

Elms Farm

Preliminary Ecological Appraisal

Prepared on behalf of Bea Bend

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Barn at Elms Wood Farm

Ecology 8810

Version 01

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1.0 Executive Summary

- 1.1 The Client is proposing to submit planning application for the demolition of an agricultural barn and construction of a residential dwelling with associated landscaping. Pro Vision were commissioned in April 2025 to carry out a Preliminary Ecological Appraisal of the site to inform the development proposals.
- 1.2 The ecological appraisal comprised a desk study of existing ecological data in relation to the site, and an assessment of the sites habitats and suitability to support protected species within the application site.
- 1.3 The site comprises an expanse of modified grassland which is grazed, sections of mixed scrub, a tree line and an agricultural building.
- 1.4 The site is located within the zone of influence of Bath & Bradford on Avon Bats Special Area of Conservation and also has potential to impact Iford Manor Sites of Special Scientific interest. A shadow Habitats Regulations Assessment has been undertaken by Paxford Ecology Limited which assessed the potential impact arising from a barn conversion on the SAC. A range of impacts were identified; however, none are considered to have more than negligible effect on the integrity of the SAC. The impacts associated with this application will be the same as demolishing the existing structure and replacing with one residential dwelling. Recommendations are provided in **Section 5.0** to mitigate the impact of the scheme on this designated site.
- 1.5 The building on site has been assessed as holding **negligible suitability** to support roosting bats. Recommendations to mitigate the impact of the development on foraging and commuting bats have been provided in **Section 5.0** to ensure bats can continue to utilise the site post development.
- 1.6 The tree line and scrub provide foraging and nesting opportunities for common bird species. It is recommended that any vegetation clearance should avoid the bird nesting season (1st March – 31st August) unless inspection by an ecologist concludes that there are no nesting birds present immediately prior to the commencement of works. If the presence of nesting birds is confirmed, any works which may disturb them will be delayed until the young birds have fledged the nest of their own accord. Details regarding this are provided in **Section 5.0**.
- 1.7 The grassland was predominantly short sward due to the current management of the site creating limited opportunities for foraging and commuting reptiles and amphibians. As absence of these species has not been confirmed it is recommended that any clearance of suitable habitat is undertaken following a precautionary method of working outlined in **Section 5.0**.
- 1.8 The habitats on site are largely considered unsuitable for hazel dormouse. However, the possibility that hazel dormouse are present within the site cannot be ruled out, no habitat will be removed as part of the works and connectivity will be maintained along the southern and western boundary of the site. Therefore, it is considered unlikely that hazel dormouse would be negatively impacted by the works. However, a precautionary approach to hazel dormouse has been recommended in **Section 5.0** in case the proposals change to include any scrub removal.
- 1.9 The development will provide ecological enhancements in line with national and local planning policy to secure net gains on the site. Further details are provided in **Section 5.0**.

Introduction

Project Background

- 2.1 Pro Vision Ecology were commissioned in April 2025 to carry out a Preliminary Ecological Assessment (PEA) of the Elms Farm, Westwood, Bradford on Avon, BA15 2AL. For the site location refer to **Appendix A**.
- 2.2 The site has Class Q prior approval for conversion of an agricultural barn to a residential dwelling (Wiltshire Council Ref: PL/2024/02742), however the proposals have updated to demolition of the building on site and replacement with a residential dwelling with associated parking and landscaping (**Appendix B**).
- 2.3 This report describes the current ecological baseline of the site based on the findings of the ecological assessment and provides information for further survey requirements and potential mitigation on the site.

Brief

- 2.4 To carry out a PEA of the land within the site boundaries, to inform the Client of any further survey work required and of the ecological implications of their proposals.

Relevant Legislation and Planning Policy

- 2.5 The key legislative provisions of relevance to this report with respect to the development proposals and their potential effects on ecological features are listed below:
 - The Conservation of Habitats and Species Regulations 2017
 - The Wildlife and Countryside Act 1981 (as amended)
 - The Natural Environment and Rural Communities (NERC) Act 2006
 - The Protection of Badgers Act 1992
 - Environment Act (2021)
- 2.6 The UK Biodiversity Action Plan (BAP) was the Governments response to the 1992 Convention on Biodiversity (The Rio Convention), with the aim of halting the loss of biodiversity in the UK. The new UK post-2010 Biodiversity Framework replaced the previous BAP and is the government's response to the new strategic plan on the United Nations Convention on Biological Diversity (CBD). Although the UK post-2010 Biodiversity Framework supersedes the UK BAP, the UK BAP lists of priority species and habitats still remain an important reference source for identifying habitats and species of principal importance within the UK. Within England, Section 41 of the NERC Act (2006) lists species and habitats of principal importance for the conservation of biodiversity.
- 2.7 The Government has set out its policies for the protection and enhancement of biodiversity through the planning system in the National Planning Policy Framework Section 15 (NPPF, 2024).
- 2.8 The Environment Act 2021 includes the requirement for developments to provide 10% biodiversity net gain, to be evidenced with the use of the statutory metric. Developments are

exempt if they are self-build comprising less than nine dwellings on an area less than 0.5 hectares, householder applications or developments below the threshold of impacts to habitats.

- 2.9 Elms Farm is located within Wiltshire Council. The Wiltshire Core Strategy – Wiltshire Local Development Framework (Adopted January 2015)) Development Plan Document (adopted 2012) includes Core Policy 50 related to Biodiversity and Geodiversity, which states:

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 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 resources 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.

2.0 Methodologies

Desk Study

- 3.1 The desk study methodology is based upon guidelines set out by the Chartered Institute of Environmental and Ecological Management (CIEEM, 2017). A data-gathering exercise was undertaken to obtain any available information relating to statutory and non-statutory nature conservation sites and protected species (**Table 1**).

Table 1: Summary of information sources used for the Desk Study.

Organisation / Source	Information Sought
Wiltshire and Swindon Biodiversity Record Centre	Records of the presence of key protected and notable species and non-statutory wildlife sites within one kilometre of the site.
MAGIC	Locations of and citations for all national statutory wildlife sites, including SSSI, within two kilometres and all international sites including SAC, SPA or Ramsar sites within five kilometres of the site. Records of European Protected Species Licences and class licence returns within two kilometres.
Ordnance Survey Maps	Large scale habitat information and identification of off-site habitats which may require consideration (such as ponds) within 500m.

Ecological Assessment

Habitats

- 3.2 A site visit was carried out on the 25th April 2025 by ecologist Maya Crate in clear, still and dry conditions with an ambient temperature of 15°C. The survey employed techniques based on the UK Habitat Classification System.
- 3.3 The collection of botanical information focused on the dominant and/or key indicator species for each habitat, to allow allocation of habitats to hierarchy levels 3 and/or 4 and where relevant to identify any priority habitats which are present on site.

Protected species

- 3.4 The PEA included an assessment of the potential for habitats on or immediately adjacent to the site to support legally protected or conservation-notable species. The location and nature of any signs of the presence of protected species (such as droppings, footprints, burrows, etc.) were documented and mapped accordingly. Indicative survey methods for protected species are outlined below.

Badgers (Meles meles)

3.5 The site and where possible 30 metres outside the site boundary was assessed for its suitability to support badgers. A direct search was undertaken for evidence of badgers. Evidence includes;

- Active or disused setts;
- Diggings;
- Latrines / dung pits;
- Foraging ('snuffle holes');
- Footprints; and
- Badger hairs.

Bats

3.6 Bats use features within buildings such as stone crevices or cracks in brickwork, ridge beams, gaps between roofing materials and the main building structure, and any potential access points. An internal and external inspection of the building was conducted by experienced ecologist Maya Crate during the PEA. During the survey any evidence of bats such as droppings, urine staining, claw marks, feeding remains or bats themselves were recorded. An assessment of the potential of the building to support roosts was then made in line with Bat Conservation Trust (BCT) guidelines (2023) shown in **Table 2** below.

Table 2: Assessment of buildings to support roosting bats

Potential	Criteria
Negligible	Negligible features on site likely to be used by bats
Low	Potential features present which may support low numbers of bats irregularly but no suitable features for regular use by large numbers of bats.
Medium	A building with one or more potential roost features that may be used by bats due to their size, shelter, protection, condition and habitats present. Unlikely to support a roost of high conservation value.
High	A building with one or more potential roost sites that are suitable for use by a large number of bats on a regular basis.

3.7 The majority of bat species roost within trees. Therefore, an assessment of trees recorded on site was undertaken identifying any Potential Roost Features (PRFs). The assessment was undertaken from the ground looking for features which may support bats such as cavities, crevices, and peeling bark. The assessment was based on BCT guidelines (Collins, 2023) shown below in **Table 3**.

Table 3: Guidelines for assessing the suitability of trees to support bat roosts

Suitability	Criteria
None	No PRFs on the tree or highly unlikely to be any present.
FAR	Further assessment required to establish if PRFS are present in the tree.
PRF	A tree with at least one PRF present

- 3.8 Bats use features in the landscape to navigate and also habitats may provide key foraging areas. Foraging and commuting habitat was assessed based on based on BCT guidelines (Collins, 2023) shown in **Table 4** below.

Table 4: Assessment of foraging/commuting habitat.

Suitability	Criteria
None	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year
Negligible	No obvious habitat features on site likely to be used as flight paths or by foraging bats
Low	Suitable but isolated habitat that could be used by small numbers of bats
Medium	Continuous habitat connected to the wider landscape that could be used by bats
High	Continuous high-quality habitat that is well connected to the wider landscape and is likely to be regularly used bats.

Birds

- 3.9 Any habitat features, for example, scrub and trees, which could potentially be used by nesting birds, were surveyed and any nesting activity was noted. The habitat was also assessed regarding its potential for bird activity.

Great Crested Newts (Triturus cristatus)

- 3.10 Ponds within the vicinity of the site were noted and the potential of the land to act as a commuting route, shelter or foraging resource for great crested newts was assessed.

Hazel dormouse (Muscardinus avellanarius)

- 3.11 An assessment of the suitability of the habitat to support hazel dormouse was undertaken in accordance with The dormouse Conservation Handbook (Bright *et al*, 2006). Any small mammal feeding signs were checked and assessed, including:
- Examination of hazel nuts; and
 - Evidence of nest building.

Invasive species

- 3.12 During the survey any invasive species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) were noted

Invertebrates

- 3.13 An assessment was undertaken to assess the potential of the habitats recorded on site to support diverse communities of invertebrates, or any Biodiversity Action Plan (BAP) species. The assessment was based on the presence of a number of habitat features which may support important invertebrate communities such as:

- An abundance of deadwood;
- Presence of diverse plant communities;
- Presence of varied woodland structure and sunny woodland edge;
- Presence of ponds or watercourses; and
- Presence of free draining soil exposures.

Reptiles

- 3.14 Habitat features that could be suitable as hibernacula, foraging or basking areas were noted. Extant refugia were lifted and examined for evidence of reptiles, including sloughs (shed skins).

3.0 Results and Analysis

Designated sites

Statutory Designated Sites

- 4.1 The data search returned one record of an International Statutory Designated Sites within five kilometres of the site. This is the Bath & Bradford on Avon Bats Special Area of Conservation (SAC) which includes the hibernation sites associated with 15% of the UK greater horseshoe bat (*Rhinolophus ferrumequinum*) population and is selected on the basis of the importance of this exceptionally large overwintering population. Small numbers of Bechstein's bats (*Myotis bechsteinii*) have also been recorded hibernating in abandoned mines in this area, though maternity sites remain unknown. Lesser Horseshoe bats (*Rhinolophus hipposideros*) are also present as a qualifying feature, however, are not a primary reason for the sites designation. This site is located at a distance of 2.6 kilometres northwest of the site boundary.
- 4.2 A shadow Habitats Regulations Assessment (sHRA) has been undertaken by Paxford Ecology Limited (2024) which assessed the potential impact arising from a barn conversion on the SAC. A range of impacts were identified; however, none are considered to have more than negligible effect on the integrity of the SAC. The impacts associated with this application will be the same as demolishing the existing structure and replacing with one residential dwelling.
- 4.3 Recommendations are provided in **Section 5.0** to mitigate the impact of the scheme on this designated site.
- 4.4 The data search also returned two records of National Statutory Designated Sites within two kilometres of the site. These are both Sites of Special Scientific interest (SSSI):
 - **Iford Manor SSSI:** This has been designated as an SSSI due to the presence of maternity colonies of Greater Horseshoe (*Rhinolophus ferrumequinum*) and Lesser horseshoe bats. This site is located 1.6 kilometres west of the site boundary.
 - **Gripwood Quarry SSSI:** This has been designated due to being a recovering earth heritage site and is located 1.2 kilometres north of the site boundary.
- 4.5 The proposed development is considered sufficiently remote from these SSSI's to avoid any direct impacts on these designated sites. There is potential for indirect impacts on Iford Manor SSSI via additional lighting on site impacting foraging and commuting habitat. Recommendations outlined in **Section 5.0** to mitigate the impact of the development on Bath & Bradford on Avon Bats SAC will also mitigate any potential impacts on.

Ecological Assessment

Introduction

- 4.6 The results of the PEA are presented below. A Habitat Survey map is provided in **Appendix C**. The map illustrates the location and extent of the sites surveyed, along with additional notable features.

Habitats

Surrounding Habitat

- 4.7 The site is located east of the village of westwood and south of Bradford on Avon. Residential properties are located west of the proposed development site, with a small number also present on the northeastern aspect. The wider area predominantly comprised agricultural land interspersed with areas of woodland.

Modified grassland

- 4.8 The site comprises a large expanse of modified grassland which was currently being utilised as a horse paddock (**Figure 1**). Horses were present at the time of the walkover survey. The sward was kept to a short sward height of approximately 7-10 centimetres with limited tussocks present throughout. Species present within the grassland included Yorkshire fog (*Holcus lanatus*), perennial rye grass (*Lolium perenne*), meadow buttercup (*Ranunculus acris*), ribwort plantain (*Plantago lanceolata*), broadleaved dock (*Rumex obtusifolius*), creeping buttercup (*Ranunculus repens*), dandelion (*Taraxacum officinale*), and white clover (*Trifolium repens*). The borders were comprised of broadleaved dock, herb Robert (*Geranium robertianum*), common nettle (*Urtica dioica*) and cleavers (*Galium aparine*). A small semi-mature willow sp. (*Salix*) was present on the western aspect of the grassland. A large expanse of bare earth was also present on the eastern boundary where the access gate into the site was located.



Figure 1: Grazed Modified grassland

Line of trees

- 4.9 A line of trees was present on the southern boundary which was comprised of semi-mature trees of field elm (*Ulmus minor*) and hawthorn (*Crataegus monogyna*). The trees canopy had gaps present and were not well connected to the wider landscape. The understory comprised broadleaf dock, a small amount of bluebell (*Hyacinthoides non-scripta*), dandelion, herb Robert (*Geranium robertianum*), a small encroachment of bramble, creeping buttercup (*Ranunculus repens*) and creeping thistle (*Cirsium arvense*). However, the majority of this area comprised of bare ground.



Figure 2: Line of trees on the Southern boundary with woodland understory

Ephemeral vegetation

- 4.10 The western aspect of the site was comprised of ephemeral vegetation which was of a well-shaded nature bordering the hedgerow and building. Species present within this area comprised bush thistle (*Cirsium vulgare*), hogweed (*Heracleum sphondylium*), common nettle, cleavers (*Galium aparine*), broadleaf dock, water figwort (*Scrophularia umbrosa*), shiny cranesbill (*Geranium lucidum*), very small level of hawthorn and read dead nettle (*Lamium purpureum*). The northern aspect of this vegetation predominantly comprised of hogweed with a small encroachment from cut leaf cranesbill and hairy willowherb (*Epilobium hirsutum*). Bare ground was interspersed throughout this vegetation.
- 4.11 A spoil heap was present on the southeastern aspect of the site which was comprised of further ephemeral vegetation. The dominant species present was common nettle with thistle, broadleaf dock, bracken (*Pteridium aquilinum*), hogweed, creeping cinquefoil (*Potentilla reptans*) and bindweed (*Convolvulus arvensis*) with three common pear trees (*Pyrus communis*). The sward of the common nettle was high reaching 30 centimetres.



Figure 3 and 4 : Ephemeral vegetation present on the western aspect

Artificial unvegetated unsealed surface

- 4.12 The majority of the site also comprised of artificial unvegetated unsealed surface in the form of a gravel driveway and parking area creating access from the main road. This was seen to have a large expanse of vegetation encroachment, particularly in the southeastern aspect. Species encroaching included Yorkshire fog, broadleaved dock, dandelion, white clover, ivy, broadleaf dock and shiny cranesbill.

Bramble scrub

- 4.13 A very sparse level of bramble scrub was present bordering the site to the south. This was seen to be of a sparse and gappy nature and ran along the boundary line. Species included within this scrub also included bramble, hawthorn, field elm, herb Robert and dog mercury (*Mercurialis perennis*).

Protected and/or notable species

Badgers

- 4.14 The WSBRC data search returned 26 records for badger within one kilometre of the site. However, the majority of these were pre-2000. Eight records were returned post 2000 with the most recent record in 2018.
- 4.15 The treeline, grassland and ephemeral vegetation provides suitable habitat for foraging commuting badgers. No signs of badger were observed within the site or in neighbouring parcels during the survey. No mammal tracks were identified within the site boundary at the time of the habitat walkover.
- 4.16 Badgers are likely within the wider landscape; however, no evidence of badgers was recorded on site. They are therefore considered likely absent.

Bats

- 4.17 The WSBRC data search returned 123 records of bats within one kilometre of the development site. Species present included:
- Serotine (*Eptesicus serotinus*)
 - Bechsteins bat (*Myotis bechsteinii*)
 - Daubentons Bat (*Myotis daubentonii*)
 - Natterer's bat (*Myotis nattereri*)
 - Noctule (*Nyctalus noctula*)
 - Pipistrelle species (*Pipistrellus*)
 - Soprano pipistrelle (*Pipistrellus pygmaeus*)
 - Common pipistrelle (*Pipistrellus pipistrellus*)
 - Brown long eared (*Plecotus auritus*)
 - Greater horseshoe (*Rhinolophus ferrumequinum*)
 - Lesser horseshoe (*Rhinolophus hipposideros*)
- 4.18 The Defra run website, MAGIC, was searched for a list of granted European Protected Species Licences (EPSL's). Three EPSLs were recorded within two kilometres of the development site for brown long-eared, common pipistrelle, daubenton, greater horseshoe, lesser horseshoe,

serotine and soprano pipistrelle. One EPSL located 1.6 kilometres west of the site boundary affected all species listed above. The EPSL licence located 1.4 kilometres to the northwest of the site impacted a maternity roost of soprano pipistrelle.

Trees

- 4.19 The trees within the tree line on the southern aspect of the site were assessed for their potential to support roosting bats. No potential roosting features were identified.

Buildings

- 4.20 One building was present within the site boundary. This was an agricultural barn which was used as storage for machinery.
- 4.21 The building comprised a corrugated metal frame with metal sheet roof and elevations (**Figure 5 and 6**). Wooden sleeper formed the bottom of the walls on the southern, western and eastern sides. The northern elevation of the barn had vertical wooden slats which had gaps between each slat allowing access into the building. A metal fascia was present separating the roof from the side panels. This was well sealed with no crevice gaps.



Figure 5 and 6: External aspect of the barn (eastern aspect on the left and western and southern aspects on the right)

- 4.22 Six skylights were present which along with the open doorway on the eastern elevation increase the ambient light level within the building (**Figure 7**). High levels of light ingress were also present on the northern aspect (**Figure 8**) due to gaps between the slats. No evidence of bats was recorded during the walkover survey.
- 4.23 No evidence of bats was recorded. The barn was considered to have negligible potential to support roosting bats as whilst access and egress opportunities where available no obvious potential roost features were identified.



Figure 7 and 8: Internal aspect of the building showing the light ingress and wooden panelling

Foraging and Commuting

- 4.24 The treeline and scrub on site provide some suitable foraging and commuting habitat. The grassland is considered sub-optimal for foraging and commuting bats due to the short sward height providing limited suitability for invertebrate prey.
- 4.25 The proposed development will result in a minor loss of sub-optimal foraging habitat however there will be no loss of linear connectivity through habitat removal. However, there may be impacts to the site indirectly via impacts associated with light spill from the proposed residential dwelling. Further details are provided in **Section 5.0**.

Birds

- 4.26 The WSBRC data search provided the following records for red list bird species of conservation concern that may be present on the site: Fieldfare (*Turdus pilaris*), greenfinch (*Chloris chloris*), Hawfinch (*Coccothraustes coccothraustes*), herring gull (*Larus argentatus*), House martin (*Delichon urbicum*), house sparrow (*Passer domesticus*), lapwing (*Vanellus vanellus*), linnet (*Linaria cannabina*), marsh tit (*Poecile palustris*), mistle thrush (*Turdus viscivorus*), skylark (*Alauda arvensis*), song thrush (*Turdus philomelos*), spotted flycatcher (*Muscicapa striata*) starling (*Sturnus vulgaris*), swift (*Apus apus*), Tree pipit (*Anthus trivialis*) woodcock (*Scolopax rusticola*), yellow wagtail (*Motacilla flava*) and yellowhammer (*Emberiza citrinella*).
- 4.27 The following Schedule 1 and/or Annex I species were returned which may breed in the area: Barn owl (*Tyto alba*), peregrine (*Falco peregrinus*) and red kite (*Milvus milvus*).
- 4.28 The treeline and the area of ephemeral vegetation on the northeastern aspect and on site provide suitable habitats for nesting birds. The modified grassland edges have limited suitability for ground nesting birds. Should any vegetation clearance be required, mitigation measures will be needed and are detailed in **Section 5.0**.

Great crested newts

- 4.29 The WSBRC data search returned two records of great crested newt presence within one kilometre of the site. However, both records were observed in 1980, no records were returned post 2000. The Defra run website, MAGIC, was searched for a list of granted EPSL's and found

no granted licences and no great crested newt class licence returns within two kilometres of the site.

- 4.30 The great crested newt risk zones for Swindon and Wiltshire were also consulted which identified the site as being located within an amber risk zone which indicates these areas could form main population centres for great crested newts and comprise important connecting habitat that aids natural dispersal.
- 4.31 There were no water bodies located within the site boundary. A ditch was present on the western boundary; however, this was seen to be dry during the walkover survey and there was no evidence that it had previously been wet. The ditch did not connect to any suitable breeding ponds within 250 metres of the site boundary.
- 4.32 A search of MAGIC identified one waterbody within 250 metres of the site boundary. This was located at a distance of 210 metres from the site boundary. The intervening habitat between the pond and the site comprised horse grazed fields and Westwood road which was noted as being in consistent use, limiting the likelihood that amphibians would have passed onto site. The pond was also small measuring approximately 11.24 metres squared. A rapid risk assessment of the site was undertaken, which is shown in Table 5. This has highlighted that the proposals will mean that an offence is highly unlikely due to the distance from the pond and due to the size of habitats that will be impacted.

Table 5: Rapid Risk Assessment

Component	Likely effect (select one for each component; select the most harmful option if more than one is likely; lists are in order of harm, top to bottom)	Notional offence probability score
Great crested newt breeding pond(s)	No effect	0
Land within 100m of any breeding pond(s)	No effect	0
Land 100-250m from any breeding	0.1 - 0.5 ha lost or damaged	0.1
Land >250m from any breeding pond(s)	No effect	0
Individual great crested newts	No effect	0
		Maximum: 0.1
Rapid risk assessment result:	GREEN: OFFENCE HIGHLY UNLIKELY	

- 4.33 The majority of the modified grassland area on site is considered to have limited suitability due to the short sward height and horse presence. However, the tussocks, ephemeral vegetation and scrub present on the western, southern and eastern boundaries could provide commuting and foraging opportunities. The tree line on the boundaries provides suitable habitat for great crested newts as it provides commuting opportunities and shelter.
- 4.34 The rapid risk assessment has assessed the risk as an offence highly unlikely. Due to this assessment, no further actions are required for great crested newts.

Hazel Dormouse

- 4.35 The WSBRC data search returned no records of hazel dormouse within one kilometre of the site. No records of granted EPSLs were found within two kilometres of the site.
- 4.36 The tree line is considered unsuitable for hazel dormouse due to its gappy nature, however it did comprise species which are favourable to dormice. There are no hedgerows on site, however the hedgerows directly adjacent to the site boundary provide suitable habitat for dormice and it is therefore likely they are present within the wider landscape.

- 4.37 The gravel driveway and the modified grassland provide negligible foraging and commuting potential for dormice. The scrub provides limited foraging nesting opportunities due to the presence of bramble; however, this is sparse and created limited connectivity due to being gappy within the hedgerow.
- 4.38 The possibility that hazel dormouse are present within the site cannot be ruled out, however connectivity will be maintained along the southern and western boundaries of the site and all scrub within the site boundary will be retained. Therefore, it is considered unlikely that hazel dormouse would be negatively impacted by the works. If works change to include the removal of scrub, outline mitigation has been outlined in **Section 5.0**.

Invertebrates

- 4.39 The WSBRC search provided no records of notable invertebrate within one kilometre of the site boundary. No habitats of note were identified on site that could support assemblages of rare invertebrates were recorded on the site. Therefore, no further action is required.

Reptiles

- 4.40 The WSBRC data search returned 25 records of reptile within one kilometre of the site pre-2000. The most recent record was a common lizard in 1980.
- 4.41 The modified grassland was considered to have limited potential for reptiles due to the short sward and well grazed nature of the field. Horses were present at the time of the walkover further reducing the likelihood reptiles within the grassland. The ephemeral vegetation provides some suitable habitat, however most of the vegetation was well shaded from the bordering tree line and the building reducing the likelihood of reptiles. There was also a large amount of bare ground interspersed among the vegetation limiting cover. The immediate landscape housed horses as well as a dog day care which utilised the site further reducing the likelihood that reptiles are present on site.
- 4.42 The spoil heap on the southwestern aspect could provide suitable habitat for reptiles. The longer sward grass and areas of ephemeral vegetation within this area provide suitable foraging, commuting and sheltering opportunities. However, this area will not be built upon and it is considered to be outside of the application site.
- 4.43 The site also had some connectivity to the wider landscape and if reptiles were present within the fields on the western aspect they could access and utilise the site. However, the data search did not return any results of reptiles being present within one kilometre of the site boundary since 1980.
- 4.44 Due to the minor extent of the suitable habitat on site it is considered disproportionate to undertake presence/absence surveys. However, it is recommended if any habitat clearance is undertaken on spoil heap, it should follow a precautionary method of working. Details regarding mitigation are provided in **Section 5.0**.

4.0 Impacts and Mitigation

Impacts and Required Mitigation for the Proposed Development

Bath & Bradford on Avon Bats SAC and Iford Manor SSSI

- 5.1 The sHRA (Paxford Ecology Limited, 2024) considered a range of impacts associated with a barn conversion, however, none are considered to have more than negligible effect on the integrity of the SAC. The impacts associated with this application will be the same as demolishing the existing structure and replacing with one residential dwelling.
- 5.2 A lighting assessment for bats was previously carried out on the wider site in 2021, by Johns Associates. The assessment concluded that foraging suitability was limited to the southern boundary hedgerow.
- 5.3 To minimise impacts on foraging and commuting bats it is recommended that any lighting is proposed, it should adhere to the following guidelines (ILP, 2023):
- Minimise light spill on the boundary features.
 - LED luminaires should be used of a warm white spectrum (<2700 Kelvin) which will feature peak wavelengths higher than 550 nm.
 - Internal luminaires should be recessed to reduce light spill outside the property.
 - Only luminaires with a negligible or zero Upward Light Ratio, and with good optical control, should be considered.
 - Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt.
 - Where appropriate, external security lighting should be set on motion sensors and set to as short as possible.
- 5.4 The site can provide additional enhancement measures through the management and provision of native hedgerows. These measures are discussed further in relation to enhancements on the site.

Bats

- 5.5 The mitigation outlined above for the designated sites will also be sufficient to minimise impacts on the local bat population.

Nesting birds

- 5.6 The tree lines and scrub provide suitable foraging and nesting habitat for birds. Should any vegetation clearance be required to facilitate the development, it is recommended that the works should avoid the bird nesting season (1st March – 31st August) unless inspection by an ecologist concludes that there are no nesting birds present immediately prior to the commencement of works.
- 5.7 If the presence of nesting birds is confirmed, any works which may disturb them will be delayed until the young birds have fledged the nest of their own accord.

Reptiles

- 5.8 To ensure no reptiles or amphibians are harmed during the construction works, a precautionary method of works should be undertaken and supervised by a suitably qualified ecologist. This will include habitat manipulation using a two-phase strim and push methodology to encourage reptiles and amphibians to move out of the construction zone of their own accord. This must be completed during the reptile active season (March to October, dependant on temperatures). This will involve an initial reduction of the onsite vegetation height to approximately 15 centimetres, followed by reduction of habitats down to ground level. Strimming will be undertaken towards the retained grassland areas. If any reptiles are found, they will be moved to the retained habitat by a suitably qualified ecologist.

Dormice

- 5.9 The habitats on site are largely considered unsuitable for hazel dormouse. The gravel driveway and the grazed modified grassland provide negligible foraging and commuting potential for dormice. The scrub provides limited foraging nesting opportunities due to the presence of bramble.
- 5.10 The current proposals do not include the clearance of any bramble scrub and connectivity will be maintained along the southern and western boundaries of the site. Therefore with the current proposals, **no further mitigation is required**.
- 5.11 If the plans change to incorporate the removal of any bramble scrub on the boundaries, a precautionary approach the clearance of this section of habitat must be conducted under the supervision of a suitably experienced ecologist following the methodology outlined below:
- 5.12 Scrub clearance will take place in two separate stages, timed according to the dormouse life-cycle and aligning with nesting bird season:
- i. Between November and February (dormouse hibernation season) any scrub to be removed will be reduced to 15 centimetres above ground level, a hand search by a licensed ecologist will be carried out to look for signs of hibernating dormice. If dormice are recorded then works will stop and Natural England will be consulted;
 - ii. Between May and November (dormouse active season) the remaining stumps (if present) and roots can be removed.
- 5.13 Connectivity will be retained across the site, therefore it is considered unlikely dormice will be impacted.

Enhancement Measures for the Proposed Development

- 5.14 In accordance with the Natural Planning Policy Framework (NPPF, 2024), development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity. The development will be for a self-build application and is therefore exempt from mandatory Biodiversity Net Gain as outlined by the Environment Act 2021.
- 5.15 Whilst mandatory net gain is not required the following enhancement measures will be incorporated into the development:
- Any planting of trees and shrubs for any supplementary planting scheme should incorporate native species which benefit a range of wildlife.

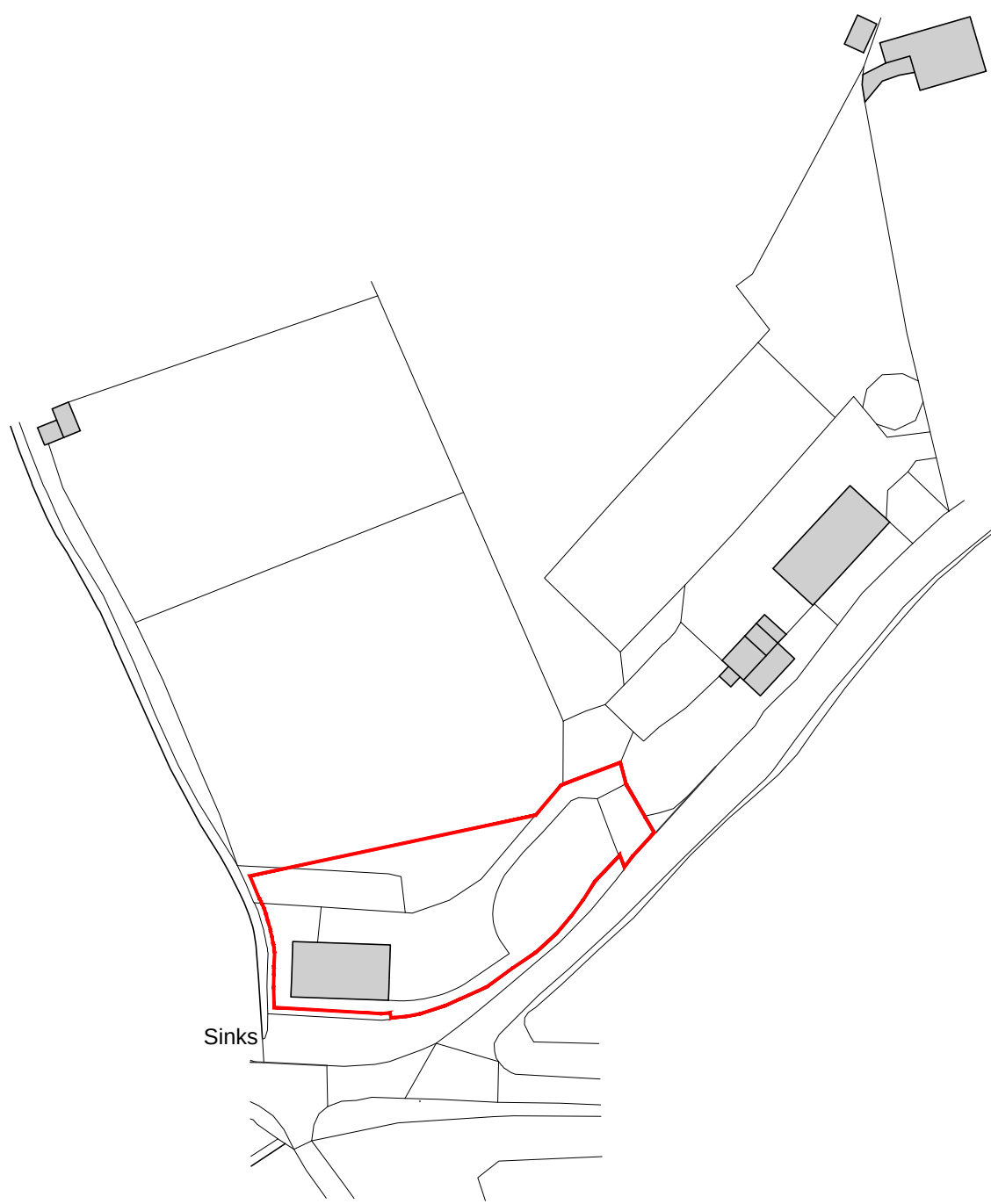
- The inclusion of wildflower grassland areas within the landscape proposals would provide additional habitat for local invertebrate populations and also provide foraging for bats and birds.
- The new residential building should include an integrated bat brick. The brick should be placed on the southern elevations at the eaves without being placed above windows.
- An Integral swift brick, which can also be used by house sparrows, should be incorporated under the eaves on a suitable elevation on the new residential dwelling.
- Bee bricks can be incorporated in the residential property closest to the areas of suitable grassland.

5.0 References and Bibliography

- Bright, P., Morris, P. & Mitchell -Jones, T. (2006). *The Dormouse Conservation Handbook*, 2nd Edition. Peterborough, English Nature 73pp.
- CIEEM (2017). *Guidelines for Preliminary Ecological Appraisal*, 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- CIEEM (2024). *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*, Version 1.3. Chartered Institute of Ecology and Environmental Management, Winchester.
- CIEEM (2020). *Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK*, 2nd Edition. Chartered Institute of Ecology and Environmental Management. Winchester.
- Collins, J (Ed) (2023). *Bat Surveys for Professional Ecologists: Good Practice Guidelines*, 4th Edition. Bat Conservation Trust, London.
- ILP (2023). *Guidance Note 8/23 Bats and Artificial Lighting at Night*.
- Johns Associated (2021) *The Yard, Westwood Road, Bradford on Avon: Lighting Assessment For Bats*
- National Planning Policy Framework (2024). *National Planning Policy Framework*. Ministry of Housing, Communities and Local Government, London.
- Natural England (2022) *GCN Risk Zones (Swindon and Wiltshire)*
- ODPM (2005). *Government Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and Their Impact within the Planning System*. London; Office of the Deputy Prime Minister.
- Oldham R.S., Keeble J., Swan M.J.S. & Jeffcote M. (2000). *Evaluating the suitability of habitat for the Great Crested Newt (Triturus cristatus)*. Herpetological Journal 10(4), 143-155.
- Paxford Ecology Limited (2024) *Shadow Habitat Regulations Assessment, Elms Farm, Westwood, Bradford on Avon, BA15 2AL*
- UKHab Ltd (2023). *UK Habitat Classification Version 2.0* (at <https://www.ukhab.org>).
- Wiltshire and Swindon Biological Records Centre (2025) *Data search results within 1000 metres of Elms Farm* WSBRC Ref: 20250425_3_PV

Appendices

Appendix A: Site Location



1

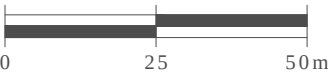
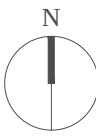
E001

SITE LOCATION PLAN

scale 1:1250

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- OWNERSHIP BOUNDARY
- APPLICATION SITE BOUNDARY



FIRST ISSUE	29.04.25	-
details	date	rev

PRELIMINARY

ELMS FARM

SITE LOCATION PLAN

Date	Client	
JANUARY 2025	Tom and Bea Bend	
Scale	Drawing no.	Revision
1:1250 @ A3	25 / 841 / E001	-

RB

Richmond Bell
ARCHITECTS

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Scale for planning purposes only, figured dimensions to be worked to at all times.

All work and materials to be in accordance with the building regulations and to comply with the relevant codes of practice and British Standards.

Please note the information is based upon the independent survey information provided. The contractor is to report any discrepancies between the drawings and the site configurations.

Appendix B: Proposed plans



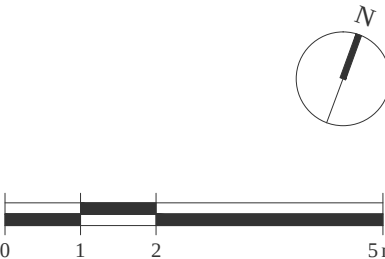
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01722 324835

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PLANNING ISSUE	27.05.25	-
details	date	rev

ELMS FARM

Date FEB 2025	Client Bea Schofield	
Scale 1:100 @ A3	Drawing no. 24 / 841 / P100	Revision -

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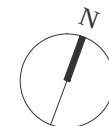
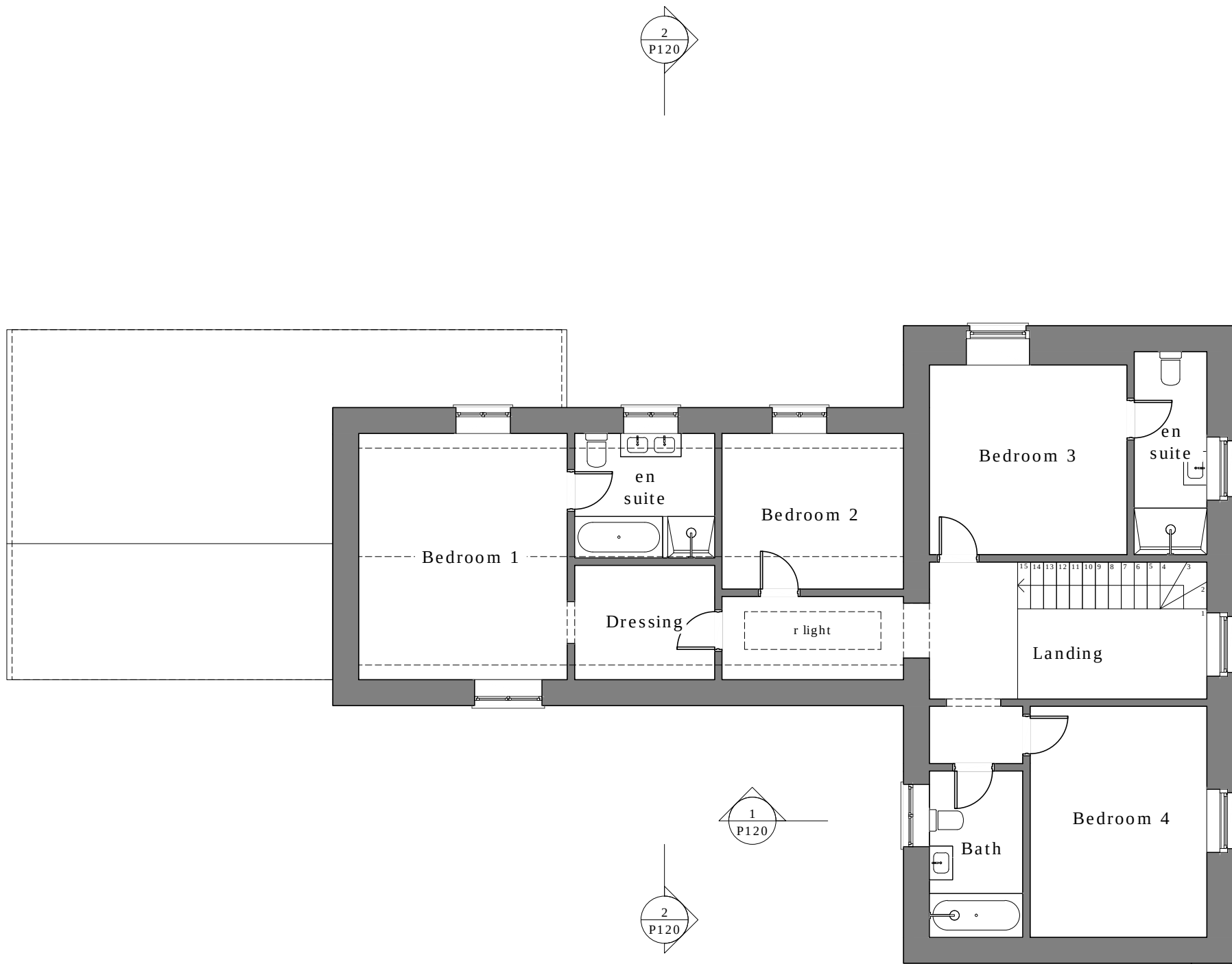
The contractor is responsible for checking dimensions, tolerances and reference. Any discrepancies to be checked with the architect before proceeding with the works.

Where an item is covered by drawings to different scales, the larger scale drawing is to be worked to.

Scale for planning purposes only, figured dimensions to be worked to at all times.

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Please note the information is based upon the independent survey information provided. The contractor is to report any discrepancies between the drawings and the site configurations.



PLANNING ISSUE	27.05.25	-
details	date	rev

PLANNING

ELMS FARM

PROPOSED FIRST FLOOR PLAN

Date	Client	
FEB 2025	Bea Schofield	
Scale	Drawing no.	Revision
1:100 @ A3	24 / 841 / P101	-



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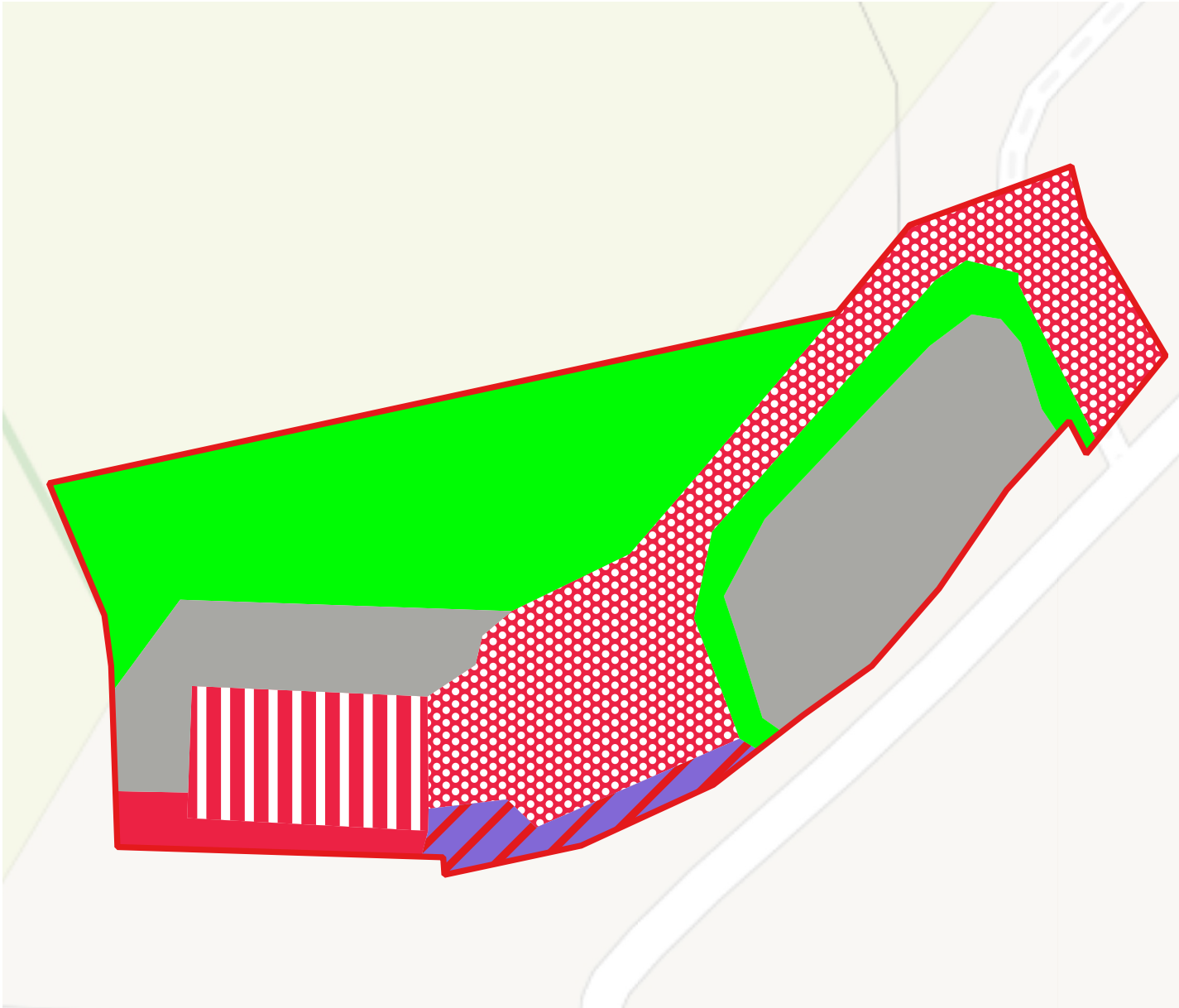
Appendix C: Habitat Map

The plan shown here is for the purpose of supporting a planning application only. Only scale from this drawing for the purposes of determining a planning application. Do not scale from this drawing for construction purposes.

The proposal presented here is subject to review by specialist consultants, and is to be read in conjunction with all relevant specialist's drawings and information where available. Any discrepancies between this and any other consultant's drawings and information should be reported to Pro Vision immediately.

Legend

-  Red Line Boundary
-  Artificial Unvegetated, Unsealed Surface
-  Developed Land; Sealed Surface
-  Mixed Scrub
-  Modified Grassland
-  Ruderal/Ephemeral
-  Bare Ground in Woodland Edge



ISSUE	DATE	DESCRIPTION	DRAWN	CHECKED
v1	21.05.25	Drawing Created	MC	AH

CLIENT:	Bea Bend		
PROJECT:	Elms Farm		
DRAWING:	Habitat Map	1:450	
NUMBER:	8810-XX-E0-01	A4	
ISSUE:	v1	23.05.25	

Appendix D- Water Body Map

The plan shown here is for the purpose of supporting a planning application only. Only scale from this drawing for the purposes of determining a planning application. Do not scale from this drawing for construction purposes.

The proposal presented here is subject to review by specialist consultants, and is to be read in conjunction with all relevant specialist's drawings and information where available. Any discrepancies between this and any other consultant's drawings and information should be reported to Pro Vision immediately.

Legend

-  Red Line Boundary
-  Water Body



ISSUE	DATE	DESCRIPTION	DRAWN	CHECKED
v1	20.05.25	Drawing created	MC	AH

CLIENT:	Bea Bend		
PROJECT:	Elms Farm		
DRAWING:	Waterbody plan		1:3500
NUMBER:	8810-XX-E0-02		A4
ISSUE:	v1		23.05.25



Appendix E: Relevant Legislation

THE CONSERVATION OF HABITATS AND SPECIES 2017

The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) transpose Habitats Directive into UK legislation. The Habitats Regulations provide for the designation and protection of European Sites and European Protected Species. European Sites include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), which form part of the Natura 2000 network of protected areas across Europe.

European Protected Species (EPS) are those listed under Schedule 2 of the Habitats Regulations and include dormouse, great crested newt, otter and all species of bat. The regulations prohibit the deliberate capture, killing or disturbance of any EPS; it is also an offence to damage or destroy a breeding site or resting place of any of these species. In order to carry out a lawful operation (e.g. development work which has full planning permission) that may result in an offence under the Habitats Regulations, it is necessary to obtain a licence from Natural England. EPS Licences will only be granted after Natural England has been satisfied that there are no satisfactory alternative and that there will not be any adverse impacts on the favourable conservation status of the species.

WILDLIFE AND COUNTRYSIDE ACT 1981

The Wildlife and Countryside Act 1981 is the principal piece of legislative protection of wildlife in Great Britain. Various amendments have occurred since the original enactment. The Wildlife and Countryside Act contains both habitat and species protection. Certain bird, animal and plant species are afforded protection under Schedules 1, 5 and 8 of the Act. Measures for the protection of the countryside, National Parks, Sites of Special Scientific Interest (SSSIs) are also included within the Act.

THE NATURAL ENVIRONMENT AND RURAL COMMUNITIES ACT 2006

The Natural Environment and Rural Communities (NERC) Act 2006 improved wildlife protection by amending the WCA. The main function of the NERC Act was to raise the profile of biodiversity amongst public authorities. Section 40 (S40 of the Act places a 'Biodiversity Duty' on all public bodies to have regard to the conservation of biodiversity when carrying out their normal functions.

THE PROTECTION OF BADGERS ACT 1992

The Protection of Badgers Act 1992 consolidates previous legislation (including the Badgers Acts 1973 and 1991 Badgers (Further Protection) Act 1991). It makes it a serious offence to:

- kill, injure or take a badger;
- attempt to kill, injure or take a badger; or
- to damage or interfere with a sett.

The 1992 Act defines a badger sett as "any structure or place which displays signs indicating current use by a badger".

ENVIRONMENT ACT 2021

The Environment Act 2021 received royal assent in November 2021 and introduces new environmental protection regimes. This includes the creation of the Office for Environmental Protection who will oversee the framework. The Act includes several measures which impact on the planning application process to provide measures to ensure developments result in a net gain in biodiversity. The Act includes the mandatory requirement of 10% net gain for new developments, unless listed within the exemptions, which includes householder applications, self-build and developments below the threshold of impacts. Biodiversity net gain must be evidenced with the use of the statutory metric and associated documents.