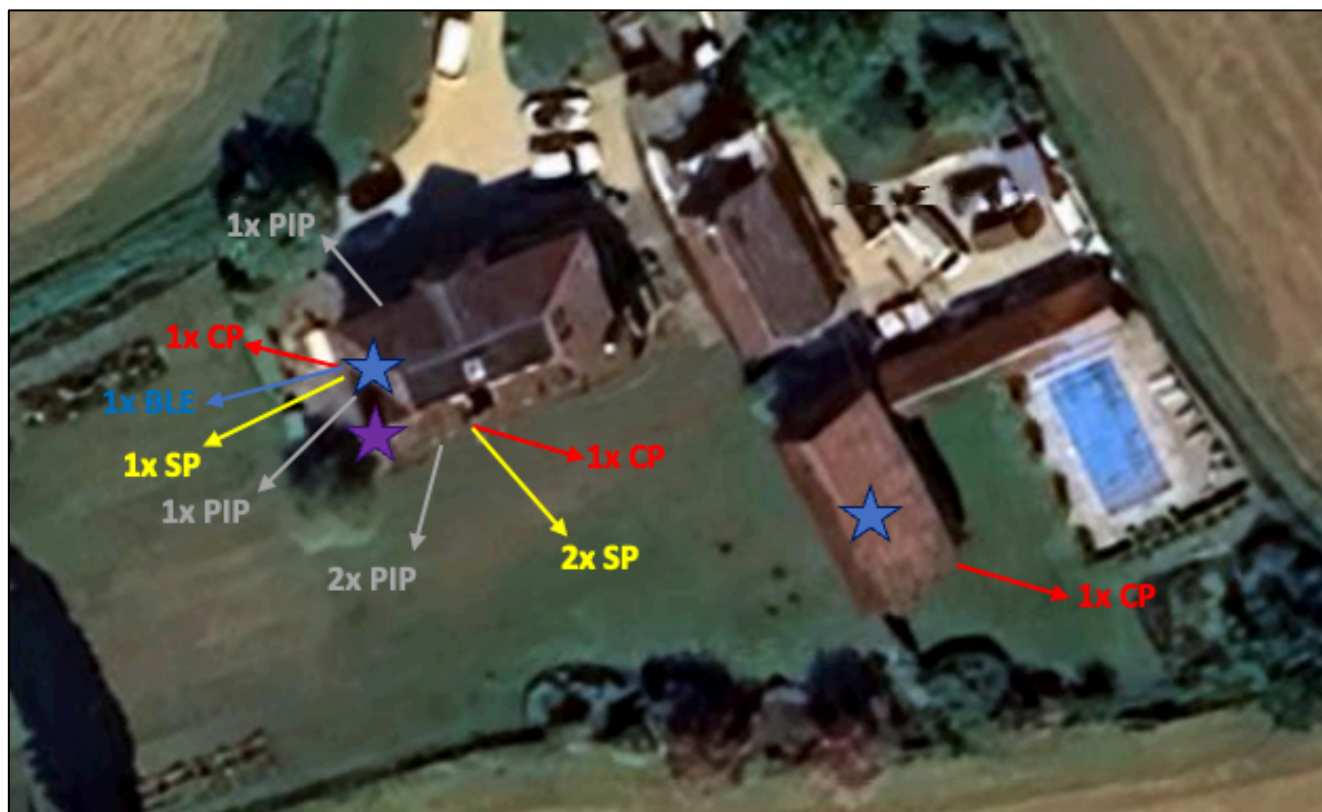
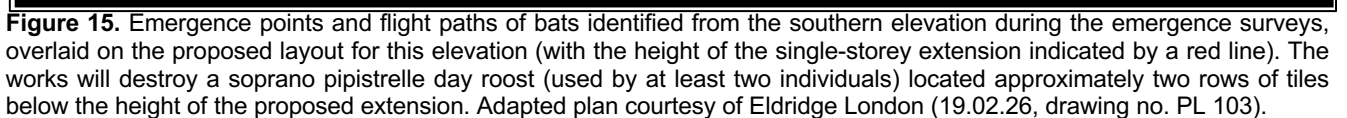
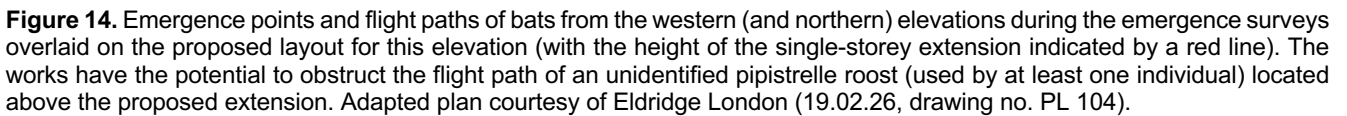


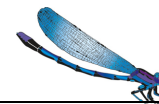
Figure 13. Bat roosts identified at Town House Farm, including two long-eared roosts in the house and barn (blue stars; the brown long-eared bat emergence in blue is considered to be part of the same roost in the house), Natterer's bat day roost (purple star), common pipistrelle day roosts (red), soprano pipistrelle day roosts (yellow) and unidentified pipistrelle bat roosts (grey; considered to be likely to be further common or soprano pipistrelle roosts).

5.2 Potential Impacts

The proposed development to the house will involve the removal of several rows of hanging tiles on the western and southern elevations of the house; a day roost shared by at least two soprano pipistrelles was identified below the proposed height of the extension and such these works will destroy the roost. The extension also has the potential to obstruct the entry passage of an unidentified pipistrelle day roost (used by one individual) on the western elevation, which in the absence of mitigation would represent disturbance of this roost. Common and soprano pipistrelles are common and widespread, and in the absence of mitigation these impacts are not considered significant to bat conservation beyond a **local level**.



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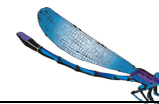
be required to safeguard bats and achieve this are outlined below:

- **Installation of Bat Boxes on Trees**
Prior to commencement of the works a minimum of two crevice bat boxes must be installed on the retained southern or eastern elevations of the building, or on mature/semi-mature trees within the garden that are outside of the construction zone. Suitable crevice boxes include the Beaumaris Woodstone Bat Box and the Improved Crevice Bat Box (see Appendix 3; other suitable options are commercially available). The boxes will be used to house any bats encountered during works and will be retained in perpetuity as enhancements. The box must be orientated to be east-facing (or east- or south-facing if on a tree) at a minimum height of 3.5m from the ground, away from sources of artificial lighting.
- **Preparatory works – ‘soft strip’**
All hanging tiles should be carefully hand stripped one by one from the walls under the direct supervision of a licenced bat ecologist. Any bats found shall be gently captured and placed into bat boxes that have been secured to trees surrounding the site in advance.
- **Timing**
The hand stripping of hanging tiles should be undertaken in the period between mid-March and the end of October to avoid disturbing bats that could be in hibernation. As no maternity roosts have been identified during the surveys of this property, avoiding the breeding period (May–August inclusive) is not considered necessary.
- **Replacement roost site**
Replacement roosting opportunities must be incorporated into the proposed replacement building. Suitable crevice features for soprano pipistrelle bats must be re-instated post-development, either achieved through at least one bat tube such as the 2FR Schwegler Bat Tube on the walls of the building, or through the use of bat access tiles or wooden wedges beneath individual hanging tiles. The wooden wedges would create a gap of approximately 15mm allowing access to roosting bats whilst ensuring the feature will remain watertight. These should be positioned on the southern elevation of the property to replace the lost roost. Some recommended examples of integrated features are shown in Appendix 3.
- **Artificial lighting**
The use of artificial lighting inappropriately can result in significant disturbance to bats. The detailed design should include a lighting scheme that minimises these impacts by following the Bat Conservation Trust’s guidance on lighting, reproduced in Appendix 4 of this report.

It is considered that with the adoption of careful works and sensitive timing (as outlined above), the remaining common and soprano pipistrelle, brown long-eared bat, Natterer’s bat and unidentified bat roosts on these elevations can remain unaffected by the proposed works.

The proposed works on the barn will be limited to the existing covered walkway and will not impact the barn where a long-eared bat and a common pipistrelle roost were identified. As such it is considered that with careful works and sensitive timing these roosts can remain unaffected by the works (following the methods outlined above).

If the development plans are changed, then a licensed ecologist must be consulted to provide an updated assessment.



5.3 Other Species

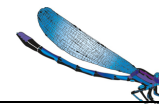
During the scoping of the barn the remains of several swallow nests were identified, with several individuals observed during this survey and the second emergence survey on 1st September 2025. The homeowner is recommended to consider the installation of swallow nest cups in the garage or barn to improve breeding opportunities for this species on site. These should be installed on walls, with individual cups situated at least 1m apart. Nesting swallows need constant access to nest cups during the breeding season (1st March–31st August) and as such access to the interior should be maintained (i.e., by keeping a door or window open throughout the season).

5.4 Conclusions

The proposed development on the house will impact on small numbers of common and widespread bat species and in the absence of mitigation is not considered significant to bat conservation beyond local level. The proposed mitigation measures outlined above will ensure that individual bats will not be harmed during the construction, and that alternative roosting opportunities are provided after completion. The applicants are confident that the three tests under Regulation 53 (2) (e) can be satisfied and an EPS licence can be obtained. As such, the planning authority can be satisfied that securing this mitigation and EPS licence under reserved matters will ensure that its duty to comply with the Conservation of Habitats and Species Regulations (2017) as amended, will have been fully met.

If any bats or other protected species are found during the development, work should be stopped immediately, and an ecologist must be contacted for advice.

Should you need any further advice on the information provided above, please do not hesitate to contact The Ecology Co-op.



APPENDIX 1 – LEGISLATION AND POLICY

All species of British bat are fully protected under the Wildlife and Countryside Act 1981 as amended through inclusion in Schedule V. All bat species in the UK are also included in Schedule II of the Habitats Regulations 2017 which transpose Annex II of the Council Directive 92/43/EEC 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora ("EC Habitats Directive") which defines European protected species of animals.

Bat species are afforded further protection by the Natural Environment and Rural Communities Act 2006.

Under the above legislation it is an offence to:

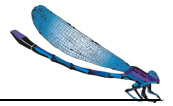
- kill, injure or take an individual;
- possess any part of an individual either alive or dead;
- intentionally or recklessly damage, destroy or obstruct access to any place or structure used by these species for shelter, rest, protection or breeding;
- intentionally or recklessly disturb these species whilst using any place of shelter or protection; or
- deliberate disturbance in such a way as to be likely to impair their ability to:
 - survive, to breed or reproduce, or to rear or nurture their young; or
 - in the case of animals of a hibernating or migratory species, to hibernate or migrate; or
 - to affect significantly the local distribution or abundance of the species to which they belong;
- keep (possess), transport, sell or exchange, or offer for sale or exchange, any live or dead bat, or any part of, or anything derived from a bat.

It is also an offence to set and use articles capable of catching, injuring or killing bats (for example a trap or poison), or knowingly cause or permit such an action. In the case of all species of British bat there is also protection under Schedule 6 of The Wildlife and Countryside Act 1981 (as amended) relating specifically to trapping and direct pursuit of these species.

The Habitats Directive and Habitats Regulations provide for the derogation from these prohibitions for specific reasons provided certain conditions are met. An EPS licensing regime allows operations that would otherwise be unlawful acts to be carried out lawfully. In England, Natural England is the licensing Authority and, in order to grant a license, ensures that three statutory conditions (sometimes referred to as the 'three derogation tests') are met:

- a licence can be granted for the purposes of "preserving public health or safety or for other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment" (Regulation 53 (2) (e));
- a licence can only be granted if "there are no satisfactory alternatives" to the proposed action;
- a licence shall not be granted unless the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.

A bat roost is defined as "any structure or place, which any wild bat uses for shelter or protection." Bats tend to re-use the same roosts; therefore, legal opinion is guided by recent case law precedents, that a roost is protected whether or not the bats are present at the time. This can include all summer roosts, used for breeding, resting or sheltering and all winter roosts used for hibernating.



APPENDIX 2 – NIGHT VISION CAMERA DARKEST POINTS



Figure 1. Darkest point of the night vision camera covering the western elevation of the house at Town House Farm during the survey on 11th August 2025.



Figure 2. Darkest point of the night vision camera covering the southern elevation of the house at Town House Farm during the survey on 11th August 2025.

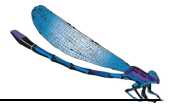


Figure 3. Darkest point of the night vision camera covering the southern pitch of the covered walkway on the barn at Town House Farm during the survey on 11th August 2025.



Figure 4. Darkest point of the night vision camera covering the northern pitch of the covered walkway on the barn at Town House Farm during the survey on 11th August 2025.

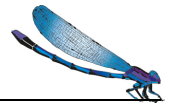


Figure 5. Darkest point of the night vision camera covering the western elevation of the house at Town House Farm during the survey on 1st September 2025.



Figure 6. Darkest point of the night vision camera covering the southern elevation of the house at Town House Farm during the survey on 1st September 2025.

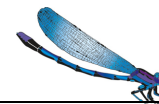
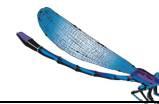


Figure 7. Darkest point of the night vision camera covering the western section of the southern pitch of the covered walkway on the barn at Town House Farm during the survey on 1st September 2025.



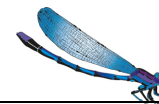
Figure 8. Darkest point of the night vision camera covering the eastern section and eastern gable end of the southern pitch of the covered walkway on the barn at Town House Farm during the survey on 1st September 2025.



APPENDIX 3 – EXAMPLES OF REPLACEMENT BAT ROOSTING FEATURES



Figure 1. Left to right, the 2FN Schwegler bat box, Beaumaris Woodstone Bat Box and Improved Crevice Bat Box, with other brands available at many on-line wildlife stores. The Schwegler and Beaumaris boxes are constructed of 'woodcrete' (a mixture of cement and woodchip) and are designed to be durable and replicate the stable thermal properties of trees and buildings (with the Improved Crevice box comprising treated plywood). They may be attached to trees or buildings.



APPENDIX 4 – REDUCING IMPACTS OF ARTIFICIAL LIGHT

Bright external lighting can have a detrimental impact upon foraging and commuting bat flight paths, but more importantly can also cause bats to remain in their roosts for longer. Artificial lighting can also cause significant impacts to other nocturnal species, most notably moths and other nocturnal insects. It can also result in disruption of the circadian rhythms of birds, reducing their fitness.

Guidelines issued by the Bat Conservation Trust¹ should be referred to when designing the lighting scheme. Note that lighting designs in very sensitive areas should be created with consultation from an ecologist and using up-to-date bat activity data where possible. The guidance contains techniques that can be used on all sites, whether a small domestic project or larger mixed-use, commercial or infrastructure development. This includes the following measures:

Avoid lighting key habitats and features altogether

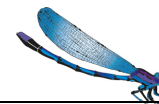
There is no legal duty requiring any place to be lit. British Standards and other policy documents allow for deviation from their own guidance where there are significant ecological/environmental reasons for doing so. It is acknowledged that in certain situations lighting is critical in maintaining safety, such as some industrial sites with 24-hour operation; however, in the public realm, while lighting can increase the perception of safety and security, measurable benefits can be subjective. Consequently, lighting design should be flexible and be able to fully consider the presence of protected species.

Apply mitigation methods to reduce lighting to agreed limits in other sensitive locations – lighting design considerations

Where bat habitats and features are considered to be of lower importance or sensitivity to illumination, the need to provide lighting may outweigh the needs of bats. Consequently, a balance between a reduced lighting level appropriate to the ecological importance of each feature and species, and the lighting objectives for that area will need to be achieved. The following are techniques which have been successfully used on projects and are often used in combination for best results:

- dark buffers, illuminance limits and zonation;
- sensitive site configuration, whereby the location, orientation and height of newly built structures and hard standing can have a considerable impact on light spill;
- consideration of the design of the light and fittings, whereby the spread of light is minimised ensuring that only the task area is lit. Flat cut-off lanterns or accessories should be used to shield or direct light to where it is required. Consideration should be given to the height of lighting columns. It should be noted that a lower mounting height is not always better. A lower mounting height can create more light-spill or require more columns. Column height should be carefully considered to balance task and mitigation measures. Consider no lighting solutions where possible such as white lining, good signage, and LED cat's eyes. For example, light only high-risk stretches of roads, such as crossings and junctions, allowing headlights to provide any necessary illumination at other times;
- screening, whereby light spill can be successfully screened through soft landscaping and the installation of walls, fences and bunding;

¹ Bat Conservation Trust and Institute for Lighting Professionals (2018) Guidance note 8. Bats and Artificial Lighting. <https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/>



- glazing treatments, whereby glazing should be restricted or redesigned wherever the ecologist and lighting professional determine there is a likely significant effect upon key bat habitat and features;
- creation of alternative valuable bat habitat on site, whereby additional or alternative bat flightpaths, commuting habitat or foraging habitat could result in appropriate compensation for any such habitat being lost to the development;
- dimming and part-night lighting. Depending on the pattern of bat activity across the key features identified on site it may be appropriate for an element of on-site lighting to be controlled either diurnally, seasonally or according to human activity. A control management system can be used to dim (typically to 25% or less) or turn off groups of lights when not in use.

Demonstrate compliance with illuminance limits and buffers

- *Design and pre-planning phase*; it may be necessary to demonstrate that the proposed lighting will comply with any agreed light-limitation or screening measures set as a result of your ecologist's recommendations and evaluation. This is especially likely to be requested if planning permission is required.
- *Baseline and post-completion light monitoring surveys*; baseline, pre-development lighting surveys may be useful where existing on or off-site lighting is suspected to be acting on key habitats and features and so may prevent the agreed or modelled illuminance limits being achieved.
- *Post-construction/operational phase compliance-checking*; as a condition of planning, post-completion lighting surveys by a suitably qualified person should be undertaken and a report produced for the local planning authority to confirm compliance. Any form of non-compliance must be clearly reported, and remedial measures outlined. Ongoing monitoring may be necessary, especially for systems with automated lighting/dimming or physical screening solutions.

Lighting Fixture Specifications

The Bat Conservation Trust recommends the following specifications for lighting on developments to prevent disturbance:

- lighting spectra: peak wavelength >550nm
- colour temperature: <2700k (warm)
- reduction in light intensity
- minimal UV emitted
- upward light ratio of 0% and good optical control.

Further reading:

Buglife (2011) A review of the impact of artificial light on invertebrates.

Royal Commission on Environmental Pollution (2009) Artificial light in the environment. HMSO, London. Available at: <https://www.gov.uk/government/publications/artificial-light-in-the-environment>

Rich, C., Longcore, T., Eds. (2005) Ecological Consequences of Artificial Night Lighting. Island Press. ISBN 9781559631297.

CPRE (2014) Shedding Light: A survey of local authority approaches to lighting in England. Available at:



<http://www.cpre.org.uk/resources/countryside/dark-skies/item/3608-shedding-light>

Planning Practice Guidance guidance (2014) When is light pollution relevant to planning? Available at: <https://www.gov.uk/guidance/light-pollution>

Institution of Lighting Professionals (2021) Guidance Notes for the Reduction of Obtrusive Light GN01:2011. Available at: <https://www.theilp.org.uk/resources/free-resources/>

Voigt, C.C., Azam, C., Dekker, J., Ferguson, J., Fritze, M., Gazaryan, S., Hölker, F., Jones, G., Leader, N., Lewanzik, D. and Limpens, H., 2018. *Guidelines for consideration of bats in lighting projects*. Unep/Eurobats. Available at: https://cdn.bats.org.uk/uploads/pdf/Resources/EUROBATGuidelines8_lightpollution.pdf?v=1542109376