



**Ashby Farm
Bat Survey Report
Holland and Holland
06 March 2026**


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1 Introduction

1.1 BACKGROUND

- 1.1.1 This report presents the findings of the bat surveys at Ashby Farm, Ducks Hill Road, Northwood HA6 2SS, henceforth known as 'the Site'. The site is centred on ordnance survey grid reference TQ07519004 and a broad scale location plan is shown in Figure 1. The desk study and survey work were carried out by Davidson-Watts Ecology Ltd on behalf of Holland and Holland.
- 1.1.2 The Site incorporates an existing main shooting facility operated by Holland and Holland, with a reception building, function space and other associated workshops and stores constructed in 2017, as well as two small residential properties known as Ashby Cottages. Additionally, within the southeast area of the site is a derelict farmhouse and approximately nine associated storage buildings and barns, collectively known as Ashby Farm.
- 1.1.3 The current proposals include demolition of the majority of the existing storage barns within the Survey Area, in order to facilitate development of a new gun making facility. The derelict farmhouse is not planned for demolition within these proposals (see Figure 2) but will be retained and developed as part of the future phase two works under a separate planning application.
- 1.1.4 Hibernation surveys were undertaken during winter 2024/2025 on buildings 1 to 9. The surveys determined that buildings all buildings apart from building 3 had no hibernation activity and did not require further consideration regarding hibernating bats. A small number of bats calls were recorded during the months of November and December at Building 3, and although concluded to be unlikely to be representative of true hibernation activity, it was concluded that a precautionary approach should be adopted and appropriate mitigation for hibernating bats should be in place for Building 3. Survey detail and recommendations can be viewed in Davidson-Watts Ecology Ltd (2025) Ashby Farm Bat Hibernation Report 2024_5.
- 1.1.5 A number of brown long-eared bat droppings (identified with use of eDNA analysis) were also identified in Building 6. The droppings were not fresh, no new droppings occurred across the course of the hibernation surveys, and no bat calls were recorded in any months for the building. As such, Building 6 was not considered to be a hibernation roost, and was therefore determined to be a **Confirmed Roost**, with further survey effort recommended to confirm characterisation.
- 1.1.6 All ecology work required for the production of this report was undertaken by Davidson-Watts Ecology Ltd, on behalf of Holland and Holland.

1.2 AIMS AND OBJECTIVES

- 1.2.1 The objectives of this report are therefore:
- to present baseline survey data on use of the site by bats and assess the value of the site to local bat populations;
 - to identify and describe all potentially significant ecological effects on bats associated with the proposed works;

- make further recommendations, where appropriate, to enable the determination of the full ecological value of the buildings on site to bats
- to set out the mitigation measures required to ensure compliance with nature conservation legislation and to address any potentially significant ecological effects; and
- to identify appropriate compensation and enhancement measures

2 Legislation

2.1 BATS

- 2.1.1 In England and Wales all bat species, their breeding sites and resting places are fully protected under the Wildlife and Countryside Act 1981 (WCA) (as amended) through inclusion in Schedule 5. This Act has been further amended by the Countryside and Rights of Way Act 2000 (CRoW).
- 2.1.2 All bats are also included under The Conservation of Habitats and Species Regulation 2017, as amended, which defines 'European protected species' (EPS) of animals. These various pieces of legislation almost parallel each other, with a few small differences in wording. The legal significance of these differences had not yet been fully established and so the following account attempts to combine them to provide a simplified summary of the relevant provisions. Taken together the Act and Regulation make it illegal to:
- deliberately kill, injure or capture (or take) a bat,
 - deliberately disturb a bat so as to impair their ability to survive, breed or reproduce, rear or nurture their young, to hibernation or migrate or to significantly affect the local distribution or abundance,
 - intentionally or recklessly obstruct access to breeding site or place of shelter, and
 - damage or destroy 'any structure or place which a bat uses for breeding or resting (including accidentally under the Habitat Regulations 1994).
- 2.1.3 European Union Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats and Species Directive) places a legal requirement on all Member States of the European Union to protect specified habitats and species through their own domestic legislation. In the UK this has been implemented by the Conservation of Habitats and Species Regulations (2017). All species of bats are on Annex IV ('European protected species (EPS) of animal'), which requires that they are given full protection.

3 Planning Policy

3.1 NATIONAL PLANNING POLICY

- 3.1.1 The National Planning Policy Framework (NPPF) (20 December 2023) Chapter 15 outlines out how the planning system should contribute to and enhance the natural and local environment by protecting sites of biodiversity value, recognising wide benefits from natural capital, minimising impacts on and providing net gains for biodiversity. If a proposed development would result in significant harm to the natural environment, Site of Special Scientific Interest or irreplaceable habitats which cannot be avoided (through the use of an alternative site with less harmful impacts), mitigated or compensated for (as a last resort) then planning permission should be refused. Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.
- 3.1.2 To minimise impacts on biodiversity and geodiversity, planning policies should identify and map components of the local ecological networks, including the hierarchy of sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat management, enhancement, restoration or creation, 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 (Paragraph 185).
- 3.1.3 The NPPF retains protection for Local Wildlife Sites which are clearly recognised in the framework as locally designated sites of importance for biodiversity (Paragraph 181). The policy provides the direction for local authorities to identify, map and protect these sites through local plans. The new policy also requires protection of Local Wildlife Sites to recognise the importance and the contribution that they make to wider ecological networks, as stated in the Government's own Natural Environment White Paper.
- 3.1.4 Planning principles to be applied include planning refusal if significant hard to biodiversity as a result of a development cannot be avoided, development can only take place where there are adverse effects on a Site of Scientific Interest where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest, development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and development whose primary objective is to conserve or enhance biodiversity should be supported especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate (Paragraph 186).
- 3.1.5 The Natural Environment and Rural Communities (NERC) Act came into force on 1st Oct 2006. Section 41 (S41) of the 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 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 Natural Environment and Rural Communities Act 2006, to have regard to the conservation of biodiversity in England, when

carrying out their normal functions. Fifty-six habitats of principal importance and 943 species of principal importance are included on the S41 list. These are all the habitats and species 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. Bats are listed as priority species under the NERC Act 2006.

- 3.1.6 In England, biodiversity net gain (BNG) is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This is referred to as BNG in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.
- 3.1.7 Under the statutory framework for BNG, every grant of planning permission is deemed to have been granted subject to a general biodiversity gain condition to secure the biodiversity gain objective. This objective is to deliver at least 10% increase in relation to the pre-development biodiversity value of the development granted permission. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits. BNG will be measured using DEFRA's biodiversity metric and habitats will need to be secured for at least 30 years.

3.2 LOCAL PLANNING POLICIES

- 3.2.1 Hillingdon's Local Plan Part 2 adopted in January 2016 details policies relating to nature conservation in Policy DMEI 7: Biodiversity Protection and Enhancement as follows:
- The design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. Where loss of a significant existing feature of biodiversity is unavoidable, replacement features of equivalent biodiversity value should be provided on-site. Where development is constrained and cannot provide high quality biodiversity enhancements on-site, then appropriate contributions will be sought to deliver off-site improvements through a legal agreement.
 - If development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value.
 - All development alongside, or that benefits from a frontage on to a main river or the Grand Union Canal will be expected to contribute to additional biodiversity improvements.
 - Proposals that result in significant harm to biodiversity which cannot be avoided, mitigated, or, as a last resort, compensated for, will normally be refused.

4 Methodology

4.1 DESK STUDY

- 4.1.1 An initial check was undertaken on Magic (www.magic.defra.gov.uk) for known European Protected Species Licences (EPSL) within 2km of the proposed works.
- 4.1.2 The data search also examined the number of bat records retained by the local records centre, Greenspace Information for Greater London (GIGL), also within 2km of the site and within the last 10 years.

External inspection

- 4.1.3 A systematic external search was undertaken on 23rd April 2024 of all areas of the property to be impacted by the proposed development, including buildings subject to structural change and buildings potentially subject to increased disturbance from noise, vibrations and/or artificial lighting that can affect bat roosting and/or foraging.
- 4.1.4 The survey area comprises a barn, stable blocks and a number of additional later-built outbuildings designed to service the livery in the form of storage etc., resulting in a series of conjoined buildings of different types: as such and for simplicity, buildings within the survey area were designated in part as 'building groups'. The locations of these building groups are detailed in Figure 4.
- 4.1.5 The survey was undertaken using binoculars, torches, mirrors and endoscopes as necessary to identify potential or actual resting places or bat access points (for example, loose or missing tiles; missing mortar at gable ends; hanging tiles or wooden cladding; raised lead flashing; gaps beneath the eaves; broken windows; damaged air vents and recesses in stonework). Characteristic field signs of bat presence, for example live or dead specimens, accumulations of droppings or obvious scratch/wear marks were also identified where possible. It should be noted that sometimes bats leave no visible signs of their presence and external signs can be washed away.

4.2 INTERNAL INSPECTION

- 4.2.1 A systemic search was undertaken of the interior of all buildings where safely accessible, to identify the potential or actual bat access points and roosting places and to locate evidence of bats. Evidence of bats could include droppings, urine staining, fur-oil staining, feeding remains (for example, large accumulations of moth wings), and individual bats including squeaking. An endoscope, torch, mirror or close-focussing camera were used when required to enable closer inspection of potentially important features. It should be noted that sometimes bats leave no visible sign of their presence even on the inside of the building, particularly when hidden in cracks, crevices, and voids. All torches were turned off to enable identification of potential roost access points through light spill.
- 4.2.2 Detail of internal structures, such as the presence and location of timber joists and other features supporting roost features, internal dimensions (width, length, height) of voids, the location of internal roosting points/opportunities and the location of access points. Any vegetation adjacent to the structure that could be used by emerging bats was also noted where

present. An assessment of the potential of the building to support roosts was then made in line with BCT guidelines (2023) shown in Table 1 below.

- 4.2.3 Any droppings present were collected for environmental DNA (eDNA) analysis and locations of collections clearly noted on a plan along with details of dropping numbers, size (measured in mm) and age class.
- 4.2.4 Detail was recorded including the size of the roost including the presence and location of timber joists and other features supporting roosts, internal dimensions (width, length, height), location of internal roosting points/opportunities and location of access points.
- 4.2.5 The survey was undertaken by Natural England (NE) bat licenced ecologists Andrew Latham (licence registration number 2023-11069-CL18-BAT) and Freja McCall-Stevenson (licence registration number 2023-11746-CL18-BAT), with a combined 10 years' experience in bat surveying.

Table 1: Criteria for categorising buildings for their potential to support a bat roost (Collins, 2023)

Suitability	Description of building
None	No habitat features on site likely to be used by any roosting bats at any time of the year. No habitat features likely to be used for commuting or foraging at any time of the year.
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 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 by a larger number of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site but could be used by individual hibernating bats). Habitats that could be used by a small number of bats as flight paths but not well connected to the wider landscape, or suitable, isolated habitat.
Moderate	A structure with one or more potential roost features that may be used by bats due to their size, shelter, protection, condition and surrounding habitat. Unlikely to support a roost of high conservation value (roost type only – hibernation or maternity). Continuous habitat connected to the wider landscape e.g. tree lines, linked back gardens, trees, scrub, grassland or water that could be used as flight lines or for foraging.
High	A structure with one or more potential roost features that are suitable for use by a large number of bats on a regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. Continuous high-quality habitat that is well connected to the wider landscape. Site close to and connected to known roosts.
Confirmed	Confirmed bat roost where bats are recorded as present or where evidence of use by bats has been recorded. Where there are multiple roost features present, a building may be confirmed as a confirmed roost, but also still have further suitability.

- 4.2.6 Consideration was also given to the potential of the structure to provide a hibernation roost in line with Figure 4.1 of Collins (2023).

4.3 SURVEY CONSTRAINTS

- 4.3.1 Building 3 could not be fully inspected during the internal survey, due to significant amounts of hay storage preventing access to the eastern, darker and more sheltered side of the barn. Additionally, access was not possible to a partial mezzanine floor, due to concerns over stability of the floor timbers. However, the overall condition of Building 3 viewed from the accessible areas was sufficient to be considered of High suitability for roosting bats (see 3.2.3): therefore, this is not considered a significant limitation to the survey at this time.
- 4.3.2 Several of the associated outbuildings were locked at the time of survey and unable to be inspected internally: these included parts of building group 1, 2 and 4, as well as the individual Buildings 8, 9 and 11. These buildings were all used for storage, typically cluttered and some interiors could be partially viewed through windows or gaps in door frames. Some of these buildings were assessed as having higher potential bat roost suitability based on a lack of evidence to the contrary, i.e. using the precautionary principle: as such, this is not considered a significant limitation to the survey. Use of the same principle applied when not being able to fully access the interior of a building.
- 4.3.3 The scope of the PRA was identified to include only the buildings within the survey area. A small number of mature trees were identified bordering the survey area and wider site, during the earlier PEA, with potential suitability for roosting bats (Davidson-Watts Ecology, 2024). This is not considered a significant limitation to this survey. However additional survey effort to assess these trees is recommended (see 6.1), in case the proposals include work that may affect this potential roost resource for bats.

4.4 DUSK EMERGENCE SURVEYS

- 4.4.1 Where the possibility that bats are present cannot be eliminated or evidence of bats is found during a PRA, further surveys such as presence absence or roost characterisation are required (Collins, 2023).
- 4.4.2 To help determine whether bats are roosting within suitable features of the building, dusk emergence surveys were undertaken on the following dates:
- 18 May (Buildings 2, 3 and 6),
 - 28 May (Buildings 4, 5 and 9).
 - 29 May (Buildings 1, 8 and 11),
 - 4 June (Buildings 7, 10 and 12),
 - 15 July (Building 4, 5 and 9),
 - 16 July (Buildings 2, 3 and 6),
 - 5 August (Buildings 2, 3 and 6, and
 - 6 August 2025 (Building 1, 4 and 8).

4.4.3 The guidelines recommend dusk emergence surveys are required as follows:

- Low roost suitability – one survey in May to August,
- Moderate roost suitability - two dusk emergence surveys area required with at least one survey between May and August, at least three weeks apart, preferably more.
- High roost suitability – May to September with at least two surveys between May and August, at least three weeks apart, preferably more.

4.4.4 Dusk emergence surveys commence fifteen minutes before dusk and finish 90 to 120 minutes after local sunset. All surveys should be undertaken in appropriate weather conditions which should be recorded at the start and end of the survey. Any additional commuting or foraging activity recorded during the protected species surveys should be noted to enable an understanding of local habitat use by bats to be formulated. The bat survey should follow guidance as set out in the Bat Conservation Trust (BCT) Survey Guidelines (Collins 2023) with explanations of any deviations from this where necessary. Surveyors should be equipped with professional full spectrum bat detectors with inbuilt SD cards to enable calls to be recorded and analysed post survey. Information should be collected on species, numbers, access points, roosting locations and flight paths. All affected PRFs should be monitored during the survey and surveyors/NVAs appropriately spaced to cover all potential exit/entry locations. All bat call recordings should be reviewed post survey by an experienced ecologist using appropriate bat software.

4.5 GROUND LEVEL TREE ASSESSMENTS

4.5.1 Where trees are likely to be impacted by development either through direct action (pruning, felling), or indirectly for example through lighting, noise, vibration or removal of adjacent vegetation, surveys are required to determine whether bats are present or absent and, where present, to confirm species, number of bats, roost type, access points, seasonal use and flight lines from the roost (Collins, 2023).

4.5.2 A detailed inspection from ground level was therefore undertaken of each tree that was proposed for removal within the site to determine the roosting resource available to bats. All visible potential roost features (PRFs) were categorised according to Table 2, below.

4.5.3 For each tree the following information was recorded:

- Recorder name, site, county and date,
- Tree species,
- Tree height,
- Number of stems,
- Tree life stage, and
- A description of all potential roost features identified on the tree.

Table 2 - Criteria for categorising trees for their potential to support a bat roost based on ground-level assessment (Table 4.3 Collins, 2023).

Suitability	Description
NONE	Either no Potential Roost Features (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.

5 Results

5.1 DESK STUDY

- 5.1.1 A total of six bat EPSL licence records were present on MAGIC within 2km of the site. The closest related to the destruction of a soprano pipistrelle *Pipistrellus pygmaeus* maternity roost 434m northeast of the site.
- 5.1.2 The GIGL data search returned 11 records of bats within 2km of the site and within the last 10 years. The records related to the following species: Daubenton's *Myotis daubentonii*, serotine *Eptesicus serotinus* whiskered/Brandt's *Myotis mystacinus/Myotis brandtii*, Leisler's *Nyctalus leislerii*, noctule *Nyctalus noctula*, common pipistrelle *Pipistrellus pipistrellus*, brown long-eared *Plecotus auritus*, Nathusius' pipistrelle *Pipistrellus nathusii* and an additional unknown bat species. The closest record related to Daubenton's bat 492m from the site.

5.2 ASSESSMENT OF SURROUNDING HABITAT

- 5.2.1 The Site sits to the south of Watford town, north of the suburb of Ruislip. Ruislip Wood is located immediately east and south of the Site, with agricultural land with hedgerows and open fields located to the immediate west and north. The wider land scape comprises woodland sections of various sizes including Bayhurst Wood County Park located to the south west, and residential developments to the north and south of Ruislip Wood. The lake Ruislip Lido is situated approximately 1.3km south east of the Site and Northwood golf course approximately 1km west of the Site. This woodland and hedgerow network provides good habitat connectivity for bat species across the wider landscape, and the Ruislip Lido lake and Northwood gold course provide a water source and foraging opportunities in the surrounding area. The habitat surrounding the Site is therefore assessed as having 'High' suitability to support roosting, foraging and commuting bats.

5.3 BUILDINGS

- 5.3.1 A summary of the search for evidence of roosting bats, external and internal PRFs is included here, as well as the resulting assessment of the suitability of each for roosting bats This assessment was also viewed in light of the habitat surrounding the survey area (and more broadly, the site) being considered of Moderate suitability for foraging and commuting bats: i.e. habitat connected to the broader landscape with suitable features including areas of grassland,

scrub, woodlands and some waterbodies (Collins 2023). More detailed descriptions of the buildings and PRFs are included in Appendix A, with photos included in Appendix B.

Building 1

- 5.3.2 No evidence of roosting bats was found outside or within the areas collectively comprising Building 1. Sections of Building 1 primarily the western courtyard stable units and hay storage outbuildings, offer a limited range of external and internal PRFs suitable for small numbers of bats, including opportunities for winter roosting. These include gaps between the wooden building frame and other materials, including under barge boards and above doorways. Other sections, including the eastern courtyard stable units and metal shed, offer minimal or no PRFs, whilst other interior parts of the eastern courtyard were inaccessible and should be presumed to have some internal PRFs suitability on a precautionary basis, despite the external appearance of the buildings. Therefore, Building 1 is assessed overall as having **Moderate** suitability for roosting bats.

Building 2

- 5.3.3 No evidence of roosting bats was found outside or within the areas collectively comprising Building 2. However, sections of Building 2 – primarily the north-facing and likely darker stable blocks – offer suitable PRFs and shelter for multiple bats, including opportunities for winter roosting, due to their more extensive internal wooden structure and void space. These include joins between the timber panelling, barge board and purlins. In addition, the outbuildings are presumed to have some suitability on a precautionary basis, due to a combination of having likely low disturbance levels, presence of open window access (in one case), lateral gaps above door frames presenting internal entry and lack of access during the survey. Therefore, Building 2 is assessed overall as having **High** suitability for roosting bats.

Building 3

- 5.3.4 No evidence of roosting bats was found outside or within the areas collectively comprising Building 3. However, the large barn has multiple external and internal PRFs, as well as points of entry to these. Many of these PRFs, based around the building's original timbers and void space, are considered individually and collectively to offer suitable roosting conditions for larger numbers of bats, including opportunities for winter roosting. These include number of exterior timber boards that have rotted or slipped, presenting entry into the interior, as well as gaps within internal mortise and tenon joints visible cut into the collar ties. In addition, the small wooden shed outbuilding is presumed to have some suitability on a precautionary basis, due to a combination of having likely low disturbance levels, suitable conditions and lack of internal access during the survey. This outbuilding has an external lateral gap above the doorway in addition to a missing wooden board, presenting internal access to bats. Therefore, Building 2 is assessed overall as having **High** suitability for roosting bats.

Building 4

- 5.3.5 No evidence of roosting bats was found outside or within the areas collectively comprising Building 4. However, a section of the large stable unit has clear external access and substrate suitable for internal PRFs, including opportunities for winter roosting. Another section (the locked interior section on the northern side, with letterbox style access), should be presumed to have some internal PRFs suitability on a precautionary basis, due to a combination of having likely low disturbance levels, suitable conditions and lack of access during the survey. Other

parts of Building 4, including the outbuildings, offer minimal or no PRFs. Therefore, Building 4 is assessed overall as having **High** suitability for roosting bats.

Building 5

- 5.3.6 No evidence of roosting bats was found outside or within Building 5. The southern section of this building is generally considered to be too open and exposed – especially to westerly winds – to provide roost suitability due to the fluctuations of temperatures. However, the northern section of the corridor becomes notably darker and more enclosed, with external access and substrate suitable for internal PRFs, including opportunities for winter roosting: opportunities for viewing the stable blocks in this area in depth are limited. Suitable PRF are offered at the join of the different types of wood used in this building’s construction. Additionally, the three storage areas are/ should be presumed to have some internal PRFs suitability on a precautionary basis, due to a combination of having likely low disturbance levels, suitable conditions and lack of access during the survey. However, access to one of these shows internal PRFs to be relatively limited. Therefore, Building 5 is assessed overall as having **Moderate** suitability for roosting bats.

Building 6 (Cottage)

- 5.3.7 This building presents a considerable number of external entry points suitable for both crevice-dwelling and void-dwelling bats. These include clear routes of entry through broken windowpanes, small gaps in areas of cracked render and/or brickwork and gaps in and amongst ivy stems. This building is of a suitable age and condition to be favourable for larger number of bats, particularly with regard to winter roosting. This is considered mostly likely with the direct access into a probably upper-storey roof void seen on the eastern aspect. The general interior of the building should be presumed to have PRFs suitability on a precautionary basis, due to a combination of being undisturbed, suitable conditions and the lack of access during the survey. Brown long-eared bat droppings were identified with use of DNA analysis in the roof void of the building during hibernation surveys and as such Building 6 is assessed as a **Confirmed Roost**.

Building 7

- 5.3.8 No evidence of roosting bats was found outside or within the areas collectively comprising Building 7. The larger of the two structures has chipboard as roof decking, which has sagged in places to present a void space. However, there is no underlay present and the sheet metal roofing above is not considered suitable roost substrate. Both structures are also open-fronted to the east and largely exposed. Therefore, Building 7 is assessed as having **Low** suitability for roosting bats.

Building 8

- 5.3.9 No evidence of roosting bats was found outside Building 8. Limited external PRFs here include a slight gap formed by the overhang of the wooden board and panelling beneath (eastern aspect) and gaps formed by cuts made into the plywood to accommodate parts of the internal wooden frame. No internal access was possible to inspect this building. Therefore, Building 8 is assessed as having **Moderate** suitability for roosting bats, on a precautionary basis.

Building 9

- 5.3.10 No evidence of roosting bats was found outside or within the areas collectively comprising Building 9. The shallow pitched wooden roof of one building has rotted through in one corner, leaving an accessible entry point. The remains of some bitumen roof felt and a gap above the fixed metal door also provide PRFs and/or entry points. No internal access was possible to inspect this building. Therefore, Building 9 is assessed as having **Moderate** suitability for roosting bats, on a precautionary basis.

Building 10

- 5.3.11 No evidence of roosting bats was found outside or within Building 10. The exterior and interior of this building, including the windows, are both generally in solid condition, with only minor damage to the edge of the roof felt and barge board in places. Therefore, Building 10 is assessed as having **Low** suitability for roosting bats.

Building 11

- 5.3.12 No evidence of roosting bats was found outside Building 11. This building is entirely wood-panelled, with modern uPvc windows and a flat felt roof and appears to be in domestic use. There is also an exterior fence present that restricted clear view during the survey beyond the northern aspect. Therefore, Building 11 is assessed as having **Low** suitability for roosting bats, on a precautionary basis.

Building 12

- 5.3.13 No evidence of roosting bats was found outside Object 12. Ivy has now covered the majority of this abandoned caravan and is seen growing inside the cabin, through a single part-broken glass pane which allows a suitable entry point for bats. No internal access was possible to inspect this vehicle. Therefore, Object 12 is assessed as having **Low** suitability for roosting bats, on a precautionary basis.

5.4 SUMMARY OF BUILDING SUITABILITY

5.4.1 Table 4 provides a summary of the suitability of all buildings within the survey area. Figure 4 provides a visual representation of the building's suitability and location within the survey area.

Table 4: Building assessment of suitability for roosting bats within the survey area

Building number	Final assessment of overall suitability for roosting bats
1	Moderate
2	High
3	High
4	High
5	Moderate
6	Confirmed
7	Low
8	Moderate
9	Moderate
10	Low
11	Low
12	Low

5.4.2 As per best practice guidance, following the assessment of suitability, further dusk emergence surveys were required, based on the assigned suitability to determine the presence of likely absence of bats, or where evidence of roosting bats has been confirmed, to classify the roost.

5.5 DUSK EMERGENCE SURVEYS

5.5.1 Surveyor locations are provided in Figure 4 and corresponding plates showing camera views are shown in Appendix D. The weather conditions for each survey are provided in Appendix D Table 6.

5.5.2 During surveys on the 5th and 6th August 2025, bats were observed emerging from three of the buildings within the Site as follows:

- On the 5th August a single common pipistrelle was observed emerging from the south west corner of Building 6 (Table 5, Figure 5).
- During the 5th August survey on Building 3, a single soprano pipistrelle was also observed emerging from the east aspect of Building 3 (Table 5, Figure 5)

- On the 6th August, a single common pipistrelle bat was observed emerging from the north facing aspect of the southern section of Building 1 (Table 5, Figure 5).

- 5.5.3 No other bats were observed emerging during any other emergence surveys undertaken on the structures in 2025.
- 5.5.4 Calls from a total of five species groups were recorded across the three surveys, these species included common pipistrelle, soprano pipistrelle, noctule, *Nyctalus/Eptesicus* sp, and *Myotis* sp.
- 5.5.5 Bat activity levels were generally low across all surveys and surveyor locations limited to individual passes or small stints of foraging activity from individual bats. The exception to the overall low activity is surveyor positions 3 and 3C at Building 1 during the survey on the 6th August where moderate activity related to common pipistrelle foraging was observed as well as social calls noted, and a small number of 'touch downs' noted around the point of emergence. The emergence of the single common pipistrelle bat noted above in paragraph 4.17.6.

5.6 GROUND LEVEL TREE ASSESSMENTS

- 5.6.1 Ground level tree assessments (GLTA's) were undertaken on the 14th August 2025 of four trees that were identified as being proposed for removal as a result of the proposed development.
- 5.6.2 Four trees were assessed with the tree locations and tree reference numbers provided in Figure 6. The corresponding tree report references are also included in Figure 6 as taken from the Arboricultural Report to BS 5837: 2012 for Holland and Holland: Ashby Farm, HA6 2SS (17 October 2025).
- 5.6.3 The surveys classified three of the trees (T1, T3 and T4) as having **Negligible** suitability for roosting bats.
- 5.6.4 A single tree, T2, was classified as **PRF-I**, with the feature noted as the ivy which covers the dead elm tree stem. Full details of the GLTA results are in Table 7 and no further surveys are required prior to planning approval.

6 Evaluation

- 6.1.1 The desk study returned a record for a granted EPSL for the destruction of a soprano pipistrelle bat maternity roost place 434m northeast of the Site.
- 6.1.2 The surrounding habitat was assessed as having '**High**' suitability to support roosting bats, with roosting opportunity in the surrounding woodland parcels. Additionally, the continual hedgerow network and green corridors provide excellent foraging and commuting connectivity across the wider landscape for bats.
- 6.1.3 Results from the emergence surveys undertaken across 2025 have confirmed three bat roosts within the Site across three buildings, **Building 1**, **Building 3** and **Building 6**.
- 6.1.4 The roost in Building 1 comprised a single common pipistrelle roosting behind the metal cladding on the north facing aspect of the building. The common pipistrelle emergence occurred during only one survey, in August. Foraging activity was also recorded in the area, and a maximum of two individual bats were present at one time, and social calls were noted. Additionally, a small number of touch downs around the point of emergence were noted following the initial emergence. As such, the roost is considered to be a male mating roost, used occasionally by one or a small number of mating common pipistrelle bats.
- 6.1.5 In Building 3 a single soprano pipistrelle bat was observed emerging from the east facing edge of the barn. The soprano pipistrelle emergence occurred during only one survey, and only low bat activity was recorded around the building. The roost is considered to be a day roost, used occasionally by one or a small number of soprano pipistrelle bats.
- 6.1.6 In Building 6 a single common pipistrelle bat was observed emerging from the right-hand side of the west facing gable. The common pipistrelle emergence occurred during only one survey, with low activity observed otherwise. The roost is considered to be a common pipistrelle day roost, used occasionally by one or a small number of common pipistrelle bats. Brown long-eared bat droppings were also identified during the winter 2024/2025 hibernation surveys, confirming Building 6 as a brown long-eared bat roost. No brown long eared bat activity was recorded during any survey across the Site during the summer of 2025. The identified droppings were all of a similar age, were not fresh when identified and were present only in small numbers. The lack of brown long-eared activity, paired with the small number and singular age of the droppings indicated that the roost is not commonly used and is used by small numbers of bats on occasion. The brown long-eared roost is therefore characterised as a day roost.
- 6.1.7 Brown long-eared bat, common pipistrelle and soprano pipistrelle bats are common and widespread across the UK and most of Europe (BCT 2023). Day roosts and mating roosts for these species would therefore be valued at the **Site** level as assessed in conjunction with Table 3.2 from the Bat mitigation Guidelines (2023).
- 6.1.8 The GLTA survey concluded one of the four trees highlighted for removal to facilitate the development as having suitability for bats. T2 was assigned a PRF-I suitability score, and as such is considered to provide suitability for roosting for individual or a small number of bats only due to the dense ivy covering which could obscure roost entrances.

7 Impact Assessment

- 7.1.1 Four bat roosts have been identified in three separate buildings within the Site across the course of the bat survey works. All four roosts are considered to be day roosts, one brown long-eared bat day roost, two individual common pipistrelle bat roosts, and one soprano pipistrelle bat roost.
- 7.1.2 The proposed works involve the demolition or reconfiguration of all buildings within the Sites footprint, and as such it is anticipated that all three of the identified day roosts will be destroyed as a result of the works. Without mitigation and compensation there is potential for a **permanent negative impact at the site level with legal implications**.
- 7.1.3 One tree (T2) within the Site has been classified as having PRF-I suitability for individual or a small numbers of bats. The Site sits within a network of woodland, where tree resourcing is readily available, and where tree roosting opportunities of a similar or higher suitability than that provided by T2 are likely to be abundant. The loss of the ivy features categorised as PRF-I on T2 through either felling or maintenance works is therefore considered to have a **Negligible** impact for bats.
- 7.1.4 PRF-Is are not required to undergo further surveys, as outlined in Collins, 2023 but a pre-felling inspection should be undertaken prior to removal.

8 Mitigation Recommendations

- 8.1.1 The mitigation recommendations have been made in line with the Guidelines for Ecological Impact Assessment (CIEEM, 2019) following the best practice hierarchy of avoidance, mitigation, compensation and enhancement.
- 8.1.2 Should T2, classified as PRF-I suitability for bats, require felling to facilitate bats, a pre-felling check of the tree should be undertaken with use of an endoscope if needed, to ensure that bats are not present ahead of works.
- 8.1.3 Prior to the commencement of any works that could damage or destroy a bat roost or kill, injure or disturb a roosting bat, the Site will be registered under a bat mitigation licence to enable the bat roosts to be damaged or destroyed legally. The Site will be registered once full planning permission has been received with all planning conditions relating to bats discharged in writing. No works will commence on site in the location of the bat roosts until the following actions have been undertaken. A copy of the licence and any supporting documentation should be kept on Site and made available to any contractors working on the remodelling.
- 8.1.4 Where bat survey data is over one season old, further updates surveys will be required to inform the licence application.
- 8.1.5 The following recommendations are made as a minimum requirement for compensation for common pipistrelle and soprano pipistrelle day roosts:

- Where 1 or more species and / or more than small numbers of bats will be impacted the provision of at least one feature, suitable for the species concerned (e.g. a bat box/tile/brick/crevice), per roost and species to be impacted is considered necessary.
 - No post development monitoring, management or maintenance is required.
- 8.1.6 Prior to the commencement of works, one cavity bat box and three crevice bat boxes should be installed on a nearby semi-mature or mature tree. The boxes should be placed at a height of 3 to 5 meters facing south or west. The boxes should be retained for the duration of the works.
- 8.1.7 Due to the roost types present within the Site and the typically low numbers of bats associated with these roosts, no timing restrictions to works are necessary. However, to reduce the risk of impacts to bats, it is recommended that works should take place outside of the hibernation period to avoid disturbance to any individual bats during this sensitive life stage. Any compensation should be installed in a position where it is freely available to use by bats, prior to the following active bat season.
- 8.1.8 Prior to the commencement of construction works on Site, all site contractors will be made aware of the potential presence of bats, the roosting locations and potential disturbance activities through a toolbox talk and all roosts and access points will be confirmed to them by a bat ecologist. A summary of the relevant legislation relating to bats will be provided. A copy of this report/and licence documentation should be kept on site throughout the works which details all mitigation measures along with full details of the mitigation licence. The contractors will be provided with details of the approach to be taken in the unlikely event that a bat is found during the remainder of the works. A written record will be kept by the Licensee to confirm that the contractors have received this toolbox talk.
- 8.1.9 Any scaffolding that is required to facilitate works should not obscure any potential bat roosting features.
- 8.1.10 Should it be necessary to use any wood timber treatments, only approved treatments may be used. Guidance on their use in the 'Bat Workers Manual', Chapter 10 must be followed.
- 8.1.11 In the instance of refurbishment works, breathable roofing membranes should not be used in any part of the roof where bats can come into contact with the roofing membrane unless the membrane has a certificate to prove that it has passed and this has been included in the bat mitigation licence.
- 8.1.12 Prior to the commencement of works, the internal roof voids or internal structures of Buildings 1, 3 and 6 should be checked by a licensed bat ecologist for the presence of any bats and these will be removed to the pre-installed bat box where possible.
- 8.1.13 Should no bats be present, the licensed bat ecologist will then directly supervise the removal of tiles, soffits, cladding or other roosting features in the bat roosting areas from scaffolding, MEWP or moving platform (as provided by the client). All will be removed under direct supervision until the bat ecologist is satisfied that there is no further potential for roosting bats. This may take several days to complete depending on the method of tile removal proposed by the roofing contractor. An endoscope and powerful torch may be required to check crevices and cavities that could support roosting bats. Where features cannot be fully inspected or where bats are noted in deep features and cannot be safely removed exclusion devices should

be fitted and left in place for a minimum of 5 nights (dependant on weather) or until it can be determined that all bats have left the feature (Bat mitigation Guidelines (2023)).

- 8.1.14 Once the bat roosts have been destroyed under the supervision of a licensed ecologist, the works can continue to completion once the licensed ecologist has declared the roof to be free from bats.
- 8.1.15 To enhance the Site and provide future bat roosting resources and opportunities, it is recommended that the building design incorporates bat tiles and integrated bat boxes into the final structure. A minimum of four boxes/tiles across the Site is recommended, to create an overall gain in the number of roost resources available following development.

8.2 DEROGATION TESTS

- 8.2.1 The law allows bat protection to be derogated through the issuing of licences. The licences in England are currently determined by Natural England (NE) for development works. In accordance with the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended), a licence can only be granted where the three Article 16 tests have been met which include:
- The licence is required to have a valid basis,
 - It must be demonstrated that there are no other satisfactory alternatives, and
 - It must be demonstrated that the proposals would not be detrimental to the maintenance of the population of the species concerned at the Favourable Conservation Status level in their natural range.
- 8.2.2 The proposed development meets all three criteria as follows:
- It would enhance the visual character of the Site by removing disused and deteriorating farm buildings, whilst providing economic benefits to the area.
 - The proposed development cannot be built without the demolition of the existing buildings, which will require the destruction of the identified roosts and with the mitigation recommendations as set out above,
 - The species recorded on site are common and widespread species and with only day roosts recorded, therefore the proposed temporary disturbance will not affect the species ability to breed, hibernate or disperse (no vegetation that would be used by emerging or commuting bats is being removed). Compensatory bat boxes will be installed prior to the closure of the bat roosts ensuring no loss of roosting resource. With additional roost provision proposed, it will increase the roosting resources available for bats within the Site and local area.

9 References

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Crown Tree Consultancy (2025). Arboricultural Report to BS 5837: 2012 for Holland and Holland Crown Ref: 12409 Site: Ashby Farm, HA6 2SS

DEFRA (2012). 'MAGIC Interactive Map – Conservation Sites with Statutory Protection'. Available: <http://magic.defra.gov.uk/>

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Ministry of Housing, Communities and Local Government (December 2024). National Planning Policy Framework.

Reason, P.F. and Wray, S. (2023). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.1. Chartered Institute of Ecology and Environmental Management, Ampfield

Hillingdon Council (2012). Hillingdon Local Plan: Part 1 – Strategic Policies

Hillingdon Council (2022). Hillingdon Local Plan: Part 2 – Development Management Policies

Figure 1 Site Location

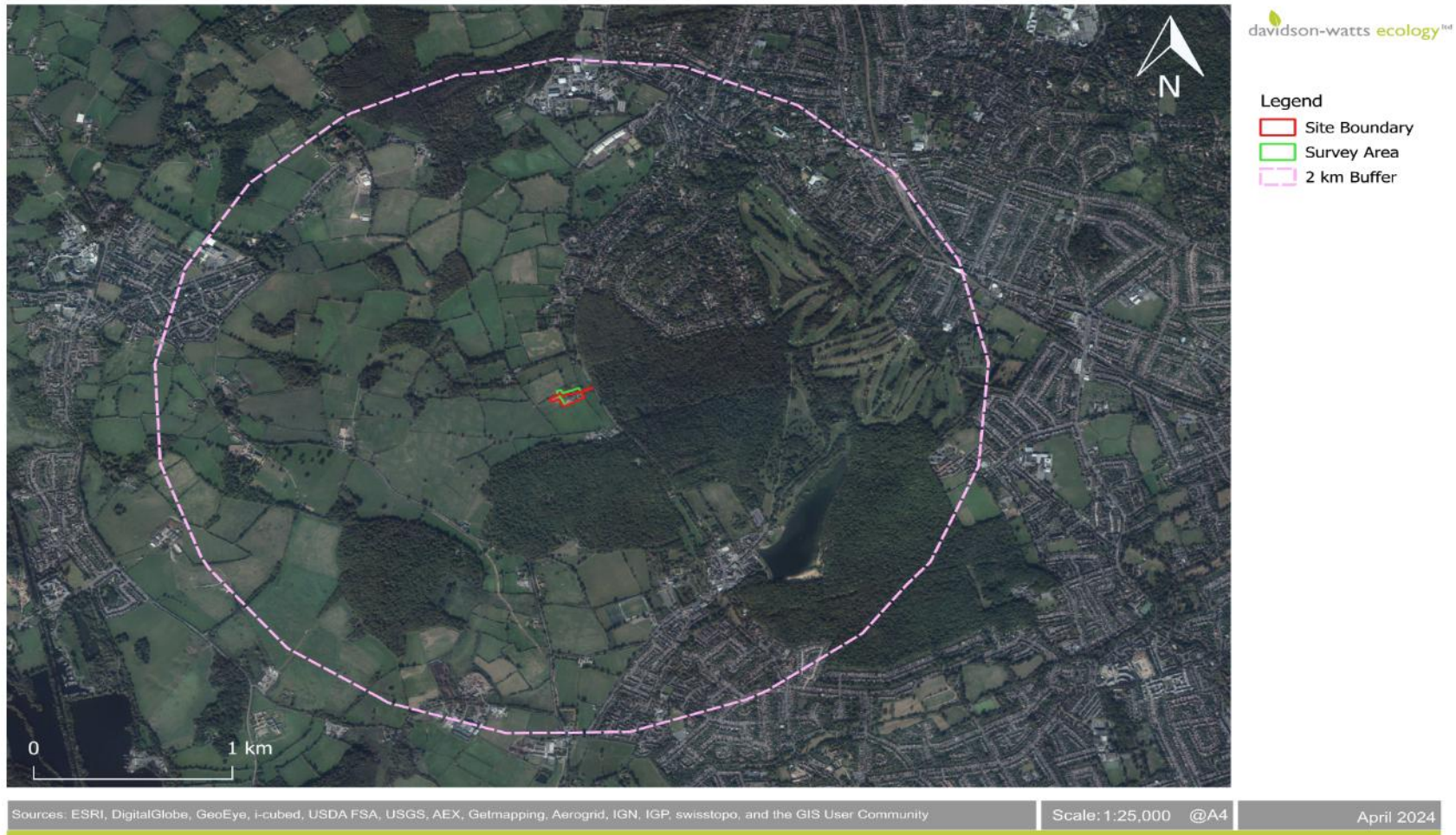


Figure 2 PRA Survey Area



Figure 3 Building Suitability



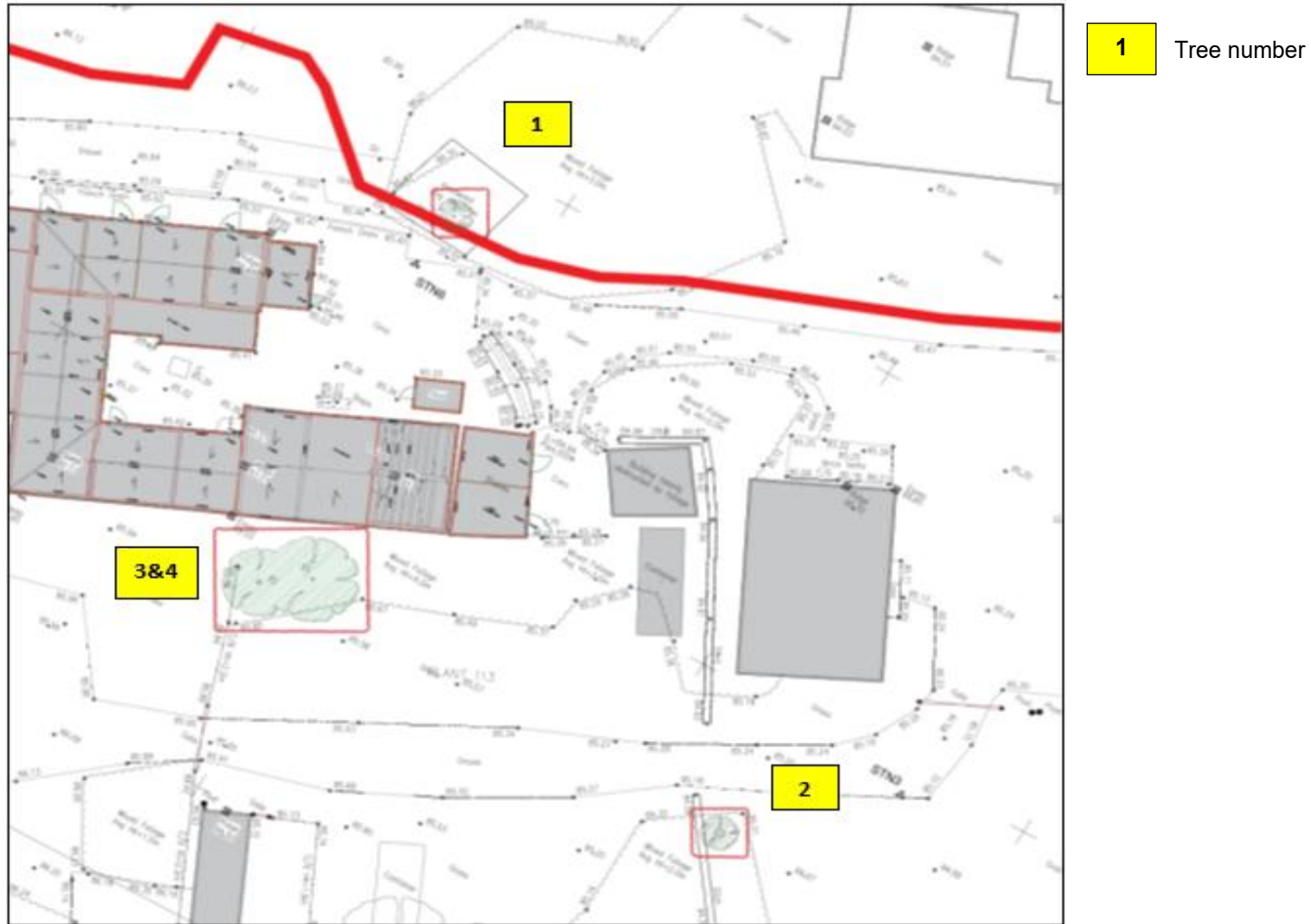
Figure 4 Surveyor Locations



Figure 5 Emergence Survey Results



Figure 6 Location of trees assessed in GLTA



Appendix A Buildings and PRF descriptions

Building 1

Building 1 collectively comprises a single-storey, adjoined 'E'-shaped modern stable block at the western end of the survey area, forming two individual 'courtyards'. The western courtyard stables are sub-divided into five units, each measuring approximately 5x5x4m, with each unit generally well-sealed from each another internally. Each unit is accessed by a typical stable door, the lower half used for entry and the upper half presenting an entirely open entry point for birds and/or bats [Plate 1]. Barn swallows *Hirundo rustica* were noted investigating and entering several of these. This stable block is timber framed, supporting modern cut, well-fitting timber panel walls and roof [Plate 2]. The shallow-pitched roof is overlain by corrugated metal sheeting, with no underlay present between the timber and metal. There is also evidence of the roof having previously been covered by a tarpaulin to provide additional insulation. This block is in consistent use and undergoes regular disturbance via the movement of horses and the maintenance/cleaning of the stable areas.

The eastern courtyard also has stable blocks, sub-divided into units. These have a more basic design, with a simple flat timber frame, plywood board walls and an entirely flat roof, directly overlain by corrugated metal sheeting [Plate 3]. The units are only partially sealed from each other and have a more open appearance. Each unit is accessed by a typical stable door, as with the western courtyard stables. This block is also in consistent use and undergoes regular disturbance, as with the western courtyard stables.

Further outbuildings have been added to both areas comprising this stable block. The western courtyard stables has on its northern side a small flat-roofed shed comprised of corrugated sheet metal (locked, no internal access) and on its eastern side two small open access structures built for extra hay storage. These latter two were largely hay-filled at the time of survey and are of basic wooden construction with ply board/mixed walls and an internal chipboard overlain by a bitumen roof [Plate 4]. The eastern courtyard stables has at its southern end a possible storage shed measuring approximately 10x5x3m, flat-roofed and clad with various layers of corrugated sheet metal (locked, no internal access) and along its eastern side another row of possible storage sheds, flat-roofed and comprised of plywood board. Windows on these units were also boarded up.

External PRsF for Building 1 are focused on the northern gable end of the western courtyard stable block, where there is a gap up behind the wide wooden barge board and corrugated metal sheeting, as well as potential shelter afforded between the wooden panelling on the western aspect and the remains of the black tarpaulin cover used to block the eaves. The wooden exteriors of the various Building 1 units appear generally in solid condition. All accessible sections of Building 1 present clear access into the various interiors through the open stable entry voids and open entranceways. One of the five stable units in the western courtyard was locked and inaccessible, but appears well sealed externally, with a narrow lateral gap above the doorframe leading to the interior. The metal shed on the northern end of the western courtyard appears entirely well sealed. The eastern courtyard has various locked sheds likely used for materials storage: of these, lateral gaps at the tops of doorframes are present on the larger southern end unit and in places on the eastern end units.

Internal PRFs for the western courtyard stables of Building 1 appear generally limited, due to the restricted size of the individual units, regular disturbance levels, typically good condition of the timber and – where there are occasional gaps – lack of suitable substrate between the roof panels and sheet roof. The stable units in particular were noted to have lots of detritus caught on the roof/walls that may further restrict access to PRFs, including hay, straw and many thick cobwebs. The hay storage outbuildings offered

relatively sheltered conditions, particularly the larger of the two, with the combination of the bitumen roof and hay accumulation creating a notably warmer microclimate within these areas. A partially cluttered but extended gap is present between a timber support and the ply wall [Plate 5]. An assumed equivalent gap at the other end of this outbuilding could not be viewed up close due to the hay storage impeding access. The eastern courtyard stables of Building 1 appear to have less PRFs suitability, with the basic internal timber frame joins well fitted and the sheet roof panelling directly adjoined to it without obvious gaps

Building 2

Building 2 collectively comprises a single-storey 'U'-shaped stable block, adjoining Building 3, located in the centre of the survey area and which seems to pre-date in appearance the more modern stable units comprising Building 1 [Plate 6]. The Building 2 courtyard stables are sub-divided into eight units of varying dimensions, but each approximately 6m in height with a timber-framed support enclosed by a steeply-pitched roof, comprised of corrugated cement sheeting. There are three sealed skylights on the roof. The structures are brick-built at the base and have a mixture of timber panel and ply sheet walls above. As with Building 1, each unit is accessed by a typical stable door, the lower half used for entry and the upper half presenting an entirely open entry point for birds and/or bats. A barn swallow nest was noted inside one of these.

Further outbuildings have been added to the area comprising this stable block. On the north-eastern gable end there is a small ply and rendered storage unit measuring approximately 6x3x2m. This structure has a flat roof, with corrugated cement sheeting. Facing the courtyard is a second outbuilding (locked, no internal access), of similar construction type. Both these buildings were fairly cluttered at the time of survey and appear to be used for equipment storage.

External PRFs for Building 2 are focused on gaps likely to be present on the northeastern gable end, at the joins between the timber panelling, barge board and purlins [Plate 7]. At the lower elevation, the external timber panels appear to be typically tight and in solid condition. All accessible sections of Building 2 present clear access into the various interiors through the open stable entry voids and open entranceways. Both outbuildings, although closed and/or locked have lateral gaps above the doorframe and small gaps at the join of ply sheets [Plate 8]. The northeastern gable end outbuilding has a small window open that was left open at the time of survey [Plate 9].

Internal PRFs within Building 2 are present for both void and crevice-dwelling bat species due to the steeper pitch of the roof, which presents both a larger volume of timber to support it and a more open roof void within [Plate 10]. The internal timbers present are modern and directly adjoin the sheet roof panels with no roof decking, whilst a considerable amount of detritus/cobwebs are present lining the walls. The western part of the stable blocks is noted to be slightly lighter due to the presence of the skylights, whilst those north-facing stable blocks are anticipated to be darker and have minimal daylight spill notable from inside. Both outbuildings are very cluttered internally and appear to have little suitable roosting substrate as PRFs within.

Building 3

Building 3 collectively comprises three structures within the central part of the survey area, with the predominant structure a large single structure used for hay storage, not regularly disturbed and

measuring approximately 12x7x10m: this appears likely to be the oldest of the structures within the survey area [Plate 11]. This large barn has its original timber structure still present, with hand-cut timber used for the joists, collars, struts, purlins and rafters, with woodworm and wet rot evident [Plate 12]. The building has lost its original roof and been replaced with a mixture of corrugated cement and metal sheet roofing, which is steeply pitched. The external walls are comprised of timber panelling of various ages, in places covered over with plywood sheets [Plate 13]. The barn has a tall open-fronted access on its northern aspect and has had a mezzanine floor added, used for additional storage of materials. The overall condition of the structure appears to be poor, with a lean notable from the exterior.

There are two outbuildings present attached to or adjacent to the large barn. A structure adjoined to the east of the barn forms an additional unenclosed stable area of two units, comprising a simple modern wooden structure built up on a breezeblock foundation, boarded and with a flat corrugated cement sheet roof. As with Buildings 1 and 2, each unit is accessed by a typical stable door, the lower half used for entry and the upper half presenting an open entry point for birds and/or bats. Additionally a very small window-less wooden shed (locked, no internal access) measuring approximately 2x2x2m stands just to the north of the barn.

The large barn has many external PRFs due to the overall poor/aged condition of the building. A number of timber boards on the exterior have rotted or slipped, presenting entry into the interior, as well as tight gaps where various sheets have been used to board over previous gaps in the timbers. On the upper eastern aspect several timbers appear to be slightly lifted, whilst ivy cover around the southeastern aspect of the building may also provide or obscure potential PRFs [Plate 14]. The additional stable units lack obvious external PRFs beyond the doorways. However, the wooden shed has a lateral gap above the doorway ~5cm wide, whilst a missing plank on the north aspect of similar width dimension allows entry into this small space [Plate 15]. There are areas suitable for individual or small numbers of bats between the wood and roof felt, as well as behind an old no smoking sign screwed into planks on the north aspect.

Many internal PRFs are present, due to the age and condition of the original timber structure. The hand-cut timbers are not perfectly fitted across a number of joints and have further natural warped with age.

There are a number of mortise and tenon joints visible cut into the collar ties that would each provide suitable substrate and shelter for roosting bats [Plate 12]. The interior reveals further locations where a mixture of machine cut timber, plywood board and tarpaulin have been more recently used to seal the structure, creating accessible PRFs internally between these different fixtures. Only the western section of this barn was accessible during the survey, due to a large amount of clutter in the form of hay bales near the entrance blocking further access into the eastern section. Although western end of the barn is quite ventilated due to the large opening – with daylight showing through many gaps – the void space created by the steeply pitched roof and the eastern end of this structure are considered likely to be darker and more sheltered. The mezzanine floor was assumed to be unstable and unsafe for survey.

Internal PRFs are considered limited within the additional stable units due to the general lack of suitable substrate and quite open environment: however, the significant ingress of ivy inside the building from the

southern side does provide some PRFs. The wooden shed was locked and not able to be inspected internally.

Building 4

Building 4 collectively comprises three structures towards the eastern part of the survey area, with the predominant structure a large single-storey timber-framed building (measuring ~12x8x10m), in regular use as a stable and compartmentalised into several units. This stable block is of mixed construction on its exterior, with timber panels on its northern aspect [Plate 16]: as with other buildings, two stable units on this aspect are accessed by a typical stable door, the lower half used for entry and the upper half presenting an open entry point for birds and/or bats. The eastern side features a large open entranceway, timber panels and corrugate metal sheeting atop recessed concrete slabs [Plate 17]. On the southern aspect the structure has been boarded both with plywood sheets and corrugated sheet metal, where the former has previously come away. Corrugated sheeting forms the entire western exterior of the building.

There are two additional outbuildings located to the west of the large stables, which are separated via a heavily vegetated ditch, which allows access only to the western side of these. The first is a small wooden shed (locked, no internal access) measuring approximately 4x4x2m, boarded in wood and further covered with some PVC sheeting. This building has a flat, corrugated sheet metal roof and may have formerly been used as an additional stable unit, due to a stable door being present, as well as a wooden saloon-style door not in use. The other building is a metal shipping container (locked, no internal access).

The large stable building has several external PRFs due to both the nature and join of the various materials used. The northern aspect in particular has some warping in places of the timber boards, although the condition in general remains solid. On the western end of this aspect there is a smaller room (locked, no internal access) with a letterbox-style entry into a presumed darkened and sheltered interior space [Plate 18]. Timber boards of similar condition are present on the western aspect, whilst on the southern side there is a gap along the junction of wood and metal, in addition to a mat of narrow-stemmed dead ivy that has encroached within the building (also present throughout the eastern side), with the possibility of PRFs creation between dead stems and the boards. There is clear unobstructed access into the main interior section of Building 4 through the open entranceway. The wooden shed outbuilding has entry into a PRF via a PVC sheet fixing that does not entirely cover the extent of the upper half of the stable door. A gap is also present between the saloon door and wall of the building, whilst ivy cover encroaches three sides of this building. The metal shipping container appears to be entirely sealed with no PRFs.

The main (southern) section of the large stable building is considered to have limited internal PRFs, due to the exposure created by having such a large entranceway (measuring one-third the length of this aspect). The internal wooden frame is machine cut, appears well fitted and the sheet roof panelling directly

adjoins to it, with no decking or underlay material present [Plate 19]. However, the slightly more sheltered southern end of this section was not fully accessible due to the clutter present, with a large amount of general detritus at roof level – cobwebs etc. – possibly obscuring PRFs at the edges of timbers. Both outbuildings were locked and not able to be inspected internally.

Building 5

Building 5 is an extended and disused stable block area, now abandoned and cluttered with general waste. The single unit measures approximately 25x5x2m, encompassing eight individual stable units in addition to several small rooms across a central corridor, presumed to be for general storage (two locked, with no internal access). This building is single storey and of mixed construction materials, with a simple internal wooden frame added to variously by ply board, corrugated sheet metal, chipboard, MDF and tarpaulin to shelter the interior. The northern end of the corridor and stable units were not able to be fully inspected during the survey, due to the amount of clutter and general detritus present [Plate 20]. The eastern aspect of this building backs onto an adjacent land parcel with hedgerow scrub and could not be inspected.

The southern portion of Building 5 is entirely open-fronted on its western aspect [Plate 21], whereas the slightly more sheltered northern portion is accessible via a gap of ~30cm+, where a fence panel does not quite enclose the northern end of the corridor. Two of the three west-facing doors to the presumed storage areas are poorly-fitted and provide entry into these sections of the interior [Plate 22]. Various limited external PRFs for crevice-dwelling bats are offered at the join of the different types of wood used in this building's construction.

Internal PRFs within Building 5 are anticipated to be focused within the storage room areas, only the northernmost of which was open and accessible. The accessible storage area shows evidence of previous use as a tack room and has various equine equipment stored within [Plate 23]. This room has limited clutter, with wood and wooden boarding within appearing well fitted. The other locked storage areas are presumed to also feature similar materials within. The more sheltered northern end of the corridor and adjacent stable blocks – heavily cluttered – may also provide PRFs obscured during the time of survey.

Building 6 (Cottage)

Building 6 is a three-storey derelict cottage within the survey area and does not form part of the proposals: it has been unoccupied for an unknown period of time, but considered to be a minimum of several years. This 'L'-shaped cottage measures ~15x10x10m, is constructed of rendered brick and has a gable roof with slate tiles. Access was not available inside this building at the time of the survey, due to concerns about structural safety. Japanese knotweed *Reynoutria japonica* is present in significant

amounts around the building and is likely to present a further problem to the structural integrity of the cottage. The cottage also has a small porch on its northern side containing an outside lavatory. The cottage has a number of entry points allowing direct access into the interior, including two sections of missing glass pane on the eastern gable end upper storey window, which may provide direct entry into a roof/loft void [Plate 24]. Two panes are also missing on the more sheltered northern aspect second-storey window (unboarded) [Plate 25], at least one on the western aspect second-storey window (unboarded) and one on the southern aspect second-storey window (boarded). All the windows of this cottage are of a sash window design, with some others having been left open at the top, creating additional small lateral gaps for entry points.

The cottage has significant amounts of ivy growth around its exterior, considered likely to offer external PRFs. This is most notably evident on its western and southern extents, where parts of the outside of the building are now entirely obscured from view, including ground-storey doors and windows. Ivy can be seen growing inside the building, through a second-storey window on the western side.

Areas of render have crumbled on parts of the building's exterior, revealing small areas of brick and mortar that have further degraded over time to leave small PRFs [Plate 26]. The removal or collapse of the door lintel on the eastern aspect has also left two access points into the interior [Plate 27].

The slate-tiled roof features three chimney stacks, which appear to be in reasonable condition relative to the overall appearance of the building. The modern slates are in overall good condition, although some edge tiles have slipped, most notably on the western gable end, presenting PRFs [Plate 28]. The condition of the wooden gable end barge boards are also likely to be degraded and offer suitably sheltered locations as PRFs.

Building 7

This building is comprised of two small and adjoined single-storey lean-to structures, located in the northwest corner of the survey area: outside the site boundary but still scheduled for removal. Both feature simple timber frames, supported variously by concrete blocks, wood panels and ply board for the walls. Both structures are open-fronted to the east and largely exposed, whilst the slightly pitched roof is of corrugated metal sheeting [Plate 29]. The larger of the two structures has chipboard as roof decking, which has sagged in places to present a void space. However, there is no underlay present and the sheet metal roofing above is not considered suitable roost substrate. These buildings contain minimal clutter and were fully accessible during the survey.

Building 8

This is a small single-storey structure at the western end of the survey area, sealed at the time of survey and with no internal access, but assumed to be used for general storage purposes. It is formed of wooden panels at the base and additionally boarded to shelter the interior. The south aspect has a metal frame door tied shut. The internal construct of the building can be seen to be wooden frames with a flat

corrugated sheet metal roof above. Limited external PRFs here include a slight gap formed by the overhang of the wooden board and panelling beneath (eastern aspect) and gaps formed by cuts made into the plywood to accommodate parts of the internal wooden frame [Plate 30]. The interior of this building is assumed to contain some clutter and be sufficiently free of disturbance to offer some roost suitability.

Building 9

This is a set of two small adjacent, single-storey wooden buildings immediately north of the survey area. The first is constructed of wood panels, with a window and entry door both boarded. The shallow pitched roof is also wooden and has rotted through in one corner, leaving an accessible entry point [Plate 31]. The remains of some bitumen roof felt and a gap above the fixed metal door also provide PRFs and/or entry points, although vegetation is emerging from this gap, suggesting a potentially cluttered interior. The second, slightly larger building has a similar construction, but with a flat, corrugated cement sheet roof. The structure interior is lightly cluttered at ground level and appears to be regularly occupied by the farmyard cats. This structure is left open to the elements on its eastern side and the open interior is also lit by windows across the extent of the western side.

Building 10

This is a small single-storey building, located east of Building 6 (Cottage). The building was possibly once in use as a summerhouse and appears far more recent in relation to nearby structures. The building is constructed entirely of well-fitted wood panels and is insulated by a shallow-pitched felt roof [Plate 32]. The exterior and interior of this building, including the windows, are both generally in solid condition, with only minor damage to the edge of the roof felt and barge board in places. Some mouse droppings are present inside the structure: it is unknown as to whether this is due to the door previously being left open, as the building appears otherwise well sealed.





Building 11





This is a single-storey cabin-type structure to the south of the survey area, also relatively recently constructed. This building is entirely wood-panelled, with modern uPvc windows and a flat felt roof [Plate 33]. The building has an aerial on the roof, indicating domestic use and has an exterior fence that restricted clear view during the survey beyond the northern aspect. There is security lighting present visible on the northern and eastern aspects. Due to its condition and likely regular use, it is considered unlikely to offer bat PRFs.





Object 12





This is an abandoned caravan left to the southeast of the survey area. Ivy has now covered the majority of the vehicle and is seen growing inside the cabin, through a single part-broken glass pane [Plate 34]. Access was not possible inside the cabin, with a combination of ivy and clutter obscuring most of the view. This entry point indicates the interior of the building should be presumed to have PRFs suitability on a precautionary basis, due to a combination of being undisturbed, suitable conditions and the lack of access during the survey.




Appendix B Plates




Plate #	Building #	
1	1	
2	1	
3	1	
4	1	




<p>5</p>	<p>1</p>	
<p>6</p>	<p>2</p>	
<p>7</p>	<p>2</p>	
<p>8</p>	<p>2</p>	




9	2	
10	2	
11	3	
12	3	




<p>13</p>	<p>3</p>	
<p>14</p>	<p>3</p>	
<p>15</p>	<p>3</p>	
<p>16</p>	<p>4</p>	




17	4	
18	4	
19	4	

20	5	
21	5	
22	5	

23	5	
24	6	
25	6	

26	6	
27	6	
28	6	

29	7	
30	8	
31	9	

32	10	
33	11	
34	12	

Appendix C Emergence Survey Results

Table 5: Bat emergences viewed on infrared video and bat activity recorded on acoustic detectors during dusk emergence surveys. Refer to Figure 4 for surveyor locations. Weather conditions for each survey are provided in Table 6. Ppip = *Pipistrellus pipistrellus*; Ppyg = *Pipistrellus pygmaeus*; Pip = *Pipistrellus* species; Myo = *Myotis* species; Eser = *Eptesicus serotinus*; Nnoc = *Nyctalus noctula*; NLS = *Nyctalus/Eptesicus* species; Bb = *Barbastellus barbastellus*.

Building	Surveyor Location	Date	Surveyor initials	Emergence (n bats)	Bat activity (n passes)
1	1 1	29-May-25	DK	None	Ppip [3], Ppyg [8], Pip sp [3], Myo [3]
	1c 2	29-May-25	DK	None	Ppyg [4], Pip sp [2]
	3 3	29-May-25	BG	None	Ppip [1], Ppyg [6], Pip sp [4], Myo [1]
	3C 1	06-Aug-25	GT	<u>Emergence of common pipistrelle</u>	Ppip [209], Ppyg [5], Pip sp [18], NLS [1]
	3 2	06-Aug-25	GT	None	Ppip [209], Ppyg [5], Pip sp [18], NLS [1]
2/3	3 4	18-May-25	GB	None	Ppip [3], Ppyg [5], NLS [1]
	2c 5	18-May-25	Remote Camera	None	Ppip [4], Ppyg [6], NLS [1]
	4 6	18-May-25	BG	None	Ppip [7], Ppyg [17], Pip sp [1]
	1 4	16-Jul-25	GT	None	Ppip [8], Ppyg [9]
	2 5	16-Jul-25	DK	None	Ppip [3], Ppyg [6], Pip sp [1]
	2c 6	16-Jul-25	GT	None	Ppip [9], Ppyg [5]
	3 4	05-Aug-25	GT	<u>Emergence of soprano pipistrelle from Building 3</u>	Ppip [7], Ppyg [8], Pip sp [1], NLS [2], Myo [1]
	2c 5	05-Aug-25	GT	None	Ppip [7], Ppyg [8], Pip sp [2], NLS [2], Myo [1]
4 6	05-Aug-25	GB	None	Ppip [1], Ppyg [6], Pip sp [1], NLS [1]	

Building	Surveyor Location	Date	Surveyor initials	Emergence (n bats)	Bat activity (n passes)
4	1 7	28-May-25	GB	None	Ppip [1], Ppyg [15], NLS [1]
	3 8	28-May-25	GT	None	No bats recorded.
	4 9	28-May-25	BG	None	Ppip [1], Ppyg [1], Pip sp [2], Nnoc [1], NLS [1]
	2 7	15-Jul-25	GT	None	Ppip [1], Ppyg [10], Pip sp [2]
	3 8	15-Jul-25	GB	None	Ppip [2], Ppyg [9], Pip sp [1]
	4 9	15-Jul-25	BG	None	Ppip [1], Ppyg [1], Pip sp [1], NLS [1]
	2C 7	06-Aug-25	TL	None	Ppip [4], Ppyg [16], Pip sp [2]
	2 8	06-Aug-25	GB	None	Ppip [4], Ppyg [4], Pip sp [2]
	4 9	06-Aug-25	TL	None	Ppip [12], Ppyg [9], Pip sp [1], NLS [3]
5	5 10	28-May-25	TL	None	Ppip [3], Ppyg [8], NLS [1]
	1c 11	28-May-25	Remote Camera	None	Ppip [3], Ppyg [7], NLS [1], Nnoc [1]
	5 10	15-Jul-25	TL	None	Ppip [1], Ppyg [8], Pip sp [2]
	2c 11	15-Jul-25	Remote Camera	None	Ppip [2], Ppyg [3], Pip sp [2], NLS [1]
6	1 12	18-May-25	GB	None	Ppip [1], Ppyg [15], NE [1]
	1c 13	18-May-25	Remote Camera	None	Ppip [3], Ppyg [7], Nnoc [1], NLS [1]
	2 14	18-May-25	DK	None	Ppip [1], Ppyg [3]
	3 12	16-Jul-25	GB	None	Ppip [2], Ppyg [13], Pip sp [2]
	4 13	16-Jul-25	BG	None	Ppip [26], Ppyg [16], Pip sp [3]
	1c 14	16-Jul-25	TL	None	Ppip [3], Ppyg [12]
	1 12	05-Aug-25	TL	None	Ppip [8], Ppyg [41], Pip sp [3]
	2 13	05-Aug-25	DK	<u>Emergence of common pipistrelle</u>	Ppip [9], Ppyg [20], Pip sp [2], NLS [3]




Building	Surveyor Location	Date	Surveyor initials	Emergence (n bats)	Bat activity (n passes)
	1C 14	05-Aug-25	TL	None	Ppip [2], Ppyg [7], Pip sp [1]
7	1 15	04-June-25	DK	None	Ppyg [2]
8	2 16	29-May-25	Remote camera	None	Ppip [1], Ppyg [10], Pip sp [2], Myo [1], NLS [1]
	2c 17	29-May-25	Remote camera	None	Ppip [3], Ppyg [5], Pip sp [1], Myo [1]
	1 16	06-Aug-25	DK	None	Ppip [74], Ppyg [10], Pip sp [10], NLS [2]
	1C 17	06-Aug-25	DK	None	Ppip [5], Ppyg [9], Pip sp [2], NLS [4]
9	4C 18	06-Aug-25	DK	None	Ppip [10], Ppyg [2]
	2 19	28-May-25	DK	None	Ppip [1], Ppyg [3]
	2C 20	28-May-25	Remote camera	None	Ppip [1], Ppyg [1]
	1c 19	15-July-2025	Remote camera	None	Ppyg [2], Pip sp [2], NLS [1]
	1 20	15-July-2025	Remote camera	None	Ppip [3], Ppyg [3]
10	2 21	04-June-25	TL	None	Ppip [2], Ppyg [18], Pip sp [2]
	2c 22	04-June-25	TL	None	Ppip [3], Ppyg [7]
11	4 23	29-May-25	TL	None	Ppyg [7], Pip sp [2]
12	3 24	04-June-25	BG	None	Ppip [1], Ppyg [4], NLS [8]

Table 6: Weather conditions during dusk emergence surveys. BF = Beaufort Scale of wind speed.

Date	Sunset	Survey start (sunset -15 mins)	Survey end (sunset +90 mins)
18-May-25	20:52	15°C, 100% cloud cover, BF1, dry	13°C, 100% cloud cover, BF1, dry
28-May-25	21:05	15°C, 100% cloud cover, BF1, dry	14°C, 100% cloud cover, BF1, dry
29-May-25	21:06	19°C, 80% cloud cover, BF2, dry	18°C, 60% cloud cover, BF2, dry
04-Jun-25	21:12	15°C, 100% cloud cover, BF1, dry	13°C, 100% cloud cover, BF1, dry
15-July-25	21:12	17°C, 100% cloud cover, BF2, dry	17°C, 100% cloud cover, BF2, dry
16-July-25	21:11	19°C, 0% cloud cover, BF1, dry	19°C, 30% cloud cover, BF1, dry
05-Aug-25	20:42	18°C, 0% cloud cover, BF1, dry	16°C, 0% cloud cover, BF1, dry
06-Aug-25	20:41	20°C, 50% cloud cover, BF1, dry	18°C, 70% cloud cover, BF1, dry

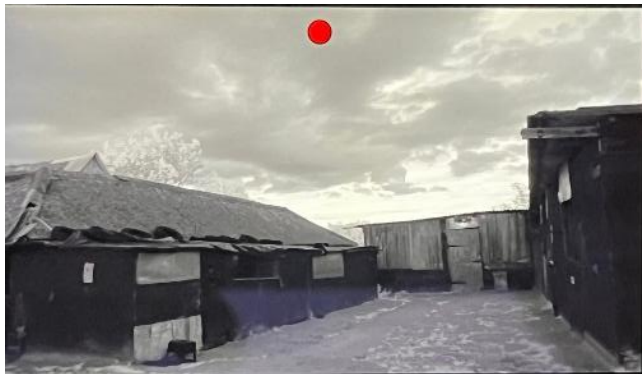
Appendix D GTLA Survey Results

Table 7: Results of the Ground Level Tree Assessment survey

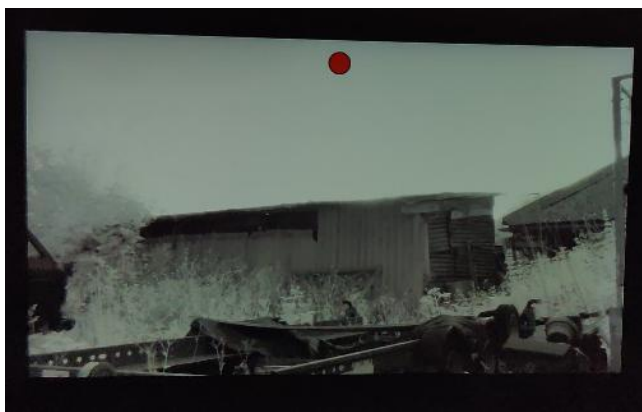
Reference	Tree species	GPS	PRF details, narrative	Image reference
1 (Tree report ref unclassified)	Dead Apple tree <i>Malus domestica</i>	TQ 07663 90015	Dead fruit tree situated in a clump of laurel, elder and blackthorn DBH – 40cm, H 7m Negligible status - no features are present.	
2 (Tree report ref T022)	Dead elm <i>Ulmus sp</i>	TQ 07688 89996	Tree is dead with ivy cover with narrow stems present DBH – 20cm H 8m Features only suitable for PRF I roosting opportunity, if that.	
3 and 4 (tree report G)25)	Group of young Ash <i>Fraxinus excelsior</i>	TQ07664 89994	The 3 ash trees are all multi-stem young trees do not have features. All DBH values are for all stems. Tree 1 DBH 40cm H 12m Tree 2 DBH 60cm H 12m Tree 3 DBH 40cm H 12m Negligible status all trees- no features are present.	

Appendix E Emergence Camera Viewpoints

Location 1



Location 2



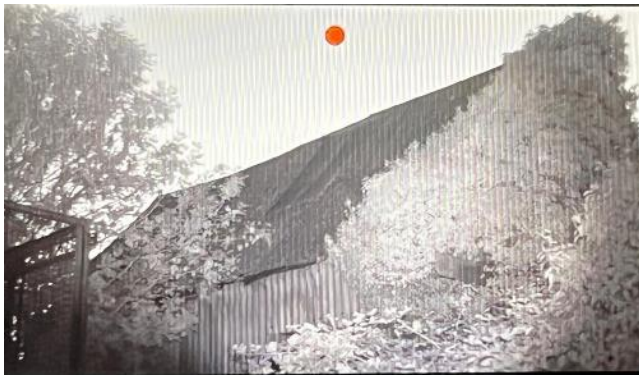
Location 3



Location 4



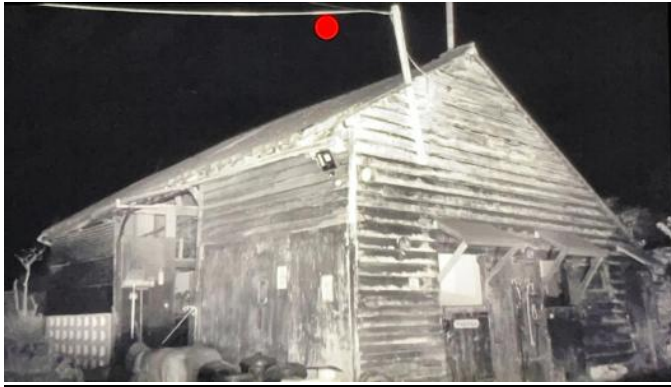
Location 5



Location 6



Location 7



Location 8



Location 9



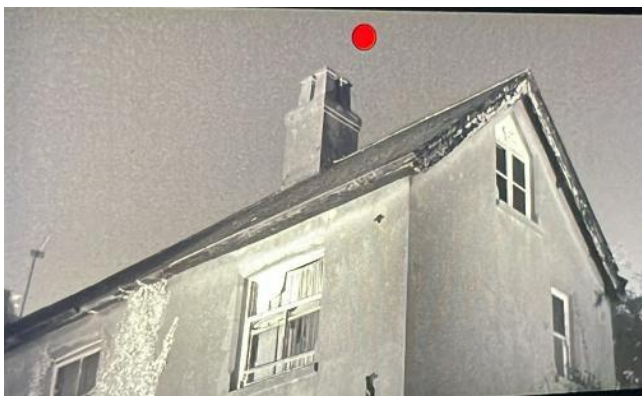
Location 10



Location 11



Location 12



Location 13



Location 14



Location 15

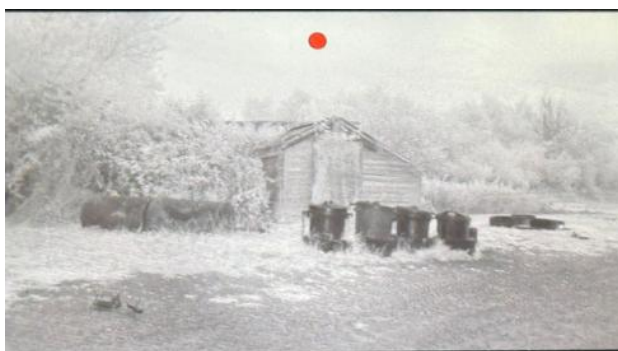


Location 16



Location 17

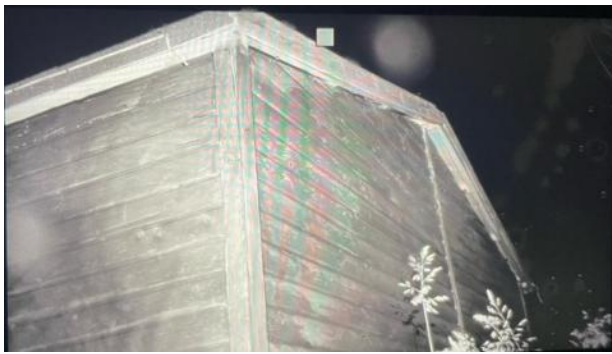
Extra detector position, no camera required.

Location 18Location 19Location 20

Location 21



Location 22



Location 23



Location 24

