



BENGROVE LTD

Ecology-BNG-Wildlife

ECOLOGICAL IMPACT ASSESSMENT **FIRST LANE, WHITLEY**

Client: Bluesteel (Bath) Ltd

Date Issued: 31 October 2025

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SUMMARY

The purpose of this report is to identify any potentially significant ecological impacts on biodiversity as a consequence of the proposed erection of two residential dwellings and the creation of a new access track connecting them to First Lane, Whitley. Additionally, if any impacts are identified, to outline how the statutory mitigation hierarchy applies.

To understand the Site's ecological function in the wider landscape, a combination of desk-based research and field surveys were used. All areas within the proposed Red Line Boundary could be surveyed, and while the botanical survey was completed in autumn, the surveyor's expertise allowed for confident identification based on vegetative (non-flowering) characteristics.

The Site is an area of neutral grassland, principally bordered by hedges, trees, and scrub, with a ditch running from north to south where it joins the South Brook stream.

The habitats and protected species present are of local ecological importance, and in the absence of avoidance or mitigation measures, the following impacts to these features are likely to be of significance at the Site level:

- Direct loss of habitat
- Degradation of neighbouring habitats
- Disruption to protected species behaviours, by forcing them to move elsewhere for foraging and shelter habitat

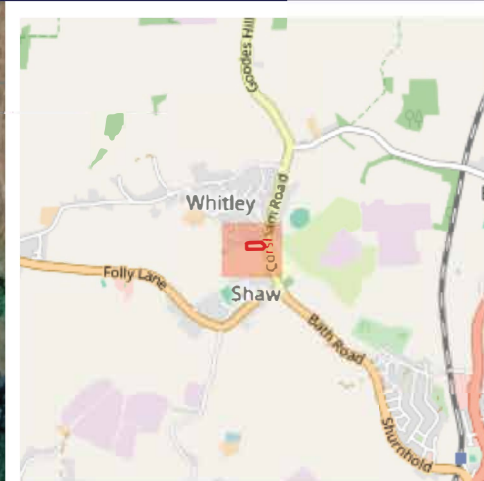
Some of these impacts can be avoided by suitable environmental working methods (e.g., concrete washout trays and no night-time working), mitigated through the enhancement of existing habitats, such as improved water quality entering the ditch, and compensated for by the creation of entirely new habitats (additional on-site trees).

1. INTRODUCTION

The key purpose of this report is to identify any potentially significant ecological impacts on biodiversity as a consequence of the proposed development, and (if there are any) to outline how the statutory mitigation hierarchy applies. The Site is an area of neutral grassland, principally bordered by hedges, trees, and scrub, with a ditch running from north to south where it joins the South Brook stream.

1.1. Scope and Purpose of the Report

- 1.1.1 Bengrove Ltd was commissioned by PlanningSphere Ltd to undertake an Ecological Impact Assessment of a parcel of land just south of First Lane, Whitley, hereafter referred to as the 'Site'. The OS grid reference for the centre of the Site is ST88686596, and the nearest postcode is SN12 8QD (see **Site Location Plan**).
- 1.1.2 The Site comprises an area of grassland, bordered with a mixture of out-grown native hedgerows, mature trees, scrub, and tall forbs. An overgrown drainage ditch runs from north to south through the centre of the field, before joining the South Brook, approximately 40m south of the Red Line Boundary. To the north and south lie the villages of Whitley and Shaw, respectively. To the west are arable fields, and to the east the B3353 (Corsham Road), with Whitley Golf Club just beyond.
- 1.1.3 A proposed residential development by Ashford Homes was previously refused on this Site (PL/2021/06922 – Outline Planning Permission, some matters reserved), this was supported by an Ecological Impact Assessment (Stark Ecology, 2020).
- 1.1.4 This purpose of this report is to:
- provide an assessment of the ecological importance of the site's habitats;
 - set out whether any protected or notable species are likely to use the site;
 - confirm whether the application will be subject to the biodiversity net gain requirement;
 - verify which ecological matters should form material considerations for the planning application;
 - identify potentially significant ecological impacts;
 - set out how the mitigation hierarchy should be applied to the project.
- 1.1.5 The report follows the approach set out in the Guidelines for Ecological Impact Assessment produced by the Chartered Institute of Ecology and Environmental Management (Version 1.3 updated September 2024).



Legend

-  Red Line Boundary
-  Land Ownership Boundary

Base Maps

Google Satellite

Project	Land South of First Lane, Whitley
Client	Bluesteel (Bath) Ltd
Title	Site Location Plan
Date	31/10/2025
Suitability	For issue
CRS	OSGB36 / British National Grid
Scale	1:1750
QGIS	3.44.2-Solothurn

2. LEGISLATION AND POLICY

Wildlife in the UK is protected through various pieces of legislation and planning policy. This forms a framework through which projects are assessed for their impacts on habitats and species and the background against which recommendations are made for the grant or refusal of planning permission. In Whitley, the creation or preservation of mixed habitats, such as grassland-scrub mosaics, wood pasture and traditional orchards are particularly encouraged.

2.1. Legislation

2.1.1 The main pieces of legislation protecting wildlife in the UK that are relevant to this project are:

- The *Conservation of Habitats and Species Regulations 2017* (as amended); and the *Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019*. These regulations cover the protection of European designated sites (the Natura 2000 Network, made up of Special Areas of Conservation and Special Protection Areas); and European Protected Species listed in Annex IV of the Habitats Directive, whose natural range includes any area in Great Britain.
- The *Wildlife and Countryside Act 1981* (as amended); the *Countryside and Rights of Way Act 2000*; and the *Natural Environment and Rural Communities Act (2006)*. Together these acts provide specific protections for a number of UK species (with some overlap with the species listed on Annex IV) and list invasive species for which there are legal provisions; nationally designated sites including Sites of Special Scientific Interest (SSSI); and set out the species of principle importance for conservation (Priority Species).
- The *Environment Act 2021, Schedule 14* which inserted *Schedule 7A* into the *Town and Country Planning Act 1990* making it mandatory for all developments (with some exceptions) to deliver at least 10% net biodiversity gain. The Acts and related regulations make it a requirement that planning applications are submitted with details of the biodiversity value of onsite habitats.

2.2. National Planning Policy Framework

2.2.1 The National Planning Policy Framework (NPPF) – last updated 7th February 2025 – sets out the government's planning policy for England. Chapter 15 sets out the policies relating to the natural environment, and the elements of particular relevance are:

-
- 2.2.2 **Paragraph 187:** Sets out that planning decisions should contribute to and enhance the natural and local environment by:
- a) Protecting and enhancing [...] sites of biodiversity [...] value (in a manner commensurate with their statutory status or identified 2quality in the development plan);
 - b) Recognising the intrinsic character and beauty of the countryside;
 - c) Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that re more resilient to current and future pressure and incorporating features which support priority or threatened species, such as swifts, bats, and hedgehogs;
- 2.2.3 **Paragraph 193:** Sets out that, when determining planning applications, local panning authorities should apply the following principles:
- a) If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative sit 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 of or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;
 - 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.

2.3. Local Plan

- 2.3.1 The relevant Local Plan is the *Wiltshire Core Strategy*, adopted in 2015. The Local Plan review is in progress (setting out plans for the period to 2038) and forthcoming policies are also acknowledged.
- 2.3.2 Stage 2 of its independent examination by the Secretary of State for Housing Communities and Local Government will begin 11th November 2025.

- 2.3.3 As of August 2025, the *Joint Melksham Neighbourhood Plan 2 (2020-2038)* is a 'made' plan that covers the ancient village of Whitley, which is mentioned in the Domesday book. Along with the nearby village of Shaw, the origin of their names relates to woods. Of historical, ecological importance, this may help inform biodiversity action for this proposal, in alignment with the Town Council's regular organised tree planting schemes¹.
- 2.3.4 Policy 7.4 of the plan allocates the Land at Whitley Farm, Whitley (roughly 450m north-west of the Site), for:
- a) redevelopment of redundant modern agricultural buildings and barns; and,
 - b) conservation and re-use of the Grade II listed Whitley Farm barn.

2.4. Local Nature Recovery Strategy

- 2.4.1 Local Nature Recovery Strategies (LNRS) have been designed to reverse biodiversity decline and restore ecological connectivity across England.
- 2.4.2 Section 40(2A) of the *Natural Environment and Rural Communities Act 2006* (duty to conserve biodiversity) and Part 6(104-108) of the *Environment Act 2021* (Local nature recovery strategies for England) outline how local authorities must create and adhere to biodiversity priorities that aim to achieve the above, within their respective areas. These priorities should then be outlined within a publicly available local habitat map, which developers and ecologists can use to inform biodiversity action.
- 2.4.3 The *Wiltshire and Swindon Local Nature Recovery Strategy* is currently under development, with full council sign-off planned for October 2025. Meanwhile, a pre-publication draft of the LNRS is available for public viewing².
- 2.4.4 To help incentivise habitat creation and restoration, LNRS-aligned projects receive a 15% uplift in biodiversity units.

¹ Joint Melksham Neighbourhood Plan (JMNP) Steering Group. Joint Melksham Neighbourhood Plan (2020-2038) [Internet]. 2025 [cited 2025 Oct 23]. Available from: https://www.wiltshire.gov.uk/media/17410/JMNP2-Referendum-Version/pdf/JMNP2_-_Referendum_Version.pdf?m=1754313251847

² Wiltshire Council, New Forest National Park, Swindon Borough Council. Local Nature Recovery Strategy for Wiltshire and Swindon [Internet]. 2025 [cited 2025 Oct 23]. Available from: https://www.wiltshire.gov.uk/media/18182/DRAFT-Local-Nature-Recovery-Strategy-for-Wiltshire-and-Swindon/pdf/DRAFT_Local_Nature_Recovery_Strategy_for_Wiltshire_and_Swindon-compressed_1.pdf?m=1759314613330

3. METHODS

To understand the Site's ecological function in the wider landscape, a combination of desk-based research and field surveys were used. All areas within the proposed Red Line Boundary could be surveyed, and while the botanical survey was completed in autumn, the surveyor's expertise allowed for confident identification based on vegetative (non-flowering) characteristics.

3.1. Desk Study

- 3.1.1 Desktop data were provided by Wiltshire and Swindon Biological Records Centre (WSBRC) on the 12th September 2025. The data search included records of protected and priority species, invasive non-native species and non-statutory designated sites within a 1km radius of the proposed development site, and within 4km for bats.
- 3.1.2 The Government's Multi-Agency Geographic Information for the Countryside (MAGIC) map was searched for great crested newt eDNA records and for records of European Protected Species Licences. This site was also used to search for European designated sites within 10km of the project; and nationally designated sites – SSSIs, National Nature Reserves (NNRs) and Local Nature Reserves (LNRs) – within 2km of the project.
- 3.1.3 MAGIC map was also used to access the Priority Habitats Inventory. This inventory provides an indication of the location and extent of Priority Habitats, but it is not a substitute for field survey and assessment - where the Inventory suggests that there may be Priority Habitats within or adjacent to the project site, they are surveyed in the field to assess them against the descriptions of the Priority Habitats and any specific qualification criteria.

3.2. Field Surveys

- 3.2.1 The Site's red line boundary cuts through the centre of the field. Consequently, the entire field and its boundaries were surveyed to accurately capture the habitats present.

Table 3-1: Summary of Field Surveys

Survey Type	Date	Surveyor
Completed as part of Stark Ecology's investigations and 2021 report		

Survey Type	Date	Surveyor
Extended Phase 1 Ecological survey	28/11/2018	Emma Heath
Otter & Water vole survey	17/05/2019	Georgie Starkie
Great crested newt pond & ditch surveys	05/2019	Georgie Starkie
Update walkover survey	11/05/2020	Georgie Starkie
<i>Completed as part of Bengrove's investigations and this report</i>		
Badger survey	18/08/2025	Craig Brakes
Pre-survey	26/09/2025	Matt Davies
Full UKHabs survey	20/10/2025	Matt Davies

3.2.2 The Site was surveyed on the 26th September 2025 by Matt Davies, who has an MSc in Vegetation Survey and Assessment and over 20 years' experience as an ecological consultant. The purpose of the survey of the survey was to get a clear understanding of the habitat features before a full UKHabs survey, and to perform a scoping assessment for protected species.

3.2.3 A full survey was then completed on the 20th October 2025, to classify the habitats according to the UK Habitat Classification Version 2.0³. Each of the Site's habitats was mapped, and a species-list compiled for each distinct area. Plant species lists were compiled for each of the main habitats, and each species assigned to an estimate of abundance according to the DOMIN scale (see **Table 1, The Domin scale**).

Table 3-2. The Domin scale (*sensu* Dahl and Hadač,

Cover/Abundance	Domin
91-100%	10
76-90%	9
51-75%	8
34-50%	7
26-33%	6
11-25%	5
4-10%	4
<4% (many individuals)	3
<4% (several individuals)	2
<4% (few individuals)	1

3.2.4 A River Condition Assessment of South Brook was not completed due to its distance from the Red Line Boundary, roughly 30m from the riparian zone.

3.2.5 The Site was also assessed for its potential to support legally protected and notable species, based upon the results of the desk study and with reference literature for the relevant species and groups:

- Amphibians (Gent and Gibson, 2003)
- Badgers (Harris et al. 1991; and Roper, 2010);
- Bats (Collins, 2023; Mitchell-Jones, 2004; and Reason, P.F. and Wray, S. 2023)

³ UKHab Ltd (2023). *UK Habitat Classification Version 2.0* (at <https://www.ukhab.org>)

- Birds (Gilbert et al. 1998; Bibby et al. 2000)
- Dormice (Bright, Morris and Mitchell-Jones, 2006)
- Terrestrial invertebrates (Drake et al. 2007; Kirby, 2001).

3.2.6 Trees were also assessed for bat roosting potential following the guidance and information in Collins et al. (2023). The trees were inspected from ground level and assigned as either PRF-I (only suitable for individuals or small numbers of bats) or PRF-M (suitable for multiple bats and may therefore be used as a maternity colony).

3.3. Impact Assessment

3.3.1 This report aims to identify those specific ecological features (habitats, species, and ecosystems) that are “important” within the meanings set out in the CIEEM guidelines. The following characteristics were used to determine importance:

- National or international conservation legislation (designated sites, biodiversity lists, action plans etc.)
- Naturalness (how free the feature is from human influence)
- Rarity (locally, nationally, and internationally)
- Population size, connectivity, and status (declining, threatened, or healthy)
- Function within the wider landscape (isolated, stepping stones, or supporting neighbouring areas)
- Diversity (the variety and relative abundance of habitats/species within a specific area or ecosystem)

3.3.2 Each feature’s importance is then contextualised at the local, county, regional, national and international geographic scales.

3.3.3 Where impacts are identified, the report sets out how they can be avoided, mitigated or compensated. These terms are defined as:

- **Avoid.** Act so potential impacts do not materialise.
- **Mitigate.** Reduce the duration, intensity and/or extent of impacts that cannot be completely avoided.
- **Compensate.** Offset any residual, adverse, or unavoidable impacts. This is the final resort after all other options have been exhausted.

3.4. Limitations

3.4.1 The South Brook (which is outside the Red Line Boundary) was inaccessible due to a large stretch of heavily outgrown brambles and scrub on the southern boundary. Aside from this, the entire Site was accessible during the survey and could be thoroughly searched for evidence of protected species.

3.4.2 Botanical surveys are best conducted in the spring and summer months (April – August), making October a sub-optimal survey period. However, the surveyor’s

experience meant species could still be confidently identified using vegetative characteristics. Estimates of relative abundance might be different if conducted at another time of year.

- 3.4.3 The western boundary of the site and adjacent land could be thoroughly searched for signs of badgers and other protected species. The private houses and gardens to the north and east were not surveyed and the identification of potential habitat for protected species relies on satellite imagery.
- 3.4.4 As noted in the Bat Conservation Trust survey guidelines, surveying trees for bat roosts is challenging because many species that roost in trees exhibit roost-switching behaviour i.e. they do not necessarily use the same roosting feature or even the same tree consistently throughout or between seasons. Rather than attempt a definitive answer on whether there are roosts in trees by conducting emergence surveys or tree climbing inspections, the approach taken here is to identify potential roosting features and assume that they may be used as roosts. The avoidance and mitigation measures set out in the report proceed from this assumption, which may over-estimate the impacts on bats but avoids a scenario where roosts are missed due to the difficulties noted and impacts are underestimated.

4. RESULTS

This section outlines the baseline results for the Site and whether the Site is important for protected species that may be found there. Where protected species may be present, the habitats are only of site-importance, but are not important within the wider area.

4.1. Designated Sites

- 4.1.1 The closest edge of the Bath and Bradford on Avon Bat Special Area of Conservation (SAC) core area impact zone lies just over 1km north-west of the Site, and the Trowbridge Westbury Bat Mitigation Strategy Sensitivity Zones just over 4km south, but the Site is not directly within any of the impact risk zones (see **Consultation Zone Plan** and **TWBMS Plan** overleaf).
- 4.1.2 Lying roughly 4km north-west of the Site, Corsham Railway Cutting SSSI is the only nationally designated site within 5km. The following nationally designated sites lie within 5-10km of the Site:
- Box Mine SSSI
 - Brown's Folly SSSI
 - Colerne Park and Monk's Wood SSSI
 - Honeybrook Farm SSSI
 - Inwood Warleigh SSSI
 - Gripwood Quarry SSSI
 - Spye Park SSSI
 - Seend Ironstone Quarry and Road Cutting SSSI
 - Seend Cleeve Quarry SSSI
- 4.1.3 There are no locally designated sites within 1km of the Site.

4.2. Habitats and Ecological Networks

- 4.2.1 The Site is within the Avon Vales National Character Area (NCA 117). The NCA is characterized by an *'undulating clay vale with a mix of arable and pasture [with] small and medium-sized fields with mostly hedgerow boundaries with few hedgerow trees'*. While close to the Cotswolds Area of Outstanding Natural Beauty (NCA 107), the Site much more closely aligns with the grassland fields of the Avon Vales.



Legend

 Red Line Boundary

 Sites of Special Scientific Interest

 5km Buffer

Designated Sites

 Trowbridge Westbury Bat Mitigation Strategy

 Impact Zones For Bat Species (Bath and Bradford on Avon Bats SAC)

Wiltshire Council Planning Explorer

 Trowbridge Westbury Bat Mitigation Strategy

 Impact Zones For Bat Species (Bath and Bradford on Avon Bats SAC)

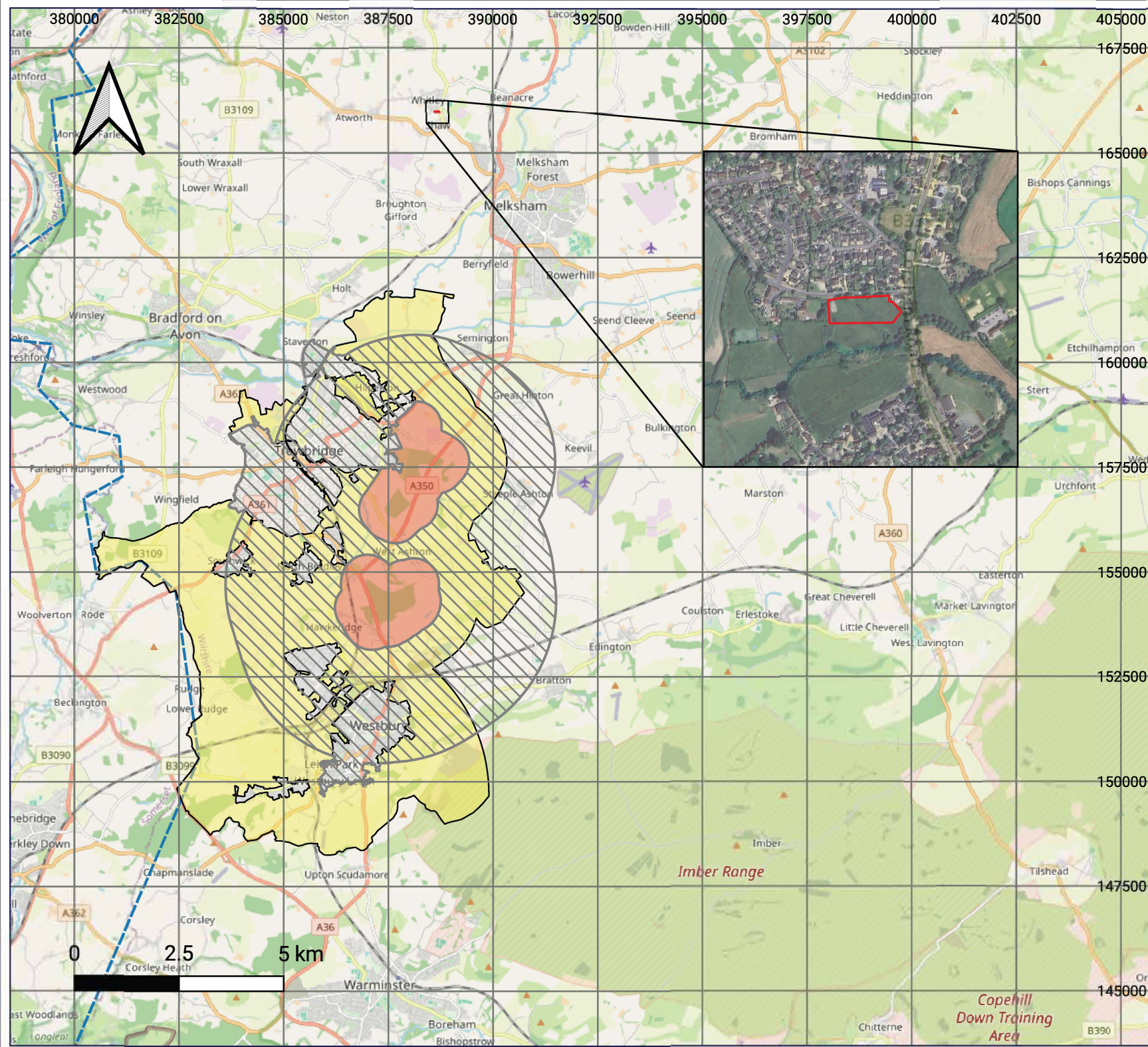
Base Maps

 Google Satellite

Project	Land South of First Lane, Whitley
Client	Bluesteel (Bath) Ltd
Title	Consultation Zone Plan
Date	05/09/2025
Suitability	For issue
CRS	OSGB36 / British National Grid
Scale	1:60000
QGIS	3.44.2-Solothurn



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Legend

 Red Line Boundary

Trowbridge Westbury Bat Mitigation Strategy - Bat Sensitivity Zones

 Grey Hatched Zone

 Red Zone

 Yellow Zone

 Wiltshire Boundary

Base Maps

OpenStreetMap

Bing Maps

Project	Land South of First Lane, Whitley
Client	Bluesteel (Bath) Ltd
Title	TWBMS Plan
Date	31/10/2025
Suitability	For issue
CRS	OSGB36 / British National Grid
Scale	1:120000
QGIS	3.44.2-Solothurn

4.2.2 There are no priority habitats or ancient woodland on or adjacent to the site, it is not within a Habitat Network (see **Habitat Networks Plan**) and does not fall within a mapped area within the draft Wiltshire and Swindon Local Nature Recovery Strategy.

4.2.3 The following habitats are also shown in the **Baseline Habitats Plan**.

4.3. Grazed pasture

UKHabs: g3c – 100, 124

4.3.1 Most of the Site comprises grazed pasture with low species-richness, with a principal abundance of Cock's-foot (*Dactylis glomerata*) and Yorkshire fog (*Holcus lanatus*), with scattered anthills throughout. Occasional herbs included Common sorrel (*Rumex acetosa*), Creeping buttercup (*Ranunculus repens*), Common vetch (*Vicia sativa*), and Canada thistle (*Cirsium arvense*). The field has two main plant communities: most of it comprises vegetation similar to MG6 grassland, whilst closer to the ditch where the soil is wetter it grades into MG9 grassland.

4.4. Bramble scrub

UKHabs: h3d – 106, 612

4.4.1 Brambles run along the recently installed wooden fence that now lines the western boundary, before continuing around and along the southern field edge where it is less managed and more overgrown. At the time of the survey, a large portion of the western area had recently been mown, notably in front of the gate into the neighbouring field.

4.5. Mixed scrub

UKHabs: h3h – 128



Figure 1. Other Neutral Grassland field, viewed facing south-west.



Figure 2. Area of unmanaged bramble scrub in front of newly installed fence.



Figure 3. Area of dwarf shrubs, bramble, and unmanaged grass.

- 4.5.1 To the south-east of the field, shortly before where the drainage ditch meets the South Brook stream, is a stand of woody shrubs oversailing unmanaged grass and brambles. Species include bullace (*Prunus insititia*), blackthorn (*Prunus spinosa*) and hawthorn (*Crataegus monogyna*).

4.6. Ditch

UKHabs: r1g – 16, 49

- 4.6.1 A drainage ditch holding a shallow depth of freshwater with heavily vegetated banks dominated by Greater willowherb (*Epilobium hirsutum*) and stinging nettles (*Urtica dioica*) runs through the centre of the Site and flows into the South Brook. In the section dominated by Greater Willowherb there are no aquatic or water-margin plants. In the section that flows beneath the dense scrub there are plants of Pendulous Sedge (*Carex pendula*) on the banks.



Figure 4. View of the ditch looking north with pendulous sedge in shaded areas.

4.7. Native, species-poor hedgerows with trees

UKHabs: h2a6 – 11, 16, 50, 128

- 4.7.1 Native hedgerows with trees run along the northern and southern boundaries of the field, with tall forbs along the northern stretch of the red line boundary where the field margin has been left to grow.
- 4.7.2 The previous survey by Stark Ecology in November 2018 identified a dry ditch running along the northern boundary. This is presumed to remain, albeit now overgrown by the forbs and sward in this area.



Figure 5. Northern hedgerow with trees and tall ground vegetation.

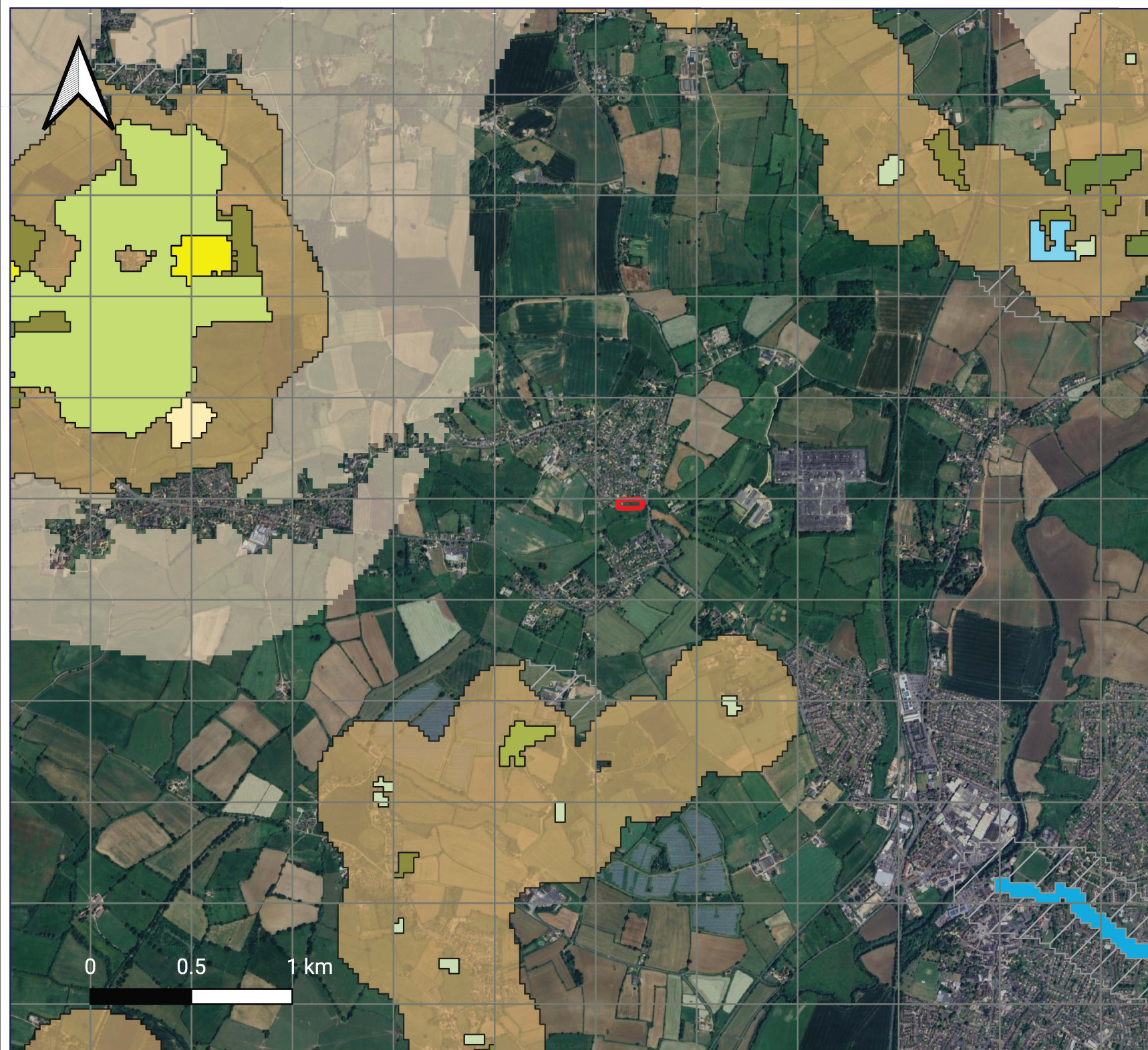
4.8. Derelict outbuilding

UKHabs: u1 – 82, 825, 833

- 4.8.1 The outbuilding previously shown to be in disrepair (Stark Ecology, 2021) remains, but the roof is now completely gone and the



Figure 6. Derelict outbuilding in neighbouring field, next to western fence.



Legend

 Red Line Boundary

Habitat Networks

-  Ancient woodland
-  Habitat Restoration-Creation
-  Lakes
-  Lowland meadows
-  Network Enhancement Zone 1
-  Network Enhancement Zone 2
-  Network Expansion Zone
-  PHI_Other
-  Restorable Habitat
-  Rivers
-  Traditional orchard
-  Wood pasture and parkland

Base Maps

Google Satellite

Project	Land South of First Lane, Whitley
Client	Bluesteel (Bath) Ltd
Title	Habitat Networks Plan
Date	05/09/2025
Suitability	For issue
CRS	OSGB36 / British National Grid
Scale	1:25000
QGIS	3.44.2-Solothurn



Legend

-  Red Line Boundary
-  Land Ownership Boundary

INDIVIDUAL TREES

-  Existing Large Urban Tree
-  Existing Medium Urban Tree

HEDGEROWS

-  Native hedgerow
-  Native hedgerow with trees

WATERCOURSES

-  Ditches
-  Other rivers and streams

HABITATS

-  Bramble scrub
-  Mixed scrub
-  Other neutral grassland
-  Tall forbs
-  Combined OS & EA Waterbodies

BASE MAPS

Bing Maps

Project	Land South of First Lane, Whitley
Client	Bluesteel (Bath) Ltd
Title	Baseline Habitats Plan
Date	31/10/2025
Suitability	For issue
CRS	OSGB36 / British National Grid
Scale	1:1187
QGIS	3.44.2-Solothurn

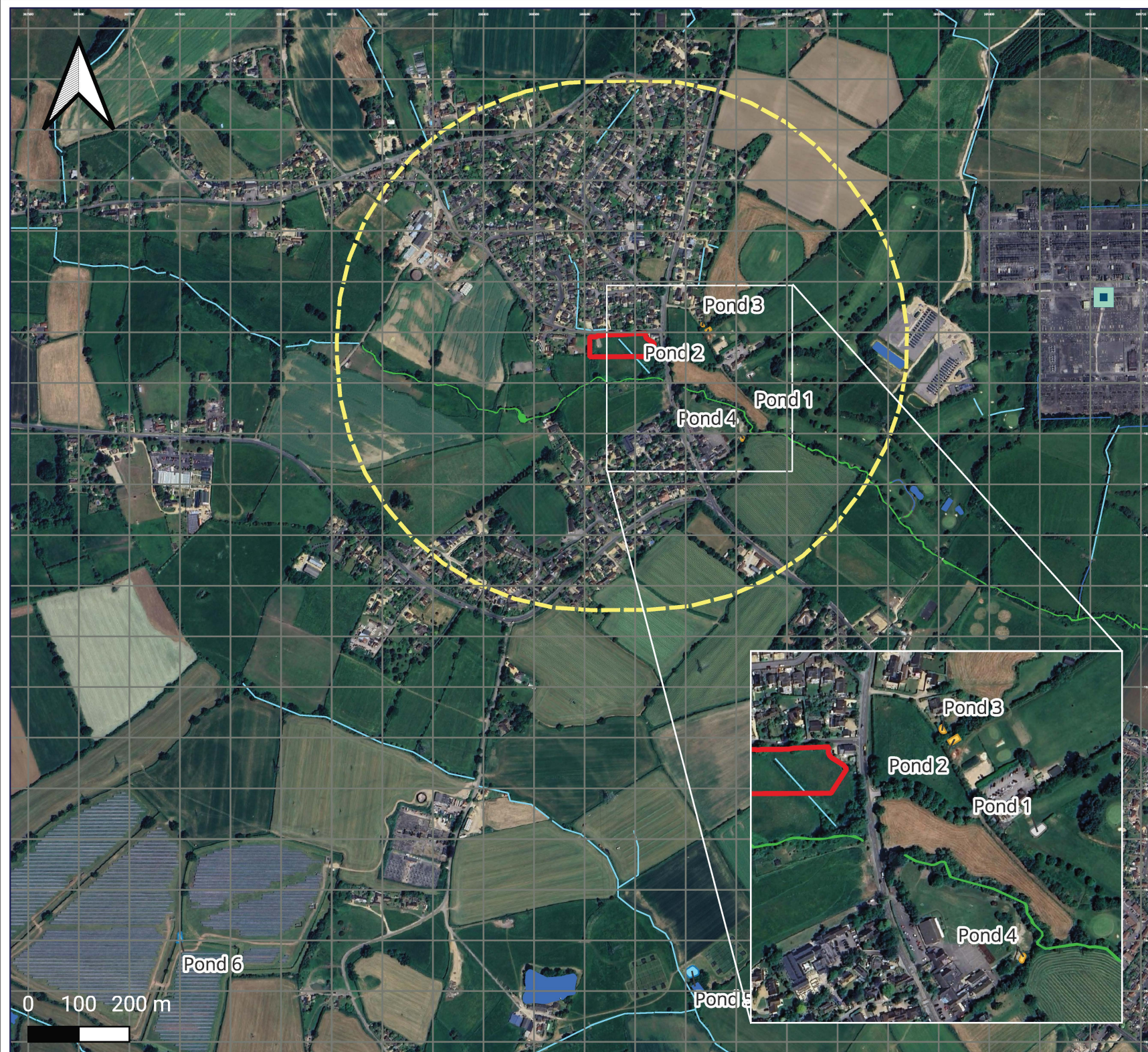
western boundary has been cleared of a large portion of the scrub vegetation.

4.9. Amphibians

- 4.9.1 The WSBRC data search contained two records of Common frog (*Rana temporaria*), three of Common toad (*Bufo bufo*), and three of Great crested newts (*Triturus cristatus*) within 1km of the Site (2015-2023).
- 4.9.2 There are three granted Great crested newt EPSL applications on MAGIC within 1km of the Site (2017-28124-EPS-MIT, MIT-1, and MIT-2). As shown on the **Pond Plan**, there are four ponds within 500m of the Site, with previous surveys by Stark Ecology (2021) deeming they were of poor suitability for this species. The eDNA survey of the Whitley Golf Course pond (Pond 1, 2017-2019) produced inconclusive results. However, Great crested newts were confirmed present in two ponds within 2km of the Site (Ponds 5 & 6), meaning they are present in the wider area.
- 4.9.3 An eastern portion of the Site falls within a Core Area on the Great Crested Newt Strategic Opportunity Areas mapping. However, this species is known for avoiding fast-flowing water, so while the Site is not separated from these ponds by the South Brook, it is split by Corsham road. Furthermore, the shallow depth and slow-running water of the on-site drainage ditch makes it unsuitable for amphibians to breed and lay their eggs. However, during the terrestrial phase of their lifecycle (adulthood), all amphibians could use the boundary hedges, scrub, and taller sward for foraging and commuting across the landscape.
- 4.9.4 It is likely the Site may occasionally be used by amphibians as they move across the wider landscape, but that it does not provide vital habitat.

4.10. Badgers

- 4.10.1 There are six records of badgers (*Meles meles*) within the 1km search area, and while the site is predominantly flat, the ditch banks, hedges and scrub provide good foraging and sett-building habitat for badgers.
- 4.10.2 While the outlier sett mentioned in the Stark Ecology report (2021, Appendix 1, TN8) was not observed on site in 2025, this is probably due to this previously scrubby, western boundary being cleared and a fence erected in its place. However, badger signs were observed in the area in 2025, notably mammal runs stretching between the southern corners of the field, a bundle of badger hair, and a single snuffle hole (see below).



Legend

- 500m Buffer
- Red Line Boundary

GCN Pond Surveys (2017-2019)

- Inconclusive
- Present
- All other values
- European Protected Species Licences

EA Waterbody Condition (2022)

- Good

OS OpenMap - Local (April 2025)

- ST_SurfaceWater_Area
- ST_SurfaceWater_Line

Base Maps

Google Satellite

Project	Land South of First Lane, Whitley
Client	Bluesteel (Bath) Ltd
Title	Pond Plan
Date	08/09/2025
Suitability	For issue
CRS	OSGB36 / British National Grid
Scale	1:10000
QGIS	3.44.2-Solothurn



Figure 7. Badger signs found to the south of the Site.

- 4.10.3 Its proximity to South Brook may also reduce the sett-building opportunities as badgers will want to avoid a flooded sett. Considering the above and the history of activity, it is reasonable to conclude that badgers use the area for foraging, but that the Site is only a small proportion of what is available in the area.

4.11. Bats

- 4.11.1 The WSBRC data search supplied confirmed records for 11 hibernacula, 15 maternity roosts, 270 roosts, and 369 verified, incidental records (i.e., not roosts) within 4km of the Site, associated with 14 of the 18 resident UK bats:

Table 4-1. Counts of bat records per species and roost type (1984-2024). Highest counts are in bold.

Species	Hibernacula	Maternity roosts	Roosts	Incidental
Lesser horseshoe (<i>Rhinolophus hipposideros</i>)	5	2	25	19
Brown long-eared (<i>Plecotus auritus</i>)	2	2	15	10
Daubenton's (<i>Myotis daubentonii</i>)	2	-	2	11
Natterer's (<i>Myotis nattereri</i>)	1	1	6	4
Whiskered (<i>Myotis mystacinus</i>)	1	-	3	2
Common pipistrelle (<i>Pipistrellus pipistrellus</i>)	-	1	18	92
Greater horseshoe (<i>Rhinolophus ferrumequinum</i>)	-	1	14	13
Soprano pipistrelle (<i>Pipistrellus pygmaeus</i>)	-	3	127	54
Noctule (<i>Nyctalus noctula</i>)	-	-	1	61
Serotine (<i>Eptesicus serotinus</i>)	-	-	3	32
Barbastelle (<i>Barbastella barbastellus</i>)	-	-	-	2
Brandt's (<i>Myotis brandtii</i>)	-	-	-	1
Leisler's (<i>Nyctalus leisleri</i>)	-	-	-	2
Nathusius' pipistrelle (<i>Pipistrellus nathusii</i>)	-	-	-	6
<i>Records where the species or genus could not be identified</i>				
Pipistrelle (<i>Pipistrellus</i>)	-	5	41	21
Long-eared (<i>Plecotus</i>)	-	-	4	7
Myotis (<i>Myotis</i>)	-	-	-	22
Nyctalus (<i>Nyctalus</i>)	-	-	-	1
Bat (<i>Chiroptera</i>)	-	-	11	9

-
- 4.11.2 The table above represents the total number of times a particular species was listed (which can help inform how a particular species is using the area), not the absolute abundance of that species. For example, one of the Lesser horseshoe (*Rhinolophus hipposideros*) maternity roost records refers to a population of 24 adults, and one of the Soprano pipistrelle (*Pipistrellus pygmaeus*) records to a population of 407 bats in general.
- 4.11.3 All the recorded species currently have the “Least Concern” category on the IUCN Red List, but population numbers for both the Lesser and Greater horseshoe bats (*Rhinolophus*) are decreasing. There is also the remote possibility that one or more of the unconfirmed, incidental Long-eared bat (*Plecotus*) records could be from a “Near Threatened” Grey long-eared bat (*Plecotus austriacus*). However, the Site is not within their known distribution.
- 4.11.4 While there are a relatively high number of Lesser horseshoe (*Rhinolophus hipposideros*) hibernacula within 4km, this species typically likes to roost by hanging upside down in caves, mines, tunnels, cellars, or roof cavities. There are no such suitable structures on the Site.
- 4.11.5 The previously identified semi-mature ash trees and mature horse chestnut (Stark Ecology, 2021) remain along the northern boundary of the Site, and the ivy coverings persist, offering shelter for individual or small numbers of bats that use this habitat, such as pipistrelles, referred to as PRF-I in Collins, J. (ed.) 2023.
- 4.11.6 The derelict outbuilding on the western boundary remains in disrepair and the scrub that previously covered it has been cut back. It remains of Negligible suitability for roosting bats.
- 4.11.7 The grazed pasture and scrub provide moderate suitability for foraging bats as they will support insect populations, while the South Brook and vegetated banks provide moderately suitable flight-paths to more foraging habitat in neighbouring fields and the Whitley Golf Course to the east. At the same time, the B3353 (Corsham Road) runs along the eastern boundary, and the site sits between Whitley to the north and Shaw to the south – which are separated by just over 200 metres. Consequently, its proximity to nearby settlements (albeit rural) will mean the Site will likely be subject to some light and noise pollution, as well as dog walkers and general human disturbance. While on-site habitats are continuous, their functional connection to the wider landscape will be restricted for some species.
- 4.11.8 Given the above, especially for light-averse species like Lesser horseshoe bats, the Site is not likely to be vital for the favourable conservation status of local bat populations.
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4.12. Birds

4.12.1 In total, 51 records of birds were returned in the 1km data search, 4 of which were Schedule 1 species, and 6 listed in the Birds of Conservation Concern 5 (BoCC5).

Table 4-2. Counts of bird records within 1km, alongside legal protection and conservation status.

Species	No. Records	Schedule 1	Birds of Conservation Concern 5
Kingfisher (<i>Alcedo atthis</i>)	8	Yes	Unlisted
Red kite (<i>Milvus milvus</i>)	4	Yes	Unlisted
Barn owl (<i>Tyto alba</i>)	2	Yes	Unlisted
Peregrine (<i>Falco peregrinus</i>)	1	Yes	Unlisted
Swift (<i>Apus apus</i>)	8	No	Red
Mistle thrush (<i>Turdus viscivorus</i>)	2	No	Red
Grey partridge (<i>Perdix perdix</i>)	1	No	Red
Tawny owl (<i>Strix aluco</i>)	17	No	Amber
Sparrowhawk (<i>Accipiter nisus</i>)	1	No	Amber
Woodpigeon (<i>Columba palumbus</i>)	1	No	Amber
Grey heron (<i>Ardea cinerea</i>)	3	No	Unlisted
Little egret (<i>Egretta garzetta</i>)	2	No	Unlisted

4.12.2 The Schedule 1 species recorded in the data search are species that will use farmland, grassland, and wetland habitats. As such, the Site offers foraging and nesting opportunities for at least three out of the four Schedule 1 species listed; there were no nesting opportunities for barn owls – while trees do border the site, they do not have cavities large enough for this purpose.

4.12.3 In relation to the other species of conservation concern in the data search:

- **Grey partridge:** the grassland is too short for suitable nests, and none were observed on the surveys.
- **Mistle thrush** can be widely observed in the winter, spring, and summer. The trees offer suitable nesting and foraging habitat. None were observed on the surveys.
- **Swift's** would historically have nested in holes in large trees, cliffs and crevices. As a summer visitor, they will have likely migrated by the time of the Site

surveys, so could not reliably be observed. They may forage for insects over the Site during the summer months but there is nowhere for them to nest on Site.

- All of the **amber list species** above generally prefer woodland habitat, followed by scrub or urban environments. They can be observed all year round, but were not recorded on the Site surveys (although tawny owls are harder to record during day-time visits). Nesting and foraging habitat is suitable, but sub-optimal.

4.12.4 Overall, the Site could provide foraging habitat and nesting opportunities for a diverse assemblage of nesting and foraging species beyond those listed above. However, as the Site represents a small proportion of the available habitat in the wider landscape – combined with the development’s distance from the South Brook – it is not considered vital for protected bird species, or those of conservation concern.

4.13. Hazel Dormouse

4.13.1 The bramble and hawthorn scrub around the site offers limited foraging opportunities, and possible commuting corridors to nearby hedgerows, but the paucity of woodland within 1km – combined with zero species records in the WSBRC data search – means there is less than a remote possibility that dormice are present on Site. Consequently, they are not considered further in this report.

4.14. Other Mammals

4.14.1 The desk study results provided records for four other mammal species within 1km of the Site.

Table 4-3. Record counts of other terrestrial mammal species found within 1km.

Species	No. Records	Legal Protection
Hedgehog (<i>Erinaceus europaeus</i>)	25	Protected under the Wildlife and Countryside Act, 1981, it is a BAP species vulnerable to extinction.
Rabbit (<i>Oryctolagus cuniculus</i>)	2	Protected from unnecessary suffering by the Animal Welfare Act 2006, they are otherwise unprotected and common.
Brown hare (<i>Lepus europaeus</i>)	1	A game species with minimal protection. Is a BAP species due to declining population numbers.
Harvest mouse (<i>Micromys minutus</i>)	1	Protected from deliberate cruelty under the Wild Mammals Protection Act. It is a BAP, near-threatened species in GB.

4.14.2 While the pasture and scrub habitats on Site offer foraging opportunities and shelter for the above species, it represents a small proportion of the same habitat in the wider area, so is not considered vital for them.

4.15. Otters

- 4.15.1 The WSBRC data search returned two otter records (2021 & 2023) within 1km of the Site, but no otter signs (couches, holts, or spraint) were observed during the Site surveys.
- 4.15.2 Otters could use the on-site ditch to travel to and from South Brook, which subsequently meanders to its confluence with the River Avon. This commuting route means otters may occasionally be present on site, but the narrowness of the ditch, limited food supply and habitats (amphibians and fish may be present, but the grassland is short and there are only small areas of scrub), combined with the innate territoriality of this species means numbers are likely to be low if they are present at all. There are more suitable habitats in the wider landscape.

4.16. Water Voles

- 4.16.1 There are three records of Water voles (*Arvicola amphibius*) within the 1km search area (2000-2020), including one sighting in the South Brook, Melksham, but no signs (droppings, drummed latrines, or feeding stations) were observed during the Site surveys. The density of vegetation both over the ditch and where the field boundary meets the South Brook prevented close inspection.
- 4.16.2 The dense vegetation over the ditch would provide shelter for Water vole burrows and the connection to the South Brook would allow movement to the wider landscape. Given the recent records and previous evidence of an old mammal burrow (Stark Ecology, 2021), it is possible that Water voles would use the Site. However, the lack of signs, shallow water, and poor food supply (short grasses exposed to predators) means the Site is unlikely to be vital for a local Water vole population.

4.17. Reptiles

- 4.17.1 The WSBRC data search returned two records of Common lizards (*Zootoca vivipara*), three records of Grass snakes (*Naatrix Helvetica*), and two records of Slow-worms (*Anguis fragilis*). Four of these seven records are dated 2010 or older.
- 4.17.2 The scrub and tall grasses at the field boundaries offer suitable foraging resources and shelter for all common UK reptile species, while the main field is poor habitat for them. The remaining derelict building could offer temporary shelter, but the loss of dense scrub in its vicinity will diminish its suitability.
- 4.17.3 The southern boundary adjacent to South Brook (outside of the Red Line Boundary) offers the best habitat for any reptiles that may be using the land. The pile of rubble on the western boundary offers sub-optimal, temporary basking opportunities due to the recent cutting of dense scrub in the area, and the northern and eastern boundaries adjoin roads. As such, the Site could be used

incidentally by more widespread species, but is unlikely to support Common lizards.

5. IMPACT ASSESSMENT

This section outlines those ecological features (habitats and species) that might be affected by the project. The main potential impacts (in the absence of any avoidance, mitigation or compensation) are direct habitat loss and pollution of the ditch and South Brook.

5.1. Project Description

- 5.1.1 The proposed development is for the erection of two residential dwellings, with a new access track connecting to First Lane, Whitley. Landscape drawings include tree planting and the creation of a bioswale that feeds into the existing ditch.

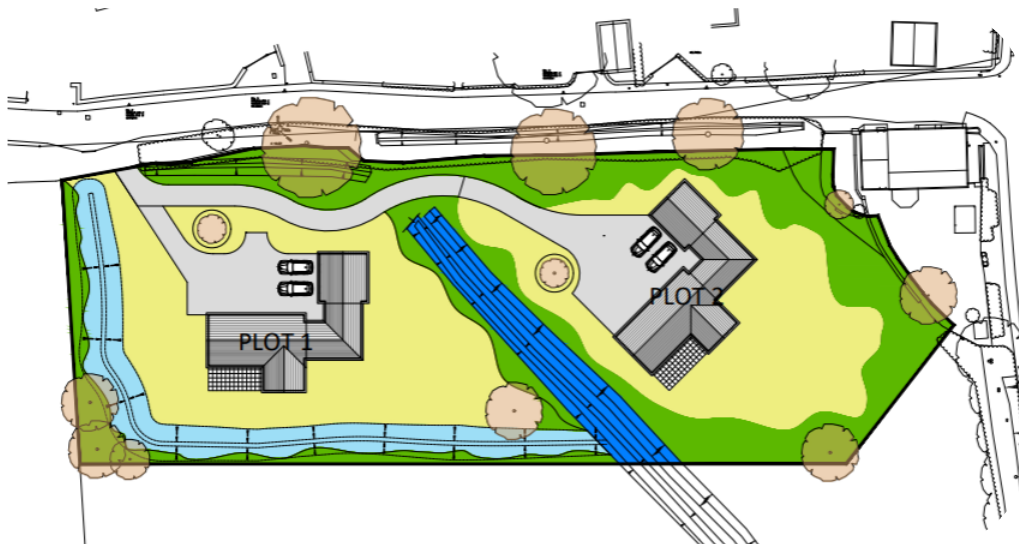


Figure 8. Illustrative masterplan of proposed development.

5.2. Designated Sites

- 5.2.1 The site of the proposed development is not within or adjacent to any statutory sites designated for wildlife features, and it is not functionally linked to any such sites. The development would not therefore have any effects on European, nationally or locally designated sites. There would be no impact on any designated sites and there is no requirement for any avoidance, mitigation or compensation measures.

5.3. Habitats and Ecological Networks

- 5.3.1 The layout of the proposed development would have the following impacts on habitats:

- **Direct Habitat Loss.** Loss of grazed pasture that is used by some protected species, but is not a Priority Habitat and which is very common in the surrounding landscape and beyond. Brambles would also be lost on the western boundary, which – while not a Priority Habitat – provide shelter, nesting sites, and foraging habitat. In the absence of any avoidance or mitigation measures, this would not be ecologically significant beyond the Site level.
- **Degradation through Pollution.** Pollutants released during construction (such as concrete washout and silt) could flow into the soil and ditch, and thereby into the South Brook. In the absence of any avoidance or mitigation measures, this could be significant at the County level.

5.4. Amphibians

- 5.4.1 The proposed development requires the removal of bramble habitat that is suitable for amphibians, however none of this is within 500m of a confirmed breeding pond. The risk of Great crested newts being affected is therefore very low. In the absence of avoidance or mitigation, it is possible that individuals of the more common amphibian species could be killed or injured during vegetation clearance. This would be significant at the Site level.

5.5. Badgers

- 5.5.1 Although badgers use the Site, the evidence indicates they are using areas outside of the development's Red Line Boundary, and there are no setts within 30m of the development. It is possible they will forage amongst the fields and northern hedge, or commute through the Site. In the absence of any avoidance or mitigation measures badgers could be injured during the construction stage. As a widespread species, this would be significant at the Site level at most.

5.6. Bats

- 5.6.1 The potential impacts of the development on bats can be broken down as follows:
- Removal of foraging habitat and consequent impacts on habitat connectivity
 - Light, noise, and visual disturbance of foraging and commuting habitat
- 5.6.2 It is unlikely that Horseshoe bat species use the Site more than incidentally, and those trees with PRF-I roosting features present on site are being retained.
- 5.6.3 In the absence of any avoidance or mitigation, the loss of widespread scrub and grassland (foraging habitat), and disturbance to individuals foraging and commuting in and around the trees, hedgerow, and ditch, is unlikely to be significant beyond the Site level.

5.7. Birds

- 5.7.1 The grazed pasture is too short for ground nesting birds, and the brambles on the western boundary are managed. If these are left to develop and works completed during the nesting season, it is possible nesting birds would be disturbed or their nests destroyed. The removal of this area is a small proportion of the total available scrub on Site. This could affect common species, but some less common or declining species such as wrens, house sparrows, starlings etc. could also be affected.
- 5.7.2 The loss of the open fields would reduce the amount of foraging habitat for species such as swallows and swifts. Proportionally to the local area, which is a rural landscape of farmed fields and woodlands, this loss is not of a large scale, and the impact would be at the Site level.

5.8. Terrestrial Mammals

- 5.8.1 In the absence of any avoidance or mitigation measures there is a sufficiently low risk of an adverse effect that it would be appropriate to carry out the work under a Precautionary Working Method.
- 5.8.2 The loss of foraging habitat and prey insects they feed on will be significant at the Site level, but not beyond.

5.9. Otters & Water Voles

- 5.9.1 In the absence of avoidance or mitigation measures, the development could result in pollution and degradation of the ditch and connected South Brook, thereby negatively affecting possible sheltering habitat for Water voles. The development-edge is close enough to the ditch that if there were any Water vole burrows, they could be disturbed by noise and vibrations during construction works.
- 5.9.2 As there are no signs that either species use the Site, the risk of any negative impact is low. In the absence of measures to avoid or mitigate the potential for disturbance and predation it is possible that otters or water voles that use the Site, but which were not seen during the surveys, or any animals that might otherwise colonise or use the site in future, could be negatively impacted.

5.10. Reptiles

- 5.10.1 The likelihood of Slow-worms or Grass snakes being present in the scrub set to be removed is relatively low, considering the extent of habitat removal and the Site's relative isolation from the surrounding landscape to the north, east, and west.

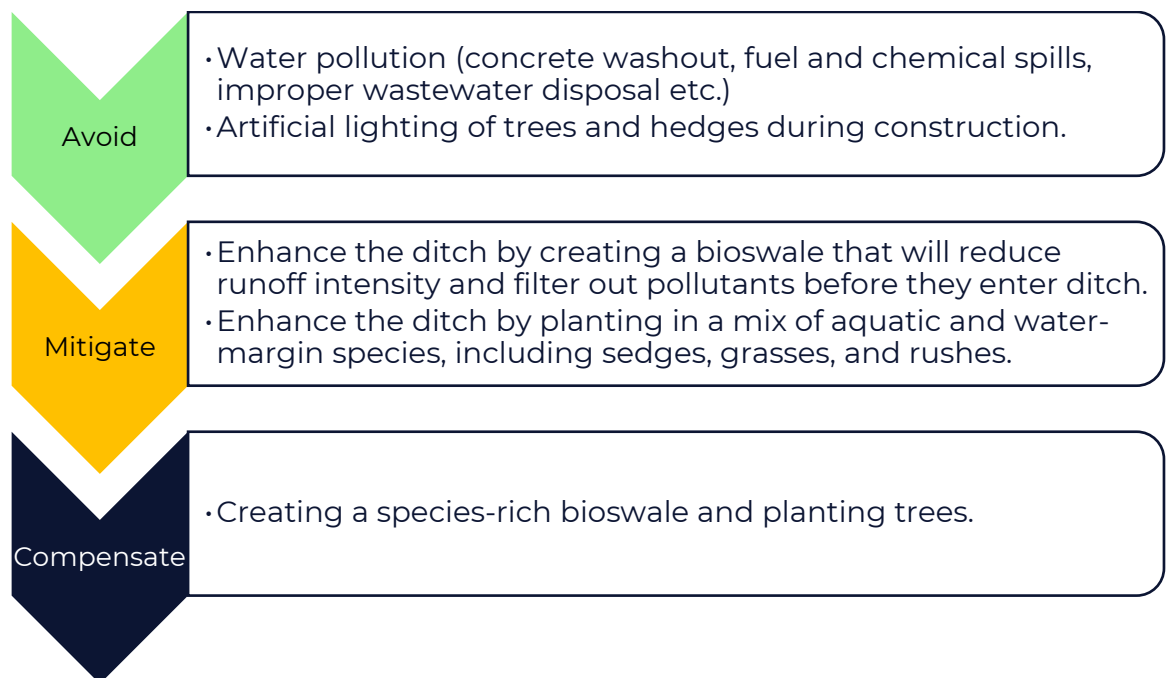
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- 5.10.2 As with other wildlife, the presence of domestic cats and dogs increases the risk of predation and introduces an additional source of potential disturbance and reduced habitat suitability.

6. AVOIDANCE, MITIGATION, AND COMPENSATION

The primary requirement of this project is to avoid polluting the ditch and South Brook waterway through construction runoff, and to mitigate the loss of on-site habitats through the creation of a bioswale, tree-planting, and by improving the ecology of the ditch.

6.1. The Mitigation Hierarchy

The potential impacts of the project can be avoided, mitigated or compensated as set out below.



7. CONCLUSIONS

7.1.1 The Site supports habitats and protected species of local ecological importance. In the absence of avoidance or mitigation measures, the following impacts to these features are likely to be of significance at the Site level:

- Direct loss of habitat
- Degradation of neighbouring habitats
- Disruption to protected species behaviours, by forcing them to move elsewhere for foraging and shelter habitat

7.1.2 Some of these impacts can be avoided by suitable environmental working methods (e.g., concrete washout trays and no night-time working), mitigated through the enhancement of existing habitats (the ditch), and compensated by the creation of entirely habitats (additional on-site trees).



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