



**Gaston Farm
Gaston
Holt
Trowbridge
BA14 6QA**

**Preliminary Ecological
Appraisal**

Luscinia Ecology
On behalf of
R Greenman (Agriculture)



LUS25073

Date: 26/06/2025

Mr R. GreenmanGaston Farm
Gaston
Holt
Trowbridge
BA14 6QA

Dear Mr R. Greenman,

**Preliminary Ecological Appraisal – Gaston Farm, Gaston, Holt,
Trowbridge, BA14 6QA**

- 1.1 Luscinia Ecology were instructed to undertake an Preliminary Ecological Appraisal (PEA) of a new farm access at Gaston Farm, Gaston, Holt, Trowbridge, BA14 6QA. This letter sets out the results of a Preliminary Ecological Appraisal, including any necessary ecological mitigation and compensation.

Introduction

- 1.2 The Site is located along the B3106 between Staverton and Holt, to north of Trowbridge, Wiltshire. The Site includes a length of native hedgerow set between the B3106 road to the west and grassland to the east. The hedgerow and grassland form part of a wider network of farmland.
- 1.3 The Proposed Development includes the creation of a new field access and the closure of an existing access via the planting of a section of hedgerow (**Figure 1**). No other works will take place. The construction footprint will be minor, and construction will be completed using small machinery and hand tools. The impacts are expected to be localised and small in scale.
- 1.4 A PEA has been completed to ensure that an assessment of the potential impacts on ecology and biodiversity is undertaken and that any arising impacts are adequately avoided or mitigated.
- 1.5 The intent of this report is to demonstrate the Applicant's approach to protecting nature as part of this Proposed Development. This letter includes the necessary information for the Proposed Development to proceed without causing harm.



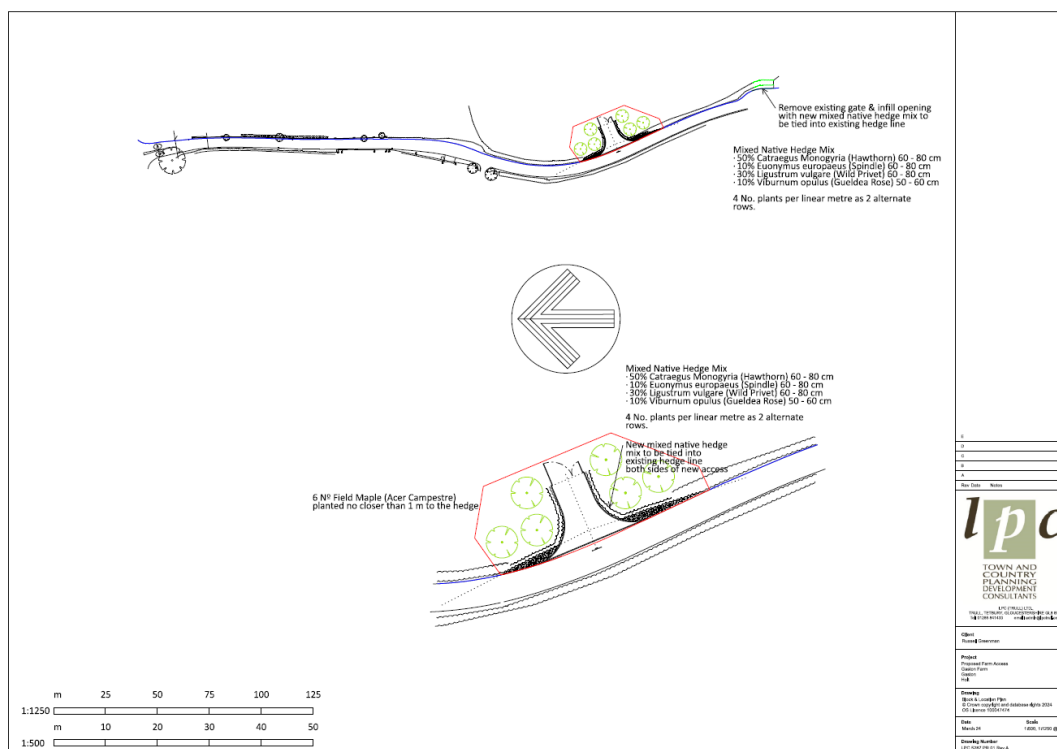


Figure 1: The Proposed Development

Method

- 1.6 A review of existing ecological knowledge of the Site and its surrounding area was undertaken on 20/05/2025 by Greg Nightingale. The data search included the following:
 - A 1km radius around the Site for granted European Protected Species Licences (EPSL), great crested newt class survey licence returns, and great crested newt pond surveys 2017 – 2019¹.
 - A 1km data search from Wiltshire and Swindon Biological Records Centre (WSBRC) for protected and notable species and non-statutory sites².
 - A 1km review of the habitats within the local landscape, habitat designations, and their suitability to support protected and notable species using aerial imagery³.
- 1.7 The Extended UK Habitat Survey was completed by Greg Nightingale on the 20/05/25. The survey included an assessment of the habitats present within the Site and an assessment of the presence or likely presence of protected and priority species.
- 1.8 This report was written by Greg Nightingale and with regard to the CIEEM Guidelines on: Ecological Report Writing⁴, Preliminary Ecological Appraisal⁵, and Ecological

¹ Multi-Agency Geographic Information for the Countryside (MAGIC) maps For England and Wales. Available online at: <https://magic.defra.gov.uk/home.htm>

² Buckinghamshire and Milton Keynes Environmental Records Centre (BMERC), received 31/03/2025.

³ Google Earth. Available online at: <https://earth.google.com/web/>

⁴ CIEEM (2015). *Guidelines on Ecological Report Writing*. Chartered Institute for Ecology and Environmental Management, Winchester.

⁵ CIEEM (2017). *Guidelines for Preliminary Ecological Appraisal. 2nd Edition*. Chartered Institute for Ecology and Environmental Management, Winchester.



Impact Assessment⁶, as well as the British Standard on the Biodiversity Code of Practice for Planning and Development Biodiversity⁷ and Writing Effective Ecological Reports⁸.

- 1.9 **Appendix A** outlines the relevant experience of the assessment contributor.
- 1.10 This PEA provides a reasonable and proportionate level of detail that is reflective of the small scale of the Site, the low importance of habitats present, and the limited extent of the works.

Results

Data search

- 1.11 Relevant to the Site's location and habitats present, the data search confirmed:
- There were no Statutory Designated Sites within 1km of the construction footprint.
 - The construction footprint is located within the Bat Consultation Zone for Bath and Bradford-on-avon bats Special Area of Conservation (SAC).
 - The construction footprint is located within ~300m of the Bristol Avon River Local Wildlife Site (located to the south) and within ~800m of the Great Bradford Wood Local Wildlife Site (located to the south-west).
 - There were two granted European Protected Species Licences within 1km of the Site. These related to brown long-eared bat *Plecotus auritus*, common pipistrelle *Pipistrellus pipistrellus*, greater horseshoe bat *Rhinolophus ferrumequinum*, and lesser horseshoe bat *Rhinolophus hipposideros*, and Natterer's bat *Myotis nattereri*.
 - Records of common frog *Rana temporaria* (all located over 400m from the construction footprint)
 - Records of great crested newt *Triturus cristatus* (all located over 540m from the construction footprint)
 - Nine records of badger *Meles meles* (all located over 300m from the construction footprint)
 - Records of 11 species of bat, including: Brandt's bat *Myotis brandti*, brown long-eared bat, common pipistrelle, Daubenton's bat *Myotis daubentonii*, greater horseshoe bat, lesser horseshoe bat, Natterer's bat, noctule *Nyctalus noctula*, serotine *Eptesicus serotinus*, soprano pipistrelle *Pipistrellus pygmaeus* and whiskered bat *Myotis mystacinus*.
 - Various records of birds
 - Three records of brown hare (all located over 850m from the construction footprint)

⁶ CIEEM (2018). *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, and Coastal and Marine*. Chartered Institute for Ecology and Environmental Management, Winchester.

⁷ BSI (2013). BS 42020:2013: *Biodiversity: Code of Practice for Planning and Development*. British Standards Institution, Bristol.

⁸ Dean M. (2021). *Writing Effective Ecological Reports: A Guide to Principles and Practice*. Pelagic Publishing, Exeter.



- Records of hedgehog *Erinaceus europaeus* (across the entire local landscape)
- One record of slow-worm *Anguis fragilis* and one record of grass snake *Natrix helvetica* (both located approximately 1km to the south)

Field Survey - Habitats

- 1.12 The extended UK Habitat Classification Survey confirmed that the construction footprint supports a small section of native hedgerow and modified grassland.

Modified grassland

- 1.13 The modified grassland appears to have been previously grazed. During the survey, the grassland had not been recently grazed and had a low-moderate sward height, which varied a little across the sward (**Photograph 1**). The ground felt and appeared compacted. Perennial rye grass *Lolium perenne* was present throughout the sward. Other species recorded included: dandelion *Taraxacum officinale* agg., false oat grass *Arrhenatherum elatius*, field buttercup *Ranunculus acris*, meadow foxtail *Alopecurus pratensis*, milk thistle *Silybum marianum*, Yorkshire fog *Holcus lanatus*, and white clover *Trifolium repens*. The **Modified grassland** was of **Negligible importance**.



Photograph 1. Modified grassland

Native hedgerow

- 1.14 The native hedgerow was 2m tall, over 2m wide, and appeared to be managed annually (**Photograph 1**). There was no grass margin along the roadside. The native hedgerow was predominantly hawthorn *Crataegus monogyna*, with elder *Sambucus nigra* occasionally present. A single horse chestnut *Aesculus hippocastanum* sapling was recorded. The hedgerow was not species-rich and was not important under the



hedgerow regulations. Wider species included: barren brome *Anisantha sterilis*, bindweed *Convolvulus arvensis*, bramble *Rubus fruticosus*, broadleaved dock *Rumex obtusifolius*, cleavers *Galium aparine*, a carrot species *Apiaceae sp.*, dandelion, false brome *Brachypodium sylvaticum*, hedge mustard *Sisymbrium officinale*, ivy *Hedera helix*, milk thistle, and nettle *Urtica dioica*. The **Native hedgerow** was of **Site Importance**.



Photograph 2. Native hedgerow

Field Survey – Species

- 1.15 Given the data search results, location of the construction footprint, the local land use, and the habitats within and adjacent to the construction footprint, it was assessed that the following species and species groups could enter or be present within the footprint of construction:
- Common amphibians
 - Badger *Meles meles*
 - Bats
 - Nesting birds
 - Brown hare *Lepus lepus*
 - Hedgehog *Erinaceus europaeus*
 - Common reptiles
- 1.16 Given there are no waterbodies or watercourses within 250m of the construction footprint, it is reasonable to assume that common amphibians are no likely to be



present within the construction footprint. The **common amphibian interest** was of **Negligible Importance** and common amphibians will not be discussed further within this report.

- 1.17 No evidence of badgers (hairs, prints, setts, paths) was recorded within the construction footprint or within 50m of the construction footprint. A mammal path, expected to be fox *Vulpes vulpes* was observed running parallel to the hedgerow on the grassland side. It is expected that badgers may occasionally commute through the local area and in the future could reasonably establish a badger sett along the hedgerow. However, the adjacent road significantly decreases the likelihood of this occurring. The **badger interest** was of **Site Importance** as a precaution.
- 1.18 It is reasonable to assume that brown hare, hedgehog, and common reptiles could occasionally be present at the base of the hedgerow and margin of the modified grassland. The likelihood is considered to be low given the adjacent road, land use of the grassland (grazed), and the land use of the adjacent landscape. Nevertheless, the presence of these species cannot be ruled out. The **brown hare, hedgehog, and common reptile interests** were of **Site Importance**.
- 1.19 It also reasonable to assume that the hedgerow will be used by various bat species as a flight-path and as foraging habitat. The **local landscape** is of **high suitability** for bat **flight-paths and foraging habitat**. The native hedgerow forms a small part of this wider landscape suitability. The presence of the bat consultation zone for the Bath and Bradford-on-Avon Bats SAC is acknowledged.
- 1.20 It is anticipated that the hedgerow will support nests of various common bird species throughout the breeding season and may occasionally support more notable bird species. The **nesting bird interest** was of **Site Importance**.

Mitigation

Consideration of Site wide mitigation

- 1.21 The construction phase is likely to be limited given the small scale of the Proposed Development. The Proposed Development will implement standard and well-rehearsed pollution control measures throughout construction. Given the scope of the Proposed Development, the following actions will be implemented during construction:
 - Measures to minimise and prevent erosion and run-off, including minimising adjacent land disturbance.
 - Control dust through fine water sprays used to dampen down the Site.
 - Screen the edge of the Construction Zone by placing a fine mesh screening close to any dust sources.
 - Cover skips and trucks loaded with construction materials and continually damp down with low levels of water.
 - Cover piles of building materials like cement, sand and other fine materials and powders, regularly inspect for spillages, and locate them where they will not be washed into waterways or drainage areas.



- Use non-toxic paints, solvents and other hazardous materials wherever possible.
- Segregate, tightly cover, and monitor toxic substances to prevent spills and possible site contamination.
- Cover up and protect all drains within and adjacent to the construction footprint.
- Collect, control, and avoid wastewater generated from construction activities, screen, discharge the clean water, and dispose of remaining sludge according to environmental regulations.
- No burning of materials.
- Reduce noise pollution through careful handling of materials; modern, quiet power tools, equipment and generators; and low impact technologies.

1.22 Lighting during construction has the potential to disrupt / modify the behaviour of wildlife. A Sensitive Lighting Strategy will be implemented. This strategy will implement the following:

- Lighting during construction will be reduced as far as practicable.
- Luminaires will be positioned and directed away from ecological receptors (the hedgerow).
- Column heights will be reduced as far as practicably possible to reduce light spill.
- White light will be avoided, and warm colours preferably used. Preferable colours are 3000°k to 2700°k (where feasible) with peak wavelengths greater than 550nm.
- Measures to ensure 0% upward light output and no tilting of the light head.
- As a last resort, the incorporation of shields, baffles and cowls fitted to the luminaires.

Consideration of designations

1.23 The Proposed Development is within the Bat Consultation Zone for the Bath and Bradford-on-Avon Bats SAC. The Impact Risk Zone that overlaps the Site outlines the following considerations:

“All Consultations: All planning applications (except householder applications) where the proposed development is outside or extends outside existing settlements/urban areas and will increase lighting levels or affect trees/woodland, waterbodies, rural buildings/structures (manmade or natural) or linear landscape features such as hedgerows, streams and rivers through direct loss, fragmentation or change of use.

Infrastructure: Airports, helipads and other aviation proposals.

Minerals, Oil and Gas: Oil & gas exploration/extraction.

Air Pollution: Livestock & poultry units with a floorspace > 500m², slurry lagoons > 4000m².



Combustion: General combustion processes >50MW energy input. Including: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/combustion."

- 1.24 The Proposed Development does not relate to infrastructure, minerals, oil, and gas, or and combustion and will not cause air pollution. **These impacts/activities are not considered further.**

- 1.25 The Proposed Development will not increase lighting levels or impact trees, woodland, waterbodies, rural buildings, or rural structures. **These impacts are not considered further.**

- 1.26 The Proposed Development will remove a short section of hedgerow. This section will be broadly compensated for by the provision of a new section of hedgerow ~60m to the south and the replacement of new native hedgerows adjacent to the new access. It is reasoned that the removal of a short section of hedgerow for a new field access will have negligible effect on the hedgerow or landscape connectively. The impact on hedgerows quoted above is highly likely to relate to the Bath and Bradford-on-Avon Bats SAC, which is located 6.3km to the west. This SAC supports greater horseshoe bat, Bechstein's bat *Myotis bechsteinii*, and lesser horseshoe bat. None of these species are likely to be materially affected by the loss of a short section of hedgerow. **No further consideration is required.**

- 1.27 The Proposed Development and associated effects arising from the construction process, are sufficiently distanced from the statutory and non-statutory designations in the local area. **No further mitigation or Reasonable Avoidance Measures are required.**

Consideration of habitats

- 1.28 The construction footprint and construction process will result in the loss of a short section of hedgerow and a small area of modified grassland. Neither of these habitats are of ecological importance and their loss will have no effect at the landscape scale. Nevertheless, an existing field access will be closed (**Photograph 3**) via the planting of a new native hedgerow (formed of hawthorn to match the existing hedgerow – outside the scope of this planning application) and the new field access will be lined with new species rich native hedgerow. There will be no net loss of hedgerow habitat and no change in the number of canopy breaks across the hedgerow. Broadly, the old and new gap in the hedgerow will be the same. The new hedgerows will be allowed to grow into and become part of the existing hedgerow, and the new and retained hedgerows will be managed as a single feature. In addition, six small native trees will be planted at the new entrance. **No further mitigation or Reasonable Avoidance Measures are required.**





Photograph 3. Existing access gate to be closed via new native hedgerow planting

Consideration of protected and priority species

1.29 The following species require consideration:

- Badgers (sett establishment, commuting, and foraging)
- Brown hare, hedgehog, and common reptiles (resting, commuting, and foraging)
- Bats (flight-paths and foraging habitat)
- Nesting birds

1.30 It is reasonable to assume that the species and species groups listed above may enter, or be present within, the area of the construction footprint. To mitigate and avoid harm, the following will be implemented:

- Prior to construction, the area within 30m of the construction footprint will be searched for large holes (badger sett entrances). In the event that an entrance is found, an ecologist will be contacted to advise. The advice of the ecologist will be followed.
- Prior to construction the grassland within the construction footprint will be strimmed to ground level using a two-cut regime. The first cut will be to 10cm with the arisings removed / raked off. Then after 24 hours, the second cut will be to ground level, with the arisings removed / raked off. These works will be undertaken during daytime temperatures of over 10°C. The arisings from the strimming will be taken away from the Site.
- The removal of the hedgerow should ideally be undertaken outside the nesting bird season (which is generally taken to be March – August inclusive). Should it



prove necessary to remove the hedgerow during the bird nesting season, then the area will be checked in advance for the presence of bird nests by a suitably competent person. If there is no evidence of breeding birds the work will be completed within 48 hours of inspection. If any active nests are identified, clearance will cease, and an appropriate buffer zone must be established around the nest in discussions with an ecologist (usually 5m). The buffer must remain intact until it has been confirmed that the young have fledged, and the nest is no longer in use.

- Any excavations (e.g., trenches / pits) will be covered when works are not taking place to ensure that they do not fill with water and to prevent wildlife from becoming trapped within the excavation. If any excavations must be left open overnight, then they will be provided with a means of escape should any wildlife enter. This could simply be in the form of a roughened plank of wood placed in the excavation as a ramp to the surface. **None are expected given the Proposed Development.**
- Any temporary exposed pipes will be capped to prevent wildlife gaining access during the night. **None are expected given the Proposed Development.**
- Any excavations and pipes will be inspected each morning to ensure no wildlife has become trapped overnight. If a badger becomes trapped, then it is likely to attempt to dig itself into the side of the excavation and form a temporary sett. If trapped badger is encountered, the advice of a suitably experienced ecologist will be sought. **None are expected given the Proposed Development.**
- The storage of topsoil or other 'soft' building materials within the clearance/construction site will be given careful consideration. Badgers could readily adopt such mounds as setts. To avoid the adoption of any mounds by badgers, mounds will be kept to a minimum and any essential mounds subject to daily inspections. **Not expected given the Proposed Development.**
- The storage of any chemicals within the clearance/construction site will be contained in such a way that they cannot be accessed or knocked over by wildlife. **Not expected given the Proposed Development.**

- 1.31 Any wildlife discovered during the construction process will be allowed to move away on its own accord and will not be handled. In the event of uncertainty, a suitably experienced ecologist will be contacted to advise and support the construction team.
- 1.32 **The implementation of the above mitigation will ensure that protected, priority, and notable species are protected throughout the construction process.**
- 1.33 As set out above, bat flight-paths and foraging habitat will not be materially affected by the loss of a short section of hedgerow. **No further consideration is required.**

Summary

- 1.34 The project will not impact any local designations, locally important habitats, or any protected, priority, or notable species. The loss of the hedgerow will be adequately compensated for.



- 1.35 The Applicant and their contractors will implement the requirements of this letter in full.
No further mitigation or Reasonable Avoidance Measures are required.
- 1.36 We trust you find our assessment in good order.

Yours sincerely,



Director, Luscinia Ecology



Appendix A: Survey Methods

1.37 Luscinia Ecology operates as a team of seven, including Greg Nightingale (Director), Lorna Roberts (Associate Director), Mungo Nash (Principal Ecologist and Biodiversity Net Gain Service Lead), Jenn Senft (Assistant Ecologist), Mel Granato (Assistant Ecologist), Natalie Nutland-Bowell (Assistant Ecologist), and Nea Steele (Marketing and Operations). Luscinia Ecology Ltd is a Chartered Institute of Ecology and Environmental Management (CIEEM) Registered practice. CIEEM act to govern best practice in the industry.

A. 1 Greg Nightingale's experience is set out in **Table 1** below.

Contributor	Experience
Greg Nightingale BSc (Hons) MCIEEM	Greg is the Director of Luscinia Ecology with over 11 years of experience in ecology and environmental management in the private sector. Greg has worked extensively within the planning system, undertaking protected species surveys, habitat surveys and Ecological Impact Assessments as well as providing advice on habitat management and mitigation and enhancement design. He has a comprehensive understanding of environmental policy and the current and emerging challenges facing the environment and how these challenges are managed within the planning sector. Through an understanding of good practice, planning policy, the ecology of protected habitats and species, and environmental impact pathways, Greg provides robust ecological advice that is cognisant of wider planning and legal requirements. He is experienced in UKHabs Classification system and the Phase 1 Habitat classification. He has designed, undertaken, and reported on numerous habitat and protected species surveys (including badger surveys, bat emergence/re-entry surveys, bat activity surveys, and hazel dormouse surveys), including bespoke survey design and the implementation of numerous protected species mitigation strategies. Greg is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM). He holds a level two Bat Licence, a level one Great Crested Newt Licence, and a NPTC (CS38) Tree Climbing and Aerial Rescue qualification. In addition, he has been named on badger and bat mitigation licences and has completed courses in barn owls, botany, breeding birds, and hazel dormouse.

Table 1: Contributor experience

