

SUPPLEMENTARY ECOLOGICAL INFORMATION

Including:
GCN RAMS
Mammal RAMS
Bird Boxes
Bats -The Three Tests and Compensation Strategy

LOWER WHITEMOOR FARM,
WHITEMOOR, CHESHIRE CW12 3NF

CLIENT: Mr S. George & Miss E. Zegar

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This report has been prepared by Sambrook Associates Ltd on behalf of Mr S George & Miss E Zegar in connection with the demolition and rebuild of Lower Whitemore Farm and takes into account their particular instructions and requirements. It is not intended for, and should not be relied on, by any third party and no responsibility is undertaken to any third party.

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1 PURPOSE OF THIS DOCUMENT

1.1 Introduction

- 1.1.1 This Supplementary Information is prepared by Sambrook Associates Ltd on behalf of Mr S. George & Miss E. Zegar in relation to the proposed demolition and re-build of buildings at Lower Whitmore Farm, Whitmore, CW12 3NF. The Site comprises a farmhouse (B1) and an outbuilding (B2) and large areas of existing hard standing and grassland. The proposed development/site is referred to as 'the proposed development'.
- 1.1.2 Staffordshire Wildlife Trust was asked to review the above application as part of a service level agreement with Staffordshire Moorlands District Council to provide ecology advice regarding planning and development management functions. Their response was received by the Applicant's Ecologist on 27 October 2021.
- 1.1.3 The response, and reasons for the production of this supplementary information document is as follows:

SUMMARY – Holding objection, further information/ amendments required.	
Required prior to determination:	Applicant's Response:
Habitat survey of grassland, trees and hedgerows proposed for removal.	Further information provided in Section 2.
Outline plan for enhancement of traditional orchard and replacement hedgerow to show a net biodiversity gain OR provide a metric calculation.	See Section 2.
Surface and foul drainage plan.	See attached Site Plan.
Further details of level changes/ spoil placement	See attached Site Plan.
Further information on bat impacts and mitigation, to determine whether the 3 tests under the Habitat Regulations would be met.	See Section 6.
Secure via condition should approval be granted in future:	All provided prior to determination (where possible).
As per the bat & bird ecology report: a. Nesting bird check of buildings and vegetation prior to works commencing. b. RAMS for great crested newts. c. RAMS for mammals. d. Bird box locations and type shown on plans. e. A bat friendly lighting scheme.	As per the bat & bird ecology report: a. Nesting bird check will be undertaken. b. Provided at Section 3. c. Provided at Section 4. d. Provided at Section 5. e. Provided at Section 6.
Specific replacement bat roost/loft design plans, including reuse/addition of materials from existing roosts.	See Section 6.
A soft landscaping scheme/ habitat plan detailing biodiversity enhancements.	See Site Plan attached.

CEMP detailing runoff and pollution prevention during construction phases.	See CEMP (Sambrook Associates Ltd, Dated 15/11/2021).
Root Protection Areas (RPAs) for retained trees and hedgerows following BS 5837:2012 – Trees in Relation to Design, Demolition and Construction’.	To be provided by Arboriculturist.

1.1.4 It is the Site Manager’s responsibility to ensure the measures outlined in this document are implemented in full as a minimum.

1.1.5 Site contractors, directors, owners, other personnel and their agents are reminded that many species and habitats are protected by law, and to kill, injure or harm such species and their habitats is a criminal offence. Custodial sentences and/or large financial penalties are expected if you break the law. Protected species and habitats commonly found on development sites include (but not limited to):

- **bats including their roosts in buildings and trees;**
- **birds including their nests;**
- **great crested newts including their areas of shelter such as hedgerows, ponds and natural and artificial habitats such as log and rubble piles;**
- **badgers including their setts which can be damaged or destroyed up to 25m from the sett entrance;**
- **otters and watervoles including aquatic and terrestrial habitats;**
- **watercourses;**
- **hedgerows; and**
- **trees.**

2 SUPPLEMENTARY HABITAT INFORMATION

2.1 Introduction

- 2.1.1 This section provides a brief overview of the habitats to be temporarily or permanently lost to the proposed development. It also discusses the status of the orchard to the west of the dwelling.

2.2 Habitat Loss and Gain

- 2.2.1 The following habitats will be affected:

- There will be temporary loss of the lawn to the front of the property which will be removed to fit a ground source heat pump and then replaced and re-sown.
- A row of holly trees to the front of the existing house which are significantly overgrown are intended to be removed (as a minimum they will be significantly cut back).
- Two large leylandii trees to the rear of the existing house will be lost.

- 2.2.2 Other than this, no hedgerows or other habitats surrounding the property will be impacted.

- 2.2.3 The lawn is a semi-improved amenity grassland which is managed as a lawn. Species include perennial rye grass *Lolium perenne*, annual meadow grass *Poa annua*, common daisy *Bellis perennis*, dandelion *Taraxacum sp.* and ribwort plantain *Plantago lanceolata*. Daffodil *Narcissus sp.* was present sporadically. The lawn is mown regularly and occasionally grazed by sheep. The lawn will be removed to installed a ground source heat system. Once the installation is complete, the area will be re-sown with a diverse seed mix such as Emorsgate MG5 grassland (or similar) and will be managed to maintain diversity, structure and condition through mowing.

- 2.2.4 The row of holly trees that will likely be removed are of ecological value and their loss must be replaced to prevent net loss of habitat. Holly provides dense cover and good nesting opportunities for birds, and its surrounding dry leaf litter may be used by hedgehogs and small mammals for hibernation. The flowers provide nectar and pollen for bees and other pollinating insects. The leaves are eaten by caterpillars of butterflies and moths. The berries are a vital source of food for birds and small mammals in winter.

- 2.2.5 To mitigate for the loss of holly, the soft landscaping scheme includes the planting of blackthorn *Prunus spinosa* and/or hawthorn *Crataegus monogyna* within the boundary hedgerow (see Site Plan ref 2081-PL-D).

- 2.2.6 The loss of two Leylandii is of no ecological significance and is not considered further.

2.3 Orchard

- 2.3.1 There is no orchard present on site. Historical mapping does show the presence of an orchard c. 100 years ago; a map from 1888 shows an orchard immediately adjacent and to the north west of the main house. In 1922, the orchard is mapped as a much smaller area and subsequently a map from 1945 shows the orchard as not present. Current aerial photography and on the ground investigations show the area as lawn with trees and shrubbery to the margins. There is no evidence of fruit trees within this area. See attached Orchard information.

- 2.3.2 No formal enhancement measures are proposed in line with orchard creation or improvements. However, the applicant is planning to plant fruit trees in the near future as part of the overall ethos for the site which is to make it as ecologically sound and naturally biodiverse as possible. See Site Plan ref 2081-PL-D for proposed locations of tree planting.

3 GCN REASONABLE AVOIDANCE MEASURES

3.1 Introduction

- 3.1.1 This section provides a brief overview of the likely current status of great crested newts on and around the proposed site, their level of protection within the UK and the measures to be undertaken to prevent harm to GCN and other amphibians.

3.2 Legislation

- 3.2.1 Great crested newts (GCN) are European Protected Species (EPS) and they and their habitat are fully protected under the Wildlife & Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2017, as amended (the 'Habitat Regulations') which transposes the Habitats Directive in UK law. The UK is no longer a member of Europe but since the Habitats Directives are embedded into UK statute, The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 was published and still applies in England and Wales). The combined legislation makes it illegal to:
- intentionally or deliberately capture, kill or injure a great crested newt;
 - intentionally or recklessly damage, destroy or obstruct access to any place used for shelter and protection including resting and breeding places, whether occupied or not;
 - deliberately, intentionally or recklessly disturb a great crested newt when in a place of shelter;
 - possess a great crested newt, or any part of it, unless acquired lawfully;
 - sell, barter, exchange or transport or offer for sale great crested newts or parts of them.
- 3.2.2 Anyone carrying out activities which may affect EPS must consider the presence of EPS, their breeding sites and resting places. Best practice guidance is available from Natural Resources Wales and Natural England, which advises on assessing for the presence of EPS, and the possible impact of operations (including strategies for avoiding committing offences). If an offence cannot be avoided, then a derogation licence should be sought from Natural Resources Wales.
- 3.2.3 In addition to legislation, there are national and local planning policies pertaining to the protection of biodiversity. The National Planning Policy Framework (Department for Communities and Local Government, 2019) states *'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'*.
- 3.2.4 Under the NERC Act, local authorities (and other public bodies) have a duty to conserve biodiversity the local authority must take the protection of the priority habitat into consideration when it is making a planning decision.

3.3 Overview of Current Status

- 3.3.1 This section provides a brief overview of the current status of the terrestrial and aquatic habitat within the application site and likelihood of GCN being present within the site and wider zone of influence.
- 3.3.2 **Terrestrial Habitat:** the habitats on-site comprise semi- improved amenity grassland, which is managed as a lawn and thus closely mown regularly and occasionally sheep grazed. Hence terrestrial habitats within the Site were considered largely sub-optimal for amphibians given the lack of vegetative cover which makes animals vulnerable to predation. Favourable terrestrial habitat was restricted to hedgerow margins as these features provide corridors for dispersal, foraging and shelter.
- 3.3.3 **Aquatic Habitat:** No ponds are present within the Site. There do not appear to be any ponds within 250m of the site. The running watercourse to the south of the site is unsuitable for GCN.
- 3.3.4 **Habitat usage and movement on land:** GCN disperse over land to forage for food and move between ponds; distances covered during dispersal will depend on habitat quality and availability. It is acknowledged that most adult newts likely stay within around 250m of breeding ponds (English Nature, 2001; Langton et al., 2001). Newts are more likely to travel greater distances if there is high quality foraging and refuge habitat extending beyond this range. Habitats such as woodland in an intensive arable landscape are examples of such habitat (Langton et al., 2001) but favourable habitat also include scrub and rough (tussocky) grassland. In the context of the Site (and from review of aerial images); higher quality terrestrial habitat is present to the site boundaries and the wider area. There are good habitat linkages throughout the landscape via hedgerows and tree belts and it is likely that these terrestrial habitats will be used in preference to extend dispersal rather than the short-mown/grazed grassland within the Site. Nevertheless, occasional presence of GCN within the site cannot be discounted.

3.4 Proposed Activities

- 3.4.1 The following activities will be undertaken during the proposed works:
- Demolition of buildings
 - Construction of buildings
 - Removal of holly and leylandii
 - Topsoil stripping of lawn (to a depth of 30cm)
 - Installation of ground source heat pipes and infrastructure, buried into the ground
 - Replace topsoil
 - Re-sow lawn with an MG5 (or similar) seed mix
- 3.4.2 No ponds or good quality habitat such as hedgerows will be directly affected by the proposed development and therefore the potential for harm to GCN is restricted to individual animals that may stray onto the area, and temporary disturbance to, and loss of, sub-optimal terrestrial habitat. It is noted that the likelihood of GCN being found on site is highly unlikely, so these measures are provided on a highly precautionary basis only.
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3.5 The RAMs Statement

3.5.1 The objectives of this Method Statement are to:

- Avoid committing an offence under the above legislation; and,
- Ensure that the favourable conservation status of the species concerned is maintained.

3.5.2 Any development related activities on the Site, such as vegetation clearance or excavations may potentially affect GCN. As a result, safeguards must be implemented to protect this species (and other amphibians) and the Method Statement below details measures to be implemented to ensure the above objectives are achieved. If these measures are followed, then both objectives will be achieved.

3.5.3 It is proposed that development works will commence under Reasonable Avoidance Measures (RAMs). Where necessary, works will be overseen by an appointed Natural England (NE) GCN licensed ecologist. Such works will be discussed with the appointed ecologist and agreed before commencing. The following measures will be implemented:

- An NE GCN licenced ecologist will be appointed and be available, as and when required throughout the construction period.
 - A toolbox talk on GCN will be given to site operatives prior to the commencement of development works on site. This will cover identification of GCN, habitat preferences, legislation, biosecurity measures to be implemented and also highlight areas of Site to be avoided and works that must be conducted in the presence of the ecologist.
 - Following the toolbox talk, the site operatives will be responsible for checking their working areas for that day for presence of amphibians, prior to the commencement of any works and will keep a watching brief during construction works on site for GCN.
 - Hedgerow protection fencing (where required) will be the first item to be installed and this will be used to provide a barrier between development works and higher quality amphibian habitats bordering the Site. Any locations where this is required will be identified at the outset by the Ecologist and the contractor. Tree Protection will be installed as per the Tree Root Protection Plan.
 - Vegetation removal and topsoil stripping from working areas will be undertaken in the presence of the licenced ecologist. The areas to be cleared will first be hand-searched by the ecologist and assuming no evidence of GCN is found, careful clearance can commence using an excavator. On completion of clearance, the ground should be lightly compacted to remove any potential places of shelter and to temporarily modify the habitat to reduce its suitability for foraging.
 - Any minor excavations will be backfilled overnight, capped at the ends (in the case of ducts) or if left open overnight, the surfaces are to be smoothed and a means of escape (a ramp) provided. As works will commence in the winter months, GCN are not anticipated to be moving or regularly active and therefore GCN should not enter the excavations or be crossing the site, therefore these works do not require the presence of a licensed ecologist, but should be checked by site operatives prior to commencing
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works in these areas each morning, particularly as the build progresses into the spring and summer months. The licensed ecologist is to be contacted immediately should GCN be found on site.

- Once the ground has been cleared of vegetation and suitably modified to deter amphibians from taking shelter within it, construction phase works can proceed in these areas on the basis of a morning working area check and watching brief by site operatives.
- Any excavated materials (such as topsoil) requiring storage should be stored on pallets raised off the ground, or otherwise compacted/modified to prevent plant growth and cracks that could be exploited by GCN. Any waste materials from demolitions should be removed from site as soon as is practicably possible. If stored on the ground, it should be checked for GCN presence by the ecologist prior to re-use or removal.
- Bought in hardcore and other surface materials are not to be left stored on site for long periods.

3.5.4 If a GCN is discovered at any point, works must stop immediately, and the ecologist is to be contacted for further advice.

4 MAMMAL REASONABLE AVOIDANCE MEASURES

4.1 Introduction

4.1.1 Mammal reasonable avoidance measures are aimed at protecting mammals from harm; this includes badgers, hedgehogs and other mammals.

4.1.2 The following measures will be implemented:

- A toolbox talk will be provided to contractors by the Ecologist in respect of legislation pertaining to mammals, including legislation providing protection for animal welfare. The toolbox talk will be given to all site operatives and be laminated and provided within the site office to all site operatives. This will comprise a toolbox talk on small mammals and best practice measures to implement if they are encountered at any stage.
- Where vegetation removal is required, the ground cover will be searched by the Ecologist prior to the start of removal. The area will be monitored until the removal is completed.
- A suitable receptor site shall be identified prior to any works being carried out and the ecologist will be responsible for the actual removal of any animals from the site. The receptor site will be located within the boundary features at sufficient distance from the proposed works.
- Material storage shall discourage opportunities for mammals to take shelter by the following means:
 - All material to be stored off ground
 - No tipping of rubbish and a clean site policy to be used
 - All stored materials to be checked prior to use by the site manager or appointed representative for the presence of small mammals
- Any netting brought onto site shall be stored off ground and in locked containers to avoid entanglement of animals.
- General avoidance measures shall consist of:
 - Noise and vehicle movements at the site will always be kept to a minimum.
 - Where any trenches or other excavations are to be left open overnight, these are to be fitted with mammal ramps or would have the sides battered to form a slope to allow animals to escape.

5 BIRD BOX SPECIFICATION

5.1 Introduction

- 5.1.1 To improve provision of nesting opportunities within and around the Site, bird boxes will be installed on mature trees to the site boundaries. Exact suitable locations will be identified on site by the retained ecologist and applicant upon the outset of the building work; ensuring the bird boxes are sited away from disturbance during construction. The following bird boxes will be installed.

Type/Description	Photograph
One Vivara Pro Woodstone house martin double nest box (or similar) to be placed under the eaves of the western elevation of the outbuilding. Box is to be placed out of direct sunlight, avoiding the prevailing wind and rain. These can be purchased at NHBS.com or Wildcare.	
Two Vivara Pro Woodstone swallow nest bowl (plywood board mounted) (or similar) to be placed under the eaves of the western elevation of the outbuilding. Boxes are to be placed out of direct sunlight, avoiding the prevailing wind and rain. These can be purchased at NHBS.com or Wildcare.	
Two 2H Schwegler robin nest boxes (or similar) will be installed on a mature tree along the southern boundary at a height of 3-4 metres. Box is to be placed out of direct sunlight, avoiding the prevailing wind and rain. This can be purchased from NHBS.com or Wildcare.	
Four Schwegler 1B nest boxes or similar, comprising a mix of 32mm, 26mm and oval holes will be installed; on mature trees (two on each tree) along the southern boundary at a height of 3-4 metres. Box is to be placed out of direct sunlight, avoiding the prevailing wind and rain. This can be purchased from NHBS.com or Wildcare.	

6 BATS – THE THREE TESTS AND COMPENSATION STRATEGY

6.1 The Three Tests

6.1.1 The removal of the roof of the house will result in impacts on bats and their roosts which is illegal under the Habitats Regulations 2017 (as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (the 2019 Habitats Regulations). In order for the works to proceed, you will be required to obtain a licence from Natural England, often referred to as a derogation licence which will permit otherwise illegal activities, providing three tests are met. These tests are described in detail at www.gov.uk. Five key principles are reviewed by Natural England in order to assess if the proposed works meet the tests. These are:

- There is a genuine **need and a 'purpose'** for the proposed activity including one of the below:
 - Imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment under section 55(2)(e); Or
 - Preserving public health or public safety, under section 55(2)(e); Or
 - Preventing serious damage to livestock, foodstuffs for livestock, crops, vegetables, fruit, growing timber, fisheries or inland waters, or any other form of property under section 55(2)(g).
- There are **no satisfactory alternatives** to delivering and meeting the need in the way proposed.
- The licensed action will allow the need to be met.
- That the proposals are proportionate.
- That there will be **no adverse effect on the conservation status** of the species concerned.

6.1.2 The three main tests are highlighted in **bold**.

6.1.3 The **first of the three tests** is qualifying the need for the proposed development. The need for the development is proven in the ability of the application to demonstrate meeting the provisions of relevant planning policy. The Planning Authority are satisfied that the application demonstrates need. The policies applicable to this development are described below.

Joint Local Plan (Chapel & Hill Chorlton, Maer & Aston, Whitemore Parishes)

6.1.4 In accordance with 'Policy HG1: New Housing', the proposal will protect and enhance the existing rural character and the replacement of the existing buildings results in appropriate development for the site. The proposal assists by providing an energy-efficient home that meets the needs of residents of all ages and physical abilities, through improved accessibility of the dwelling and outbuildings.

National Planning Policy Framework

- 6.1.5 The development of the site aids in the Sustainable Development of the surrounding area as outlined in the National Planning Policy Framework, through the replacement of the existing poor-quality dwelling and outbuildings with a new high-quality dwelling and high-quality outbuildings.
- 6.1.6 The proposal will widen the choice of high-quality homes (aiding towards section 6 of the National Planning Policy Framework) that will meet the needs of different groups within the community.
- 6.1.7 The proposal allows for development of the site whilst maintaining the openness of the surrounding area, with no detrimental impact on neighbouring amenities.
- 6.1.8 The proposal is in accordance with Paragraph 89 of the National Planning Policy Framework, being a replacement residential dwelling and replacement outbuilding.
- 6.1.9 The **second test** is to demonstrate no satisfactory alternative. In this instance, alternative options have been reviewed as follows:
- The do-nothing scenario:
 - the Applicant lives in the existing dwelling without remedial works
 - the Applicant does not move into the site and leaves it abandoned
 - The do-something scenario where either:
 - The Applicant undertakes some structural works to stabilize the structural integrity of the building, undertakes other works to make damp proof, weather proof etc. including roof replacement.
 - The Applicant proposes to demolish the dwelling (and outbuildings) and creates a purpose built dwelling that meets the needs of current standards of family living and energy efficiency.
- 6.1.10 The existing buildings are suffering from subsidence. There are large cracks in the main house and the outbuilding and roofing is in disrepair. This damage is not cost effective to repair, a new build approach is far more cost effective. The existing buildings are full of water damage and damp, the site levels along with leaking roofs have caused the damp, in multiple areas the external ground level is higher than the internal finished floor level without adequate tanking. The existing buildings are set over numerous levels with multiple sets of steps/ staircases between areas, this is the case within the main house too which is not accessible due to these existing internal and external level changes. The condition of the existing house is therefore such that it could not be easily inhabited in its current state and it would not be cost effective to undertake the necessary works. Furthermore, undertaking remedial structural works to the house would still result in impacts on bats since the roof would certainly need to be removed and replaced.

- 6.1.11 If the applicant was to abandon the site and seek an alternative home, it would lead to further degradation of the buildings, including the main roof of the house which would ultimately result in the roof becoming unsuitable for bats.
- 6.1.12 The proposals allow for a well-built, robust, sustainable, highly insulated, high quality replacement main house and outbuildings. The proposals have been carefully developed to allow for a rationalising of site levels and proposed floor levels, making all the proposed spaces accessible with minimal level changes and avoiding the requirement for tanking. A chartered structural engineer is designing the proposed new foundations and ground slabs to ensure the existing subsidence issues are overcome within the new buildings. The proposals give rise to the opportunity to provide safe and well maintained roosting provision for bats in the long term.
- 6.1.13 Overall, the proposals will enhance the existing site and surrounding area by replacing the existing poor quality buildings with a high quality main house and outbuildings.
- 6.1.14 The **third and final test** is maintenance of the species concerned; this is demonstrated in the ecological appraisal by the full and thorough assessment of the type/s of roosts identified (in accordance with BCT Guidelines), the species involved, the conservation value of the species at geographic scales and the ability for this application to provide an alternative roosting provision on a like-for-like basis, as required by NE's Bat Mitigation Guidelines Figure 4: Guidelines for proportionate mitigation. The mitigation proposed aims to address characteristics identified during the site assessments (as described in the NE guidelines):

NE Guidelines:	The Proposed Mitigation
Quantitative characteristics: There should be no net loss of roost sites, and in fact where significant impacts are predicted there will be an expectation that compensation will provide an enhanced resource compared with that to be lost. The reasoning behind this concept is that the acceptability of newly created roosts by bats is not predictable (see 6.2.2 Long-term impacts: Habitat loss).	The number of roost sites currently found on the existing building is approximately 22, the majority of which are underneath slates on the roof. Other locations are under the apex of the eaves of the porch, under timber fascia (barge board) to the front of the house and two locations under hanging tiles on the side of the building. Although the number of roof locations will not be exactly matched by the new replacement building, the capacity of the replacement roost locations will ensure the number of bats at the site are more than catered for. It is proposed to install at least four habitat access slates and four ridge tiles with gaps. Other slates will also be installed with gaps underneath. The eaves will have a gap all around to facilitate air flow which will also allow bats to access. Barge boards on one gable end will allow gaps behind it to mimic the porch, barge board and hanging tile roost locations.
Qualitative characteristics: the plans should aim to replace like with like. As an extreme	The replacement roost is like-for-like in that it is a south facing aspect in a building very

example, it would be unacceptable to replace maternity roosts with hibernation sites.	close to the existing roost building. The structure of the roof will be replicated where necessary to form the same environmental conditions experienced by the existing roosts. The current roost building is not heated and is in a poor state of repair. Although the new building will be structurally sound, there will be gaps underneath roof tiles and specific access slates to mimic the current access opportunities.
Functional characteristics: compensation should aim to ensure that the affected bat population can function as before. This may require attention to the environment around the roost.	There will be no modification of habitats in the long term; the bat population can continue to use the site, including foraging areas and commuting routes as they have been doing previously. Roosting opportunities will mimic those currently available.

6.1.15 The table above demonstrates the level of survey, assessment and mitigation/compensation proposed for this development is fit for purpose i.e. the application meets the need of the third test.

6.2 Compensation Strategy

- 6.2.1 The indicative replacement roost locations are demonstrated on the accompanying figures. Drawings have not been produced for the bat roost design as yet. The replacement roosts will be replicas of the existing roosts. Having searched all three loft spaces for evidence of usage, no evidence was found and hence it is evident that bats are only roosting in the gaps between the roof slates and internal boarding. Nevertheless, bats will have access to the larger loft space but this is an enhancement rather than compensation for impacts.
- 6.2.2 During demolition of the existing roost building, timber materials will be reclaimed and re-used where possible in the new outbuilding to provide a familiar environment for bats. Droppings will also be transferred.
- 6.2.3 The lighting strategy is shown on Figure 2081-PL-101-D. The lighting strategy is designed in line with BCT/ILP and limited to areas where it is absolutely necessary for safe usage around the site. The lighting will be on a motion sensor system so that it only switches on when required. This means it will be off for most of the time. Lighting will not be installed near to the replacement roosts, nor will light spillage be allowed onto commuting and foraging areas. The Applicant is naturally keen to maintain the darkness around the site but where lighting is required it will be in the form of a capped downlighter which directs light down to the floor rather than upwards or to the front and sides. The design will be similar to the following and will be located next to doorways:



7 REFERENCES

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