



LAND SOUTH OF SEAGRY HOUSE, UPPER SEAGRY

ECOLOGICAL IMPACT ASSESSMENT (EcIA)

THALA FAMILY
INVESTMENTS
LTD

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QUALITY ASSURANCE

This report has been prepared in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Report Writing (2nd Edition, December 2017).

The facts stated in this report are true to the best of our knowledge and belief, and any opinions expressed are held genuinely and in accordance with the accepted standards of the profession. ACD Environmental Ltd is a CIEEM Registered Practice.

Client:	James Barrett-Jolley
Site/job:	Land South of Seagry House, Upper Seagry
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1 EXECUTIVE SUMMARY

Purpose of report	To assess the ecological impacts of a proposed development at Land South of Seagry House, Upper Seagry, clearly identifying any 'significant effects' on important ecological features (including designated sites or protected species) and detailing any mitigation and/or compensation measures required, and how these could be secured. The report also confirms how the proposed development could achieve Biodiversity Net Gain.
Description of proposed development	Detailed planning permission is being sought for demolition of the existing buildings and development of 4No. flexible B8 storage and distribution and/or Class E(g) Commercial, Business and Service units and erection of building for mixed agricultural and equestrian workshop, storage, estate office and stables.
Brief description of the site	The proposed development site (hereafter referred to as 'the Application Site') is approximately 1 hectare and is located in the small village of Upper Seagry in Wiltshire. The Ordnance Survey Grid Reference for the approximate centre of the Application Site is ST94494 80840. The Application Site was largely comprised of mixed woodland with open areas of neutral grassland. The former chicken farm/now warehouse land was acquired by the application and incorporated within the existing Seagry Estate. There are seven buildings, the main one being a long, dilapidated warehouse. There are areas of ruderal vegetation and bare ground where some trees within woodland (mostly ash and self-seeded sycamore) have previously been felled. The longstanding yard areas and trackways and the general management of the area have been reused. On subsequent visits a few more ash and self-seeded sycamore trees had been removed, and the grassland has been mowed to a short sward height.
Designated nature conservation sites	No designated sites will be affected.
Key habitats	The most valuable habitat present within the Application Site is the mixed woodland.

Key species	The Application Site offers some foraging and sheltering opportunities for amphibians, badgers, nesting birds, reptiles and other wildlife (e.g. hedgehogs). The Application Site also offers foraging, commuting and roosting opportunities for bats. Small day roosts of individual common pipistrelle and soprano pipistrelle bats were found in B1. Bat activity surveys are not yet completed but several species have been recorded on site during emergence surveys including barbastelle bats. The ponds surrounding the Application Site were eDNA tested and were all positive for great crested newts, which are therefore likely to be using terrestrial habitat on site. A 'good' population of grass snakes were found on site with a peak count of five individuals. Common bird species are likely to be nesting within vegetation and buildings on site.
Key impacts and mitigation/compensation measures	The proposed development will result in the loss of woodland, scrub, tall ruderal and neutral grassland. All buildings will be demolished. The pipistrelle day roosts will be lost as B1 will be demolished. Suitable bird nesting and foraging habitat will be removed. Some of the current grassland that supports grass snakes and potentially great crested newts will be removed as tracks and yards have been reinstated to facilitate the development.
Mitigation	Grass snakes will be discouraged off site and into surrounding habitats using a phased vegetation removal regime. All habitat and building clearance will be undertaken outside of the nesting bird season (February – August inclusive) or following a nesting bird check by a suitably experienced ecologist. A sensitive lighting scheme will be designed and implemented to retain dark corridors for bats and other wildlife during the operational phases of the development. B1 will need to be demolished under a low impact bat mitigation licence. Precautionary measures will be used when the building is taken down including timing constraints. The Application Site will be registered under the district level licence for great crested newts and precautionary measures will be in place when removing habitat.
Compensation	Suitable bird nesting and foraging habitat will be created within enhanced and new areas of grassland, tree and shrub planting. Bird boxes will be mounted on mature trees and/or buildings. Some off-site areas of habitat creation will be required to compensate for the loss of woodland; off-site options are currently being explored. Bat boxes will be mounted on retained trees to compensate for loss of roost and hibernacula/log piles created for reptiles and amphibians.

Enhancements	There will be new areas of neutral grassland, and the retained woodland will be enhanced, there will also new small areas of introduced shrub planting; and new native hedgerows along most of the site boundaries. The Statutory Biodiversity Metric calculations has demonstrated that the proposed development is not capable of achieving BNG on site due to loss of woodland habitats as the results show a net loss of -5.01% in terms of habitats but a net gain of 628.6% in terms of linear features. The Statutory Biodiversity Metric requires a net gain of at least 10% and therefore off-site habitat creation will be required. Offsite options are currently being explored.
Conclusions	The proposed development is capable of complying and delivering enhancements in accordance with Paragraphs 187-195 of the NPPF, and Core Policy 50 of the Wiltshire Core Strategy.

1 INTRODUCTION

- 1.1. This report provides an assessment of the ecological effects of the proposed development of an area of land known as Land South of Seagry House, Upper Seagry (the Application Site, see **Image 1**). The principal author of this report is Madison Sellar. The client is James Barrett-Jolley.

Background

- 1.2. The address of the Application Site is Seagry House, Startley Road, Upper Seagry, Chippenham SN15 5HD. The Ordnance Survey Grid Reference for the approximate centre of the Application Site is ST94494 80840.
- 1.3. The Application Site is approximately 1 hectare and is largely comprised of mixed woodland with open areas of neutral grassland. There are seven buildings, the main one being a long, dilapidated warehouse. There are areas of ruderal vegetation and bare ground where some trees within the woodland (mostly ash and self-seeded sycamore) have previously been felled. The local landscape consists of residential buildings, agricultural land, scattered trees, waterbodies and deciduous and ancient woodland.
- 1.4. Detailed planning permission is being sought for demolition of the existing buildings and development of 4No. flexible B8 storage and distribution and/or Class E(g) Commercial, Business and Service units and erection of building for mixed agricultural and equestrian workshop, storage, estate office and stables.

Competence

- 1.5. This report has been written by Madison Sellar, Ecologist with ACD Environmental Ltd. Madison has approximately three years' experience in ecological consultancy and has undertaken various surveys, ranging from Extended Phase 1 Habitat Surveys to Phase 2 surveys for protected species, including bats, hazel dormice, badgers, reptiles, water voles and great crested newts. Madison has written various reports, including Preliminary Ecological Appraisals (PEAs), Preliminary Roost Assessments (PRAs), Ecological Impact Assessments (EclAs), Landscape and Ecological Management Plans (LEMPs) and Construction Environmental Management Plans (CEMPs).

- 1.6. A Technical Review of this report has been undertaken in line with ACD Environmental Ltd's Quality Assurance procedures. The Technical Review was undertaken by Lisa Durrant, Senior Ecologist at ACD Environmental Ltd who has over 12 years' experience and has been involved in a wide range of ecological projects including extended Phase 1 Habitat Surveys, Phase 2 surveys for protected species and European Protected Species (EPS) licence applications. She is a full member of CIEEM (MCIEEM) and holds Natural England Class licences to survey for bats, barn owl *Tyto alba*, dormouse *Muscardinus avellanarius* and great crested newt *Triturus cristatus*.

Purpose of the report

- 1.7. The purpose of this EclA is as follows:
- To identify and describe all potentially significant ecological effects associated with the proposed development.
 - To set out the mitigation measures required to ensure compliance with nature conservation legislation and relevant planning policy, and to address any potentially significant ecological effects.
 - To identify how mitigation measures will/could be secured.
 - To identify any significant residual ecological effects and set out any compensation measures proposed to address these.
 - To identify appropriate enhancement measures in order to achieve Biodiversity Net Gain.
 - To set out the requirements for post-construction monitoring.



Image 1: Application Site location and red line boundary.

2 PLANNING POLICY AND LEGISLATION

Legislation

2.1. The following pieces of legislation are of specific relevance to this assessment:

- The Environment Act 2021.¹ This piece of legislation is of relevance because all planning permissions granted in England are mandated to deliver at least 10% Biodiversity Net Gain from 12th February 2024 (unless exemptions apply and small sites were mandated on 2nd April 2024, neither of which are applicable to the Application Site).
- The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.² This piece of legislation is of relevance because the Application Site supports bats, which are EPS.
- Wildlife and Countryside Act 1981³ (as amended, including by the Countryside and Rights of Way Act 2000). This piece of legislation is relevant because the Application Site is within the zone of influence of a Site of Special Scientific Interest (SSSI), which is protected in England under this Act, and species scoped into this assessment are protected under various sections of this Act.
- Natural Environment and Rural Communities (NERC) Act 2006⁴. Section 41 includes lists of habitats and species recognised as of 'principal importance' for the conservation of biodiversity. Section 40 of the NERC Act 2006 requires all public bodies to have regard for biodiversity conservation when carrying out their function. This is commonly referred to as the 'biodiversity duty'. This piece of legislation is of relevance because the Application Site supports species of principal importance.

2.2. The following pieces of legislation have been considered, but are not considered to be of specific relevance in this case:

- Protection of Badgers Act 1992 (no badger setts are present within the Application Site or sufficiently close to be affected).

¹ UK Government. *Environment Act 2021*. Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents>

² UK Government. *The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019*. Available from: <https://www.legislation.gov.uk/ukdsi/2019/9780111179512/contents>

³ UK Government. *Wildlife and Countryside Act 1981*. Available at: <http://www.legislation.gov.uk/ukpga/1981/69/contents>

⁴ UK Government. *Natural Environment and Rural Communities Act 2006*. Available at: <http://www.legislation.gov.uk/ukpga/2006/16/contents>

- Hedgerows Regulations 1997 (the Regulations do not apply to the hedgerows within the Application Site in this context).
- Water Framework Directive 2000 (there are no water within the Application Site).

Environment Act 2021

- 2.3. In accordance with the Environment Act 2021⁵, mandatory BNG will apply from for developments in the Town and Country Planning Act 1990 from 12th February 2024 (unless exemptions apply and small sites were mandated on 2nd April 2024, neither of which are applicable to the Application Site).
- 2.4. Schedule 7A of the Act makes provision for grants of planning permission in England to be subject to a condition, to secure that the 'biodiversity gain objective' is met.
- 2.5. The 'biodiversity gain objective' is met in relation to development for which planning permission is granted if the biodiversity value attributable to the development exceeds the pre-development biodiversity value of the onsite habitat by at least the relevant percentage.
- 2.6. The biodiversity value attributable to the development is the total of the following:
- The post-development biodiversity value of the onsite habitat.
 - The biodiversity value, in relation to the development, of any registered offsite biodiversity gain allocated to the development.
 - The biodiversity value of any biodiversity credits purchased for the development.
- 2.7. The relevant percentage is 10%, but the Secretary of State may by regulations amend this paragraph so as to change the relevant percentage.
- 2.8. The biodiversity value of any habitat or habitat enhancement are to its value as calculated in accordance with the Statutory Biodiversity Metric.
- 2.9. Every planning permission granted for the development of land in England shall be deemed to have been granted subject to the condition in sub-paragraph (2), which states that the development may not be begun unless:

⁵ Great Britain. *The Environment Act 2021*. Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

- A biodiversity gain plan has been submitted to the planning authority.
- The planning authority has approved the plan.

2.10. Local Planning Authorities (LPAs) will have to approve a Biodiversity Net Gain plan for development work before it can start.

Planning policy

National Planning Policy Framework 2024⁶

2.11. Paragraph 187-191 of the NPPF relates to 'Conserving and enhancing the natural environment' and Paragraphs 192-195 relates to 'Habitats and Biodiversity'.

2.12. Paragraph 187 of the NPPF states the following:

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

"a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land; where

⁶ HM Government. *National Planning Policy Framework December 2024*. Available at:
<https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf>

appropriate.”

2.13. Paragraph 193 of the NPPF states the following:

“When determining planning applications, local planning authorities should apply the following principles:

“a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is 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;

c) 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 reasons⁶⁷ and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”

Wiltshire Core Strategy (2015)⁷

2.14. The Wiltshire Core Strategy (2015) provides a guide to development in the county until 2026.

2.15. Core Policy 50: Biodiversity and Geodiversity includes:

Protection

Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such

⁷ Wiltshire Council (2015). *Wiltshire Core Strategy*. Adopted 20th January 2015. Available at: <https://www.wiltshire.gov.uk/planning-policy-core-strategy>

features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services.

All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.

Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 above where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.

Biodiversity enhancement

All development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services. Such enhancement measures will contribute to the objectives and targets of the Biodiversity Action Plan (BAP) or River Basin/ Catchment Management Plan, particularly through landscape scale projects, and be relevant to the local landscape character.

Local sites

Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment. Damage or disturbance to local sites will generally be unacceptable, other than in exceptional circumstances where it has been demonstrated that such impacts:

- i. cannot reasonably be avoided*
- ii. are reduced as far as possible*
- iii. are outweighed by other planning considerations in the public interest*
- iv. where appropriate compensation measures can be secured through planning obligations*

or agreements.

Development proposals affecting local sites must make a reasonable contribution to their favourable management in the long-term.

Seagry Parish Neighbourhood Plan (2019)⁸

2.16. The Seagry Parish Neighbourhood Plan (2019) provides a guide to development in the parish until 2036.

2.17. Natural Environment and Biodiversity – Objective: O1 states:

There is widespread community support for preserving and enhancing the natural environment and biodiversity of the Parish, as well as recognition of the importance of green spaces for wildlife habitats, active recreational activities, cultural history, mental wellbeing, and public enjoyment.

It is also critical to note that all of the Parish is within the 'Bristol Avon Catchment Partnership', something to which attention must be paid in any planning application (<https://www.wessexwater.co.uk/bristolavon/>).

In general, adequate protection is provided by Wiltshire Core Policies 50 (Biodiversity and Geodiversity), 51 (Landscape) and 52 (Green Infrastructure). As well as taking particular account of any impacts on these, the community encourages any applicant to highlight natural environment and biodiversity aspects related to any development and, where possible, offer mitigation of negative impacts.

⁸ Seagry Parish Council (2019). *Seagry Parish Neighbourhood Plan (2019)*. Adopted 19th May 2021. Available at: https://seagryparishcouncil.gov.uk/documents_category/neighbourhood-plan/

3 METHODOLOGY

Scope of assessment

- 3.1. The EcIA focuses on 'important ecological features', i.e. those which are considered to be of relevance to the decision-making process and could be affected by the proposed development. Important ecological features include protected species, habitats/species of 'principal importance' for biodiversity conservation (i.e. Section 41 habitats/species⁹), birds of conservation concern¹⁰, invasive non-native plant species¹¹, and habitats and species identified as priorities for conservation in the CWP Biodiversity Action Plan (CWP BAP).

Zone of influence

- 3.2. The 'zone of influence' (ZOI) is the area over which important ecological features (onsite or offsite) may be affected as a result of the proposed development and associated activities. The ZOI can vary for different ecological features, depending on their sensitivity to environmental change.
- 3.3. The ZOI for statutory designated sites has been informed by Natural England's Sites of Special Scientific Interest Impact Risk Zones¹² (SSSI IRZs). IRZs define zones around each SSSI that reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. This has been determined insofar as possible as part of the desk study, as discussed below. In this case, it is clear that the Application Site falls within the IRZ of Harries Ground Rodbourne SSSI, which is located c.1.8km to the north-west and Sutton Lane Meadows SSSI, which is located c. 3km south.
- 3.4. Although the Application Site lies within IRZ, the proposed development type does not meet the descriptions detailed within the IRZ for the SSSI designations, and only relates to aviation infrastructure, air pollutions, combustion, waste, compost and discharge. Therefore, there is no need to consult Natural England on the likely impacts of development on terrestrial SSSIs

⁹ Section 41 (41) of the Natural Environment and Rural Communities (NERC) Act, which came into force on 1st October 2006, requires the Secretary of State to publish a list of habitats and species which are of principle importance for the conservation of biodiversity in England.

¹⁰ Red list species are those that are globally threatened, whose population or range has declined rapidly in recent years (i.e. by more than 50% in 25 years), or which have declined historically and not recovered. Amber list species are those whose population or range has declined moderately in recent years (by more than 25% but less than 50% in 25 years), those whose population has declined historically but recovered recently, rare species (<300 breeding pairs or <900 wintering individuals), those with internationally important populations in the UK, those with localised populations, and those with an unfavourable conservation status in Europe. Species that meet none of these criteria are Green-listed.

¹¹ Invasive non-native plants (Section 14) on Schedule 9 of the Wildlife & Countryside Act 1981 (as amended).

¹² Natural England (June 2019). Natural England's Impact Risk Zones for Sites of Special Scientific Interest (For use by Local Planning Authorities to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites and determine when to consult Natural England).

and SACs, SPAs or Ramsar sites that they underpin.

Desk Study

3.5. The following information was included in a desk study with Wiltshire & Swindon Biological Records Centre (WSBRC) for a search area of 2km around the central Ordnance Survey Grid Reference central of the Application Site:

- Local wildlife sites.
- Species records.

3.6. This data search was carried out on 7th May 2024.

3.7. A desk study was also carried out using the MAGIC website¹³ with the latest searches in June 2025.

3.8. The MAGIC website was used to carry out a data search of 5km for the following:

- Statutory designated sites designated for nature conservation interest, namely SSSIs, Special Protection Areas (SPAs), Special Areas for Conservation (SACs) and Ramsar Sites; as well as National Nature Reserves (NNRs) and Local Nature Reserves (LNRs).

3.9. The MAGIC website was also used to carry out a data search of 2km for the following:

- Granted EPS licences including bats, great crested newt *Triturus cristatus* and hazel dormouse *Musccardinus avellanarius*.
- Class Survey Licence Returns - presence only records from class licence surveys.
- Pond Surveys 2017 - 2019 - data from ponds surveyed for District Level Licensing.
- Priority habitats.

Field surveys

3.10. A summary of ecological field surveys is provided in **Table 1**. Descriptions of full survey methods are provided in **Appendix 1**.

¹³ Multi Agency Geographic Information for the Countryside [online]. Available at: <https://magic.defra.gov.uk/>

Table 1: Field surveys

Survey	Surveyor/s	Survey date/s	Study Area	Relevant guidelines
Ecology site walkover and UK Habitat Classification Survey	Lisa Durrant and Charlene Watts	16 th May 2024	Red line boundary	UKHab (2023)
Badger visual survey	Lisa Durrant and Charlene Watts	16 th May 2024 and all other site visits used as an opportunity to update the ecological baseline	Red line boundary	Scottish Natural Heritage (1989) Harris <i>et al</i> (1989)
Bat visual assessment - tree scoping assessment	Lisa Durrant and Charlene Watts	16 th May 2024	All trees within red line boundary	Collins (2023) Andrews (2013)
Bat visual assessment - buildings (internal where access allowed and external)	Lisa Durrant and Charlene Watts	16 th May 2024	All buildings within red line boundary	Collins (2023)
Reptile presence/absence survey	Madison Sellar	9 th May 2025 (deployment of mats) – 16 th June 2025 (final check and collection of mats)	Red line boundary	Gent and Gibson (1998) Froglife (1999) Sewell <i>et al</i> (2012)

				NARRS (2007)
Great crested newt Habitat Suitability Index (HSI) Assessment	Lisa Durrant	16 th May 2025	Offsite ponds	Oldham <i>et al</i> (2000)
Great crested newt eDNA survey	Lisa Durrant and Madison Sellar	16 th May 2025	Four ponds offsite	Biggs <i>et al</i> (2014)
Bat emergence surveys	Dominic Lambert Madison Sellar Charlene Watts Jake Cranston Matthew Simmons	22 nd May 2025 3 rd July 2025 24 th July 2025	Buildings 1, 3, 5 and 6 Building 1 only Building 1 only	Collins (2023)
Automated detector surveys	Madison Sellar	22 nd May 2025 (1 st deployment) 3 rd July 2025 (2 nd deployment) To be deployed 2 nd September 2025 (3 rd deployment)	Suitable habitats onsite	Collins (2023)

Limitations

- 3.11. There were no limitations regarding the site walkover surveys.
- 3.12. The protected species surveys were all carried out at optimal times of the year and in suitable weather conditions. There are therefore no limitations in this regard.

Assessment methodology

- 3.13. The habitats and species evaluations and likely effects are made with reference to CIEEMs Guidelines for Ecological Impact Assessment.¹⁴
- 3.14. The importance of ecological features has been assessed by carrying out a suite of specialist surveys (**Table 1**) to determine whether protected species/habitats, and/or species/habitats of conservation concern are present in the Application Site or its ZOI, then comparing their status at the international/national/county/regional/local scale, through the use of available contextual information, to establish the importance of those features in a geographical context.
- 3.15. The overall effect of the proposed development on a given feature has been predicted, considering the baseline data collected through desk study and field survey, and the various impacts expected to occur. An assessment has then been made as to whether the effect on each important ecological feature is likely to be significant or not.
- 3.16. Significance is the weight that should be attached to effects when decisions are made. For the purpose of EclA, a likely significant effect is an effect that either supports or undermines biodiversity conservation objectives for important ecological features (which could be species populations/groups of species, habitats, or a designated site), or for biodiversity in general. Effects have been considered significant at a wide range of scales, from national to local.
- 3.17. A sequential process has been adopted to avoid/mitigate, and if required, compensate for significant negative ecological effects. This is referred to as the 'Mitigation Hierarchy'. Avoidance includes measures to change the design of the proposed development to avoid an impact occurring. Mitigation includes measures to avoid or reduce the negative impacts of the proposed development. Compensation addresses significant negative residual effects (those likely to occur after avoidance and mitigation have been considered). It is this objective of compensation, and not its location, that distinguishes compensation from 'mitigation'.
- 3.18. In EclA, it is only essential to assess and report significant residual effects that remain after mitigation measures have been taken into account. However, the potential significant effects

¹⁴ CIEEM (2019). *Guidelines for Ecological Impact Assessment in the UK and Ireland. Terrestrial, Freshwater and Coastal, Version 1.1.* updated September 2019. Chartered Institute of Ecology and Environmental Management, Winchester.

without mitigation as well as the residual significant effects following mitigation have been presented where the mitigation proposed is experimental, unproven or controversial and/or to demonstrate the importance of securing the measures proposed through planning conditions or obligations.

Valuation

3.19. The value of important ecological features (sites, habitats and species) is assigned according to their scale of importance using the following terms:

- International importance - ecological features of international importance such as SPAs and SACs, and/or sites that support internationally important populations of species.
- National importance - ecological features of national importance such as SSSIs, features which meet the criteria for designation as a SSSI, and/or sites that support nationally-important populations of certain species.
- Regional importance - ecological features of regional importance, such as a species population that is of importance at a scale greater than the County but does not meet the criteria for National Importance.
- County importance - ecological features of county-scale importance, including features that have been designated as local wildlife sites, or meet the criteria for designation as a local wildlife site, and/or county-important populations of species.
- Local importance - ecological features of local importance, including habitats or species populations listed as being of nature conservation importance (e.g. S41, local BAP, or listed in local planning policy) which are not considered to be of County importance by virtue of the quality, size/number, rarity, the extent to which they are threatened throughout their range, or to their rate of decline.

Precautionary principle

3.20. The evaluation of significant effects is based on the results of the ecological surveys carried out in the Application Site and other available evidence. In cases of reasonable doubt, where it is not possible to robustly justify a conclusion of no significant effect, a significant effect is assumed. Where uncertainty exists, it has been duly acknowledged.

4 BASELINE ECOLOGICAL CONDITIONS

Context

- 4.1. The Application Site is largely comprised of mixed woodland with open areas of neutral grassland. There are seven buildings, the main one being a long, dilapidated warehouse. There are areas of ruderal vegetation and bare ground where some trees within the woodland (mostly ash and self-seeded sycamore) have previously been felled. Other habitats present include scrub, native hedgerow and non-native & ornamental hedgerow and hardstanding.
- 4.2. The local landscape consists of residential buildings, agricultural land, scattered trees, waterbodies and deciduous and ancient woodland.
- 4.3. The landscape within which the Application Site is located is shown in **Image 2**, which shows the features mentioned above.



Image 2: Landscape within which the Application Site is located.

Designated Sites

- 4.4. Statutory designated sites are the most significant ecological receptors and include SPAs and Ramsar sites of **International Value** and SSSIs and NNRs of **National Value**.
- 4.5. LNRs are notified under Section 21 of the National Parks and Access to the Countryside Act 1949 (as amended) by local authorities and are of Local Value. They are places with wildlife or geological features and are intended for public appreciation, enjoyment and education. The LNR designation does not afford special protection; however, LNRs are protected under legislation and planning policy.

4.6. SSSIs, SACs and SPAs with IRZs within the boundary of Application Site are shown in **Table 2**.

Table 2: Statutory designated sites within 2km of the Application Site.

Name of statutory designated sites	Approximate distance from the Application Site	Reason for designation
Harries Ground Rodbourne SSSI	1.8km north-west	Harries Ground supports a nationally important species rich neutral grassland community. This community comprises a dry type characterised by crested-dog's tail and lesser knapweed. The relevant National Vegetation Classification communities are <i>Cynosurus cristatus</i> , <i>Centaurea nigra</i> lowland hay meadow pasture, <i>Danthonia decumbens</i> sub-community (NVC MG5c). The site also contains a population of a nationally scarce butterfly, the marsh fritillary <i>Euphydryas aurinia</i> .

- 4.7. There are five non-statutory designated sites within 2km of the Application Site as shown in **Table 3**.

Table 3: Non-statutory designated sites within 2km of the Application Site.

Name of non-statutory designated sites	Approximate distance from the Application Site	Reason for designation
Seagry Wood and Oak Hill Local Wildlife Site (LWS)	850m north-west	Mixed conifer and sweet chestnut <i>Castanea sativa</i> plantation on an ancient woodland site. Located on gently sloping land on clay and greensand with a rich ground flora including abundant Bluebells <i>Hyacinthoides non-scripta</i> .
Eil Wood LWS	850m south-west	Mostly semi-natural ancient woodland on Kellaways sands and clay.
North Draycot Park LWS	1km south-west	Old parkland - a high concentration of very old oak trees <i>Quercus robur</i> (many pollards) in semi-improved grassland.
Chalkenhams LWS	1.7km north-west	Unimproved, cattle-grazed, herb rich, species rich neutral grassland with damper areas supporting common spotted orchids <i>Dactylorhiza fuchsii</i> . A small woodland of oak <i>Quercus robur</i> with bluebells <i>Hyacinthoides non-scripta</i> and mature hawthorn <i>Crataegus monogyna</i> is present in south part of site.
The Shrubbery LWS	2km south-west	A small ancient replanted woodland set in parkland with a stream running along the southern boundary.

-
- 4.8. No impacts to statutory and non-statutory designated sites are anticipated due to the proposed development's size and distance from such sites.

Local Habitats

- 4.9. There are five priority habitats within 2km of the Application Site, which include:

- Deciduous woodland ~ onsite
- Woodpasture and parkland ~ onsite
- Ancient woodland (including Seagry Wood and Ell Wood) ~ 450m west
- Coastal and floodplain grazing marsh ~ 950m south-east
- Lowland meadows ~ 1.5km north-west

Onsite Habitats

- 4.10. The existing habitats are shown in the Existing UK Habitat Classification plan at **Appendix 2** and **Photographs 1- 4** at **Appendix 3**.

Other woodland; mixed w1h

- 4.11. The species that were present within the mixed woodland include elm *Ulmus procera*, Leyland cypress *Cupressus x leylandii*, oak *Quercus robur*, ash *Fraxinus excelsior*, beech *Fagus sylvatica*, horse chestnut *Aesculus hippocastanum*, silver birch *Betula pendula*, locust tree *Robinia pseudoacacia*, aspen *Populus tremula*, crack willow *Salix fragilis*, crab apple *Malus Sylvestris*, yew *Taxus baccata*. In places there was an understory of bramble *Rubus fruticosus*, lords and ladies *Arum maculatum*, cleavers *Galium aparine*, herb Robert *Geranium robertianum*, garlic mustard *Alliaria petiolata*, cow parsley *Anthriscus sylvestris*, ground ivy *Glechoma hederacea*, dock *Rumex obtusifolius*, germander speedwell *Veronica chamaedrys*, elder *Sambucus nigra* and dandelion *Taraxacum officinale*. This habitat is listed as Priority Habitat Inventory Woodland as deciduous woodland. This habitat is of 'moderate' condition according to UKHabs condition assessment criteria.

- 4.12. The mixed woodland is considered to be at least of **Site Value**.

Other neutral grassland g3c

- 4.13. The grassland is dominated by rough meadow grass *Poa trivialis* and meadow foxtail

Alopecurus pratensis, other species included cocksfoot *Dactylis glomerata*, creeping buttercup *Ranunculus repens*, hogweed *Heracleum sphondylium*, common nettle *Urtica dioica*, wood avens *Geum urbanum*, red clover *Trifolium pratense*, horse tail sp. *Equisetum sp.*, and spear thistle *Cirsium vulgare*. There were vehicle trackways through the site from the access and the sward varied in height across the Application Site. This habitat is of 'moderate' condition according to UKHabs condition assessment criteria.

- 4.14. The other neural grassland is reasonably diverse and is considered to be of **Site Value**.

Heathland and shrub with ruderal vegetation h 81

- 4.15. There are pockets of ruderal vegetation in various places around the Application Site including around the dilapidated building and also on a bank on the northwestern edge of the Application Site. Species include common nettle *Urtica dioica*, red campion *Silene dioica*, garlic mustard *Alliaria petiolata*, cleavers *Galium aparine*, forget me not *Myosotis sylvatica*, thistle sp. *Cirsium sp.*, soft rush *Juncus effusus* and pendulous sedge *Carex pendula*.

- 4.16. This habitat is considered to be of **Site Value**.

Dense scrub h3

- 4.17. There is an area of dense scrub along the access track on the northern boundary which consists of dogwood *Cornus sanguinea*, elder *Sambucus nigra*, bramble *Rubus fruticosus* and lords and ladies *Arum maculatum*.

- 4.18. The dense scrub is considered to be of **Site Value**.

Native hedgerow h2a

- 4.19. There is a hedgerow along a section of the southern boundary. It is approximately 1.8m in height and is gappy and leggy. Species present are hawthorn *Crataegus monogyna*, bramble *Rubus fruticosus*, blackthorn *Prunus spinosa*. The hedgerow is of 'moderate' condition according to UKHabs condition assessment criteria.

- 4.20. The native hedgerow is considered to be of **Site Value**.

Non-native and ornamental hedgerow h2b

- 4.21. There is a very large cypress *Cupressus × leylandii* hedgerow along a section of the northern Application Site boundary.

- 4.22. This hedgerow is comprised of non-native species and is therefore considered to be of **negligible** intrinsic ecological value.

Developed land; sealed surface u1b

- 4.23. There is an area of hardstanding in the south-eastern corner of the Application Site.
- 4.24. The hardstanding is of **negligible** intrinsic ecological value.

Buildings u1b5

- 4.25. There are seven buildings (B) within the Application Site.
- 4.26. B1 is a single storey long barn, it has smashed windows and is dilapidated to the point of collapse in some places. It has a breeze block base with wooden cladding and a corrugated asbestos-type fibre cement covered in moss and herb Robert *Geranium robertianum*/geranium species *Geranium spp.*. The building is also heavily clad in ivy *Hedera helix*.
- 4.27. B2 is a small woodcrete building with a wooden door and felted roof, it is also dilapidated to point of almost collapse and is overgrown with some ivy *Hedera helix* cladding.
- 4.28. B3 is a small breeze block and wood construction storage building with an open doorway, it is adjacent to Building 1 and it is heavily ivy *Hedera helix* clad.
- 4.29. B4 is a large wooden storage barn with a flat roof and open void, it currently contains a car and a caravan.
- 4.30. B5 is a small concrete garage with asbestos roof tiles and a metal door. The building has windows, and the roof is heavily ivy *Hedera helix* clad.
- 4.31. B6 is a wooden frame and mesh structure with plastic sheeting over the top which looks like a former aviary.
- 4.32. B7 is a small metal/plastic storage container.
- 4.33. The buildings are of **negligible** intrinsic ecological value.

Fauna

Amphibians

-
- 4.34. The scrub, woodland and grassland as well as several suitable refugia (as referenced on the Existing UK Habitat Classification Plan, see **Appendix 2**) all offer sheltering opportunities for amphibians. There are several areas of grassland that are optimal due to being undisturbed and having a high sward height, however the majority of the grassland has now been disturbed by machinery as the site is incorporated back into the Seagry Estates and is bare in a lot of places, making it not optimal for amphibians (high predation risk and high chance of being run over). However, individuals could still commute through the Application Site.
- 4.35. Amphibians also require suitable aquatic habitats in which to breed and fulfil their lifecycle. The dispersal distance of great crested newt *Triturus cristatus* from breeding ponds depends upon habitat quality and availability; however, core terrestrial habitat is considered to be 250m whilst ponds up to 500m require consideration.^{15 16}
- 4.36. There are no ponds within the Application Site. There are 13 known ponds within 500m of the Application Site boundary and 10 known ponds within 250m, when consulting MAGIC maps, including 10m north-west (P1), 15m south-west (P2), 15m east (P3), 170m west (P4), 190m north-west (P5) and 40m east (P6). A pond location plan is provided in **Appendix 9**.
- 4.37. For the nearest pond offsite, a natural England Rapid Risk Assessment was undertaken for the proposed works to the site. The risk assessment assumes that great crested newts are present in the nearest inaccessible pond and the disturbance of 1.5ha of habitat and returned a result of 'Red: Offence highly likely' for the proposed development works (Natural England, 2016)¹⁷. Albeit low, there is a low risk that amphibians could be found in the vicinity of the works. They could be injured or killed without mitigation.
- 4.38. According to MAGIC maps, there are no great crested newt European Protected Species Licenses (EPSSLs), Class Survey License Returns and two records from Pond Surveys within 2km of the Application Site.
- 4.39. The data search with WSBRC returned two records of amphibians within 2km of the Application Site, including one record of great crested newt and one record of common toad *Bufo bufo*.
- 4.40. No amphibians have been found onsite; however, there is the potential for presence unseen.

¹⁵ HM Government (26/07/2022). Guidance Great crested newts: advice for making planning decisions. Available at: <https://www.gov.uk/guidance/great-crested-newts-surveys-and-mitigation-for-development-projects>

¹⁶ Langton, T., Beckett, C. and Foster, J. (2001). Great Crested Newt Conservation Handbook. Froglife, Halesworth.

¹⁷ Natural England (2016). Great Crested Newts: Surveys and Mitigation for Development Projects – Standing Advice. Online at: <https://www.gov.uk/government/publications/great-crested-newts-apply-for-a-mitigation-licence>

4.41. A HSI Assessment was conducted on P1 - P4. P5 was not assessed as it was dry and P6 was not assessed as it was clearly not suitable for great crested newts (a shallow water feature with manmade and steep concrete banks). Scores for P1 - P4 are shown in **Appendix 4**.

4.42. On 16.05.25, samples of water from P1, P2, P3 and P4 were taken and subsequently sent off to SureScreen for DNA analysis. Samples from P5 were not possible as the pond was dry when the eDNA survey was carried out. Samples from P6 were not deemed necessary as the pond was not suitable for great crested newts. The results came back positive for all four ponds for great crested newt. An extract from the eDNA survey showing the results is shown in **Appendix 5**.

4.43. Furthermore, although not a targeted survey for great crested newt, reptile surveys in May - June 2025 (seven checks with a composite of bitumen mats, carpet tiles and tins) within grassland areas around the Application Site and no great crested newt were found.

4.44. The potential value of the Application Site for amphibians is considered to be of **Site Value**.

Badger

4.45. The data search with WSBRC returned seven records of badger *Meles meles* within 2km of the Application Site.

4.46. No badger setts or other signs of badger activity (i.e. sett-making activity, latrines or feeding activity) were found onsite. However, badgers are a highly mobile species and setts can appear at any time where suitable habitat has been identified.

4.47. No direct impacts are anticipated on badgers as a result of the proposed development. However, albeit low badgers could still commute through the site and get stuck in any excavations (if any) during the construction phase.

4.48. A badger inspection on and within 30m of the site will be conducted by an ecologist c. six weeks before clearance / construction begins. This will allow time for any mitigation/avoidance measures to be designed, and preparation of a Natural England badger Development Licence application if required.

4.49. The potential value of the Application Site for badger is considered to be of **Site Value**.

Bats

Data search

4.50. The data search with WSBRC returned no records of bats within 2km of the Application Site.

4.51. A search on MAGIC for granted bat EPS licences revealed the following results within the search area:

- A granted licence at c.1.7km to the north for destruction of a 'resting place' for common pipistrelle *Pipistrellus pipistrellus* and soprano pipistrelle *Pipistrellus pygmaeus*, which was granted in 2015.

Visual assessments

4.52. All trees onsite were subject to a Ground Level Tree Assessment (GLTA) to assess the likely bat potential from the ground. TR1 and TR2 are mature oak trees with **moderate bat roosting potential** in the form of holes and splits with ivy *Hedera helix* cladding. TR3 and TR4 are mature beech trees with **low bat roosting potential** in the form of cracks/splits and ivy cladding. No Potential Roosting Features (PRFs) were noted on the remaining trees within the Application Site.

4.53. If any of the trees are due to be removed, then they will need to be considered further and a bat climbing PRF inspection survey may need to be carried out to investigate possible roosting features.

4.54. The buildings onsite were subject to a Preliminary Ecological Appraisal (PRA) to assess the suitability of the buildings as roosting place for bats.

4.55. B1 has **low bat potential** due to gaps between the roofing sheets and boarding in places. B3 has **low bat potential** due to heavy ivy *Hedera helix* cladding creating some potential crevice features or obscuring features on the building. B5 and B6 also have **low bat potential** due to heavy ivy *Hedera helix* cladding for similar reasons as B3. B2, B4 and B7 have **negligible potential** for roosting bats.

4.56. The locations of PRFs are shown at **Photographs 5-10** at **Appendix 3**.

Emergence surveys

- 4.57. With reference to best practice guidelines¹⁸, at least one emergence survey (May - September) is required for the buildings (B1, B3, B5, B6) given the assessment of low potential to confirm presence/absence of roosting bats. Two further emergence surveys spread out by at least three weeks (May - September) were required due to bats emerging from two separate locations (Location 1 and Location 2) on B1. This is in line with best practice guidelines and is required to confirm the roost type.
- 4.58. To accurately covers all PRFs, four surveyors (with cameras) and a separate camera were required for the first emergence survey. Two surveyors were required for the 2nd and 3rd emergence surveys to cover Location 1, 2 and 3 on B1.

The results of these surveys are shown in **Table 4**.

¹⁸ Collins, J. (ed.) (2023). *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)*. The Bat Conservation Trust, London.

Table 4: Results of the emergence surveys.

Survey number	Date	Results	Broad roost locations
1	22.05.25	x1 common pipistrelle emerged from B1 at 21:23 (sunset at 21:04) - Location 1 x1 soprano pipistrelle emerged from B1 at 21:50 (sunset at 21:04) - Location 2	
2	03.07.25	x1 common pipistrelle emerged from B1 at 21:51 (sunset 21:58) – Location 3	
3	24.07.25	No emergences.	

Commuting and foraging

- 4.59. The Application Site provides optimal foraging and commuting habitat for bats in the form of woodland (present throughout), grassland, scrub and hedgerow.
- 4.60. There is also connectivity for commuting and foraging bats adjacent to the Application Site (connected woodland) and in the local landscape in the form of tree lines, hedgerows and patches of woodland.

Bat activity surveys

- 4.61. Automated surveys were also carried out in conjunction with the emergence surveys. Two automated detectors (Anabat Express) were left out on three occasions, spread out over the survey period May - September 2025 and for five consecutive nights each time. Calls will be analysed using the software programme Anabat Insight. The results of these surveys will be analysed once surveys are finished, and a complete data set is available.
- 4.62. During the bat emergence surveys, a number of passes were recorded of soprano pipistrelle *Pipistrellus pygmaeus* navigating/foraging, common pipistrelle *Pipistrellus pipistrellus*, serotine *Eptesicus serotinus* and noctule *Nyctalus noctula*. Furthermore, there was one pass of myotis *Myotis* sp. during the survey on 23rd May 202 and one pass of Leisler's *Nyctalus leisleri* during the survey on 18th June 2024. There were also passes of barbastelle *Barbastellus barbastellus* on the final survey on 25th July.

4.63. Considering the results of all of the surveys carried out, B1 supports a small day roost of individual common pipistrelle *Pipistrellus pipistrellus* and soprano pipistrelle *Pipistrellus pygmaeus* bats, the building can therefore be demolished under the low impact licence for roosts of 'low conservation significance'.

4.64. The value of the Application Site for roosting bats is considered to be of **Local Value** and the value for navigating/foraging bats is also considered to be of **Local Value** - this may need updating once the results of the activity surveys have been analysed.

Birds

4.65. WSBRC returned records of birds of conservation concern from within 2km of the Application Site. Species with particular associations with woodland are considered here given the particular presence of this habitat within the Application Site. These species have been grouped by their UK conservation status according to the RSPB, where birds are split into conservation priority from red (most critical group), amber (next most critical group) to green (least critical group).¹⁹

- Red listed species comprising swift *Apus apus*, herring gull *Larus argentatus*, lapwing *Vanellus vanellus*, lesser redpole *Acanthis cabaret*, skylark *Alauda arvensis*, greenfinch *Chloris chloris*, house martin *Delichon urbicum*, yellowhammer *Emberiza citronella*, linnet *Linaria cannabina*, yellow wagtail *Motacilla flava*, spotted flycatcher *Muscicapa striata*, house sparrow *Passer domesticus*, willow tit *Poecile montanus*, marsh tit *Poecile palustris*, starling *Sturnus vulgaris*, fieldfare *Turdus pilaris* and mistle thrush *Turdus viscivorus*.
- Amber listed species comprising green sandpiper *Tringa ochropus*, reed bunting *Emberiza schoeniclus* and redwing *Turdus iliacus*.
- Green listed species comprising golden plover *Pluvialis apricaria*, little egret *Egretta garzetta*, kingfisher *Alcedo atthis*, brambling *Fringilla montifringilla* and common crossbill *Loxia curvirostra*.

4.66. Raptors are considered separately due to the mix of habitats within the Application Site with potential prey opportunities including small birds and mammals. The following records were returned:

- Green listed - red kite *Milvus milvus*, peregrine *Falco peregrinus* and hobby

¹⁹ Information on RSPB listings here: <https://www.rspb.org.uk/birds-and-wildlife/wildlife-guides/uk-conservation-status-explained/>

Falco subbuteo.

- 4.67. No evidence of birds' nests has been found onsite during surveys. However, there are multiple opportunities for nesting birds, particularly within the derelict buildings, grassland (long sward height), woodland and hedgerows. Additionally, during the emergence surveys and reptile presence/absence surveys, multiple birds were observed within B1 and also within scrub area in the southern portion of the Application Site.
- 4.68. No barn owl or evidence of barn owl was found during the visual assessments.
- 4.69. Surveys can be reasonably scoped-out given that the woodland will continue to be available for use by birds and will only impact upon the woodland edge and that precautions will be implemented during the proposed works.
- 4.70. The potential value of the Application Site for nesting birds is considered to be of **Site Value**.

Hazel dormouse

- 4.71. The Application Site lies within the hazel dormouse *Muscardinus avellanarius* range and are present in the county of Wiltshire²⁰. However, the data search from WSBRC returned no records of dormouse and according to MAGIC maps, there are no granted hazel dormouse EPSLs within 2km of the Application Site. In addition, they are considered to be absent from the Application Site due to lack of suitable habitat and connectivity. Hedgerows on site are limited in their extent and floral diversity and the woodland areas have limited structural diversity and are not well connected to suitable off-site habitat. Dormouse are thus considered absent from the Application Site and will not be addressed further in this report.
- 4.72. The potential value of the Application Site for hazel dormouse is considered to be of **Negligible Value**.

Invertebrates

- 4.73. The data search from WSBRC returned records of five species of invertebrates within the 2km of the Application Site. All of which are Section 41 species of principal importance under the NERC and UKBAP species (research only). These include 15 records of small heath *Coenonympha pamphilus*, two records of lackey *Malacosoma neustria*, one record of shaded broad-bar *Scotopteryx chenopodiata*, one record of buff ermine *Spilosoma lutea* and one record of cinnabar *Tyria jacobaeae*.

²⁰ People's Trust for Endangered Species. *Hazel dormice range and distribution in the UK*. Available at: <https://ptes.org/campaigns/dormice/about-hazel-dormice/hazel-dormice-range-and-distribution-in-the-uk/>

4.74. The potential value of the Application Site for invertebrates is considered to be of **Site Value** only due to limited habitats on site which are unlikely to support any rare species or significant assemblages.

Reptiles

4.75. Similarly to amphibians, the grassland, scrub and woodland as well as several suitable refugia (as referenced on the Existing UK Habitat Classification Plan, see **Appendix 2**) all offer sheltering opportunities for reptiles. There are several areas of grassland that are optimal due to being undisturbed and having a high sward height. Therefore presence/absence surveys have been carried out.

4.76. The data search with WSBRC returned one result of grass snake *Natrix natrix* within 2km of the Application Site.

4.77. The results of the presence/absence surveys are summarised in **Table 5**.

Table 5: Summary of the reptile survey results.

Survey	Date	Results			
		Grass snake			
		Adult male	Adult female	Unidentified adult	Juvenile
Check 1	22.05.25				
Check 2	27.05.25				
Check 3	29.05.25				2
Check 4	03.06.25				3
Check 5	06.06.25			1	4
Check 6	10.06.25	1			1
Check 7	16.06.25				3

4.78. Based on this survey data, the continued presence of grass snake (maximum count of 1 unidentified adult, 1 male adult and 13 juveniles = total of 15) was confirmed. The grass snakes were found in the grassland areas, particular in the north-east corner and in the centre of the Application Site. With reference to guidance from Froglife Advice Sheet 10: Reptile Survey²¹,

²¹ *Froglife Advice Sheet 10: An Introduction to Planning, Conducting and Interpreting Surveys for Snake and Lizard Conservation*. Available at: www.froglife.org. It is important to note that this guidance defines population sizes based on a density of 10 tins per hectare and the maximum number of adults; however, it still serves as a useful guide to the size of the population albeit that the actual population following any survey methodology is likely to be higher.

the results represent a **'good population'** of grass snake with a peak count of 5 individuals.

- 4.79. Due to grass snakes being highly mobile in nature and the presence of ample surrounding habitats, precautionary mitigation measures for grass snakes are deemed satisfactory.
- 4.80. The value of the Application Site for reptiles is considered to be of **Local Value**.

Other wildlife

- 4.81. The WSBRC data search also returned records of eurasian otter *Lutra lutra*, west European hedgehog *Erinaceus europaeus*, brown hare *Lepus europaeus* and water vole *Arvicola amphibius* within 2km of the Application Site.
- 4.82. The WSBRC data search returned five records of otter and one record of water vole. There are no suitable habitats onsite for otters and water voles.
- 4.83. The WSBRC data search returned 13 records of hedgehog. Habitats within the Application Site provide suitable opportunities for hedgehog, in particular the grassland, scrub, woodland as well as suitable refugia as referenced on the Existing UK Habitat Classification Plan (**Appendix 2**).
- 4.84. Additionally, a singular hedgehog was observed during the last emergence survey on the 24th May 2025.
- 4.85. The potential value of the Application Site for hedgehogs is considered to be of **Site Value**.

5 SCHEME DESIGN

- 5.1. There is inherent mitigation embedded within the layout through retention of the majority of the higher value habitats, which is in accordance with the mitigation hierarchy whereby avoidance of impacts on higher value habitats has been avoided in the first instance. This includes retention (and enhancement) of some of the woodland and hedgerows.
- 5.2. There will be new areas of grassland sown with a woodland seed mixture and the woodland that is retained will be enhanced through selective thinning and ground flora/understorey planting; there will be an area of native planting to the south as well as new trees and new small areas of introduced shrub planting; and new species-rich hedgerows. Full soft landscape proposals are available (PRI24552 11).
- 5.3. Habitats and species-specific impacts and relevant compensation and mitigation for any impacts are detailed in **Section 7**.

6 ASSESSMENT OF EFFECTS AND MITIGATION MEASURES

- 6.1. In accordance with CIEEM guidelines, the following important ecological features have been identified with the potential to be affected by the proposed development and carried forward for further assessment:

Table 6: Important ecological features brought forward for impact assessment.

Statutory sites	n/a
Non-statutory sites	n/a
Habitats	Other woodland; mixed
Species and species groups	Amphibians (including great crested newts) Badger Bats Nesting birds Reptiles Other wildlife (including hedgehog)

The following ecological features have been scoped out of the ecological impact assessment, owing to the conclusion that no significant effects are predicted.

Table 7: Ecological features scoped out of the impact assessment.

Statutory sites	Harries Ground Rodbourne SSSI
Non-statutory sites	Seagry Wood and Oak Hill LWS Ell Wood LWS North Draycot Park LWS Chalkenhams LWS The Shrubbery LWS
Habitats	Non-native and ornamental hedgerow Developed land; sealed surface
Species and species groups	Hazel dormouse

Trees/woodland

Construction Impacts

- 6.2. The majority of the woodland will be retained as part of the development.
- 6.3. Without mitigation, the retained woodland could be impacted directly or through vibration and dust created during the construction activities on-site.

Operational Impacts

- 6.4. Inappropriate management and littering could negatively impact the retained woodland and individual trees long term.

Mitigation

- 6.5. Root protection areas around all retained trees will be marked out using Heras fencing, which will be maintained for the duration of the construction phase. Dust-proof netting will be utilised on the Heras fencing to protect the retained woodland.

Residual effects

- 6.6. Without any enhancement of the retained woodland or compensatory planting, there is likely to be a non-significant negative effect at the Local scale.

Amphibians

Construction Impacts

- 6.7. Without appropriate mitigation, the removal of areas of grassland, woodland and scrub habitat on-site is likely to kill and/ or injure great crested newts and will result in the loss of terrestrial habitat on site.
- 6.8. The impact is likely to be significant negative within the Zone of Influence.

Operational Impacts

- 6.9. Inappropriate management of the retained habitats on-site could impact any great crested newts that re-colonise the Application Site following completion of the construction phase.

Mitigation

- 6.10. The client has opted to join the District Level Licencing (DLL) Scheme which is operated by Natural England in this area. The DLL involves making payments into off site compensation schemes instead of applying for a traditional licence and this negates the need for further full pond population surveys.
- 6.11. The scheme is within the 'amber' risk zone and has ponds in close proximity to the site that are positive for great crested newt DNA and are therefore confirmed breeding ponds. A great crested newt district level enquiry form has been submitted and will be used by Natural England to assess the effects of the development on great crested newts.
- 6.12. The DLL does not require any specific mitigation measures as the payments made are used to fund off site measures such as new pond creation, although standard precautionary measures will be recommended and these will be very similar to those required for reptiles. They are likely to include;
- Phased removal of the grassland/ruderal habitats on site carried out when newts are active, in April to October inclusive, and in suitable weather conditions when it is dry and the air temperature is 9-18°C.
 - Any log/brash/rubble piles will be removed carefully by hand so that newts can be relocated by a licenced ecologist to outside of the development area.

Residual effect

- 6.13. With the inclusion of the mitigation measures above, the overall residual effect will be non-significant negative within the Zone of Influence.

Reptiles

Construction Impacts

- 6.14. Without appropriate mitigation, the removal of areas of grassland and scrub habitat on-site is likely to kill and/ or injure grass snakes, which are present on-site.
- 6.15. The impact is likely to be significant negative within the Zone of Influence.

Operational Impacts

- 6.16. Inappropriate management of the retained habitats on-site could impact any reptiles that re-colonise the Application Site following completion of the construction phase.

Mitigation

- 6.17. A Prior to the commencement of site clearance, a precautionary working method will be implemented, to include the following measures:
- A two-stage cut is required in areas with longer vegetation.
 - The cuts should be carried out with a brush cutter (or handheld equivalent).
 - The cuts must be carried out when reptiles are active, in April to October inclusive, and in suitable weather conditions when it is dry and the air temperature is 9-18°C.
 - The cuts must be carried out starting in the centre and working outwards towards the site boundaries.
 - A first stage cut must be carried out to a sward height of approximately 15cm with a second stage cut the following day to ground level.
 - Any log/brash/rubble piles will be removed carefully by hand.
 - The cuts and removal of any log/brash/rubble piles will be carried out under the supervision of an ecologist who will carry out searches before and during the cut as required.
 - Any reptiles found would be moved only by the ecologist to a suitable offsite area.
- 6.18. General measures will be adopted during the proposed works to safeguard any reptiles (and other wildlife) that may be present:

-
- Heras fencing will be installed around the site boundaries and to protect RPZs. The RPZs will be maintained throughout the construction phase and will be subject to weekly checks by the contractors to ensure this is still in place and is not damaged or compromised.
 - There will be appropriate fencing and signage to delineate clear boundaries of movement for vehicles/people and working/storage zones.
 - Any excavations (e.g. trenches/pits) would be covered when works are not taking place to ensure that they do not fill with water and prevent the potential for reptiles (and other wildlife) to become trapped.
 - Any excavations that must be left open overnight will be provided with a means of escape should reptiles (and other wildlife) enter. This would simply be in the form of a roughened plank of wood placed in the excavation as a ramp to the surface. This is particularly important if the excavation fills with water.
 - Any excavations would be inspected each morning to ensure no reptiles (or other wildlife) have become trapped overnight.
 - All temporarily exposed pipes must be capped overnight to prevent reptiles (and other wildlife) gaining access and later becoming trapped.
 - Mounds and piles of materials (e.g. bark mulch) would be kept to a minimum and any essential piles kept off the ground and subject to daily inspections.
 - Machinery and building tools/materials must not be stored within or in close proximity to the site boundaries. Where possible, machinery and building tools/materials should be stored in containers.
 - The storage of any chemicals within the construction site will be contained in such a way that they cannot be consumed or knocked over by any wildlife.
 - The construction site must be left clean and tidy at the end of each working day and food and litter must not be left out overnight.

Residual effect

6.19. With the inclusion of the mitigation measures above, the overall residual effect will be non-significant negative within the Zone of Influence.

Bats

Construction Impacts

- 6.20. Two small day roosts were identified in B1 consisting of individual common pipistrelle *Pipistrellus pipistrellus* and soprano pipistrelle *Pipistrellus pygmaeus* bats. Therefore, the demolition of B1 without mitigation and suitable protected species licence could result in an offence due to both loss of a bat roost and disturbance/injury to any bats present. The impact is likely to be significant negative within the Zone of Influence.
- 6.21. Bat activity surveys are yet to be completed but so far results indicate that the woodland and periphery habitats are being used regularly by several bat species including barbastelle which are a light intolerant species. It is likely that the Application Site is used often by foraging and commuting bats and therefore lighting during the construction phase could disturb bats, which use the boundary habitats to forage and commute.
- 6.22. A number of the trees within the Application Site were assessed as having potential roosting features for bats. Under the current proposals, no trees with bat roosting potential are scheduled to be removed. If plans change and additional trees need to be removed, a ground-level assessment of these trees will need to be carried out and possible further emergence surveys.

Operational Impacts

- 6.23. Any additional lighting within the Application Site has the potential to impact bats.

Mitigation

- 6.24. B1 will be demolished under the low impact licence also known as a Bat Mitigation Class Licence (BMCL) this is a streamlined process involving common or widespread bat species and roosts with low conservation status. Mitigation will include 2 x bat boxes mounted on retained trees and/or the new buildings prior to demolition and the demolition of B1 will be carried out ideally during spring or autumn under a watching brief, with any potential roosting features removed by hand where possible and where health and safety permits.
- 6.25. To minimise the impact of the proposed development on commuting and foraging bats, the lighting scheme will be sensitively designed. During the construction phase, the following mitigation will be followed:
- All works will be undertaken during normal working daylight hours. Any artificial lighting (required) should not illuminate boundary vegetation.

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- Light levels should not exceed artificial levels already present.
 - Where security lighting is required, it is recommended that these are motion-activated with hooded luminaires.
 - Any site compounds will be sited away from all features of ecological interest described in this document, namely areas of woodland.

6.26. Suitable mitigation during the operational phase will follow the principles of mitigation as outlined within the Bat Conservation Trust and Institution of Lighting Professionals Guidance Note²². Mitigation measures for external lighting will include:

- Lighting must not be directed at or towards boundary habitats and the woodland must be kept as a 'dark zone' to allow all species to utilise it for commuting/foraging.
- The following lighting is recommended - LED luminaires should be used/lighting with a warm white light source (2700Kelvin or lower)/lighting with peak wavelengths higher than 550nm. This will avoid the components of light most disturbing to bats.
- If all other options have been explored, accessories such as hoods, covers, louvers and shields can be used throughout to avoid excessive light spill and this should be agreed with an ecologist.

Residual effect

6.27. With the inclusion of the mitigation measures above the overall residual effect will be neutral.

Birds

Construction Impacts

6.28. The demolition of the buildings and the clearance of the scrub and trees has the potential to destroy, damage or disturb nesting birds.

Operational Impacts

6.29. Inappropriate management of the retained habitats on-site has the potential to negatively impact nesting birds.

Mitigation

²² Bat Conservation Trust and Institution of Lighting Professionals. (2018). Guidance Note 08/18 Bats and artificial lighting in the UK: Bats and the Built Environment Series. UK: BCT & The ILP.

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- 6.30. Without appropriate mitigation, there is the potential for nests to be destroyed during the removal of the buildings, scrub and trees. In addition, without mitigation, increased disturbance as a result of construction noise, dust and vibration is likely to affect the ability of birds nesting within retained and off-site habitats to hold territory and breed successfully, if construction takes place in the breeding season. Ambient noise level increases would be variable, but at times there could be considerable increases in noise levels. This would lead to a temporary negative impact on nesting birds, which would be significant within the Zone of Influence.
- 6.31. To protect nesting birds, removal of vegetation and demolition of the buildings should ideally take place outside of the nesting bird season. If works must be undertaken during the nesting bird season (February to August inclusive) then these will be preceded by a check for active birds' nests undertaken by an ecologist. If no birds' nests are found then works can proceed within 48 hours; however, if an active birds nest is found then works must stop and an appropriate buffer installed around the nest (usually 5m). The buffer must remain in place until the ecologist confirms the young have fledged.
- 6.32. The retained habitats will be managed long-term to enhance their suitability for wildlife, including nesting birds. Management will be carried out sensitively to create a diverse habitat, that has areas of dense and bushy vegetation suitable for nesting birds.

Residual effect

- 6.33. With the inclusion of the mitigation measures above the overall residual effect will be neutral.

Badgers and general wildlife

- 6.34. The following good practice measures will be adhered to protect badgers throughout the construction phase:
- Any excavations (e.g. trenches/pits) would be covered when works are not taking place to ensure that they do not fill with water and prevent the potential for wildlife to become trapped (especially badger).
 - Any temporary exposed pipes must be capped to prevent badgers gaining access during the night.
 - If any excavations are left open, then they must be provided with a means of escape should a badger enter. This could simply be in the form of a roughened plank of wood placed in the excavation as a ramp to the surface. This is particularly important if the excavation fills with water.
 - Any excavations would be inspected each morning to ensure no badgers have

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 an ecologist must be sought.

- The storage of topsoil or other 'soft' building materials within the construction site would be given careful consideration. Badgers could readily adopt such mounds as setts. To avoid the adoption of any mounds by badgers, mounds would be kept to a minimum and any essential mounds subject to daily inspections.
- The storage of any chemicals within the construction site would be contained in such a way that they cannot be accessed or knocked over by any roaming badgers.
- The use of night-time lighting will be avoided, or sensitive lighting design will be implemented to avoid light spill on to habitats which badgers could use.

- 6.35. A pre-commencement check for new badger activity is to be undertaken by a suitably qualified ecologist no more than one month, or as close to the construction period as possible, to account for any changes which may have occurred since the previous surveys. If a new badger sett is identified, it is possible that a Natural England Licence may be required for the Approved Development to proceed lawfully.
- 6.36. If a large D-shaped hole is identified at any point during the course of the development, a suitably qualified ecologist is to be contacted for advice in the first instance, and a 30m buffer created around the hole in question.
- 6.37. Subject to the results of the pre-commencement check, badger exclusion fencing may be needed to exclude badgers from the development area.
- 6.38. Provided the above mitigation measure are implemented, this would have no significant impacts on badgers at a Site level.

Table 8: Impact summary table.

Feature	Scale of importance	Impact (before mitigation)	Type of impact (construction or operational)	Effect (without mitigation)	Mitigation	Residual effect
Amphibians	Local	Direct harm	Construction	significant negative	DLL licence Sensitive timing of works Measures to discourage amphibians from entering the construction site and minimise harm should they do so.	No negative effects
		Reduced habitat opportunities onsite and landscape connectivity	Operational		Suitable planting strategy Long-term habitat management Hibernacula/log piles	
Roosting and foraging bats	Local	Direct harm	Construction	significant negative	Low Impact Licence Sensitive timing of works/site supervision	No negative effects

					Bat boxes	
		Reduced habitat opportunities onsite and landscape connectivity	Operational		Suitable planting strategy Suitable lighting strategy New provision - bat boxes	
Nesting birds	Local	Direct harm	Construction	significant negative	Sensitive timing of works/site supervision	No negative effects
		Reduced habitat opportunities onsite and landscape connectivity	Operational		New nesting provision - bird nest boxes Suitable planting strategy	
Reptiles	Local	Direct harm	Construction	significant negative	Maintain a short sward prior to works Sensitive timing of works Measures to discourage reptiles from entering the construction site and to	No negative effects

					minimise harm should they do so	
		Reduced habitat opportunities onsite and landscape connectivity	Operational		Suitable planting strategy Long-term habitat management Hibernacula/log piles	

7 BIODIVERSITY NET GAIN

Biodiversity metric

- 7.1. The Statutory Biodiversity Metric has been completed for the Application Site. This has been calculated using baseline habitat and species information collected during the UK Habitat Classification Survey and using post-development landscape proposals (PRI24552 11). A full methodology is provided in **Appendix 8**. A completed version of the Statutory Biodiversity Metric and the condition sheets have been submitted in full as separate Excel documents.
- 7.2. The headline results are shown in **Table 9**.

Table 9: Summary of the results of the Statutory Biodiversity Metric.

Onsite baseline	Habitat units	6.34
	Hedgerow units	0.21
	River units	n/a
Onsite post-intervention	Habitat units	5.95
	Hedgerow units	1.55
	River units	n/a
Total net unit change	Habitat units	-0.4
	Hedgerow units	1.34
	River units	n/a
Total net % change	Habitat units	-5.01
	Hedgerow units	628.6
	River units	n/a

- 7.3. The Statutory Biodiversity Metric calculations has demonstrated that the proposed development is not capable of achieving BNG for habitats on site as the results show a net loss of 5.01% in terms of habitats, however there is a large net gain of **628.6%** in terms of linear features due to native hedgerow planting. The Statutory Biodiversity Metric requires a net gain of at least 10% and therefore the proposed development falls short of this value for habitats.
- 7.4. Whilst opportunities have been utilised for new scattered tree planting, there is a loss in woodland to accommodate the proposed development. Even with enhancing the condition of the retained woodland the development still has a loss in habitat units. The woodland will also be enhanced through suitable management such as clearance of dense bramble and native ground flora/understorey planting (e.g. bluebell/hawthorn and honeysuckle).

7.5. Offsite options are being explored for habitat creation/enhancement, and it is likely that a 10% net gain in habitat units can be achieved using offsite land owned by the applicant. As 'example scenario', at least 0.4ha of arable land or modified grassland would need to be planted with 0.2ha woodland and 0.2ha mixed scrub in order to meet trading rules and have a 10% net gain in habitats.

7.6. Habitats within the Application Site will be managed by a management company during the operational phase of the development. Management prescriptions will be included within a LEMP and will be designed to ensure long-term maintenance and enhancement of ecologically valuable habitats within the development.

Additional enhancements

7.7. In addition to the habitat and hedgerow enhancements outlined above, which have contributed to the Application Site's Statutory Biodiversity Metric score, the following enhancements will be included to provide new opportunities for wildlife:

- Bird boxes - to be erected on retained trees within the woodland:
 - 2x Vivara Pro Seville 32mm WoodStone Nest Boxes.
 - 2x Vivara Pro Seville 28mm WoodStone Nest Boxes.
 - 2x Vivara Pro WoodStone House Sparrow Nest Boxes.
 - 1x Eco Tawny Owl Nest Box.
- Bat box - the following enhancement is recommended (additional to the mitigation required for the bat licence):
 - 1x Low Profile WoodStone Bat Box.
- There will also be at least 1 x hibernacula or log pile which will be of benefit to great crested newts and also reptiles.

7.8. The above measures are considered to be a significant contribution to the overall biodiversity value of the Application Site.

8 CONCLUSIONS

- 8.1. The Application Site largely comprises mixed woodland with open areas of neutral grassland. There are seven buildings, the main one being a long, dilapidated warehouse. There are areas of ruderal vegetation and bare ground where trees within the woodland (mostly ash and self-seeded sycamores) have been felled.
- 8.2. The most valuable habitat onsite is the woodland. The Application Site offers some foraging and sheltering opportunities for amphibians, badgers, nesting birds, reptiles and other wildlife (e.g. hedgehogs). The Application Site also offers foraging, commuting and roosting opportunities for bats. Small day roosts of individual common pipistrelle and soprano pipistrelle bats were found in B1. The ponds surrounding the Application Site were eDNA tested and were all positive for great crested newts, which are therefore likely to be using terrestrial habitat on site. A 'good' population of grass snakes were found on site.
- 8.3. The mitigation comprises retention of some of the woodland, demolition of B1 under the Bat Low Impact Class Licence with mitigation provided through bat boxes, a sensitive clearance methodology for grass snakes (and great crested newts) and the Application Site will be registered under the great crested newt district level licence scheme. Precautionary measures for habitat removal for nesting birds and low-level lighting schemes for foraging/commuting bats have also been recommended.
- 8.4. To help achieve Biodiversity Net Gain, there will be retained and enhanced woodland, new areas of wildflower grassland and native shrub and tree planting. There will also be native hedgerow planting along most of the site boundaries.
- 8.5. The Statutory Biodiversity Metric calculations has demonstrated that the proposed development is not capable of achieving BNG 'on site' due to loss of woodland habitats as the results show a net loss of **-5.01%** in terms of habitats and a net gain of **628.6%** in terms of linear features. The Statutory Biodiversity Metric requires a net gain of at least 10% and therefore off-site habitat creation will be required. Offsite options are currently being explored.
- 8.6. The proposed development is capable of complying and delivering enhancements in accordance with Paragraphs 187-195 of the NPPF, and Core Policy 50 of the Wiltshire Core Strategy.

APPENDIX 1: FIELD SURVEY METHODOLOGY

Habitats

UK Habitat Classification Survey

- The Application Site was surveyed on 16th May 2024 (one surveyor) using the UK Habitat Classification methodology²³ This technique provides an inventory of the basic habitat types present and allows identification of areas of greater potential that require further survey. Any such areas identified can then be examined in more detail.
- This survey categorises habitats and allows for the completion of condition sheets for input into the Statutory Biodiversity Metric.
- May and August are within the optimal period for UK Habitat Classification Surveys and the vegetation present was clearly visible and allowed an accurate assessment to be made.
- The range of site visits for further surveys also provided an opportunity to update the ecological baseline at different times of the year.
- Using the above method, the Application Site was classified into areas of similar botanical community types with a representative sample of those species present at the time of the survey being described. Descriptive target notes were used for particular areas of interest.
- Incidental records of fauna were made during the survey and the habitats identified were evaluated for their potential to support legally protected species and species of Principal Importance.

Limitations

- There were no limitations associated with the UK Habitat Classification Surveys.

Fauna

Badger

²³ UKHab (2023). *UK Hab V2*. Available at: <https://ukhab.org/>

- Visual badger surveys were carried out in combination with the UK Habitat Classification Surveys (May 2024) and the site visits for further surveys were used as an opportunity to update the ecological baseline, which included periods of night for the bat emergence surveys.
- Badger field signs surveys comprised walking the perimeter and interior boundaries of the Application Site, searching for evidence of badgers, in accordance with Harris *et al*²⁴ (1989) and Scottish Natural Heritage²⁵ (2018).
- Where possible, these areas were systematically surveyed for evidence of badger, in the form of:
 - Setts - comprising either single isolated holes or a series of holes, which may be link to each other underground.
 - Faeces - badgers deposit faeces in characteristic excavated pits, concentrations of which (latrine sites) are typically found at home range boundaries, field boundaries and around setts.
 - Paths - worn paths used by badger, often linked to setts or foraging grounds.
 - Scratching posts - typically at the base of tree trunks.
 - Snuffle holes - scrapes where badgers have searched for food.
 - Day nests - bundles of grass and other vegetation where badgers may sleep above ground).
 - Hairs - usually found outside setts or caught under fencing.
- Where badger setts are found, they are described using the following criteria:
 - Number of well-used holes - one or more of the features: well-worn entrance; freshly excavated soil; bedding material.
 - Number of partially-used holes - leaves or twigs in entrance and/or mosses and other plants growing in or around entrance).

²⁴ Harris, S., Cresswell, P., and Jefferies, D. (1989). *Surveying Badgers*. Mammal Society.

²⁵ Scottish Badgers (2018). *Surveying for Badgers: Good Practice Guidelines*. Version 1.

- Number of disused holes - partially or completely blocked, with considerable amount of excavation required for reoccupation.
- Where feasible, badger setts are classified into the following:
 - Main sett - continuously used, breeding and over-wintering sett for a social group of badgers. Only one main sett will exist in each social groups territory and will be relatively centrally located within the group's range.
 - Annexe sett - annexe of the main sett, linked by well-used paths to the main sett (but not connected underground). Not continuously used.
 - Subsidiary sett - distant from the main sett. Several entrances, but with no well-used paths connecting to the main sett, and only used seasonally.
 - Outlier sett - distant from the main sett. Small, with only one of two entrances only. Used for short periods sporadically, with no obvious, well-used paths connecting to other setts.

Limitations

- There were no limitations associated with the badger scoping survey.

Bats

Preliminary Bat Roost Assessment

- An external Preliminary Roost Assessment (PRA)²⁶ was carried out in combination with the UK Habitat Classification Survey on 16th May 2024 and an internal and external PRA was carried out on 16th May 2024. The purpose of these PRAs was to search for bats/evidence of bats and assess the likelihood of bats being present and the need for further survey and/or mitigation.
- The external assessment comprised a systematic search of the buildings and the ground, especially below potential access points where present. Such features include windows sills, windowpanes, walls, tiles, weather boarding, lead flashing, eaves, behind surfacing materials and under tiles, and other cracks and crevices that provide protection from the elements. Such features are known to be used by roosting bats.

²⁶ Collins, J. (ed.) (2023). *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)*. The Bat Conservation Trust, London.

- The PRAs included searching for the following:
 - Roosting bats within crevices or free-hanging.
 - Bat corpses.
 - Bat droppings beneath roosting features.
 - Feeding remains e.g. moth/butterfly wings and beetle wing casings.
 - Scratch marks and staining from fur oil/urine beneath bat roosting features.
 - 'Clean' gaps associated with bat roosts.
 - Bat-fly pupal cases.
 - Clean swept floor/s, which may indicate evidence as above has been removed.
- The following equipment was used for the assessment (collection pots were available but not required):
 - Powerful torches.
 - Copy of plans to make detailed field notes.
 - Camera to record the structures assessed.
- A bat scoping assessment of trees was carried out in combination with the UK Habitat Classification Survey on 10th August 2023.

Limitations

- There were no limitations associated with the visual bat assessment surveys.

Emergence surveys

- A suite of bat emergence surveys were carried out to identify/confirm species, numbers, access points and types of roost during the spring/summer.
- The surveys were carried out during suitable weather conditions with suitable temperatures, no precipitation and low winds.
- The timing of the surveys was carried out with reference to best practice guidelines.

- Detailed field notes were made allowing for *in-situ* identification during surveys and *ex-situ* identification of recordings following surveys.
- With reference to best practice guidelines²⁷, at least one emergence survey (May - September) is required for the buildings (B1, B3, B5, B6) given the assessment of low potential to confirm presence/absence of roosting bats. Two further emergence surveys spread out by at least three weeks (May - September) were required due to bats emerging from two separate locations (Location 1 and Location 2) on B1. This is in line with best practice guidelines and is required to confirm the roost type. To accurately covers all PRFs, four surveyors (with cameras) and a separate camera were required for the first emergence survey. Two surveyors were required for the 2nd and 3rd emergence surveys to cover Location 1 and Location 2 on B1.
- A summary of the surveys carried out is shown in **Table 10**, which includes the dates, number of surveyors, sunrise/sunset time, bat detectors used and weather conditions.

²⁷ Collins, J. (ed.) (2023). *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)*. The Bat Conservation Trust, London.

Table 10: Summary of bat emergence/re-entry surveys

Survey number	Date	Surveyors		Sunset time	Weather				
		Number of surveyors	Bat detectors		Start/end	Air temperature (°C)	Cloud cover (%)	Precipitation	Wind (Beaufort Scale)
1	22.05.25	4 + 1 extra camera	Anabat Scout	21:04	Start	12	75	n/a	3
					End	8	80	n/a	3
2	03.07.25	2	Anabat Scout	21:28	Start	16	0	n/a	1
					End	15	0	n/a	1
3	23.07.25	2	Anabat Scout		Start	20	95	n/a	0
					End	17	95	n/a	0

Limitations

There was some precipitation at the start of the emergence survey on 2nd May 2024; however, this was limited to drizzle at the start of the survey and bats were recorded emerging and active during the survey. Furthermore, this survey had the highest roost count of all the surveys carried out.

The wind intensity was higher during the emergence survey on 28th May 2024; however, this was limited to a 'fresh breeze' at its highest intensity. Similarly, bats were recorded emerging and active during the survey.

It is generally possible to isolate pipistrelle species to individual species through analysis of ultrasonic data, albeit that there is some overlap between species. In this case, it has been possible to determine that the roost is of common pipistrelle *Pipistrellus pipistrellus* and soprano pipistrelle *Pipistrellus pygmaeus* bats.

There was one activity record of myotis and calls of the five species of myotis should be treated with caution, because the species can be difficult to separate out from one another. This one activity record has been referred to as myotis; however, there are no significant impacts in any case as this is a single activity record over six surveys and this bat is not roosting onsite.

On the basis of these considerations, there are no significant limitations to the surveys carried out.

Birds

- Evidence of nesting birds recorded during the UK Habitat Classification Surveys/PRAs for bats and any incidental bird observations/birds heard were noted. The PRAs comprised an external visual assessment of the buildings. These surveys included searching for birds' nests/evidence of nesting/roosting birds.
- The visual assessment of buildings/trees included searching for the following with regard to barn owl:
 - Birds present - roosting or nesting.
 - Birds present - corpses.
 - Pellets - undigested feeding remains.
 - Nests - formed on layers of degraded pellets.

- Droppings or 'liming' - often present on/below roosts.
- Eggs - intact/broken or within nest/below nest.
- Feathers - adult or natal down.
- The external assessment of the buildings included searching for suitable access points for barn owl (e.g. open doorways).
- The range of site visits were also used to record incidental bird activity, which included dusk/dawn surveys for bats.

Great Crested Newt

Habitat Suitability Index (HSI) Assessment

- Four offsite ponds were assessed for its suitability to support great crested newt using the HSI scoring system on 16th May 2025.²⁸
- This method seeks to quantify the potential of a pond to support great crested newt by numerically assessing ten indices thought to influence their presence.
- The indices considered are:
 - Location.
 - Pond area.
 - Pond permanence.
 - Water quality.
 - Percentage shade.
 - Presence waterfowl.
 - Presence of fish.
 - Number of ponds in the wider landscape.
 - Suitability of terrestrial habitat.

²⁸ Amphibian and Reptile Groups of the United Kingdom (May 2010). *ARG UK Advice Note 5 Great Crested Newt Habitat Suitability Index*. Available at: <https://www.arguk.org/info-advice/advice-notes/9-great-crested-newt-habitat-suitability-index-arg-advice-note-5/file>

- Percentage macrophyte cover.
- The HSI system is not a substitute for presence/absence surveys and is not intended to predict the occurrence of great crested newt. However, a correlation between the presence of great crested newt and a high HSI score is observed in ponds.

eDNA survey

- The presence of great crested newt for four offsite ponds was determined by eDNA sample analysis following current guidance.²⁹
- The field sampling was carried by great crested newt Natural England Class licence holder Lisa Durrant accompanied by Madison Sellar of ACD Environmental Ltd on 16th May 2025. Laboratory analysis was carried out by SureScreen Scientifics.
- A total of 20 samples of pond water are collected and during the laboratory analysis, the pond samples are combined to produce one eDNA extract. A total of 12 separate analyses are carried out from this one extract. This results in a score for the number of positive replicates (score out of 12) and if one or more are positive then presence is confirmed.
- Results are interpreted as follows:
 - Positive - the results indicate that great crested newt is present within the pond. Full survey methods are required to estimate the population size.
 - Negative - the result indicates that great crested newt is not within the pond. No further survey work is required.
 - Inconclusive - indicates degradation or inhibition of the sample, therefore the lack of detection of great crested newt DNA is not conclusive evidence for determining the absence of the species. Further eDNA sampling or full surveys will be required.

Limitations

- There were no limitations to the HSI Assessments or eDNA survey.

Reptiles

²⁹ Biggs J., Ewald N., Valentini A., Gaboriaud C., Griffiths R.A., Foster J., Wilkinson J., Arnett A., Williams P. and Dunn F. (2014). *Analytical and methodological development for improved surveillance of the Great Crested Newt. Appendix 5. Technical advice note for field and laboratory sampling of great crested newt (Triturus cristatus) environmental DNA.* Freshwater Habitats Trust, Oxford.

- Reptile habitat suitability and refugia locations was assessed with reference to NARRS (2007).³⁰
- The grassland, scrub and woodland as well as several suitable refugia (as referenced on the Existing UK Habitat Classification Plan all offer sheltering opportunities for reptiles. There are several areas of grassland that are optimal due to being undisturbed and having a high sward height. Therefore presence/absence surveys have been carried out.
- The reptile presence/absence surveys were carried out between 22nd May 2025 (deployment of mats) to 16th June 2025 (final check and collection of mats).
- Survey methodology was carried out with reference to the Herpetofauna Workers' Manual³¹ and more specific advice in Froglife Advice Sheet 10: Reptile Survey.³² In terms of the number of survey visits, Froglife refer to seven checks; however, research by Sewell *et al* (2012).³³ found that three to four checks provides 95% confidence in determining presence/absence of reptiles. A total of seven checks were carried out, which was therefore at the recommended maximum within this survey guidance.
- The total area of the Application Site is 1.5 hectares. In accordance with the Herpetofauna Workers' Manual, refugia should be deployed at a density of at least 10/hectare of suitable habitat. A total of 55 refugia were deployed.
- The refugia were a composite of bitumen mats, carpet tiles and tins carpet, which provides a range of potential opportunities for reptiles.
- Reptile mats were deployed on 22nd May 2025. The refugia were left for 21 days before checking to allow the refugia to 'bed-in' and become more attractive to reptiles before the first survey commenced. All of the surveys were carried within the reptile survey season with three (of the seven) surveys carried out within the optimal month of May.
- The refugia are cut to c.50cm x 50cm and provide suitable opportunities for sheltering and basking reptiles.

³⁰ National Amphibian and Reptile Recording Scheme (2007). *Reptile Habitat Guide*.

³¹ Gent, A. H., and Gibson, S. D., eds. (1998). *Herpetofauna Workers' Manual*. Joint Nature Conservation Committee, Peterborough.

³² Froglife. *Froglife Advice Sheet 10: An Introduction to Planning, Conducting and Interpreting Surveys for Snake and Lizard Conservation*. Available at: www.froglife.org

³³ Sewell, D., Guillera-Aroita, G., Griffiths, R.A. and Beebee, T.J.C. (2012). *When is a species declining? Optimizing survey effort to detect population changes in reptiles*. PLoS ONE 7(8): e43387.doi:10.1371/journal.pone.0043387.

- During each check, reptiles were searched for on top of the mats (basking), underneath the mats (sheltering) and was also searched for. During each survey, the surveyor walked a transect between refugia, paying particular attention to potential basking spots, and checking for reptiles on top and underneath refugia. When reptiles were found, they were logged on a recording sheet. Number, species and sex were recorded of individuals found as well as evidence of reptiles (e.g. sloughs). Weather conditions were also recorded.
- The dates and weather conditions are shown in **Table 11**.

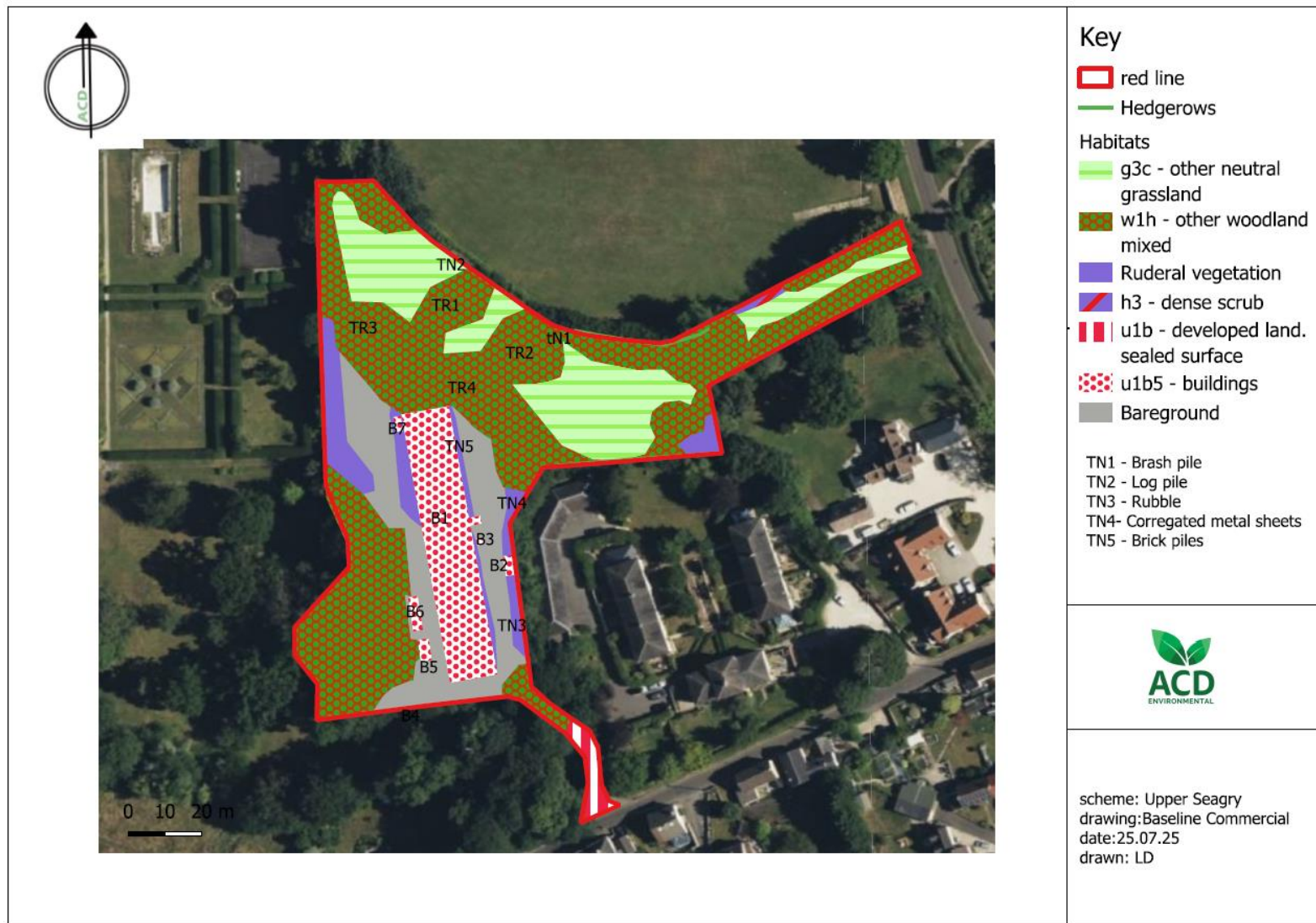
Table 11 Dates and weather conditions of surveys.

Survey	Date	Air temperature (°C)	Cloud cover (%)	Precipitation	Wind (Beaufort Scale)
Check 1	22.05.25	18	25	0	2
Check 2	27.05.25	18	50	0	2
Check 3	29.05.25	19	85	0	3
Check 4	03.06.25	19	50	0	3
Check 5	06.06.25	17	65	0	3
Check 6	10.06.25	19	55	0	1
Check 7	16.06.25	20	95	0	1

Limitations

- There were no limitations to the reptile surveys.

APPENDIX 2: EXISTING UK HABITAT CLASSIFICATION PLAN



APPENDIX 3: SITE PHOTOGRAPHS



Photograph 1: Mixed woodland



Photograph 2: Grassland with hedgerow



Photograph 3: Woodland and grassland.



Photograph 4: Building 1.



Photograph 5: TR1 oak with splitting and ivy cladding



Photograph 6: TR2 oak with knot holes



Photograph 7: TR2 oak with a knot hole



Photograph 8: Hole in the roofing sheet of B1



Photograph 9: Gap between roofing sheet and boarding in B1



Photograph 10: Ivy cladding on B1

APPENDIX 4: GREAT CRESTED NEWT HSI ASSESSMENT

ARGUK GCN HIS Calculator

Pond Name		P1	P2	P3	P4
SI No	SI Description	SI Value	SI Value	SI Value	SI Value
1	Geographic location	1.00	1.00	1.00	1.00
2	Pond area	0.20	0.20	0.20	1.00
3	Pond permanence	1.00	1.00	0.50	0.90
4	Water quality	0.67	0.67	1.00	1.00
5	Shade	1.00	1.00	1.00	1.00
6	Waterfowl effect	1.00	1.00	1.00	0.67
7	Fish presence	0.67	0.67	0.67	0.67
8	Pond density	1.00	1.00	1.00	1.00
9	Terrestrial habitat	1.00	1.00	0.67	1.00
10	Macrophyte cover	0.40	0.40	0.70	0.80
HSI Score		0.70	0.70	0.70	0.90
Pond suitability (see below)		<i>Good</i>	<i>Good</i>	<i>Good</i>	<i>Excellent</i>

Categorisation of HSI Score by Lee Brady

HIS Score	Pond Suitability
< 0.50	Poor
0.50 - 0.59	Below average
0.60 - 0.69	Average
0.70 - 0.79	Good
> 0.80	Excellent

Based on ARGUK advice note 5 - Great Crested Newt Habitat Suitability Index

APPENDIX 5: EXTRACT FROM GREAT CRESTED NEWT EDNA SURVEY

Folio No: 1696-2025
Purchase Order: PR124552
Contact: ACD Environmental Ltd
Issue Date: 05.06.2025
Received Date: 21.05.2025



GCN eDNA Analysis

Summary

When great crested newts (GCN), *Triturus cristatus*, inhabit a pond, they continuously release small amounts of their DNA into the environment. By collecting and analyzing water samples, we can detect these small traces of environmental DNA (eDNA) to confirm GCN habitation or establish GCN absence.

Results

Lab ID	Site Name	OS Reference	Degradation Check	Inhibition Check	Result	Positive Replicates
GCN25 5894	PR124552 - P3	ST 9427 8084	Pass	Pass	Positive	12/12
GCN25 5895	PR124552 - P4	ST 9463 8090	Pass	Pass	Positive	12/12
GCN25 5896	PR124552 - P2	ST 9442 8076	Pass	Pass	Positive	8/12
GCN25 5897	PR124552 - P1	ST 9443 8079	Pass	Pass	Positive	12/12

Matters affecting result: none

Reported by: Amy Bermudez

Approved by: Vanessa Hind

APPENDIX 6: PROPOSED UK HABITAT CLASSIFICATION PLAN



APPENDIX 7: SOFT LANDSCAPE PROPOSALS



APPENDIX 8: BIODIVERSITY METRIC METHODOLOGY

Assessment Framework

For the purposes of this assessment, the Statutory Biodiversity Metric has been utilised. The Statutory Biodiversity Metric is accompanied by a 'Calculation Tool'. This was used to calculate the biodiversity units for the Application Site before and after development. The assessment was conducted using the criteria set out within the Statutory Biodiversity Metric User Guide.³⁴

Habitat Measurements

- Baseline habitat measurements were carried out in line with the results of the UKHab survey.
- Proposed habitat measurements were calculated from the Soft Landscape Proposals prepared by TEA Architects (2025), which are shown in **Appendix 7**.
- Measurements were entered to the nearest 0.001ha in area.

Habitats - Linear Features

- Linear features (hedgerows) have been measured in metres and the height and condition of the habitats were recorded during the habitat survey.
- Measurements were entered to the nearest 0.001km in length.

Distinction Assessments

- Habitats are assigned to distinctiveness bands automatically within the Metric. These are based on an assessment of the distinguishing features of a habitat or linear feature, including the consideration of species richness, rarity (at local, regional, national and international scales), and the degree to which a habitat supports species rarely found in other habitats.
- The distinctiveness band of each habitat is preassigned in the Statutory Biodiversity Metric. The bands are based upon the UK Habitat Classification system. A combination of simple rules and professional judgement have been used to assign each habitat type to the appropriate distinctiveness band. The distinctiveness categories used are tailored to habitat type.
- Distinctiveness Assessments are assigned according to **Table 15**.

³⁴ Department for Food & Rural Affairs (February 2024). *The Statutory Biodiversity Metric User Guide*. Available at: https://assets.publishing.service.gov.uk/media/65c60e0514b83c000ca715f3/The_Statutory_Biodiversity_Metric_-_User_Guide_.pdf

Table 12: Distinctiveness Assessment.

Category	Scores	Multiplier
Very High	8	Priority habitats as defined in Section 41 of the NERC Act 2006 that are highly threatened, internationally scarce and require conservation action e.g. blanket bog
High	6	Priority habitats as defined in Section 41 of the NERC Act 2006 requiring conservation action e.g. lowland fens
Medium	4	Semi-natural habitats not classed as a Priority Habitat but with significant wildlife benefit e.g. mixed scrub
Low	2	Habitat of low biodiversity value e.g. temporary grass and clover ley
Very Low	0	Little or no biodiversity value e.g. hardstanding or sealed surface

Condition Assessments

- Parcels of habitat will be in different ecological condition. The Metric therefore takes account of variation in habitat condition.
- Condition Assessments are assigned according to **Table 13**. Habitat Condition was assessed using the criteria set out within the Natural England guidance document.

Table 13: Condition Assessment.

Category	Score
Good	3
Fairly Good	2.5
Moderate	2
Fairly Poor	1.5
Poor	1

Strategic Significance

- The spatial location of a habitat is treated as a component of the quality of a habitat parcel in the same way as distinctiveness or condition. Strategic significance is used to determine whether the habitat is of increased importance due to its location.

Risk Factors

- As part of any proposed habitat creation and restoration, risk factors must be taken into account to correct for disparity, delay or risk. These values are preassigned within the Metric and take into consideration the following factors:
 - Temporal risk.
 - Difficulty of creation and restoration.
- Advance/delay in habitat creation takes into account any significant time difference in the creation of a habitat type. This time is measured in full years and is entered by the assessor.
- Habitat creation in advance is rewarded by reducing the difficulty and temporal risk multipliers applied. This reflects the lower delivery risk - there is less risk of failure when a habitat is already making progress towards its target condition.
- Any significant delay in the creation of a habitat types relative to loss of onsite habitats (e.g. due to phased developments and developments that temporarily require parts of the development site for construction purposes) is added to the pre-populated time to target condition and increases the effect of the risk multiplier accordingly.

Limitations

- Although the Statutory Biodiversity Metric is a valuable tool underpinned by ecological evidence, there are certain limitations that must be considered when applying the metric. The key principles and rules for the use of the Statutory Biodiversity Metric have been followed at all times, in line with these limitations. Further detail is available within the Statutory Biodiversity Metric User Guide.

APPENDIX 9: POND LOCATION PLAN



