



PEA Report Template

Preliminary Ecological Appraisal Report

Cereal Partners UK

Staverton, Trowbridge, Wiltshire, BA14 6PG

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Basis of Report

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Executive Summary

In June 2025, SLR Consulting Limited (SLR) was commissioned by Cereal Partners UK CPUK to undertake a Preliminary Ecological Assessment (PEA) on an area of land located at CPUK's existing facility at Staverton, located at Trowbridge, BA14 6PG, hereafter 'the Site'.

The development is for the construction of a new factory building with CPUK's existing facility at Staverton.

A UK Habitat Classification (UKHab) survey, protected species scoping survey, badger survey, daytime bat walkover (DBW), ground level tree assessment (GLTA) for potential (bat) roosts features (PRFs), an external preliminary roost assessment (PRA) of buildings PRFs and a desk study was undertaken in August 2025.

The Site comprised hardstanding, buildings, gravel, scrub, other neutral grassland, hedgerow and woodland.

Based on the protected species scoping survey and UKHab survey undertaken it is considered that no major ecological constraints are present which would preclude the Site's development.

If the removal of the tree and scrub are to occur within March to August inclusive, nesting bird surveys will be required when the works are due to be completed.

A lighting scheme including plans to demonstrate that there is no spill of lighting onto surrounding habitat may be required if there are to be changes to the existing external lighting design.

Based on the baseline assessment presented in this report, no further ecological surveys are recommended to support and inform the planning application.



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Acronyms and Abbreviations

A/MCIEEM	Associate/Full Member of Chartered institute of Ecologists and Environmental Managers
BAP	Biodiversity Action Plan
BNG	Biodiversity Net Gain
CIEEM	Chartered institute of Ecologists and Environmental Managers
CSLR	Class Survey Licence Returns
DBLB	Dashed Blue Line Boundary
DBW	Daytime Bat Walkover
ECOW	Ecological Clerk of Works
EPS	European Protected Species
EPSL	European Protected Species Licence
EPSML	European Protected Species Mitigation Licence
GCN	Great Crested Newt
GLTA	Ground-Level Tree Assessment
INNS	Invasive Non-Native Species
IUCN	International Union for Conservation of Nature
LDP	Local Development Plan
LPA	Local Planning Authority
MAGIC	Multi-Agency Geographic Information for the Countryside
NE	Natural England
NERC	Natural Environment and Rural Communities Act 2006 (as amended)
OS	Ordnance Survey
PEA	Preliminary Ecological Appraisal
PEAR	Preliminary Ecological Appraisal Report
PRA	Preliminary Roost Assessment
PRF	Potential Roosting Feature
RLB	Red Line Boundary
SAC	Special Area of Conservation
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
UKHab	UK Habitat Classification
SNCI	Site of Nature Conservation Interest
WCA	Wildlife and Countryside Act 1981 (as amended)
WSBRC	Wiltshire & Swindon Biological Records Centre



1.0 Introduction

In July 2025 SLR Consulting was commissioned by Cereal Partners UK (CPUK) Staverton to complete Preliminary Ecological Appraisal (PEA) on an area of land located at CPUK's existing facility at Staverton (hereafter referred to as the 'Site'), located at Trowbridge, BA14 6PG. This report presents the findings of the PEA of the Site.

1.1 Site Description

The area within the Site's red line boundary (RLB) is approximately 1.4ha, shown in **Appendix A**. The ordnance survey (OS) National Grid Reference (NGR) for the Site is ST 85859 60963.

The Site comprises vehicle parking facilities, further hardstanding for vehicle movements, the cereal factory building, gravel areas, mowed grassland, a 'butterfly area' with mown paths, and a strip of woodland along the north-eastern edge.

The northern boundary of the Site is bordered by woodland and the river Avon; the southeast boundary is bordered by a railway line and the southwest is bordered by a grass field. The surrounding area mostly comprises of agricultural fields. There is a small woodland further west and the closest large urban developments are Staverton and Trowbridge to the south.

1.2 Details of the Proposed Development

The proposals involve the construction of a new factory building within CPUK's existing facility at Staverton. This is planned on the eastern side of the Site which is reflected by the RLB seen in **Appendix A**. The development area is predominately within existing hardstand but may affect a small area (0.04ha) of grassland and one tree.

1.3 Purpose of this Report

This report presents the findings of the Preliminary Ecological Appraisal. The report seeks to:

- establish baseline conditions and determine the importance of ecological features present (or those that could be present), as far as is possible;
- to identify potential ecological constraints to the proposed development and make initial recommendations to avoid potentially significant effects on important ecological features, where possible;
- to identify potential requirements for mitigation, where possible, including mitigation measures that will be required and those that may be required (depending on results of further surveys or final scheme design);
- to establish any requirements for more detailed surveys; and
- to identify opportunities for biodiversity enhancements as part of the project.

1.4 Evidence of Technical Competence and Experience

The field survey was undertaken by Lis Weidt, BSc. Lis is an associate ecologist with ten years' experience working in ecology within environmental consultancies. Lis is a full member of the Chartered Institute of Ecology & Environmental Management (MCIEEM).

This report has been authored by Bethany Thickitt, BSc, a project ecologist with over two years of experience, and a qualifying member of CIEEM. The desk study was undertaken by



Rea Yellowlees BSc, MSc a project ecologist with over three years' experience, and a qualifying member of CIEEM.

The report was reviewed by Lis Weidt and quality assured by Stephanie Boocock. Steph has over twenty years' experience in environment-based roles and is a Chartered Environmentalist and Full Member of the Chartered Institute of Ecology and Environmental Management (MCIEEM). Steph has led on large scale development projects delivering Ecological Impacts Assessments, Appropriate Assessments (in UK and Ireland) and developing mitigation strategies for a range of EPS, including obtaining licences for bats.

1.5 Relevant Legislation and Policy

The key wildlife legislation underpinning the conservation of habitats and species and National planning policies are presented in **Appendix B**. The Local planning policy is presented below. The current policy is the "Wiltshire Core Strategy 2015"¹ however, a new policy "The Wiltshire Local Plan – Planning for Trowbridge September 2023"² is intended to be adopted in the third quarter of 2025.

1.5.1 Local Development Plan (LDP): Wiltshire Core Strategy 2015

Core Policy 50: Biodiversity and Geodiversity 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 resource, and secure the integrity of local ecological networks and provision of ecosystem services.

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

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

Biodiversity enhancement

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

¹ https://www.wiltshire.gov.uk/media/372/Wiltshire-Core-Strategy-adopted-2015/pdf/Wiltshire_Core_Strategy_2015.pdf?m=1735555642237 (Accessed: 26th August 2025)

² [Planning for Trowbridge September2023.pdf](#) (Accessed: 26th August 2025)



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:

- cannot reasonably be avoided
- are reduced as far as possible
- are outweighed by other planning considerations in the public interest
- 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 Methodology

2.1 Baseline Data Collection

2.1.1 Desk Study

The desk study involved the collation and review of contextual information such as designated sites and past records of protected and priority species occurring within the potential zone of influence.

An ecological data search was received in August 2025 from the Wiltshire & Swindon Biological Records Centre (WSBRC).

An internet-based desk study was also undertaken, using Multi-Agency Geographic Information for the Countryside (MAGIC) websites. The website provided information on habitats and species of principal importance for conservation in England.

A summary of the information and search areas obtained is outlined in **Table 2-1** below.

Table 2-1 Desk Study Data Sources

Data	Search Area
Species	
Protected and notable species	2km ¹
Protected species mitigation licence applications	4km ² (Bats) 2km ² (GCN)
S41 species	2km ²
Habitats	
S41 Habitats	1km ²
Ancient Woodland	2km ²
Sites	
Statutory protected sites (Sites of Special Scientific Interest – impact zones)	Within the site
Non-statutory protected sites (e.g. LWS, SNCI, SINC)	2km ¹
National statutory protected sites	5km ²
International statutory protected sites	10km ²
1= Wiltshire & Swindon Biological Records Centre. Received August 2025. 2= MAGIC ³ August 2025	

In the light of the scope of the project, the search areas are sufficient to cover the potential zone of influence of the project in relation to designated sites, habitats and species. Biological records that are older than 10 years have been excluded.

A desk-based scoping exercise was undertaken using OS maps and aerial imagery to locate any waterbodies within 500m of the Site that could potentially support great crested newts (GCN) *Triturus cristatus*. The parameter is based on best practice (English Nature, 2001), which advise that ponds up to 500m away from a development centred on those ponds could be affected by changes to a site. It should be noted that 500m is the upper, precautionary distance covering the maximum ranging possible for GCN; normal home ranges of GCN

³ [MAGIC - Map Page new URL](#) (Accessed 4th September 2025)



excluding unusual migratory or exploratory movements typically cover a smaller radius of up to 250m; however, these factors would be assessed in more detail at a later date if the PEAR finds potential for GCN.

2.1.2 Field Survey(s)

2.1.2.1 Habitat Survey

A UK Habitat Classification (UKHab) survey was undertaken by Lis Weidt on the 11th of August 2025. The land within the Site boundary was surveyed (where access was possible).

Habitats were mapped and features of interest were recorded. The habitats were mapped using the information gathered from the ecological walkover and followed the UKHab methodology⁴ and results are provided in **Appendix A**. Field evidence indicating the presence or potential presence of species that could constitute a material consideration in planning terms, such as protected or notable plant or faunal species were also recorded.

The UKHab is a comprehensive classification system for the UK that has been developed to benefit from changes in habitat categorisation, recording analysis in recent decades. The system comprises a principal hierarchy (the Primary Habitats) which include broad habitats and priority habitats and non-hierarchical secondary codes.

Searches were also made for Invasive Non-Native Species (INNS) listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) (WCA), such as Japanese knotweed *Reynoutria japonica* and Himalayan balsam *Impatiens glandulifera*.

2.1.2.2 Condition Assessment for Biodiversity Net Gain

While undertaking the habitat survey, a condition assessment of each habitat parcel, using the criteria produced by Natural England⁵ was also undertaken for later use in a BNG assessment. The condition assessment included, for example, collecting information on the physical characteristics of the habitat, the presence of positive/ negative indicator species and the presence of INNS. Each habitat parcel, that requires it, will be assigned condition score of 'poor', 'moderate' or 'good'.

2.1.2.3 Protected Species Assessment

As part of the appraisal the Site was assessed for its potential to contain protected or notable species. Further information on the legal protection of these is presented in **Appendix B**. Protected species assessed for, but not limited to were:

- Badger *Meles meles*;
- Bats;
- Dormouse *Muscardinus avellanarius*;
- Birds nesting;
- Amphibians including GCN;
- Reptiles; and
- Invertebrates.

4 The UK Habitat Classification Working Group (May 2023) The UK Habitat Classification User Manual Version 2.0.

5 Natural England. 2023. The Biodiversity Metric 4.0 -Technical Annex 1: Condition Assessment Sheets and Methodology. Peterborough: Natural England.



Whilst not a full protected species survey, this method of survey enables experienced ecologists to obtain an understanding of the ecology of a Site such that it is possible either:

- to confirm the conservation significance of the Site and assess the potential for impacts on species likely to represent a material consideration in planning terms, or
- to establish the scope and extent of any additional specialist ecological surveys that will be required before such confirmation can be made.

2.1.2.4 Badger Survey

A detailed inspection of the Site was undertaken alongside the PEA survey by Lis Weidt on 11th of August 2025 in order to search for signs of badger activity; in particular for setts, foraging signs, dung pits/ latrines, snuffle holes, scratching posts, hair traces, prints, day nests and 'runs'. Particular attention was paid to banks and slopes with areas of scrub cover.

Setts, where found, were classified as being Main, Annex, Subsidiary or Outlier, depending upon their size, relative locations and degree of use. Classification criteria for rural setts are listed in **Table 2-2**, following Neal & Cheeseman (1966)⁶. However, it should be noted that urban setts can have fewer entrances (Davison *et al.* 2008⁷), and therefore classification relies more heavily on expert professional judgement.

Table 2-2; Sett Classification

Sett Type	Definition
Main	At least five entrances, often with large spoil heaps and obvious pathways originating from and between sett entrances. Breeding sett. High activity levels, usually occupied.
Annex	Sett with several holes, connected to a main sett by a clear badger path, normally less than 150m from the main sett. Not used all of the time
Subsidiary	Usually at least 50m from the main sett with no obvious paths connecting to other setts. Used intermittently.
Outlier	One or two holes. No obvious paths connecting to other setts and only used sporadically. Little spoil outside holes. Often used by other mammals.

2.1.2.5 Daytime Bat Walkover (DBW)

Habitats within the Survey Area were assessed together at a 'Site level' for their ability to support foraging and commuting bats. The categories are based on the observation and information set out in set out in Table 2-3, Table 2-5 and **Error! Reference source not found.** which is best based on best practice guidelines (Collins J, 2023)⁷.

The Survey Area was assigned a suitability level as per best practice guidelines based on the presence of habitats and features within the Survey Area and within the wider landscape **Table 2-3** shows the criteria applied during the DBW.

Table 2-3; Categorisation of Foraging and Commuting Habitat for Bats^{Error! Bookmark not defined.}

Suitability	Commuting and foraging habitats
None	No habitat features on Site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitat that provided continuous lines of

⁶ Neal and Cheeseman (1996). Badgers. Bloomsbury Publishing

⁷ Collins, J. ed. (2023). Bat Surveys for Professional Ecologists, Good Practice Guidelines (4th edition). Bat Conservation Trust, London. (based on table 4.1-page 44 Collins J 2023)



Suitability	Commuting and foraging habitats
	shade/protection for flight-lines or generate/shelter insect populations available for foraging bats).
Negligible	No obvious habitat features on Site likely to be used as flightpaths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	Habitat that could be used by small numbers of bats as flightpaths such as gappy hedgerow or unvegetated stream, but isolated i.e., not very well connected to the surrounding landscape by other habitat.
Moderate	Continuous habitat connected to the wider landscape that could be used by bats for flightpaths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by for foraging such as trees, scrub, grassland or water.
High	Continuous high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flightpaths such as river valleys, streams, hedgerows, lines of trees and woodland edge. Site is close to and connected to known roosts.

2.1.2.6 Preliminary Roost Assessment

A Preliminary Roost Assessment (PRA) of the building and one tree to be affected by the proposal on Site was undertaken in conjunction with the UKHab survey. This consisted of an external building inspection of the building on Site looking for signs of bats and suitable roosting features which could be utilised by bats for roosting in line with best practice guidelines (Collins J, 2023)⁸ and classification of the tree following Table 2-5.

The buildings were then classified on their potential for roosting bats in line with **Table 2-4**.

Table 2-4 Roosting Habitat in Structures Categorisation⁹

Suitability	Description Roosting habitats in Structures
None	No habitat features on site likely to be used by any roosting bats at any time of year (i.e. a complete absence of crevices/ suitable shelter at all ground/ underground levels
Negligible ^a	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions ^b and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation ^c).
Moderate	A structure with one or more potential brew sites that could be used by bats due to their size, shelter, protection, conditions ^b and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation - the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).

⁹ based on table 4.1 page 44 Collins J 2023



Suitability	Description Roosting habitats in Structures
High	A structure with one or more potential re sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions ^b and surrounding habitat. These structures have the potential to support high conservation status routes, e.g. maternity or classic cool back slash stable hibernation sites.
Confirmed Roost	Evidence of use by bats – including bat themselves, dropping, feeding remains.
a. Negligible is defined as ‘so small or unimportant as to not be worth considering, insignificant’. This category may be used where there are places that bat could roost or forage (due to one attribute) but it is unlikely that they could actually would (due to another attribute). b. For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance. c. Evidence from the Netherlands shows mass warming events of common pipistrelle bats in the autumn followed by mash mass hibernation in a diverse range of building types in urban environments (Korsten et al., 2016 and Jasen et al., 2022). Common pipistrel swarming has been observed in the UK (Bell, 2022 and Tomlinson, 2020) and winter hibernation in numbers of this species has been detected at Seaton Delaval Hall in Northumberland (National Trust, 2018). This phenomenon requires some research in the UK, but ecologists should be aware of the potential for large numbers of this species to be present during the autumn and winter in prominent buildings in the landscape, urban or otherwise.	

Table 2-5: Tree Suitability for Roosting Bats from GLTA

Suitability	Description
NONE	Either no PRFs in the tree or highly unlikely to be any.
FAR	Further Assessment Required to establish if PRFs are present in the tree.
PRF	A tree with at least one PRF present.

2.1.3 Limitations

2.1.3.1 Desk Study

Desk study data is unlikely to be exhaustive, especially in respect of species, and is intended mainly to set a context for the study. It is therefore possible that important habitats or protected species not identified during the data search do in fact occur within the vicinity of the Site. Interpretation of maps and aerial photography has been conducted in good faith, using recent imagery, but it has not been possible to verify the accuracy of any statements relating to land use and habitat context outside of the field study area.

2.1.3.2 Field Survey(s)

The field survey was undertaken during late summer following very dry and hot weather and therefore it's likely that some species within the grassland have been missed spring.

The survey did not seek to identify all of the plant species within the study area and as such, this report does not provide an exhaustive list of flora found within the study area. However, it is considered that the survey results are representative of the habitats and flora of the Site.



It should be noted that lack of evidence of protected flora does not necessarily preclude a species from being present in varying seasons. The Site was visited over one day as such seasonal variation in species composition is not reported within this report, the baseline in this report is considered to be an accurate representation of the Site at the time of writing.

2.2 Evaluation Approach

The ecological evaluation approach used in this report is based on Guidelines for Ecological Impact Assessment in the United Kingdom and Ireland ("CIEEM guidelines") (CIEEM, 2024¹⁰).

2.2.1 Important Ecological Features

Ecological features can be important for a variety of reasons and the rationale used to identify them is explained in the text. Importance may relate, for example, to the quality or extent of the Site or habitats therein; habitat and/ or species rarity; the extent to which such habitats and/or species are threatened throughout their range, or to their rate of decline.

2.2.1.1 Determining Importance

The importance of an ecological feature should be considered within a defined geographical context. The following frame of reference has been used in this case, relying on known/ published accounts of distribution and rarity where available, and professional experience:

- International;
- National (i.e. UK/ England, etc.);
- Regional (i.e. South-West of England);
- County (i.e. Wiltshire); and
- Local (i.e. within circa 5km).

The above frame of reference is applied to the ecological features identified during the desk study and surveys to inform this report.

The value of habitats has been measured against published selection criteria where available. Examples of relevant criteria include: descriptions of habitats listed on Annex 1 of the Habitats Directive; descriptions of habitats of principal importance for biodiversity under Section 41 of Natural Environment and Rural Communities (NERC) Act 2006; Local Wildlife Site Selection Criteria; and Habitat Action Plans (HAPs) contained within Local Biodiversity Action Plans.

In assigning a level of value to a species, it is necessary to consider its distribution and status, including a consideration of trends based on available historical records. Reference has therefore been made to published lists and criteria where available. Examples of relevant lists and criteria include: species of European conservation importance (as listed on Annexes II, IV and V of the Habitats Directive or Annex 1 of the Birds Directive); species of principal importance for biodiversity under Section 41 of the NERC Act 2006 and Birds of Conservation Concern¹.

For the purposes of this report, ecological features of local importance or greater and/or subject to legal protection have been subject to detailed assessment. Effects on other ecological features are considered unlikely to be significant in legal or policy terms.

¹⁰ <https://cieem.net/wp-content/uploads/2018/08/EcIA-Guidelines-v1.3-Sept-2024.pdf> (Accessed: 4th September 2025)



3.0 Results

3.1 Designated Sites

3.1.1 Statutory Designated Sites

The Site is not within a statutory designated site. MAGIC records confirm that there are two international statutory designated sites within 10km of the Site, and three national statutory designated sites within 5km. The location of the Statutory sites in relation to the Site are presented in **Figure 3-2** and Figure 3-2. The details of the sites are summarised below in **Table 3-1**.

Table 3-1 Statutory Designated Sites within the search area; international sites within 10km and national sites within 5km of the Site

Site*	Distance from Site (km)	Feature
Gripwood Quarry SSSI	3.6 W	The Site locally hosts rich marine fauna including crinoids, brachiopods, molluscs, and bryozoans.
Southwick Country Park LNR	4.9 SW	The Site hosts veteran and ancient oak and ash trees, as well as established woodland flora. It hosts protected species including water vole <i>Arvicola amphibius</i> , nine species of bat – including Bechstein's bat <i>Myotis bechsteinii</i> , Horseshoe bat <i>Rhinolophus sp.</i> , 11 UK BAP Priority Species of Lepidoptera, 12 species of Odonata including the red listed scare chaser <i>Libellula fulva</i> , otter <i>Lutra lutra</i> , grass snake <i>Natrix Helvetica</i> , adder <i>Vipera berus</i> , slow-worm <i>Anguis fragilis</i> , and 15 red-listed bird species.
Green Lane Wood LNR	3.7 SE	The Site hosts several ancient woodland indicator plant species including Solomon's Seal <i>Polygonatum</i> , Stinking Iris <i>Iris foetidissima</i> , and a host of orchids. Other species present on Site include grass snake, slow worm, and butterflies – including the silverwashed fritillary <i>Argynnis paphia</i> and Duke of Burgundy <i>Ducatus Burgundiae</i> .
Bath & Bradford on Avon Bats SAC	6.3 W, 7.7 NW, and 7.7 N	The Sites host several habitats including heath, scrub, maquis and garrigue, phygrana, and broadleaved deciduous woodland. It hosts three Annex II bat species – Greater horseshoe <i>Rhinolophus ferrumequinum</i> , lesser horseshoe <i>Rhinolophus hipposideros</i> , and Bechstein's bat.

*Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Special Protection Area (SPA), Local Nature Reserve (LNR)



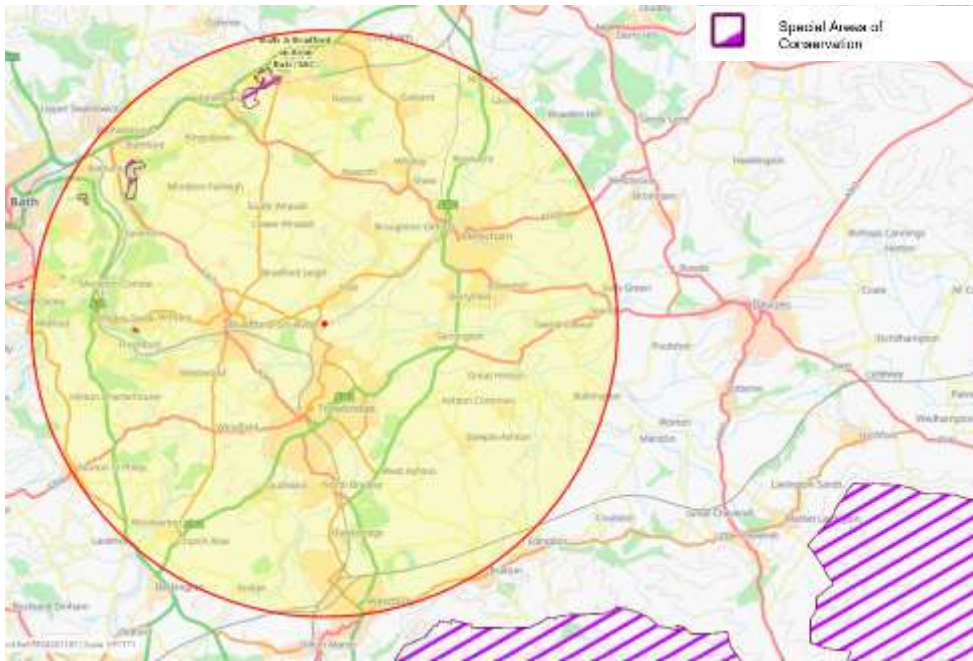


Figure 3-2. International statutory designated sites within 10km of site.¹

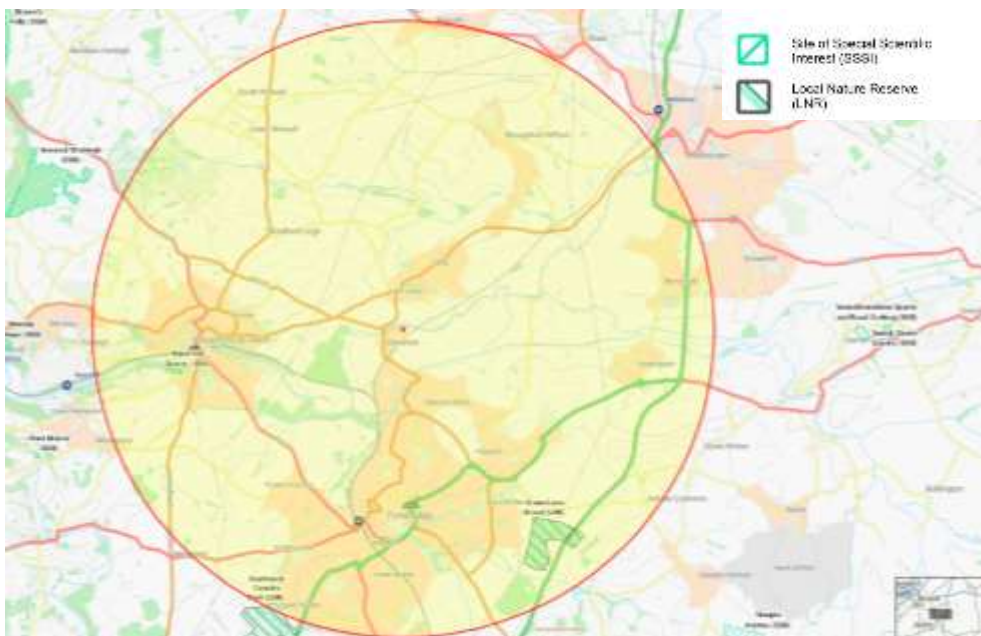


Figure 3-1. National and Local statutory designated sites within 5km of site.

There will be no direct impacts to any other non-statutory designated site due to the distance and lack of connecting habitat. No anticipated indirect impacts due to the small scale of the development, the majority of which will only affect existing made ground within an existing industrial development with no change of use and the potential small loss of 0.04ha of highly managed grassland and a single semi-mature tree.

Therefore statutory designation will not be considered further.



3.1.2 Non-statutory Designated Sites

A search by MAGIC¹ for non-statutory designated sites within the 2km of the proposed development Site found no sites within 2km. The WSBRC did however return results for 5 non-statutory sites. The details of these sites are summarised below in **Table 3-2**. A map of these is shown in Error! Reference source not found..

Table 3-2 Non -Statutory Designated Sites within 2km of the Site.

Site	Distance (km)	Feature
Bristol Avon River (LWS)	12m N	One of the main river systems draining north-west Wiltshire.
Kennet & Avon Canal (LWS)	0.75 SE	A restored canal much used for recreation.
Great Bradford Wood (LWS)	1.3 SW	A large ancient woodland site with semi-natural broadleaved woodland and broadleaved and conifer plantation on a limestone plateau overlooking the River Frome.
Lady's Coppice (LWS)	1.95 N	A small stand of ancient semi-natural broadleaved coppice with standards woodland and adjacent mature broadleaved plantation.
Widbrook Wood WWT Reserve (LWS)	2 SW	A stretch of mixed young mixed broadleaf planation with meadow between the river Avon and Kennet and Avon canal

The Site is located approximately 12m from a section of the Bristol Avon River LWS and therefore the proposed works have potential to impact the designated site.

There will be no direct impacts to any other non-statutory designated site due to the distance and lack of connecting habitat. No anticipated indirect impacts due to the small scale of the development, the majority of which will only affect existing made ground within an existing industrial development with no change of use and the potential small loss of XXha of highly managed grassland and a single semi-mature tree.

Therefore Bristol Avon River LWS will be considered further.

3.1.3 SSSI Impact Risk Zones

A Site of Specific Scientific Interest (SSSI) Impact Risk Zone is a defined zone around each SSSI in England that reflect the particular sensitivities of the features for which they are notified and indicate the types of development proposal that could potentially have adverse impacts. Developments of a certain size and nature that fall within SSSI Impact Risk Zones, require the Local Planning Authority (LPA) to consult with Natural England (NE) to determine whether the proposed development is likely to have an impact upon the SSSI.

The Site is within a SSSI Impact Risk Zone; however, it is not listed as a development which requires further consultation with Natural England.

Due to the proximity of Site to Bristol Avon River LWS



3.1.4 Priority Habitats

The MAGIC website¹¹ returned a number of principle habitats and priority habitats within 2km, as per **Table 3-3** and **Table 3-4**, respectively. Three habitats of principal importance and two priority habitats are present within 2km of the Site.

Table 3-3. Habitats of Principle Importance within 2km of the Site

Habitat	Feature	Distance from site of nearest feature (m/km)	Number of areas of habitat
Coastal and floodplain grazing marsh	Periodically inundated pastures, rich in plants and invertebrates.	1.3km SW	1
Woodpasture and Parkland	Possibly old boundary trees in parkland which has been managed through grazing.	0.6km N	2
Traditional orchard	Groups of fruit and nut trees planted on vigorous rootstocks at low densities in permanent grassland and are managed in a low intensity way.	0.7km NE	5

Table 3-4. Priority Habitats within 2km of the Site.

Habitat	Feature	Distance from site of nearest feature (m/km)	Number of areas of habitat
Ancient woodland	Great Bradford Wood	0.8km W	3
Deciduous woodland	Semi-natural deciduous woodland.	0.6km N	18

3.2 Habitats

The results of the UKHab Survey are illustrated in map form in Appendix A, and photographs are presented in Table 3-5 below. The unique UK Habitat Classification survey code (e.g., u1b6) habitat is attributed to is included in brackets within the text below. For the purposes of this report the habitats present within the Site have been mapped using the fine scale minimum mapping unit (25m², 5m length), in accordance with the UK Habitat Classification User Manual¹². The relevant secondary codes are presented after the primary codes.

The following habitats were recorded within the RLB of the Site;

- Buildings – u1b5
- Developed land – sealed surface - u1b6
- Artificial unvegetated, unsealed surface - u1c

¹¹ [MAGIC - Map Page new URL](#) (Accessed 4th September 2025)

¹² The UK Habitat Classification Working Group (2023) The UK Habitat Classification User Manual Version 2.0



- Built Linear Feature – u1e
- Other neutral grassland – g3c
- Bramble Scrub - h3d
- Hedgerow Priority Habitat - h2a
- Other Lowland Mixed Deciduous Woodland - w1f7

Table 3-5 UKHab and BNG Results Summary

Photograph	UK Hab Type Species	Condition assessment
	U1b5 - Buildings	N/A
	U1b6 - Developed land; sealed surface. Other developed land	N/A
	g3c – Other Neutral Grassland secondary code 108 Species list: Cocks foot <i>Dactylis glomerata</i> , Yarrow <i>Achillea millefolium</i> , Ribwort plantain <i>Plantago lanceolata</i> , Autumn hawkbit <i>Leontodon autumnalis</i> , Perennial ryegrass <i>Lolium perenne</i> , Creeping cinquefoil <i>Potentilla reptans</i> , Self-heal <i>Prunella vulgaris</i> , Common daisy <i>Bellis perennis</i> , Red fescue <i>Festuca rubra</i> .	Poor



Photograph	UK Hab Type Species	Condition assessment
	g3c – Other Neutral Grassland Secondary code: 13, 127 Species list: Yarrow , False oat grass, Creeping cinquefoil, Buddleia <i>Buddleja davidii</i>, Bramble, Cocks Foot, Dandelion, Nettle, Wild teasel, Southern globethistle <i>Echinops bannaticus</i>, Lavender <i>Lavandula angustifolia</i>, Common Knapweed <i>Centaurea nigra</i>, Spear thistle <i>Cirsium vulgare</i>. The short, mown paths contain Ragwort <i>Senecio</i> sp., Couch <i>Elytrigia</i> sp.	Moderate
	(3)U1c – Artificial Unvegetated, Unsealed Surface Bramble, Ribwort Plantain, Wild teasel <i>Dipsacus fullonum</i>, Yarrow, Broadleaved dock <i>Rumex obtusifolius</i>, Yorkshire fog <i>Holcus lanatus</i>, Silver birch saplings, Dandelion <i>Taraxacum officinale</i>, Ryegrass <i>Lolium</i> sp., Scentless mayweed <i>Tripleurospermum inodorum</i>, Cranes bill sp. <i>Geranium</i> sp., Narrow leaved ragwort <i>Senecio inaequidens</i>, Self-heal.	N/A
	W1f7 – Other Lowland Mixed Deciduous Woodland Species list: goat willow <i>Salix caprea</i>, grey willow <i>Salix cinerea</i>, Bramble <i>Rubus fruticosus</i> sp., Yew <i>Taxus baccata</i>, Sessile oak <i>Quercus petraea</i>, Alder <i>Alnus glutinosa</i>, Silver birch <i>Betula pendula</i>, ivy <i>Hedera helix</i>, Nettle <i>Urtica dioica</i>, Dogs Mercury <i>Mercurialis perennis</i>, Elder <i>Sambucus nigra</i>, Pine sp. (rare), Field Maple <i>Acer campestre</i>.	Moderate



Photograph	UK Hab Type Species	Condition assessment
	(2)h2a – Hedgerow Priority Habitat Species list: Beach <i>Fagus sylvatica</i> , Field maple, Blackthorn <i>Prunus spinosa</i> , Hawthorn <i>Crataegus monogyna</i> .	Good
	H3d – Bramble Scrub Species list: bramble.	N/A
Individual Trees		
	Red maple tree	Moderate

The field survey did not find any priority, distinctive or high value habitats on Site. All habitats recorded on Site can be considered widespread and common. Therefore, habitats are not considered further.



3.3 Species

3.3.1 Plants

WSBRC returned records for 40 species within the 2km search radius of the Site recorded in the last 10 years.

3.3.1.1 Protected Plant Species

Schedule 8 of the Wildlife Countryside Act 1981 (as amended) (WCA) lists endangered plant species which are protected by law from being picked, uprooted or destroyed.

The WSBRC returned 11 records within 2km of the Site of Bluebell *Hyacinthoides non-scripta*. The closest record 860m SE of the Site.

3.3.1.2 Threatened Plant Species

The data search returned records of four species that are threatened or listed as vulnerable on the IUCN red lists. This included:

- Three records of the species Stinking Chamomile *Anthemis cotula*. The closest record is 1.5km NW of the Site.
- Eight records of Dwarf Spurge *Euphorbia exigua*. The closest record is 1.5km NW of the Site.
- One record of Oak-leaved Goosefoot *Euphorbia exigua*. The closest record is 1.5km NE of the Site.
- One record of Strawberry Clover *Trifolium fragiferum*. The record is 1.6km SE of the Site.

There is also a record of one species listed on Schedule 41 of the NERC Act 2006 (as amended) (NERC): Cornflower *Centaurea cyanus*. The record is 1.3km NW of the Site.

Other nationally rare species include Rye Brome *Bromus secalinus*, Box *Buxus sempervirens*, and Galingale *Cyperus longus*.

No protected plant species were identified on Site during the UKHab surveys, and the habitats present are common and widespread. Therefore, protected and threatened plants are not considered further.

3.3.1.3 Invasive Plant Species

Schedule 9 of the WCA lists INNS that are already established in the wild, which continue to pose a conservation threat to native biodiversity and habitats.

No records of species listed as Schedule 9 INNS were returned from the WSBRC data search or recorded during the Site survey. Therefore, invasive plant species are not considered further.

3.3.2 Invertebrates

Schedule 5 of the WCA lists endangered species which are protected from killing, injury, taking, possession, and disturbance or obstruction/destruction of place they use for shelter.

The data search returned records for nine invertebrate species. One record of Duke of Burgundy *Hamearis Lucina* butterfly was received from 1.5km SW of the Site, a species listed on Schedule 41 of the NERC Act 2006 (as amended) (NERC).

There are also records for the species Jersey Tiger *Euplagia quadripunctaria*, an Annex 2 listed species under the Habitats Directive.



Other nationally rare species include Scarce Chaser, Common Darter *Sympetrum striolatum*, and Large Tortoiseshell beetle *Nymphalis polychloros*.

The habitats on Site are relatively common and widespread so therefore unlikely to be critical for protected or notable invertebrate species. Although the designated 'butterfly area' does contain a mix of tall forbs. Due to the habitats present being common and widespread and therefore supporting common and widespread invertebrate species, therefore rare or notable invertebrate species are not considered further.

3.3.3 Amphibians

All UK amphibians are protected from harm by Schedule 5 of the WCA. Great crested newts are also listed in Annex IV of the Habitats Directive and afforded further protection from possession, control, transport and sale and it is an offence to injure or kill them.

WSBRC returned one record of great crested newt within 2km of the Site. The record is 1.1km NE of the Site.

A search for granted protected species mitigation licence applications was undertaken on MAGIC¹¹ within 2km which returned no applications for GCN. A search for GCN Class Survey Licence Returns (CSLR) also returned no records for GCN.

MAGIC revealed several waterbodies within 2km of the Site:

- approximately 37m directly adjacent to the Site - the River Avon;
- approximately 150m NE of the Site;
- approximately 280m NW of the Site;
- approximately 250m SE of the Site;
- approximately 340m SE of the Site;
- approximately 490m NW of the Site.

A search of OS maps and aerial imagery within 500m of the Site looking for ponds was undertaken. No additional waterbodies were found within 500m of the Site (see **Figure 3-3**).

No suitable breeding waterbodies were present within the Site. The River Avon borders the Site; this is too large and fast flowing to provide breeding suitable habitat for amphibians, and it likely to form a barrier for any such species. The grassland in the 'butterfly area' could provide a suitable terrestrial habitat for amphibians, however, this area is not being affected by the works, therefore amphibians will not be considered further in this report.



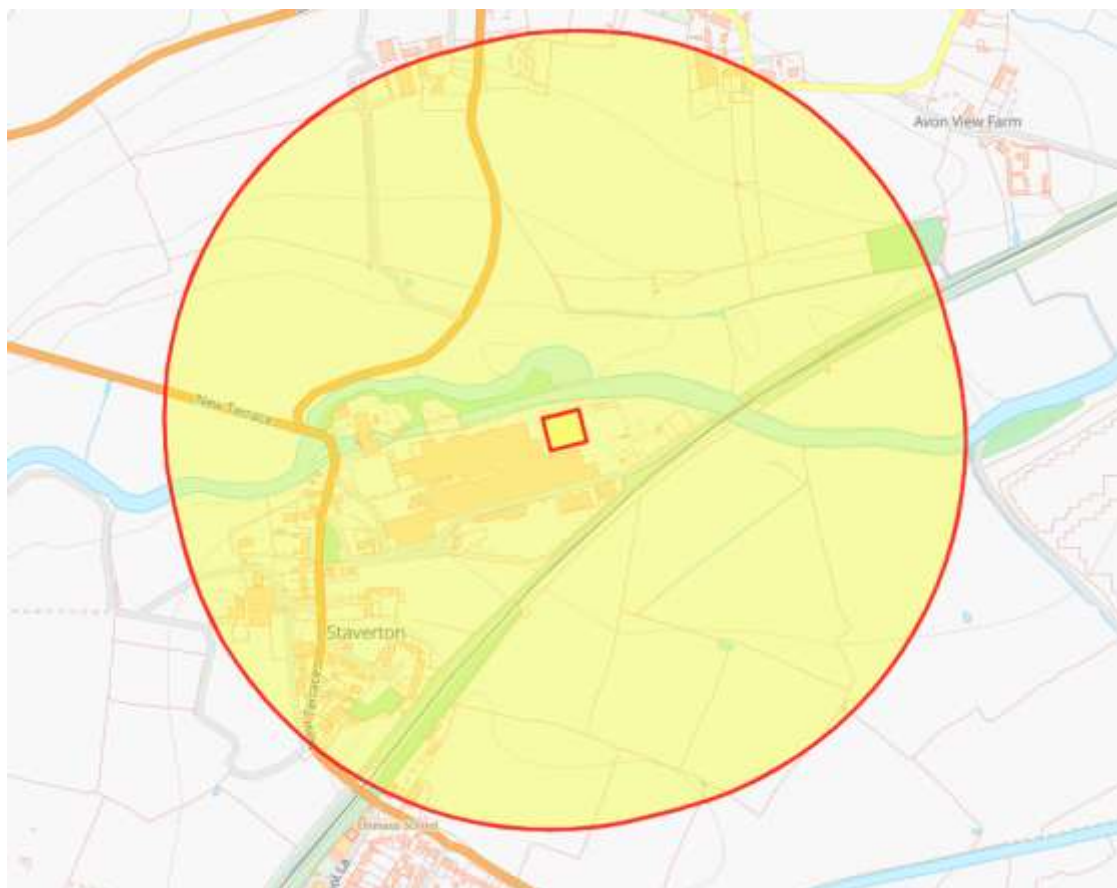


Figure 3-3. Waterbodies within 500m of the Site.

3.3.4 Birds

All naturally occurring wild birds in the UK are protected from persecution under the WCA. It is illegal to harm any wild bird, damage their eggs and destroy their nests whilst in use or being built. Bird species listed on Schedule 1 of the WCA are afforded extra legal protection concerning the disturbance of their young and interference whilst nesting.

A range of records comprising of 31 species of birds, including birds of prey, wetland, and farmland species have been recorded by the WSBRC. There are records of nine species listed under Schedule 1 of the WCA, some notable species are listed below with any additional protection listed:

Table 3-6 WSBRC notable/protected bird species from 1 km search area

Species	Number of records	Status	Distance from Site (nearest, m/km)
Barn Owl <i>Tyto alba</i>	1	WCA1i	0.8km southwest
Black Redstart <i>Phoenicurus ochruros</i>	1	BAmb, WCA1i	0.6km southwest
Cetti's Warbler Owl <i>Cettia cetti</i>	2	WCA1i	0.6km southwest



Species	Number of records	Status	Distance from Site (nearest, m/km)
Common Sandpiper <i>Actitis hypoleucos</i>	1	BAmb	0.6km southwest
Dunnock <i>Prunella modularis</i>	2	BAmb, Sect.41, UKBAP	0.9km northeast
Fieldfare <i>Turdus pilaris</i>	1	BRed, WCA1i	1.0km southeast
Grasshopper Warbler <i>Locustella naevia</i>	1	BRed, Sect.41, UKBAP	0.9km northeast
Greenfinch <i>Chloris chloris</i>	6	BRed	0.8km northeast
Grey Wagtail <i>Motacilla cinerea</i>	1	BAmb	0.9km northeast
Hen Harrier <i>Circus cyaneus</i>	1	BD1, BRed, Sect.41, WCA1i	0.9km northeast
Herring Gull <i>Larus argentatus</i>	10	BRed, Sect.41, UKBAP	0.9km northeast
Hobby <i>Falco subbuteo</i>	1	WCA1i	0.9km northeast
House Martin <i>Delichon urbicum</i>	13	BRed	0.9km northeast
House Sparrow <i>Passer domesticus</i>	3	BRed, Sect.41, UKBAP	0.9km northeast
Kingfisher <i>Alcedo atthis</i>	4	BD1, BAmb, WCA1i	0.1km southwest
Lesser Black-Backed Gull <i>Larus fuscus graellsii</i>	1	BAmb	0.9km northeast
Mallard <i>Anas platyrhynchos</i>	9	BAmb	0.9km northeast
Mistle Thrush <i>Turdus viscivorus</i>	1	BRed	0.9km northeast
Moorhen <i>Gallinula chloropus</i>	1	BAmb	0.9km northeast
Redkite <i>Milvus milvus</i>	2	BD1, RLGLB.NT, WCA1i	0.9km northeast
Redwing <i>Turdus iliacus</i>	1	BAmb, RLGB.CR, WCA1i	1.0km southeast
Rook <i>Corvus frugilegus</i>	8	BAmb	0.1km southwest
Skylark <i>Alauda arvensis</i>	1	BRed, Sect.41, UKBAP	0.6km southwest
Snipe <i>Gallinago Gallinago</i>	1	BAmb	1.0km northeast



Species	Number of records	Status	Distance from Site (nearest, m/km)
Song Thrush <i>Turdus philomelos</i>	4	BAmb, Sect.41, UKBAP	0.9km northeast
Sparrowhawk <i>Accipiter nisus</i>	2	BAmb	0.6km southwest
Starling <i>Sturnus vulgaris</i>	1	BRed, Sect.41, UKBAP	0.9km northeast
Swift <i>Apus apus</i>	14	BRed	0.8km northeast
Willow Warbler <i>Phylloscopus trochilus</i>	1	BAmb	0.9km northeast
Woodpigeon <i>Columba palumbus</i>	16	BAmb	0.9km northeast
Wren <i>Troglodytes troglodytes</i>	5	BAmb	0.9km northeast

The MAGIC search also identified records of several notable bird species including snipe, and corn bunting within the Site.

The woodland, individual tree, scrub and longer grass on Site could provide appropriate habitats for nesting birds, out of these only the scrub and individual tree will be removed for the works. Therefore, nesting birds will be considered further in the report.

3.3.5 Reptiles

All species of common reptiles receive limited protection from harm under Section 9(1) of the WCA. The WSBRC returned eight records for the species Slow Worm, listed under Schedule 5 of the WCA and Schedule 41 of NERC. The closest record is 1.6km SE of the Site.

The Site is generally unsuitable for reptiles, except in the long grassland in the 'butterfly area', additionally the grasslands to be removed are kept short through regular mowing and therefore, unlikely to be suitable for reptiles. Due to the lack of proximity of records and lack of destruction on suitable habitat, reptiles are not considered further in this report.

3.3.6 Mammals

3.3.6.1 Bats

Bats are protected from killing, injury, damage or destruction or obstruction of a resting place and disturbance while occupying a structure or place which it uses for shelter or protection' under the WCA and Conservation of Habitats and Species Regulations (2017).

The WSBRC records identified that the Site is within Bath and BoA Bat SAC consultation zone and returned 13 notable bat species records within 2km of the Site, as well as a general record of *Myotis sp.*, *Nyctalus sp.*, *Pipistrelle sp.*, and *Plecotus sp.* Records included:

Species	Number of records	Status ^{Error! Bookmark not defined.}	Distance from Site (nearest, m/km)
Common pipistrelle	82	HabRegs2, HSD4, WCA5/9.4b, WCA5/9.4c	c. 600m southwest



Species	Number of records	Status ^{Error! Bookmark not defined.}	Distance from Site (nearest, m/km)
<i>Pipistrellus pipistrellus</i>			
Serotine <i>Eptesicus serotinus</i>	14	HabRegs2, HSD4, RLGB.VU, WCA5/9.4b, WCA5/9.4c	c. 600m northeast
Leisler's bat <i>Nyctalus leisleri</i>	12	HabRegs2, HSD4, RLGB.Lr(NT), WCA5/9.4b, WCA5/9.4c	c. 1.6 m southwest
Noctule <i>Nyctalus noctula</i>	34	HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	c. 600m northeast
Soprano pipistrelle <i>Pipistrellus pygmaeus</i>	47	HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	c. 200m southeast
Brown long-eared bat <i>Plecotus auritus</i>	23	HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	c. 600m southwest
Natterer's bat <i>Myotis nattereri</i>	3	HabRegs2, HSD4, WCA5/9.4b, WCA5/9.4c	c. 700m northeast
Nathusius's pipistrelle <i>Pipistrellus nathusii</i>	3	HabRegs2, HSD4, RLGB.Lr(NT), WCA5/9.4b, WCA5/9.4c	c. 1.7 km southeast
Barbastelle bat <i>Barbastella barbastellus</i>	1	HabRegs2, HSD2p, HSD4, RLGB.VU, Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	c. 1.6km northeast
Daubenton's Bat <i>Myotis daubentonii</i>	10	HabRegs2, HSD4, WCA5/9.4b, WCA5/9.4c	c. 700m northeast
Greater Horseshoe Bat	24	HabRegs2, HSD2p, HSD4, Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	c. 1.2km southwest
Lesser Horseshoe Bat	23	HabRegs2, HSD2p, HSD4, Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	c. 900m southeast

Granted PSL Applications

A search for granted protected species mitigation licence applications was undertaken on MAGIC^{Error! Bookmark not defined.} which revealed 19 granted applications for bats within a 4km radius, six of which are still in date at this time. Those in date are detailed in **Table 3-7** below.



Table 3-7. Granted PSLs for Bats within 4km.

Licence Return	Species	Licence Type	Distance (km)
2018-37074-EPS-MIT	Brown long-eared; Common Pipistrelle; Soprano Pipistrelle; Whiskered Bat	Destruction of a resting site	2.88
2019-39554-EPS-MIT	Brown long-eared; Common Pipistrelle; Lesser horseshoe	Destruction of a breeding site	0.76
2019-39554-EPS-MIT-1	Brown long-eared; Common Pipistrelle; Lesser horseshoe	Destruction of a breeding site	0.76
2020-44595-EPS-MIT	Brown long-eared; Common Pipistrelle; Greater Horseshoe; Lesser horseshoe; Natterer's Bat	Damage and destruction of both a resting and breeding site	0.88
2020-48491-EPS-MIT	Common Pipistrelle	Destruction of a resting site	3.47
2015-15090-EPS-MIT	Common Pipistrelle; Lesser horseshoe	Destruction of a resting site	3.46

Daytime Bat Walkover

The habitat within the Survey Area comprised of a small area of woodland with the river Avon running along the northern edge of the woodland, just out of the Site boundary. South of the woodland there is a mowed grassland which includes a 'butterfly area'. All but the mowed grassland provides possible foraging habitat for bat. The grassland is likely to be well lit due to its proximity to the factory. The only habitat to be removed is the short grassland, making it unlikely to significantly impact foraging bats. The Site is therefore considered to have **Low** potential for commuting and foraging bats due to the high level of level of anthropomorphic activity (human presence, vehicle movement, noise and lighting).

Potential Roost Assessment (PRA)

The buildings on Site are large, flat roofed factory buildings, consisting of well-maintained brick walls and large expanses of metal sheet walls. Due to the regular use of the buildings, a lack of gaps in the brickwork and lack of insulation for the metal sheeting, the building is assessed as having negligible potential for bats roost and no further surveys regarding the buildings are required.

One individual tree was assessed and found to be negligible for PRFs. The trees in the woodland are being retained, therefore these did not undergo a GLTA survey.

Although the Site has low potential for bats, the area the works are to occur in, if considered alone are negligible, composed mostly of hardstanding and mowed grass. Therefore, bats are not considered further in this report.

3.3.7 Badger

Badgers and badger setts are protected under the Protection of Badgers Act 1992. This makes it an offence to kill or take a badger, to cruelly ill-treat a badger, or to interfere with a badger sett, including disturbing a badger while it is occupying a sett.

WSBRC returned 14 records of badger, the closest record is 0.6km SW of the Site.



No Badger field signs were observed during the Site visit, additionally the grassland does not provide an appropriate habitat for sett building. Though the bank in the woodland could provide appropriate habitat for badgers, it floods yearly, and the planned works will be occurring over 20m from the woodland.

Therefore, badgers are not considered further in this report.

3.3.8 Dormouse

Hazel dormice are protected from killing, injury, damage or destruction or obstruction of a resting place or breeding site; and disturbance while occupying a structure or place which it uses for shelter or protection' under both Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

No records of dormouse were returned from WSBRC. There were no suitable habitats, in the area of Site where the works are due to occur or evidence of dormouse observed during the Site visit; therefore, dormouse are not considered further.

3.3.9 Otter, Water Vole and Beaver

Otters are protected from killing, injury, damage or destruction or obstruction of a resting place or breeding site; and disturbance while occupying a structure or place which it uses for shelter or protection under both Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

WSBRC returned six records of otter, the closest record is 1km SW of the Site.

Water voles are protected from killing, injury, damage or destruction or obstruction of a resting place or breeding site; and disturbance while occupying a structure or place which it uses for shelter or protection under both Schedule 5 of the Wildlife and Countryside Act 1981 (as amended)

WSBRC returned one record of water vole, the record is located 0.9km SE of the Site.

Beavers are now listed in Schedule 2 of the Conservation of Habitats and Species Regulations 2017, making it an offence to deliberately capture, injure, kill or disturb beavers, or damage and destroy their breeding sites or resting places without a wildlife management licence from Natural England.

WSBRC returned 78 records of beaver *Castor fiber*, the closest record is located 0.06km NE of the Site.

The river Avon provides a suitable habitat for otters, water voles and beavers; however, this is located 50m away from the proposed works, which will primarily affect existing hardstanding and only potentially remove 0.04ha of grass which is not suitable habitat for any of these species.

3.3.10 Other Mammals

Hedgehog *Erinaceus europaeus* are listed under the Wild Mammals Protection Act (1996) which prohibits cruel treatment of hedgehogs, and they are a Species of Principal Importance under Section 41 of NERC.

WSBRC returned 53 records of hedgehog, the closest record is 0.4km SW of the Site. Suitable habitat for this species is present within the Site, in particular the tall grassland, and scrub which may be removed; therefore, hedgehogs are considered further.

Records for Brown Hare *Lepus europaeus* and Rabbit *Oryctolagus cuniculus* were also returned from the search.



One medium-sized mammal hole was found on Site, in the butterfly area, this was too small for badger or fox, but this could have rabbit. However, the butterfly area is not being removed for these works, therefore, rabbits are not considered further in this report.



4.0 Ecological Constraints and Opportunities

4.1 Designated Sites

Statutory designated sites often represent the most significant ecological receptors, being of recognised importance at an international and/or national level. National Site networks designations include Special Areas of Conservation (SACs). Whilst national designations include Sites of Special Scientific Interest (SSSIs), and Local Nature Reserves (LNRs).

As identified in **Section 3.1**, there was one international statutory designated site and three national designated sites within the potential zone of influence of the Site. However, there will be no direct impacts due to the distance and no anticipated indirect impacts due to the small scale of the development the majority of which will affect existing made ground within an existing industrial development with no change of use.

Bristol Avon LWS is located to the immediate north of the Site. The extension is planned to be no closer than 50m to the River Avon which is considered likely to have a low impact on the River Avon, due to this already being a developed Site. Additionally, the expanse of grass and strip of woodland between the construction works and the river are likely to absorb any surface run off due to the works before they reach the river, negating any negative impacts surface runoff would have on the water quality within the River Avon.

If there are to be changes to the existing lighting, light spill on the adjacent designated sites should be prevented by development of a sensitive lighting scheme which will minimise any increase of current light levels along the boundary to the Bristol Avon LWS.

4.2 Protected Species

4.2.1 Birds

The individual tree, scrub and woodland within the Site provide suitable nesting habitat for common and garden bird species.

Clearance of a tree and a small area of scrub is likely to be required as part of the development proposal. The loss of these areas is not considered significant due to the abundance of similar habitat in the surrounding areas. It is considered highly unlikely that the Site is critical to the maintenance of any local bird population.

However, if unmitigated, construction activities (e.g., clearance of vegetation) have the potential to cause injury or mortality of breeding birds, and damage or destruction of eggs or nests during construction. Vegetation clearance works should therefore be timed to avoid the bird breeding season (March to August inclusive). If this is not possible and vegetation clearance works are due to commence within the breeding bird season, a check for nesting birds should be undertaken by a suitably experienced ecologist immediately prior to the commencement of works. Should nesting birds be encountered, an exclusion zone around any active nests would be required to prevent damage of the nests and injury to the young birds until they had fledged.

4.2.2 Hedgehog

This report has concluded that the presence of suitable habitat on Site, as well as the local records of hedgehog in the vicinity means that the proposed scheme could impact upon hedgehogs. Mitigation measures should be in place to prevent harm to hedgehogs during the development.

If the small area of scrub is to be removed a Precautionary Method of Works should be submitted as part of the works. Removal of any habitats with potential as hibernation sites should take place outside of winter (e.g. piles of leaves, log piles, brash, or the bases of



hedgerows. Supervision by an experienced Ecological Clerk of Works (ECoW) during clearance is recommended if potentially suitable habitat is to be removed in winter. With this mitigation measure in place, no significant impacts upon hedgehogs are predicted.

4.3 Potential Opportunities for Biodiversity Enhancements

Detailed development plans are not available at this time therefore, the recommendations listed below to provide nature conservation enhancements, as required under local planning policy, are very generic. The list below is not exhaustive and may change depending on the detailed design of the development and any protected or notable species confirmed to be present following further survey work.

- A hedgehog house could be added to the 'butterfly area' in a shaded position away from potential flooding;
- Planting of fruit trees in the 'butterfly area';
- Bird boxes – nesting opportunities for birds should be considered through artificial placement of bird boxes or through the creation of further habitat to offset that which will be lost from the proposed works. Habitat should be dense and be included within a management plan for the retention of suitable nesting features.
- Grassland enhancement – The remaining grassland should be treated to management that would improve the floral diversity by undergoing management techniques such as removing cuttings and therefore reducing nutrients.



5.0 Conclusions and Recommendations

This PEA is informed by a desk study and a field survey undertaken in August 2025. The Site was found to comprise other neutral grassland, woodland and intersected by hardstanding.

Based on the protected species scoping survey and UKHab survey undertaken it is considered that no major constraints are present which would preclude the Site's development.

If the removal of the tree and scrub are to occur within March to August inclusive, nesting bird surveys will be required when the works are due to be completed.

A lighting scheme including light spill plans to demonstrate that there is no spill of lighting onto surrounding habitat maybe required depending on if there are to be changes to the existing lighting.

Based on the baseline assessment presented in this report, no further ecological surveys are required to inform the planning application.





Appendix A UK Hab Baseline Habitats Map Including the RLB

PEA Report Template

Preliminary Ecological Appraisal Report

Cereal Partners UK

SLR Project No 416.066492.00001

9 September 2025





Secondary Codes
13: Scattered scrub
108: Frequently mown
127: Sward type mosaic

LEGEND

Survey Area

Target Note

Primary Habitat Classification

Heathland and Shrub - Hedgerows

h2a - Hedgerow Priority Habitat

Grassland - Neutral Grassland

g3c - Other Neutral Grassland

Heathland and Shrub - Dense Scrub

h3d - Bramble Scrub

Urban - Built-up Areas and Gardens

u1b - Developed Land; Sealed Surface

u1c - Artificial Unvegetated, Unsealed Surface

u1e - Built Linear Feature

Woodland and Forest - Broadleaved Mixed and Yew Woodland

w1f7 - Other Lowland Mixed Deciduous Woodland



CPUK NEW FACTORY BUILDING
BNG BASELINE REPORT
UK HABITAT BASELINE

FIGURE 1

Scale 1:800 @ A3 Date AUGUST 2025



Appendix B Relevant Legislation and Planning Policy

PEA Report Template

Preliminary Ecological Appraisal Report

Cereal Partners UK

SLR Project No 416.066492.00001

9 September 2025

Legislation

A summary of legislation relevant to (onshore) biodiversity in England is provided below. Note that the summary provided here is intended for general guidance only and the original legislation should be consulted for definitive information.

Environment Act (2021)

The Environment Act has wide ranging provisions including those around:

- Environmental governance;
- Environmental regulation;
- Waste and resource efficiency;
- Air quality and environmental recall;
- Water;
- Nature and biodiversity;
- Conservation covenants.

Of particular relevance is Part 6 of the Act which introduces “biodiversity gain in planning” and will apply in England to planning applications under the Town & Countryside Act and the Planning Act. Schedule 14 now requires that biodiversity gain be a condition of planning permission in England. These changes will be enacted through subsequent secondary legislation or regulations. This part of the Act also changes the responsibilities that Government or public bodies have by strengthening the existing NERC Act biodiversity duty. Public authorities are now required to seek to conserve and enhance biodiversity in the exercise of their functions.

Conservation of Habitats and Species Regulations 2017 (as amended)

The Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitats Regulations) consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments. The Regulations transpose Council Directive 92/43/EEC, and certain elements of the Wild Birds Directive (Directive 2009/147/EC) (known as the Nature Directives) into national law. Changes were made by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 to the 2017 Regulations so that they operate effectively. Most of these changes involved transferring functions from the European Commission to make changes to the appropriate authorities in England. The obligations of a competent authority in the 2017 Regulations for the protection of sites or species do not change. Though they are described as the ‘Onshore’ regulations, they cover coastal waters out to 12 nautical miles (nm).

All other processes or terms in the 2017 Regulations remain unchanged and existing guidance is still relevant. The 2019 Regulations have created a national site network on land and at sea, including both the inshore and offshore marine areas in the UK. The national site network includes:

- existing SACs and SPAs



- new SACs and SPAs designated under these Regulations

Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new national site network.

Under the Habitats Regulations it is an offence to deliberately capture, kill or disturb¹³ wild animals listed under Schedule 2 of the Regulations as well as damage or destroy a breeding site or resting place of such an animal (even if the animal is not present at the time). Sites which are part of the National Site Network, including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), are also protected under the Habitat Regulations, and any proposal that could affect them will require a Habitats Regulations Assessment (HRA).

The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017

Part 3 of the regulations provide for the protection of areas of habitats or species where maintenance of the status of water is an important factor. Under the regulations additional consideration may need to be given to sites in the form of a Water Framework Directive (WFD) assessment where a project lies in proximity to a water body or to linked water bodies which could be affected. This includes consideration of whether water bodies are WFD receptors in particular those of high status or have high status morphology.

Natural Environment & Rural Communities (NERC) Act 2006

Section 40 of the NERC Act 2006 places a duty on public authorities to have regard to the purpose of conserving biodiversity in the exercise of their functions. Public authorities include government departments, local authorities and statutory undertakers.

Section 41 of the Act (Section 42 in Wales) requires the publication of a list of habitats and species publish which are of principal importance for the purpose of conserving biodiversity. The Section 41 list is used to guide authorities in implementing their duty to have regard to the conservation of biodiversity.

Note that Sections 40 and 42 were superseded in Wales by the Environment (Wales) Act 2016 (see below).

Protection of Badgers Act 1992

The Protection of Badgers Act 1992 makes it illegal to kill, injure or take a badger or to intentionally or recklessly interfere with a badger sett. Sett interference includes disturbing badgers whilst they are occupying a sett or obstructing access to it.

Wildlife & Countryside Act 1981

The Wildlife and Countryside Act 1981, as amended by the Countryside and Rights of Way (CROW) Act 2000 and the Natural Environment and Rural Communities (NERC) Act 2006, consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council

¹³ Disturbance, as defined by the Conservation of Habitats and Species Regulations 2010, includes in particular any action which impairs the ability of animals to survive, breed, rear their young, hibernate or migrate (where relevant); or which affects significantly the local distribution or abundance of the species.



Directive 79/409/EEC on the Conservation of Wild Birds (Birds Directive), making it an offence to:

- Intentionally kill, injure or take any wild bird or their eggs or nests (with certain exceptions) and disturb any bird species listed under Schedule 1 to the Act, or its dependent young while it is nesting;
- Intentionally kill, injure or take any wild animal listed under Schedule 5 to the Act;
- intentionally or recklessly damage, destroy or obstruct any place used for shelter or protection by any wild animal listed under Schedule 5 to the Act;
- intentionally or recklessly disturb certain Schedule 5 animal species while they occupy a place used for shelter or protection;
- Pick or uproot any wild plant listed under Schedule 8 of the Act; or
- Plant or cause to grow in the wild any plant species listed under Schedule 9 of the Act.

Planning Policy

A summary of national planning policy relevant to (onshore) biodiversity in England is provided below. Note that the summary provided here is intended for general guidance only and the original policy documents should be consulted for definitive information. For local planning policy relevant to biodiversity the relevant local plans should be consulted.

National Planning Policy Framework December 2024 (England)

The National Planning Policy Framework (NPPF)¹⁴ sets out guidance for local planning authorities and decision-makers in how to apply planning policies when drawing up plans and making decisions about planning applications. Along with Government Circular 06/052, the broad policy objectives in relation to the protection of biodiversity and geological conservation in England through the planning system are set out. Specific policies relating to habitats and biodiversity are set out in paragraphs 187 to 195 of the NPPF.

Conserving and enhancing the natural environment

Paragraph 187 states that:

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

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

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

¹⁴ Ministry of Housing, Communities & Local Government (December 2024).
<https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf>



- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs; minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate”.*

Habitats and biodiversity

Paragraph 192 states that:

“To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”*

Paragraph 193 of the NPPF states that:

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

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*



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

Paragraphs 194 - 195 relate to the National Sites Network (referred to as habitats sites) and state:

“The following should be given the same protection as habitats sites:

- a) potential Special Protection Areas and possible Special Areas of Conservation;*
- b) listed or proposed Ramsar sites; and*
- c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.*

The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.”



