

FAO: Chris Cary
Woolley & Wallis
4-5 Hughenden Yard,
High Street,
Marlborough,
Wiltshire,
SN8 1LT

3rd November 2025

Dear Chris Cary,

Re: Proposed agricultural barns and yard at Lower Dunge Farm, BA14 6AX

This Technical Note outlines the findings of an ecological walkover survey at Lower Dunge Farm (Central Grid Reference ST 90105 54105). Proposals at the site include the construction of two agricultural buildings with associated yard.

An ecological walkover was undertaken on 19th August 2025 by Becky Morris, Senior Ecologist at Ethos Environmental Planning. The survey focused on habitats and potential for protected species within the redline with a scoping survey of the wider habitats outside of the redline boundary. Habitats within proximity to the redline include farm infrastructure, existing barns and arable land bound by hedgerow.

Trowbridge and Westbury Bat Mitigation Strategy Zones

The site falls within the 'yellow zone' within the Trowbridge and Westbury Mitigation Strategy (TWMS). The zones are based on whether development in the area could negatively impact on rare bats linked to the Bath and Bradford on Avon Special Area of Conservation (SAC).

The proposals are compliant with the TWMS through site location and sensitive design. The site has been located on arable land and the development includes a 15m buffer to the nearest hedgerow. Arable land is a habitat that offers very low value for bats and is not associated with the SAC. As such, the proposals are compliant with the requirements of the TWMS as they will ensure there is not a net loss of bat suitable habitat. A 15m buffer has been designed into the proposals to ensure compliance with the dark corridors required within the TWMS and will ensure that the offsite hedgerow will remain unchanged and for use by the local bat population. Sensitive design of the proposals include ensuring that no external lighting is proposed on the buildings, therefore avoiding any potential light spill issues on commuting and foraging bats.

As the proposals will not be impacting the SAC either directly or indirectly, further bat surveys are not considered necessary of proportionate to support the application and bats are not considered further within this technical note.

Baseline Habitats

The area for proposed agricultural barns comprises a section of arable field.

The Biodiversity Net Gain (BNG) area is a modified grassland field margin that will be utilised for tree planting only without any new infrastructure. The field margin grassland is dominated by a false oat grass with creeping thistle, which meets the criteria of modified grassland by being a species poor grassland that has occurred through natural succession on a high fertility soil. Table 1 at the end of this report outlines the condition assessment for the grassland area, which scored a *Poor Condition*.

Biodiversity Net Gain

The proposals for the site include the construction of two new agricultural barns and an associated yard to be built on existing arable land. The proposed Biodiversity Net Gain will come from the planting of rural individual trees within an existing field margin.

A total of 69 small urban trees will be planted within the retained modified grassland field margin to achieve the minimum 10% gain in habitat units.

The BNG metric shows a +10.83% gain can be shown onsite. A Biodiversity Net Gain Metric will be provided alongside this application.

Conclusions

The proposals include the construction of two new agricultural barns and an associated yard. These proposals have been designed to ensure compliance of the TWMS through good design and citing of the proposals away from habitats which could be utilised by bats, namely the nearby hedgerow. BNG compliance is demonstratable through a positive BNG metric showing a gain of over 10%.

No further recommendations for enhancement to the site are applicable given the surrounding arable land which will continue to be cultivated.

Yours sincerely,

Matthew Attrill
Principal Ecologist,
Ethos Environmental Planning



Photo 1: Site entrance and arable land



Photo 2: Arable land and existing offsite agricultural buildings



Photo 3: Grassland strip for proposed tree planting onsite



Photo 4: Grassland strip for proposed tree planting onsite.

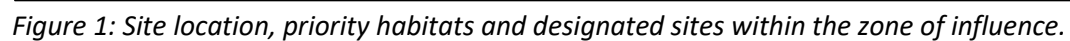




Figure 2: Existing baseline habitats onsite



Figure 3: Proposed habitats onsite

Table 1: Condition assessment for modified grassland margin

Condition Assessment Criteria	Evidence	Pass/Fail
There are 6-8 vascular plant species per m² present, including at least 2 forbs. Note - this criterion is essential for achieving Moderate or Good condition. Where the vascular plant species present are characteristic of medium, high, or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m² (excluding creeping thistle, spear thistle, curled dock broad-leaved dock, common nettle, creeping buttercup, greater plantain, white clover and cow parsley), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland, and then use the relevant condition sheet.	Grassland is dominated by false oat grass with creeping thistle frequent within the sward. This condition is failed as the average no. of species per m² is lower than 6-8 required by the condition. No forbs are present.	Fail
Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	Grassland is all the same sward height	Fail
Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. may be present). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	No scrub present within the area.	Pass
Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	Unmanaged area of grassland with no damage.	Pass
Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	Bare ground is 0% through a thatching of previously fallen grass stems.	Fail
Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	None recorded within the area	Pass
There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA).	No invasive plants recorded within area	Pass

Condition Assessment Criteria	Evidence	Pass/Fail
Condition Assessment Result	Condition Assessment Score	Achieved
<i>Passes <3 criteria or 4-6 criteria, excluding essential criterion A</i>	<i>Poor (1)</i>	Poor condition, 4 criteria passed but excluding essential criteria A
<i>Passes 4 or 5 criteria, including essential criterion A</i>	<i>Moderate (2)</i>	
<i>Passes 6 or 7 criteria, including essential criterion A</i>	<i>Good (3)</i>	

Figure 4: Headline final results from BNG metric

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	0.14
	Hedgerow units	0.00
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	10.83%
	Hedgerow units	0.00%
	Watercourse units	0.00%
Trading rules satisfied?	Yes ✓	

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Area habitat units	10.00%	1.28	1.41	0.00
Hedgerow units	10.00%	0.00	0.00	0.00
Watercourse units	10.00%	0.00	0.00	0.00

No additional area habitat units required to meet target ✓
No additional hedgerow units required to meet target ✓
No additional watercourse units required to meet target ✓