

Ecological Impact Assessment

Land at Gate Farm, High Street, Sutton Benger

Gleeson Land Limited

December 2025

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Executive summary

Introduction and approach

EAD Ecology was commissioned by Gleeson Land Limited to undertake an Ecological Impact Assessment (EclA) of a proposed residential development at Land at Gate Farm, High Street, Sutton Benger (the 'site'). The EclA followed Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines (2018) and BS42020:2013. The work was carried out in accordance with CIEEM's Code of Conduct and following standard published methods.

Baseline

Designated sites

There are no statutory designated sites within or adjacent to the site, and no Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites within 10km of the site. The Site does not lie within any core areas or consultation zones associated with such sites.

There are four Sites of Special Scientific Interest (SSSIs) within 5km of the site, although only two are designated for biological interest. The closest of these is Sutton Lane Meadows SSSI, which lies approximately 750m south-east of the site and is designated for unimproved neutral grassland. The closest non-statutory site is The Shrubbery Local Wildlife Site (LWS), an area of ancient replanted woodland 40m to the north of the site. Bristol Avon River LWS is approximately 1.6km downstream of the watercourse to the north of the site.

Habitats

The site consisted predominantly of modified (agricultural) grassland, bordered by species-poor hedgerows. Lowland mixed deciduous woodland was present approximately 20m north of the site at its closest point (The Shrubbery LWS forms part of the wider woodland), and a watercourse occurred 30m north of the site at its closest point. The hedgerows, woodland and watercourse corresponded to respective Priority Habitats.

Protected / notable species

Ecological baseline surveys undertaken between May and October 2025 identified the following:

- Suitable terrestrial habitat for common amphibians, including common toad. Great crested newt is considered to be absent from the site.
- Low numbers of slow-worms within grassland and alongside hedgerows.
- A limited range of breeding birds, but potentially including notable species such as dunnoek, song thrush, woodpigeon and wren breeding on site.
- Suitable foraging habitat for badgers (no setts were recorded).
- At least 10 bat species recorded commuting/foraging within and adjacent to the site, with most bat activity occurring alongside the woodland/watercourse to the north of the site. Common and soprano pipistrelle bats were the most abundant, accounting for approximately two-thirds of all registrations on static detectors. 'Light-sensitive' species were recorded including greater horseshoe bat, lesser horseshoe bat and barbastelle, however registrations were either concentrated over short periods of time, or at such low levels to indicate that the site did not contain important commuting routes or key foraging habitat for these species. There was no suitable bat roosting habitat on site.
- Otter spraint alongside the watercourse to the north of the site.

No evidence of hazel dormouse or water vole were recorded; these species were considered to be absent from the site and surrounding habitats. Presence of hedgehog and brown hare, both Priority Species, was assumed.

Potential effects, avoidance, mitigation, compensation and enhancement

Recreational impacts on Sutton Lane Meadows SSSI arising from the proposed development are expected to be minimal and unlikely to affect the current 'favourable' condition status of the SSSI. There is however the potential for accidental damage and/or pollution to The Shrubbery LWS (including associated ancient woodland) and Bristol Avon River LWS as a result of construction activities.

Construction would result in the loss of habitats including modified grassland and hedgerows. Retained habitats could also be affected through pollution and/or physical damage. Habitat impacts would reduce available habitat for protected and notable species during construction and there is the risk of direct impacts (i.e. killing or injury) to common amphibians, reptiles, nesting birds, badgers and hedgehogs. There would also be the potential for disturbance to commuting and foraging bats, badgers and other wildlife arising from lighting during and post-construction.

The proposed development includes the creation of wildflower grassland, new species-rich hedgerows, marginal planting around attenuation features, and native and ornamental tree planting. Indicative habitat retention, creation and enhancement proposals have been assessed using the Statutory Biodiversity Metric. The Biodiversity Net Gain (BNG) assessment has calculated that the development proposals would deliver a net loss of 9.12 Habitat Units (-44.40%) but a net gain of 1.77 Hedgerow Units (+71.41%). The preliminary assessment complies with all BNG trading rules, and no irreplaceable habitats would be affected.

Additional measures are proposed to further avoid and mitigate negative effects and provide ecological enhancement including:

- Biodiversity offsetting (compensation and enhancement) to deliver 10% net gain for habitats overall.
- A financial contribution would be provided to fund visitor management measures at the Sutton Lane Meadows SSSI, for example the provision and regular emptying of dog waste bins, fencing.
- A 15m-wide buffer would be applied alongside the woodland and watercourse (including the Shrubbery LWS and associated ancient woodland) to the north of the site. No contractors' compounds, materials or any construction-related activities would be permitted within this buffer.
- Installation of temporary barriers/fencing; adherence to BS 5837:2012; and implementation of pollution-control measures during construction to protect retained/adjacent habitats, The Shrubbery LWS and Bristol Avon River LWS.
- 'Habitat manipulation' prior to construction to prevent killing/injury of reptiles and amphibians.
- Removal of hedgerow sections outside of the bird-breeding season to avoid direct impacts to nesting birds.
- An update badger survey prior to the start of construction to confirm absence of active setts, and construction management measures to avoid impacts to badger and otter during construction.
- Bee bricks, bird boxes and bat boxes incorporated into new buildings to provide additional habitat for these species.
- Restrictions on construction lighting, and implementation of a mitigated public-realm lighting design to minimise impacts on commuting/foraging bats and otter.

- Creation of hedgehog passes within new garden fences to increase permeability of the site post-construction.
- Management of new and retained habitats in accordance with a Habitat Management and Monitoring Plan (HMMP).

Cumulative and residual effects

Long-term residual effects on designated sites and protected/notable species would be either negligible or positive, so there is no risk of a significant cumulative effect occurring on these receptors in combination with other developments. There would be a long-term net loss of habitats on site (biodiversity offsetting is proposed), however this would not be significant and would not lead to significant long-term cumulative effects with other developments.

Conclusions

Assuming the implementation of all avoidance, mitigation, compensation and enhancement measures identified in this report, all long-term effects on designated sites and protected/notable species would be either negligible or positive. There would be a long-term net loss of habitats on site, however this would not be significant and a net gain for habitats overall would be achieved through biodiversity offsetting (compensation and enhancement).

The proposed development could achieve a minimum of 10% BNG for habitats and hedgerows, and could be delivered in accordance with relevant national and local biodiversity planning policies, and legislation relating to BNG, designated sites and protected species. No irreplaceable habitats would be affected.

1 Introduction, background and approach

1.1 Introduction

1.1.1 EAD Ecology was commissioned by Gleeson Land Limited to undertake an Ecological Impact Assessment (EcIA) of a proposed residential development at Land at Gate Farm, High Street, Sutton Benger (approximate OS Grid Ref: ST940785; refer to Figures 1 - 3), hereafter referred to as 'the site'. This report documents the EcIA, which was undertaken in accordance with BS42020:2013 and following Chartered Institute of Ecology and Environmental Management (CIEEM) guidelines (2018). It includes the following sections:

- Description of the existing ecological baseline;
- Identification of the potential impacts of the proposals during and post-construction;
- Identification of proposed avoidance, mitigation and compensation measures for negative impacts, and further enhancement measures;
- Summary of residual ecological effects, i.e. those occurring after mitigation;
- Consideration of cumulative effects; and
- Conclusions, including assessment of compliance with wildlife legislation and planning policy.

1.2 Legislation and planning policy

Wildlife legislation

1.2.1 The following wildlife legislation is relevant to the proposed development (refer to Appendix 1 for further details):

- Environment Act 2021;
- Conservation of Habitats and Species Regulations 2017 (as amended);
- Wildlife and Countryside Act 1981 (as amended);
- Countryside and Rights of Way Act 2000;
- Natural Environment and Rural Communities Act 2006;
- Protection of Badgers Act 1992; and
- Hedgerow Regulations 1997 (as amended).

National planning policy

1.2.2 The National Planning Policy Framework (NPPF; 2024) includes the Government's policy on the protection of biodiversity through the planning system. A summary of the relevant paragraphs of the NPPF is provided in Appendix 2.

Local planning policy

1.2.3 Current local planning policy comprises the Wiltshire Core Strategy (WCS; adopted January 2015) together with 'saved' policies of the North Wiltshire Local Plan. The following policies are considered relevant to the ecological assessment of the proposed development:

- Wiltshire Core Strategy Policy 50: Biodiversity and geodiversity.
- North Wiltshire Local Plan 'Saved' Policy NE14: Trees and the control of new development.

1.2.4 Wiltshire Council is currently undertaking a Local Plan Review and published the Wiltshire Local Plan Pre-Submission Draft 2020-2038 (Regulation 19 consultation) in September 2023. The emerging Local Plan does not revisit the strategic objectives that were set out in the WCS, but it

does update and introduce new policies to guide the determination of planning applications. The following emerging policies are relevant to biodiversity are as follows:

- Policy 88: Biodiversity and geodiversity.
- Policy 89: Biodiversity net gain.
- Policy 90: Woodland, hedgerows and trees.

1.2.5 Relevant adopted and emerging local policy text is contained in Appendix 3. Policy 89 of the emerging Local Plan requires developments to achieve a 20% Biodiversity Net Gain (BNG). This exceeds the mandatory 10% BNG requirement. While Plan-makers may seek a higher percentage than the mandatory requirement, Government guidance states that it would “*generally be inappropriate for plans or supplementary planning documents to include policies or guidance which are inconsistent with this [statutory] framework*”, and that, if proposed, “*such policies will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development.*” Policy 89 has not yet been examined or adopted and is yet to be tested against the emerging Government guidance.

1.2.6 The following additional documents are considered to be relevant to the ecological assessment of the Proposed Development:

- Bats Special Areas of Conservation (SAC) Planning Guidance for Wiltshire (Natural England and Wiltshire Council, 2015).
- Wiltshire Biodiversity Action Plan.

1.3 Approach

Ecological baseline

1.3.1 The ecological baseline was determined through desk study and site survey.

Desk Study

1.3.2 Biodiversity information was requested from a study area of 2km radius around the site boundary (extended to 4km for bats) from Wiltshire & Swindon Biological Records Centre in April 2025. Information requested included the location and details of the following:

- Designated sites of nature conservation importance (statutory and non-statutory; extended to 10km for European statutory designated sites and 5km for other statutory sites using the Defra MAGIC website); and
- Previous records of protected and/or notable species, including Priority Species (Species of Principal Importance for Conservation in England listed on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006) and Wiltshire Biodiversity Action Plan (BAP) Priority Species.

1.3.3 Information was also obtained from the following websites:

- <https://magic.defra.gov.uk/MagicMap.aspx> – Information on protected sites;
- <http://jncc.defra.gov.uk> – information on protected sites, Priority Habitats and Species; and
- <https://www.gov.uk/government/organisations/natural-england> – information on protected sites and standing advice.

Site survey

1.3.4 An ‘Extended’ UKHab habitat survey of the site was undertaken on 17 April 2025 and updated on 19 June 2025. The survey followed the UK Habitat Classification Version 2.0 (UKHab Ltd, 2023) and

identified the main habitat types on the site and the presence/potential presence of protected and notable species. The results of the survey were detailed on a habitat plan, with target notes used to identify specific features of ecological interest; refer to Figure 4. A botanical species list was recorded, although no attempt was made to record every plant species on the site; refer to Appendix 4.

- 1.3.5 The UKHab survey identified the potential for protected and notable species within the survey area. Further (Phase 2) surveys were subsequently undertaken to determine if such species were present. A summary of these surveys is provided in Table 1.1 below; full details of methodologies and results are contained in Appendices 5 - 13. All surveys were carried out following standard published methods.

Table 1.1: Summary of Phase 2 ecological surveys

Survey	Date(s)	Details
Hedgerow and invasive species survey	June 2025	Ecological assessment of hedgerows under Hedgerow Regulations criteria and a search for invasive non-native plants. Refer to Appendix 5.
Great crested newt survey	April – May 2025	Habitat Suitability Index (HSI) and presence/absence surveys of ponds within 250m of the site. Refer to Appendix 6.
Reptile survey	August – September 2025	Deployment of artificial refugia in suitable habitat followed by seven checks. Refer to Appendix 7.
Breeding bird survey	May – July 2025	Three visits to record all birds present and estimate number of breeding territories/pairs. Refer to Appendix 8.
Hazel dormouse survey	May – October 2025	Deployment of nest tubes in suitable habitat followed by monthly checks. Refer to Appendix 9.
Badger survey	June 2025	Search for signs of badger activity e.g. setts, prints and latrines. Refer to Appendix 10.
Bat activity survey	May – October 2025	Night-time walkover surveys once per season and monthly deployment of four static bat detectors. Refer to Appendix 11.
Bat roost survey	June 2025	Ground level assessment of trees for potential roost features. Refer to Appendix 12.
Otter and water vole survey	June – August 2025	Surveys for field signs of both species along watercourse. Refer to Appendix 13.

Survey limitations

- 1.3.6 Due to the presence of livestock, reptile survey equipment was not deployed in the majority of the site due to risk of damage/interference by livestock, and instead deployed in adjacent habitat to the north and east. This is not considered to be a significant limitation as the habitat was broadly the same and the findings of the survey can be applied to the site.
- 1.3.7 It was not possible to undertake breeding bird or bat activity surveys in the month of April due to project timescales. However, three bird survey visits were completed during the breeding-bird season with each visit spaced by three weeks, which was considered to provide sufficient data to undertake an assessment on breeding birds. In respect of the bat activity survey, the large dataset collected in other months (May to October inclusive) was considered sufficient to inform the assessment on commuting/foraging bats.

- 1.3.8 Low numbers of dormouse nest tubes throughout the survey period were damaged or removed by livestock. These tubes were replaced immediately as needed and therefore this did not represent a significant limitation to the survey.
- 1.3.9 The B4069 roadside verge was surveyed in December 2025, which is outside the optimal survey period. However, sufficient information was obtained to determine grassland condition.

Biodiversity Net Gain assessment

- 1.3.10 A Biodiversity Net Gain (BNG) Assessment was undertaken using the Defra Statutory Biodiversity Metric calculation tool (Defra 2025a); refer to Appendix 14. A Biodiversity Statement is provided in Section 5.
- 1.3.11 A Habitat Condition Assessment (HCA) survey was undertaken to inform the BNG assessment; this was undertaken by an experienced ecologist (FISC Level 4 or above) on 19 June 2025 (majority of site) and 10 December 2025 (B4069 verge only). All habitats on site were assessed in accordance with the Statutory Metric Condition Assessment Criteria (Defra, 2025a). All baseline habitats were mapped in accordance with the UKHab Classification System (V2.0, 2023) following methodologies detailed in the UK Habitat Classification User Manual (Butcher *et al*, 2020). The Illustrative Masterplan (refer to Figure 3) were referenced for the proposed (post-intervention) development scenario; refer to Appendix 14. A further BNG assessment would be undertaken at the Reserved Matters stage using detailed landscape planting plans to confirm the delivery of net gain, as required by the mandatory Biodiversity Gain Planning Condition.

Evaluation of ecological features

- 1.3.12 The importance of the ecological features identified was evaluated using criteria for habitats and species based on CIEEM guidelines (2018). Ecological importance was classified using an eight-level geographic scale from 'Sub-Parish' (low) to 'International' (high); refer to Appendix 15. Legal protection of species is considered in Section 4 (mitigation) and does not specifically form part of the valuation process.

Confirmation of 'important' ecological features

- 1.3.13 Features were identified that were considered 'important', in accordance with CIEEM guidelines (2018), and therefore subject to further detailed assessment. Features that were unlikely to be affected by the project, or were sufficiently widespread, unthreatened or resilient to potential project impacts, were not considered important in the context of the proposed development, and were not, therefore, subject to further assessment.

Identification of potential impacts

- 1.3.14 Potential impacts on the important ecological features were described for the construction and post-construction phases of the development.

Avoidance, mitigation, compensation and enhancement measures

- 1.3.15 The proposed development (refer to Figures 2 and 3) was informed by the ecological baseline, including the presence/predicted presence of protected species. Therefore, the impact assessment was of a partially-mitigated scheme. Additional avoidance, mitigation, compensation and enhancement measures for the construction and post-construction phases of the development were identified; where appropriate, recommendations for how these measures could be secured (for example, through planning conditions/obligations or Natural England licensing) were also identified.

Residual effects

- 1.3.16 An assessment of the residual positive, negative or neutral ecological effects was undertaken following CIEEM (2018) guidelines. The effect timescale was given as:
- Acute, immediate and discrete.
 - Short-term: 0-3 years.
 - Medium-term: 3-10 years.
 - Long-term: 10+ years.
- 1.3.17 Effects were described at a geographical scale (refer to Appendix 15); effects identified at Sub-Parish level and below were not considered 'Significant'.
- 1.3.18 The conclusion to the assessment confirms any significant residual effects, compliance with national planning policy (including the avoidance of 'significant harm' in accordance with Paragraph 193 of the NPPF, 2024), and compliance with relevant Wiltshire local planning policy.

Consultation

- 1.3.19 Meetings were held with Natural England and The National Trust regarding potential recreational impacts on Sutton Lane Meadows Site of Special Scientific Interest (SSSI) that could arise from the proposed development. Minutes of these meetings are provided in Appendix 16.

2 Ecological baseline

2.1 Designated sites of conservation importance

- 2.1.1 The site does not lie within or adjacent to any statutory designated sites of nature conservation importance. There are no Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites within 10km of the site. The site does not lie within any bat SAC consultation zones (e.g. Bradford-on-Avon SAC; Natural England and Wiltshire Council, 2015) or any 'nutrient neutrality' catchments (e.g. River Avon SAC, River Lambourn SAC).
- 2.1.2 There are four Sites of Special Scientific Interest (SSSIs) within 5km of the site, although only two are designated for biological interest; refer to Table 2 for further details and Appendix 16 for SSSI locations. The closest of these is Sutton Lane Meadows SSSI, which lies approximately 750m south-east of the site and is designated for botanically-diverse, unimproved neutral grassland, which is managed as traditional meadows and contains a wide variety of plants including green-winged orchid and meadow saffron.

Table 2.1 Sites of Special Scientific Interest within 5km of the site

SSSI	Reason(s) for designation	Approx. distance and direction from site
Sutton Lane Meadows	Unimproved neutral grassland	750m SE
Stanton St. Quintin Quarry and Motorway Cutting	Geological interest	2.1km NW
Kellaways – West Tytherton, R. Avon	Geological interest	2.6km S
Harries Ground, Rodbourne	Species-rich neutral grassland; marsh fritillary <i>Euphydryas aurinia</i> .	3.6km N

- 2.1.3 There are 11 non-statutory Local Wildlife Sites (LWS) within 2km of the site; refer to Table 2 for further details and Appendix 16 for LWS locations. The closest of these is The Shrubbery, an area of ancient replanted woodland 40m to the north of the site. Sutton Lane LWS is a neutral grassland meadow adjacent to Sutton Lane Meadows SSSI approximately 750m south-east of the site.

Table 2.2 Local Wildlife Sites within 2km of the site

LWS	ID code (refer to Appendix 16)	Description	Approx. distance and direction from site
The Shrubbery	ST97.056	A small ancient replanted woodland set in parkland with a stream running along the southern boundary.	40m N
Sutton Lane Meadows	ST97.060	A small neutral meadow adjacent to a larger SSSI meadow.	750m SE
North Draycot Park	ST97.067	Old parkland - a high concentration of very old oak trees (many pollards) in semi-improved grassland.	900m N
Ell Wood	ST98.039	Mostly semi-natural ancient woodland on Kellaways sands and clay.	1.3km N

LWS	ID code (refer to Appendix 16)	Description	Approx. distance and direction from site
Sydney's Wood	ST97.031	A small stand of ancient semi-natural broadleaved woodland with some plantation.	1.5km S
Bristol Avon River	ST96.043	One of the main river systems draining north-west Wiltshire.	1.6km E
Kingston Langley Meadow	ST97.018	A small field with damp neutral grassland communities, now subdivided and partially within a garden.	1.6km SW
Seagry Wood and Oak Hill	ST98.038	Mixed conifer and Sweet Chestnut plantation on an ancient woodland site. Located on gently sloping land on clay and greensand with a rich ground flora including abundant Bluebells.	1.7km N
Old Coppice	ST97.032	Immature mixed plantation over a thin understorey and much bramble in the ground flora.	1.8km S
The Cuttings	ST97.063	Historically excavated borrow pit adjacent to railway with ponds and marsh.	1.8km SE
Poor Lain's Coppice	ST97.033	Conifer plantation with a mixed understorey mainly of sycamore.	2km S

2.2 Habitats within the site boundary

Modified grassland

- 2.2.1 An area of modified grassland within the site was managed through a mix of grazing and silage cutting, whereas the grassland immediately to the north and east (outside the site but within the survey boundary) was used for agricultural access. The sward in both areas dominated by grasses, with species including Yorkshire fog, perennial rye-grass, creeping bent, rough meadow grass, cock's-foot, crested dog's-tail and sweet vernal grass. Forbs were rare, but included common mouse-ear, field bindweed, creeping buttercup, dandelion, and bulbous buttercup. A single pyramidal orchid was recorded on the southern edge of the site, near the B4069 road verge.

Other neutral grassland

- 2.2.2 A narrow strip of other neutral grassland was present on the roadside verge alongside the B4069. This contained a variety of forbs including yarrow, hedge bedstraw, oxeye daisy, burnet saxifrage, common knapweed, hedgerow crane's-bill, dove's-foot crane's-bill, hedge woundwort, common vetch, field speedwell and perforated St John's-wort.

Native hedgerows

- 2.2.3 Native species-poor hedgerows bordered the site to the south, east and west. The hedgerows along the southern and eastern boundaries were heavily flailed and gappy, with species including blackthorn, field maple, elder, and hawthorn. The two hedgerows along the western boundary had become overgrown due to lack of management, with species including hazel, blackthorn, hawthorn, and elder. Hedgerows are a Priority Habitat.

2.3 *Adjacent and surrounding habitats*

Mixed scrub

- 2.3.1 A small area of mixed scrub was present approximately 30m north of the site, intersected by a section of the watercourse. Species included willow, alder, hazel, cherry laurel and snowberry.

Ornamental hedgerow

- 2.3.2 Approximately 15m east of the site, a hedgerow comprising cypress trees formed the boundary to existing development.

Watercourse

- 2.3.3 A stream averaging 2–3 m in width and less than 0.3 m in depth flowed west to east through the woodland approximately 30m north of the site at its closest point. The stream had a silty substrate and a slow to moderate flow. Marginal vegetation included pendulous sedge, opposite-leaved golden saxifrage, common nettle, hemlock water-dropwort, meadowsweet, and angelica. 'River' is a Priority Habitat.

Woodland

- 2.3.4 Lowland mixed deciduous woodland was present approximately 20m north of the site at its closest point. This included an area of ancient replanted woodland 40m to the north of the site (The Shrubbery LWS). The canopy was largely formed of oak and ash, with willow and alder present along the watercourse. Understory species included hazel, cherry laurel, willow and elder. The field layer included pendulous sedge, nettle, dog's mercury, hogweed and ivy. Lowland mixed deciduous woodland is a Priority Habitat.

2.4 *Protected and notable species*

Plants

Desk Study

- 2.4.1 A range of notable plant species has been recorded from the 2km study area. This includes:
- English bluebell, which receives partial legal protection.
 - Frog orchid, shepherd's-needle, tubular water-dropwort, fine-leaved sandwort, broad-fruited cornsalad, and basil thyme; these are all Priority Species.

Site survey

- 2.4.2 A list of plants recorded is provided in Appendix 4. No specially protected, notable or invasive plant species were recorded on site.

Invertebrates

Desk Study

- 2.4.3 A number of notable invertebrates have been recorded from the 2km study area, including:
- Small heath, white admiral and wall; butterflies that are Priority Species.
 - Blood-vein, buff ermine, cinnabar, shaded broad-bar and lackey; moths that are Priority Species.

Site survey

- 2.4.4 The presence of small numbers of notable invertebrates was considered possible; however, these are likely to be restricted to hedgerows around the margins of the site where suitable larval host

and food plants may occur. Due to the small size and agricultural nature of the site, significant populations of notable invertebrates were considered unlikely.

Amphibians

Desk Study

- 2.4.5 There are previous records of great crested newt from a number of different locations within 2km of the site, although none are within 250m of the site. GCN is a legally-protected Priority Species. Common toad, a Priority Species, has also been recorded in the 2km study area.

Site survey

- 2.4.6 Three ponds/waterbodies potentially suitable for GCN were provisionally identified within 250m of the site on OS Maps. During surveys, one of the ponds was found to no longer exist. The two other ponds, considered to have poor/below average suitability based on the GCN Habitat Suitability Index (HSI; Oldham *et al* (2000)) were subject to an environmental DNA (eDNA) survey in May 2025. The results of the eDNA survey were negative for both ponds, indicating likely GCN absence.
- 2.4.7 Based on the lack of previous GCN records within 250m and negative eDNA results, the presence of GCN on site was considered very unlikely. Habitats were however potentially suitable for common toad and other common amphibians.

Reptiles

Desk Study

- 2.4.8 There are previous records of slow-worm and grass snake from the 2km study area. All native reptiles are legally-protected Priority Species.

Site survey

- 2.4.9 A 'low' population of slow-worms was recorded; refer to Appendix 7 for further details. Suitable reptile habitat on site was generally restricted to field/hedgerow margins and brash piles.

Birds

Desk Study

- 2.4.10 A range of notable bird species have been recorded from the 2km study area. Those with potential to breed/forage on site during the breeding season are listed in Table 2.3 along with their legal and conservation status. All breeding birds, their nests, eggs and young are legally protected; species listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) received additional protection; refer to Appendix 1.

Table 2.3: Selected notable bird records from the 2km study area

Common name	BoCC5 status ¹	Priority Species ²	Schedule 1 ³	Annex I ⁴
Barn owl			✓	
Bullfinch	Amber	✓		
Corn bunting				
Cuckoo	Red	✓		
Dunnock	Amber	✓		
Greenfinch	Red			
Grey wagtail	Red			
Hobby			✓	

Common name	BoCC5 status ¹	Priority Species ²	Schedule 1 ³	Annex I ⁴
House martin	Red			
House sparrow	Red	✓		
Kestrel	Amber			
Kingfisher			✓	
Linnet	Red	✓		
Mallard	Amber			
Marsh tit	Amber	✓		
Meadow pipit	Amber			
Mistle thrush	Red			
Moorhen	Amber			
Red kite			✓	✓
Redpoll	Red	✓		
Reed bunting	Amber	✓		
Rook	Amber			
Skylark	Red	✓		
Song thrush	Red	✓		
Sparrowhawk	Amber			
Spotted flycatcher	Red	✓		
Starling	Red	✓		
Stock dove	Amber			
Swift	Red			
Tawny owl	Amber			
Whitethroat	Amber			
Willow warbler	Amber			
Woodpigeon	Amber			
Wren	Amber			
Yellowhammer	Red	✓		

¹ Red or Amber-listed Birds of Conservation Concern (Stanbury *et al.*, 2021)

² Species of Principal Importance in England

³ Schedule 1 of the Wildlife and Countryside Act 1981 (as amended)

⁴ Conservation of Habitats and Species Regulations 2017 (as amended)

Site survey

- 2.4.11 The breeding-bird survey recorded a total of 29 species, however many of these were associated with the woodland/watercourse 20-30m to the north of the site, and the site itself supported a limited assemblage. Notable species probably/possibly breeding on site included dunnoek, song thrush (both Amber-listed Priority Species), woodpigeon and wren (both Amber-listed Species). Hedgerows bordering the site provided the habitats of highest value for breeding birds. No ground-nesting birds were recorded within the site.

Hazel dormouse

Desk Study

- 2.4.12 There are no previous records of hazel dormouse, a legally protected Priority Species, from the 2km study area.

Site survey

- 2.4.13 No evidence of hazel dormouse was recorded during the nest tube survey. This species is therefore very unlikely to be present on site.

Badger*Desk Study*

- 2.4.14 There are numerous records of badger from the 2km study area. Badgers and their setts are legally protected.

Site survey

- 2.4.15 No badgers, badger setts or evidence of badgers were identified during the badger survey. This species may however use the site occasionally for foraging.

Bats*Desk Study*

- 2.4.16 At least 11 bat species have been previously recorded in the extended 4km study area. Roosts have been recorded for common pipistrelle, soprano pipistrelle, brown long-eared bat, greater horseshoe bat, lesser horseshoe bat, serotine, Natterer's bat and whiskered bat, although the only maternity roosts identified were for common and soprano pipistrelles. Other species recorded within 4km but not roosting are noctule, Leisler's bat, and Daubenton's bat; there are also numerous field records of bats not assigned to species/genus. All bats and their roosts are legally protected; some species are also Priority Species (refer to Appendix 1).

Site survey

- 2.4.17 There were no buildings or trees on or adjacent to the site with bat roost suitability, therefore no roost surveys were undertaken. The woodland to the north of the site may contain trees with potential bat roost features.
- 2.4.18 The night-time walkover and static detector surveys recorded at least 10 bat species commuting/foraging within and adjacent to the site. Common and soprano pipistrelles were the most abundant, accounting for approximately two-thirds of all registrations on static detectors, followed by *Nyctalus/Eptesicus* bats, *Myotis* bats, noctule and greater horseshoe bat. Other species recorded but accounting for fewer than 1% of registrations each were long-eared bats, lesser horseshoe bat, Nathusius' pipistrelle, serotine and barbastelle. The highest overall levels of bat activity were recorded adjacent to the woodland/watercourse north of the site, although bats were recorded commuting/foraging along hedgerows on site.
- 2.4.19 Of the scarcer 'light-sensitive' species, greater horseshoe bat (GHS) accounted for 2.65% of all registrations on static detectors, however most GHS registrations occurred in relatively quick succession over a short time period in September/October, suggesting localised foraging by individual or low numbers of GHS rather than consistent commuting/foraging behaviour. Across the remainder of the survey period, very few GHS registrations were recorded. This suggests that the site did not represent core commuting/foraging habitat for GHS, rather the site was used sporadically or opportunistically for foraging.
- 2.4.20 Lesser horseshoe bat (LHS) was recorded less frequently than GHS on static detectors overall, but there was greater temporal and spatial variation in LHS registrations. The timings and frequency of registrations suggest that the site is not associated with a large roost nearby, and the site does

not support core commuting/foraging habitat for this species. Barbastelle was recorded in low numbers and sporadically with no clear pattern of behaviour identified.

Otter

Desk Study

- 2.4.21 There are previous records of otter from a number of different locations within 2km of the site; most of these records are associated with the River Avon, 1.4km – 2km east/south-east of the site. Otter is a legally protected Priority Species.

Site survey

- 2.4.22 Otter spraints were recorded at several locations along the watercourse to the north of the site, indicating regular use of this habitat. Habitats on site were generally unsuitable, although otter may cross the site occasionally.

Water vole

Desk Study

- 2.4.23 There is a single historical (1989) record of water vole from a location approximately 1.4km north-east of the site.

Site survey

- 2.4.24 No evidence of water vole was recorded along the watercourse to the north of the site. Water vole is therefore very unlikely to be present.

Other mammals

Desk Study

- 2.4.25 There are numerous records of hedgehog from the 2km study area. Brown hare has also been recorded, and there are historical records of harvest mouse. These are all Priority Species.

Site survey

- 2.4.26 Habitats on site were suitable for hedgehog, although given the size of the site, this species is only likely to be present in low numbers. Brown hare may occasionally use the site, but harvest mouse is unlikely to be present due to frequent grazing/management of grassland.

2.5 Evaluation and confirmation of important ecological features

- 2.5.1 An evaluation of the ecological features within the study area is provided in Table 2.3 below. This also includes confirmation of 'important' ecological features in the context of the proposed development, i.e. those that have been included in, or excluded from, further assessment.

Table 2.3: Evaluation and confirmation of important ecological features

Ecological feature	Ecological importance	Included in detailed assessment?	Reason
<i>Designated sites of nature conservation importance</i>			
Bath & Bradford on Avon Bats SAC	International	No	Valuation reflects designation. No potential impact pathways identified. The site does not lie within any associated bat consultation zones.
River Avon SAC River Lambourne SAC	International	No	Valuation reflects designation. No potential impact pathways identified; the site does not lie in nutrient neutrality catchments for these SACs.
Sutton Lane Meadows SSSI	National	Yes	Valuation reflects designation. Potential for increased recreational pressure from residents of the proposed development.
Other biological SSSIs within 5km	National	No	Valuation reflects designation. No mechanisms or pathways identified likely to affect these.
The Shrubbery LWS	County	Yes	Valuation reflects designation. Potential for direct damage and pollution as a consequence of the proposed development.
Sutton Lane Meadows LWS	County	Yes	Valuation reflects designation. Potential for increased recreational pressure from residents of the proposed development.
Bristol Avon River LWS	County	Yes	Valuation reflects designation. Hydrologically connected via watercourse to north of site therefore potential for pollution during construction.
Other LWS within 2km	County	No	Valuation reflects designation. No mechanisms or pathways identified likely to affect these sites.
<i>Habitats on the site</i>			
Modified grassland	Sub-Parish	Yes	Agricultural grassland, dominated by grasses with few forbs. Potentially impacted by the development.
Native hedgerows	Parish	Yes	All native hedgerows are Priority Habitats and support a range of species including nesting birds. Potentially impacted by the development.
<i>Adjacent and surrounding habitats</i>			
Mixed scrub, ornamental hedgerows	Sub-Parish	No	Common and widespread habitats of low ecological importance. Unlikely to be affected by the proposed development.
Woodland	Regional	Yes	Woodland to north of site includes an area of ancient woodland, considered an 'irreplaceable' habitat under national planning policy. Potential for accidental damage and pollution from the proposed development.
Watercourse	Parish	Yes	Watercourse corresponded to Priority Habitat 'Rivers'. Potential for accidental damage and pollution from the proposed development.

Ecological feature	Ecological importance	Included in detailed assessment?	Reason
<i>Protected and notable species</i>			
Plants	Sub-Parish	Yes	No specially protected, notable or invasive species recorded. The proposed development could reduce the botanical value of the site.
Invertebrates	Sub-Parish	Yes	Small numbers of notable invertebrates may be present but habitats on site were limited. Potentially impacted by the development.
Amphibians	Sub-Parish	Yes	The presence of great crested newt on-site was considered very unlikely, however common amphibians (e.g. common toad) may be present.
Reptiles	Sub-Parish	Yes	A 'low' population of slow-worms was recorded on site, mainly around field margins. Potentially impacted by the development.
Birds	Sub-Parish	Yes	Hedgerows on site provided suitable breeding habitat potentially including notable species, although the site supported a limited overall assemblage of birds. Potentially impacted by the development.
Hazel dormouse	Negligible	No	No evidence of this species recorded and very unlikely to be present within the site. No impacts predicted.
Badger	Sub-Parish	Yes	No setts recorded, but habitats on site may be used foraging badgers. Potentially impacted by the development.
Bats	Parish	Yes	No roosts identified on/adjacent to site, however at least 10 species recorded flying including scarce light-sensitive species. Potentially impacted by the development.
Otter	Parish	Yes	Watercourse 30m north of site used by otter. Habitats on site unlikely to be used regularly. Potentially impacted by the development.
Water vole	Negligible	No	No evidence of this species recorded and very unlikely to be present within the site. No impacts predicted.
Other mammals	Sub-Parish	Yes	The site provided habitat for brown hare and hedgehog. Both species could potentially be impacted by the development.

3 Assessment of ecological effects

3.1 *The proposed development*

Development description

- 3.1.1 An Outline Planning Application (with all matters reserved except means of access) for up to 90 no. (class C3) residential dwellings (including 40% affordable dwellings) including the creation of new vehicular access (from the B4069), pedestrian and cycle paths, parking spaces, public open space, biodiversity enhancement, landscape planting, surface water attenuation, associated infrastructure and other associated works.

Ecological design and avoidance measures

- 3.1.2 The proposed development would include the following (refer to Figure 3):
- Wildflower grassland created in open-space areas (approximately 0.78ha).
 - Creation of new species-rich hedgerows (approx. 285m) and maximising hedgerow retention.
 - Attenuation features with marginal planting (approx. 0.16ha).
 - Native and ornamental tree planting in developed areas of the site.
 - A buffer between the development and the woodland/watercourse to the north.

3.2 *Unmitigated effects during construction*

Designated sites of nature conservation importance

- 3.2.1 There is the potential risk that pollutants generated by construction activities could run off the site and enter the watercourse to the north of the site, which feeds into Bristol Avon River LWS. This could occur, for example, as a result of surface runoff contaminated with silt, hydrocarbons or other construction materials, or from an accidental fuel or concrete spill. Dust and other airborne pollutants generated by construction activities could also affect the woodland habitat within The Shrubbery LWS. Mitigation is proposed; refer to Paragraphs 4.1.2 - 4.1.3.

Habitats on the site

- 3.2.2 Based on the indicative development proposals, site clearance (including for development and green infrastructure) would result in the removal of approximately 4.95ha of modified grassland and approximately 20m of species-poor hedgerow. These losses would be mitigated in the medium-term through the implementation of the proposed landscape strategy; refer to Figure 3.
- 3.2.3 Airborne and ground-level pollutants generated by construction activities could affect retained habitats during the construction phase, including the hedgerows. There is also the risk of accidental damage, for example by construction machinery. Mitigation is proposed; refer to Paragraph 4.1.4.

Habitats adjacent to and surrounding the site

- 3.2.4 Pollution and accidental damage could also affect adjacent habitats during the construction phase, including the watercourse and ancient woodland to the north of the site. Mitigation is proposed; refer to Paragraph 4.1.4.

Protected and notable species*Plants*

- 3.2.5 No significant impacts are predicted. The proposed habitat creation and landscape proposals would result in an overall increase in the botanical diversity of the site once established.

Invertebrates

- 3.2.6 No significant impacts on notable invertebrate populations are predicted. With the retention and buffering of the majority of the hedgerow network, the most suitable invertebrate habitat would be retained. Site clearance would result in the loss of habitat for some common and widespread invertebrates, although this would be mitigated in the medium-term by the implementation of the habitat creation and landscape proposals. Additional habitat is also proposed; refer to Paragraph 4.1.6.

Amphibians

- 3.2.7 Construction could result in the killing/injury of common amphibians including common toad (but not great crested newt) and would also lead to a reduction in suitable foraging/sheltering habitat, although this would be mitigated in the medium-term by the implementation of the habitat creation and landscape proposals.

Reptiles

- 3.2.8 Construction could result in the killing/injury of slow-worms and lead to a reduction in suitable foraging, shelter and hibernation habitat, although this would be mitigated in the medium-term by the implementation of the habitat creation and landscape proposals. Mitigation measures are proposed to ensure legal compliance; refer to Paragraphs 4.1.8 - 4.1.9.

Birds

- 3.2.9 Site clearance would result in the removal of small sections of hedgerows, which provide nesting habitat for birds and could also lead to direct effect (i.e. killing or injury) on nesting birds, their eggs and young if undertaken during the breeding season. Mitigation is proposed to ensure legal compliance; refer to Paragraphs 4.1.10 - 4.1.11. There would also be a loss of foraging habitat for species that don't breed on site but use it to forage, such as house sparrow and starling, although this would be mitigated in the medium-term by the implementation of the habitat creation and landscape proposals.

Badger

- 3.2.10 Site clearance would result in the loss of suitable badger foraging habitat. There were no active badger setts within or adjacent to the site, and therefore no effects on setts are predicted. However, badgers could forage occasionally within the site and could be harmed or become trapped in open excavations during the construction phase. Mitigation is proposed; refer to Paragraphs 4.1.13 - 4.1.14.

Bats

- 3.2.11 No effects on bat roosts are predicted.
- 3.2.12 The removal of hedgerow sections to create new road and pedestrian access points could fragment the retained hedgerow network and result in a change or reduction in bat commuting / foraging activity. However, hedgerow removal would be limited to the southern boundary (total

20m) and there would be no direct impacts to the woodland/watercourse corridor to the north of the site, where the highest levels of bat activity were recorded.

- 3.2.13 Bats commuting and foraging across the site could also be negatively impacted by construction lighting. This would have the greatest impact on light-sensitive species such as horseshoe bats and *Myotis* bats. However, between spring and autumn construction activities would typically be undertaken during daylight hours when bats are not active, and lighting is only likely to be required during the winter months, when bats would be expected to be hibernating for the majority of the time and therefore either absent or present in very low numbers. Nevertheless, mitigation is proposed to minimise potential negative effects; refer to Paragraph 4.1.16.

Otter

- 3.2.14 A pollution event during construction could have a negative effect on the water quality of the watercourse to the north of the site, which could directly harm otter and/or affect prey availability. Any otters using the watercourse adjacent to the site could also be disturbed by construction noise and lighting. However, as otters are predominantly nocturnal, the effects of disturbance would be largely avoided as work would be undertaken during the day. Mitigation is proposed to reduce the likelihood of such effects; refer to Paragraph 4.1.18.

Other mammals

- 3.2.15 Site clearance would reduce the area of habitat suitable for hedgehog. Construction activities could also result in direct effects of killing and/or injury to hedgehogs. Mitigation is proposed; refer to Paragraph 4.1.19.

3.3 Post-construction effects

Designated sites of nature conservation importance

- 3.3.1 Sutton Lane Meadows SSSI and LWS and are connected to the site by a network of public footpaths and bridleways that run to the south of Sutton Benger village. The proposed development comprises up to 90 dwellings which, based on the latest national statistics (2.35 residents per household¹ and 36% of households owning dogs²) would result in an increased population of at least 212 people and 32 dogs. This could lead to additional recreational pressure on the SSSI and LWS, particularly through eutrophication/nutrient enrichment from dog faeces; The National Trust (which manages Sutton Lane Meadows) has identified this as the main recreational impact presently affecting the site (refer to Appendix 16). However, it would be expected that only a small proportion of new residents would regularly exercise their dogs at Sutton Lane Meadows due to the distance from the site (approximately 1.8km by public footpath/bridleway) and presence of other areas of public open space closer to the site (for example, Sutton Benger Recreation Ground). Any additional recreational impacts arising from the development are therefore expected to be minimal and unlikely to affect the current 'favourable' condition status of the SSSI.
- 3.3.2 The proposed SuDS drainage for the development would ensure that there would be no change in the quantity or quality of water leaving the site. Accordingly, there would be no risk that the proposed development would affect water quality within the watercourse to the north of the site, and consequently there would be no risk of an impact to Bristol Avon River LWS.

¹ [Families and households in the UK - Office for National Statistics](#)

² [UK Pet Population | UK Pet Food](#)

- 3.3.3 No impacts to other designated sites are predicted post-construction. The Shrubbery LWS is located on private land and would not be accessible to residents of the proposed development.

Habitats on the site

- 3.3.4 The habitat creation/enhancement and landscape strategy for the site are summarised in Paragraph 3.1.2 and shown on Figure 3. The indicative calculation in change in habitat value through the Statutory Biodiversity Metric confirms that the onsite habitat creation proposals, based on the Illustrative Landscape Plan (Figure 3) would deliver a net loss of 9.12 Habitat Units (-44.40%) but a net gain of 1.77 Hedgerow Units (+71.41%). The BNG position would be confirmed at Reserved Matters stage through submission of the Biodiversity Gain Plan in accordance with the Statutory BNG Condition.
- 3.3.5 New and retained hedgerows alongside residential gardens could be subject to interference, damage and/or removal by new homeowners whose gardens border the hedgerows, affecting their structure and functionality. The Illustrative Layout (refer to Figure 2) shows that the majority of new dwellings are outward facing i.e. the frontages face the hedgerows that border the site. However, for those dwellings where gardens border the hedgerows, mitigation is proposed; refer to Paragraph 4.2.6.

Habitats adjacent to and surrounding the site

- 3.3.6 There would be no public access to the woodland and watercourse to the north of the site, and the proposed SuDS drainage for the development would ensure that there would be no change in the quantity or quality of water leaving the site.

Protected and notable species

Plants

- 3.3.7 New habitat creation, including wildflower grassland and marginal planting, would increase the overall botanical diversity of the site compared with the pre-construction baseline.

Invertebrates

- 3.3.8 Once established, newly created habitats including wildflower grassland, marginal planting, trees and shrubs would be suitable for a range of invertebrates.

Amphibians

- 3.3.9 The creation of hardstanding, roads and buildings within the site could create physical barriers to movement for common amphibians. However, the habitat creation measures including wildflower grassland and marginal planting would provide foraging / sheltering and potentially breeding habitats for amphibians once established.

Reptiles

- 3.3.10 The creation of hardstanding, roads and buildings within the site could create physical barriers to movement for reptiles. However, the habitat creation measures including wildflower grassland and marginal planting would provide suitable foraging / sheltering habitats for reptiles once they are established.

Birds

- 3.3.11 The change of land use from agricultural to 'urban' habitats is likely to change the bird assemblage using the site post-construction. Native tree planting and hedgerow creation would result in an increase in nesting habitat available for some species, and residential gardens would also be likely

to provide suitable foraging and nesting habitat as they became established. Species of conservation concern most likely to benefit from these changes include house sparrow, starling, woodpigeon, wren and dunnock, which could all increase their populations on site.

- 3.3.12 It would be expected that a proportion of residents within the new development would own cats, and therefore local bird populations may also be adversely affected by increased predation. However, it would also be expected that a proportion of residents within the development area would provide supplementary feeding for birds, which is likely to help winter survival rates within the local population of some species and has been shown to improve breeding success in the following spring (Robb *et al.*, 2008).

Badger

- 3.3.13 Creation of new roads and additional vehicles within the site could result in increased badger mortality from vehicle collisions. However, as the new roads would be restricted to low-speed limits, the risk of collisions is unlikely to increase significantly. New habitats in public open space would be suitable for foraging badgers.

Bats

- 3.3.14 The hedgerows bordering the site, which are used as flight corridors by a range of bat species, would be largely retained and linked by new hedgerow creation. Once established, newly created habitats including wildflower grassland and marginal planting would provide additional foraging resource.
- 3.3.15 Street lighting and lighting from residential properties could have an adverse effect on commuting and foraging bats, particularly light-sensitive species such as horseshoe bats, barbastelle and *Myotis* bats. The impact of public-realm lighting on bats is variable and depends upon the species concerned and the nature of their activity, as well as on the type and intensity of the lighting. Certain bat species are known to be relatively tolerant of artificial lighting, e.g., common pipistrelle and noctule; these species are likely to continue to forage over the urban areas of the Site. Light spill onto habitats used by light-sensitive species such as brown long-eared bat, barbastelle, horseshoe and *Myotis* bats could potentially sever flightpaths, with such species likely to avoid illuminated areas (Stone *et al.*, 2015). Mitigation is proposed; refer to Paragraphs 4.2.14 - 4.2.16.

Otter

- 3.3.16 The new development could potentially subject otters using the watercourse north of the site to increased levels of anthropogenic disturbance, through traffic, lighting and noise. However, this is expected to be minimal; the watercourse is 30m from the development, which would be buffered along its northern boundary buffered by green infrastructure. Traffic would be speed-restricted in accordance with the residential nature of the proposed development; therefore, the potential for otter collision is negligible.

Other mammals

- 3.3.17 Hedgehogs are likely to attempt to use gardens and newly created habitats within the Site for foraging and shelter. However, without mitigation, close-board fences (e.g., for residential gardens) are likely to impede the movement of hedgehogs. Mitigation is proposed; refer to Paragraph 4.2.18. The presence of roads within the site is considered unlikely to result in a significant increase in hedgehog mortality as the new roads would be subject to low traffic volumes, travelling at low speeds. The site would be unsuitable for brown hare post-construction.

4 Avoidance, mitigation, compensation and enhancement

4.1 *Avoidance, mitigation, compensation and enhancement prior to & during construction* *General*

- 4.1.1 A Construction Ecological Management Plan (CECoMP) would be produced to detail measures to ensure habitat and species protection during the pre-construction and construction phases. An Ecological Clerk of Works (ECW) would be appointed to provide advice and undertake ecological supervision, as required by the CECoMP.

Designated sites of nature conservation importance

- 4.1.2 To prevent potential damage to The Shrubbery LWS and associated ancient woodland, temporary barriers (e.g. Heras fencing) which would be positioned on/adjacent to the northern boundary of the site, and outside of a 15m-wide buffer alongside the LWS/woodland (refer to Figure 5). No contractors' compounds, materials or any construction-related activities would be permitted within this 15m buffer zone, which would be maintained throughout construction. These measures would be specified in the CECoMP.
- 4.1.3 To prevent potential pollution of Bristol Avon River LWS, The Shrubbery LWS and associated ancient woodland, construction would be undertaken in accordance with Defra pollution prevention guidance (<https://www.gov.uk/guidance/pollution-prevention-for-businesses>). A Construction Environmental Management Plan (CEMP) would be prepared and agreed prior to the commencement of construction that would specify pollution control measures, including measures to prevent runoff leaving the site and entering the watercourse to the north of the site. Method statements for high-risk activities, such as refuelling and use of concrete, would also be included within the CEMP.

Habitats on and adjacent to the site

- 4.1.4 Construction methods would adhere to the CECoMP, CEMP, BS 5837:2012 (Trees in relation to design, demolition and construction) and Defra pollution prevention guidance. Temporary barriers would be extended to protect all retained trees and hedgerows on and adjacent to the site. Woodland to the north of the site would be protected by temporary barriers positioned on/adjacent to the northern boundary of the site, and outside of the 15m-wide buffer alongside the LWS/woodland (refer to Figure 5).

Protected and notable species

Plants

- 4.1.5 No specific mitigation for plants is proposed.

Invertebrates

- 4.1.6 Insect/bee bricks would be incorporated into the walls of new residential buildings at a minimum ratio of one box per two dwellings. This requirement would be set out in the CECoMP. Insect/bee bricks would be located on south-facing walls at a height of 1 - 1.5m, without any vegetation obstructing the holes but close to areas of nectar and pollen-rich planting within gardens and public open space.

Amphibians

- 4.1.7 The approach employed during the reptile mitigation strategy (see below) would prevent killing/injury to common amphibians.

Reptiles

- 4.1.8 'Habitat manipulation' would be undertaken prior to construction to prevent killing/injury of reptiles during site clearance (and ensure legal compliance). This can be undertaken any time between late March and early October and would involve two-stage cutting of vegetation to encourage reptiles to leave the affected area as follows:

- Firstly, all grassland would be cut to 150mm and then left for a week, to allow reptiles to move into adjacent retained habitats.
- Secondly, after a week, the grassland would be cut to ground level and then maintained at that level to discourage reptiles from entering the cut areas until site clearance is undertaken.

- 4.1.9 The topsoil would subsequently be stripped from the area, rendering it unsuitable for reptiles. The ECW would undertake a watching brief during the topsoil strip search for any remaining reptiles present and also supervise removal of any remaining suitable reptile habitat (e.g. brash piles). Any remaining reptiles found would be moved by the ECW to suitable retained habitat in the vicinity.

Birds

- 4.1.10 Clearance of hedgerow sections would be undertaken between September and February inclusive (i.e. outside of the main bird breeding season) to ensure that there were no direct effects on nesting birds. If clearance was required during the nesting season, an ecologist would first check the affected habitats for active nests. If any were found, the nest(s) and immediate surroundings would be left undisturbed until the eggs had hatched and young had fledged, or the breeding attempt was otherwise concluded i.e. nest abandoned/predated. The ecologist may establish a buffer zone around the nest (e.g. 5m) to minimise the risk of accidental damage/destruction.

- 4.1.11 To prevent potential harm to nesting birds in retained habitats, temporary barriers (e.g. Heras fencing) which would be positioned alongside all retained hedgerows prior to construction. No contractors' compounds, materials or any construction-related activities would be permitted within the fenced zones, which would be maintained throughout construction. These measures would be specified in the CECoMP.

- 4.1.12 Schwegler Type 1A swift boxes (or similar approved) would be incorporated into the walls of new buildings at a minimum ratio of one box per dwelling. These would be suitable for use by swift, which is a Red-listed Bird of Conservation Concern (Stanbury *et al* 2021) and can also be used by other declining urban species such as house sparrow. Boxes would be integrated into the walls of new buildings at a minimum height of 4m; the precise locations of boxes would be detailed in the CECoMP.

Badger

- 4.1.13 Prior to the start of construction, an update survey would be carried out to locate any newly established badger setts within the site. A Natural England Badger Development Licence would be obtained prior to commencement of works for any active setts where retention is not feasible and/or where they are likely to be damaged or disturbed during site clearance/construction. All works would be undertaken in accordance with the Method Statement for the Licence. Requirements for a licence, and steps to protect any retained setts, would be specified in the CECoMP.

- 4.1.14 General construction management measures to minimise impacts on badgers would be adhered to during construction in order to protect badger welfare. Excavations and piping (>100mm in diameter) would be fenced/capped overnight to deter badgers from entering; excavations that cannot be covered would have a means of escape for any animals that may fall in (e.g., sloping sides/ramps a maximum of 1:2 gradients). Fuel, oil and chemicals will be stored in secure sites within the construction compound, and no fires would be lit.

Bats

- 4.1.15 A detailed lighting strategy for the development, designed to minimise impacts on bats post-construction, would be approved by Wiltshire Council prior to construction commencing. Further details are provided in Paragraphs 4.2.14 - 4.2.16.
- 4.1.16 During construction, temporary barriers (e.g. Heras fencing) would be positioned on/adjacent to the northern boundary of the site, and outside of a 15m-wide buffer alongside the woodland to the north of the site (refer to Figure 5). Temporary barriers would also be extended to protect all retained trees and hedgerows on and adjacent to the site. No contractors' compounds, materials or any construction-related activities would be permitted within the 15m buffer zone or fenced zones, which would be maintained throughout construction. In addition, any construction lighting would be turned off prior to sunset between April and October inclusive; any security lighting would be positioned at low height and motion-activated on short-timers only.
- 4.1.17 Schwegler 1FR bat tubes (or similar approved) would be incorporated into new buildings at a minimum ratio of one box per two dwellings, to provide new roosting habitat for bats. Boxes would be integrated into walls at a minimum height of 3m, close to eaves, avoiding north facing elevations with limited fenestration and in proximity to green infrastructure. The number, specifications and exact locations would be included the CECoMP.

Otter

- 4.1.18 Measures to minimise construction impacts on badgers (see Paragraph 4.1.14) and bats (see Paragraph 4.1.16) would also minimise any impact on otters using the watercourse to the north of the site, or should any otters enter the works area.

Other mammals

- 4.1.19 Clearance of hedgerow sections would be preceded by a hand search for hedgehogs by the ECW. Any animals found would be moved to suitable retained habitat adjacent to the works area

4.2 Avoidance, mitigation, compensation and enhancement post-construction

Designated sites of nature conservation importance

- 4.2.1 It is considered that any increase in recreational pressure at Sutton Lane Meadows SSSI arising from the proposed development would not lead to a significant negative effect on the SSSI i.e. it would not affect its current 'favourable' condition status (refer to Paragraph 3.3.1). However, to minimise the risk of low-level negative effects, a financial contribution would be provided to The National Trust to fund visitor management measures at the SSSI, for example the provision and regular emptying of dog waste bins; fencing. If required, this would be secured using a S111 Agreement, S106 Agreement or Unilateral Undertaking.
- 4.2.2 No additional measures are considered necessary for other designated sites of nature conservation importance.

Habitats on the site

- 4.2.3 As detailed in Paragraph 3.3.4, the preliminary BNG Assessment has demonstrated that that it is not possible to deliver a 10% net gain in Habitat Units within the site boundary. Whilst the first two tiers of the ecological hierarchy, avoidance and mitigation, have been applied, considering all other layout constraints, it is not possible to deliver the required avoidance, mitigation and enhancement on-site. In line with the third tier of the ecological hierarchy, compensation, and then further enhancement, would be proposed outside of the site boundary to deliver the 10% net gain. This could be achieved through one of the following 'biodiversity offsetting' measures:
- Delivery of Habitat Units outside of the Site boundary through creation of a Habitat Bank.
 - Purchase of Habitat Units for an existing Habitat Bank.
 - Purchase of Statutory Credits from the government; this is considered as a last resort.
- 4.2.4 Potential options for Habitat Bank creation have been provisionally identified on land to the north and west of the site, which are under the same landowner holding (refer to Figure 1). This could include (but may not be limited to) creation of wildflower grassland, woodland and/or native scrub planting. Alternatively, other biodiversity offsetting measures may be considered. Precise details would be confirmed through submission of the Biodiversity Net Gain Plan to discharge the Statutory BNG Planning Condition.
- 4.2.5 New and retained habitats would be managed in accordance with a Habitat Management and Monitoring Plan (HMMP). This document would form part of the Biodiversity Net Gain Plan and would be submitted to Wiltshire Council to discharge the Statutory BNG Planning Condition.
- 4.2.6 The final layout for each development phase would seek to avoid houses backing on to new and retained hedgerows as far as possible, in accordance with the Illustrative Layout (Figure 2). Where this could not be avoided, hedgerows would be protected by a 1.2m-1.8m post and wire-mesh fence installed along garden boundaries. The wire mesh would allow vegetation to grow through whilst also protecting the integrity of the hedgerow.

Habitats adjacent to the site

- 4.2.7 No measures in respect of adjacent habitats are considered necessary post-construction. There would be no public access to the woodland and watercourse to the north of the site.

Protected and notable species***Plants***

- 4.2.8 No specific mitigation for plants is proposed.

Invertebrates

- 4.2.9 Insect/bee bricks incorporated into walls within the proposed residential development are designed to be maintenance-free and no management would be required.

Amphibians and reptiles

- 4.2.10 Habitats on site would be managed in accordance with the HMMP, which would include details of the timing and height of grassland management to benefit/avoid negative impacts to amphibians and reptiles.

Birds

- 4.2.11 Measures to avoid impacts on nesting birds as a result of landscape management works would be included in the HMMP. Bird boxes within buildings (refer to Paragraph 4.1.12) are designed to be maintenance-free and no management would be required.

Badger

- 4.2.12 No specific measures in respect of badger are considered necessary post-construction.

Bats

- 4.2.13 Bat boxes within buildings (refer to Paragraph 4.1.17) are designed to be maintenance-free and no management would be required.
- 4.2.14 The detailed lighting design for the development would ensure that lighting impacts on bats were minimised post-construction. The design would seek to follow BCT/ILP guidance (2018) recommendations to prevent light spill onto new and retained habitats. Key to this design would be to ensure that light spill does not intrude on the 15m-wide buffer zone alongside the woodland/watercourse to the north of the site.
- 4.2.15 Lighting would be designed to direct light away from site boundaries and new and retained hedgerows. Lighting along roads and footpaths, where required, would be kept to the minimum required for security and public health and safety, and avoided as far as possible within the public open space. Measures that could be provided to further reduce lighting impacts include:
- LED luminaires should be used wherever possible. All luminaires should lack UV elements when manufactured.
 - Luminaires feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats.
 - Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt.
 - Height of light units should be minimised (whilst ensuring light does not spill above horizontal plane).
 - Avoidance of upward light (e.g. ground-mounted floodlights up-lighting trees and buildings).
 - Variable lighting regimes (motion sensors or part-night lighting) in areas close to site boundaries.
 - Internal luminaires should be recessed (as opposed to using a pendant fitting) where installed in proximity to windows to reduce glare and light spill.
 - Only if all other options have been explored, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed.
- 4.2.16 The final lighting design would be reviewed by a suitably qualified ecologist and would be subject to approval by Wiltshire Council.

Otter

- 4.2.17 The mitigated lighting design for bats (see above) would also prevent any potential post-construction lighting effects on otter.

Other mammals

- 4.2.18 Hedgehog passes would be created within new garden fences to allow hedgehogs to move freely around the site post-development. Each gap would have a minimum dimension of 13cm x 13cm

and would be cut out of a gravel board on the bottom of the fence, or a similar sized gap left at the end of a board. One hedgehog pass would be created in each boundary fence.

4.3 *Ecological monitoring*

- 4.3.1 The Ecological Clerk of Works (ECW) would assist in the delivery of avoidance and mitigation during the pre-construction/construction period. This would be set out in the CECoMP.
- 4.3.2 Post-construction monitoring of the retained, created and enhanced habitats would be undertaken to ensure successful establishment and management; a monitoring protocol would be contained in the HMMP.

4.4 *Mechanisms for mitigation delivery*

- 4.4.1 The proposed CECoMP and lighting strategy could be secured via a planning condition. The mandatory BNG condition would be automatically applied to the planning permission, which would require a Biodiversity Gain Plan, including the HMMP.
- 4.4.2 Mitigation in respect of Sutton Lane Meadows SSSI would be secured using a S111 Agreement, S106 Agreement or Unilateral Undertaking.

5 Residual effects

5.1 *Summary of residual effects*

- 5.1.1 Table 5.1 below provides a summary of the ecological assessment and identifies the residual ecological effects arising from the proposed development.

5.2 *Cumulative effects*

- 5.2.1 Long-term effects on designated sites and protected/notable species would be either negligible or positive, so there is no risk of a significant cumulative effect occurring on these receptors in combination with other proposed or consented developments. There would be a long-term net loss of habitats value on site (offsetting is proposed), however this would not be significant and is unlikely to lead to long-term cumulative effects with other developments.

5.3 *Conclusion*

- 5.3.1 Assuming the implementation of all avoidance, mitigation, compensation and enhancement measures identified in this report, all long-term effects on designated sites and protected/notable species would be either negligible or positive. There would be a long-term net loss of habitats on site, however this would not be significant and a net gain for habitats overall would be achieved through biodiversity offsetting.
- 5.3.2 On this basis, the proposed development could achieve greater than 10% BNG for habitats and hedgerows, and could be delivered in accordance with relevant national and local biodiversity planning policies, and legislation relating to BNG, designated sites and protected species. No irreplaceable habitats would be affected.

5.4 *Biodiversity Statement*

- 5.4.1 The requirements of the Environment Act 2021 (and implementing Regulations) apply to the proposed development with respect to Biodiversity Net Gain (BNG). A baseline habitat plan showing onsite habitat existing on the date of application is provided in Appendix 14. The Habitat Condition Assessment undertaken in June and December 2025 represents the pre-development biodiversity value of the onsite habitat at the date of the Application. No destructive or degrading activities have taken place, which would impact the biodiversity baseline assessment (other than standard agricultural operations) and no irreplaceable habitat occurs on or immediately adjacent to the land to which the application relates.
- 5.4.2 An indicative Biodiversity Net Gain (BNG) Assessment has been produced for the illustrative development proposals; refer to Appendix 15 and an indicative Statutory Metric that has been submitted separately. The BNG Assessment confirms that the proposed development could deliver a net loss of -9.12 'Habitat Units' (-44.40%) and a net gain of 1.77 'Hedgerow Units' (+71.41%). An additional 11.18 Habitat Units would be required to achieve 10% Biodiversity Net Gain. Biodiversity offsetting could be undertaken to ensure that the development delivers at least 10% net gain for habitats and hedgerows overall.

Table 5.1: Summary of ecological assessment

Ecological feature	Potential unmitigated impact	Avoidance, mitigation, compensation and enhancement	Residual effect
Designated sites of nature conservation importance			
Sutton Lane Meadows SSSI / LWS	Potential post-construction recreational impacts expected to be minimal and not affect the 'favourable' condition status of the SSSI.	A financial contribution to be provided to fund visitor management for low-level negative effects e.g. provision and emptying of dog waste bins.	Negligible.
The Shrubbery LWS	Accidental damage and airborne pollution during construction.	15m-wide buffer implemented alongside woodland/watercourse to the north of the site. Construction undertaken in accordance with Defra pollution-prevention guidance, BS 5837:2012, CEcoMP and CEMP.	Negligible.
Bristol Avon River LWS	Water pollution during construction.	15m-wide buffer implemented alongside woodland/watercourse to the north of the site. Construction undertaken in accordance with Defra pollution-prevention guidance, CEcoMP and CEMP.	Negligible.
Habitats			
Habitats within the development site (modified grassland, hedgerows)	Removal during site clearance. Accidental damage of retained habitats during construction. Damage by new residents post-construction.	Installation of temporary barriers alongside retained hedgerows. Construction undertaken in accordance with Defra pollution prevention guidance, BS5837:2012, CEcoMP and CEMP. Management of new habitats in accordance with HMMP. Installation of fencing post-construction to protect retained hedgerows where appropriate. Biodiversity offsetting (off-site compensation and enhancement) proposed.	Positive long-term effect at Sub-Parish level, not significant.
Adjacent/surrounding habitats (including woodland and watercourse to north)	Pollution and accidental damage during construction.	15m-wide buffer implemented alongside woodland/watercourse to the north of the site. Construction undertaken in accordance with Defra pollution-prevention guidance, BS 5837:2012, CEcoMP and CEMP.	Negligible.

Ecological feature	Potential unmitigated impact	Avoidance, mitigation, compensation and enhancement	Residual effect
Protected and notable species			
Plants	No significant effects on notable plant species predicted.	Management of new habitats in accordance with the LEMP to maximise botanical diversity.	Negligible.
Invertebrates	Loss of habitat through site clearance. No significant effects on notable populations predicted.	Management of new habitats in accordance with the LEMP. Installation of insect/bee bricks within the walls of new dwellings.	Negative, medium-term effect at Sub-Parish level, not significant. Neutral long-term effect at Sub-Parish level.
Amphibians	Loss of habitat and risk of killing and/ or injury to individual amphibians during site clearance (excluding GCN).	Habitat manipulation to prevent killing/injury. Management of new habitats in accordance with LEMP to consider presence of amphibians.	Negative, medium-term effect at Sub-Parish level, not significant. Neutral long-term effect.
Reptiles	Loss of habitat and risk of killing and/ or injury to low numbers of slow-worms during site clearance.	Habitat manipulation to prevent killing/injury. Management of new habitats in accordance with the LEMP to consider presence of reptiles.	Negative, medium-term effect at Sub-Parish level, not significant. Neutral long-term effect.
Birds	Potential direct effects on individual birds, their nests and eggs. Loss of nesting and foraging habitat. Potential increase in cat predation post-construction, although gardens would provide new habitat and likely to provide supplementary food.	Clearance of hedgerow sections outside of main bird nesting season or subject to pre-clearance check by an ecologist. Installation of temporary barriers alongside retained hedgerows during construction. Provision of nest boxes within new buildings. Habitats managed in accordance with LEMP.	Negative, medium-term effect at Sub-Parish level, not significant. Neutral long-term effect.
Badger	Loss of foraging habitat. Entrapment/ injury during construction. Additional mortality due to vehicle collisions.	Pre-construction survey for badger setts. Closure of active setts under licence if deemed likely to be affected by construction activities. Adherence to best practice working methods to mitigate potential construction impacts.	Negative, medium-term effect at Sub-Parish level, not significant. Neutral long-term effect.
Bats	Loss/fragmentation of bat commuting and foraging habitat. Potential disruption to light-averse bat species through construction and post-construction lighting.	15m-wide buffer implemented alongside woodland/watercourse to the north of the site. Installation of temporary barriers alongside retained hedgerows during construction.	Negative, medium-term effect at Sub-Parish level, not significant. Neutral long-term effect.

Ecological feature	Potential unmitigated impact	Avoidance, mitigation, compensation and enhancement	Residual effect
		Provision of bat boxes within new buildings. Post-construction lighting designed to minimise impacts on bats.	
Otter	Indirect effects through pollution of watercourse north of site. Disturbance from construction activities.	15m-wide buffer implemented alongside woodland/watercourse to the north of the site. Construction undertaken in accordance with Defra pollution-prevention guidance, CEcoMP and CEMP. Sensitive lighting design.	Negligible.
Other mammals	Loss of habitats and potential for direct effects (killing / injury) to hedgehog during site clearance. Fragmentation of new habitats from garden fencing.	Creation of hedgehog 'highways' through passes in new garden fences.	Negative, medium-term effect at Sub-Parish level, not significant. Neutral long-term effect.

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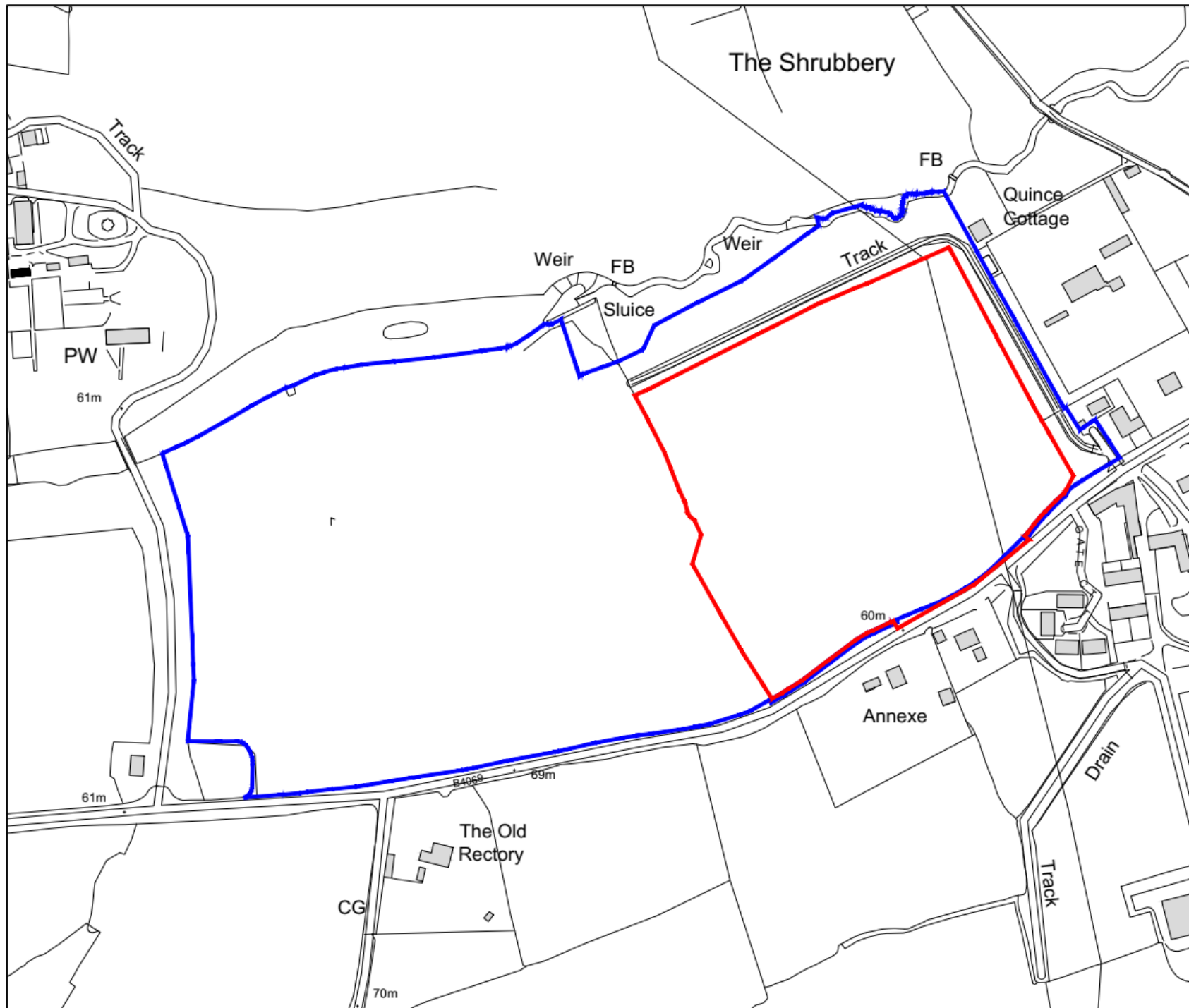
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Figure 1: Site Boundary Plan



The scaling of this drawing cannot be assured			
Revision	Date	Drn	Ckd
F Graphics updated	20.11.25	SM	FM

- Site Boundary
- Landowner Holding

Project
Sutton Benger

Drawing Title
Site Boundary Plan

Date	Scale	Drawn by	Check by
04.06.25	1:2,500 @A3	S.M.	F.M.
Project No	Drawing No	Revision	
333102291	STN-GEN-SW-DR-MP-02F		



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Figure 2: Illustrative Layout



Project
Sutton Benger

Drawing Title
Illustrative Site Layout

Date	Scale	Drawn by	Check by
31.07.25	1:1,250 @A2	M.D.	F.M./S.B.
Project No	Drawing No	Revision	
333102291	STN-GEN-SW-DR-MP-06	A	

Figure 3: Illustrative Landscape Plan



Key:

- Site Boundary
- Existing and Retained Vegetation
- Proposed Open Space Trees
- Proposed Street Trees
- Proposed Ornamental Shrub Planting
- Proposed Attenuation Basin
- Proposed Marginal Planting
- Proposed Species Rich Seeding
- Proposed LEAP
- Proposed Benches
- Public Right of Way



Project	Sutton Benger
Drawing Title	Illustrative Landscape Mitigation and Enhancement Plan
Scale	A3: 1:1500
Drawing No	17958/P08
Date	October 2025
Checked	EE/TRS

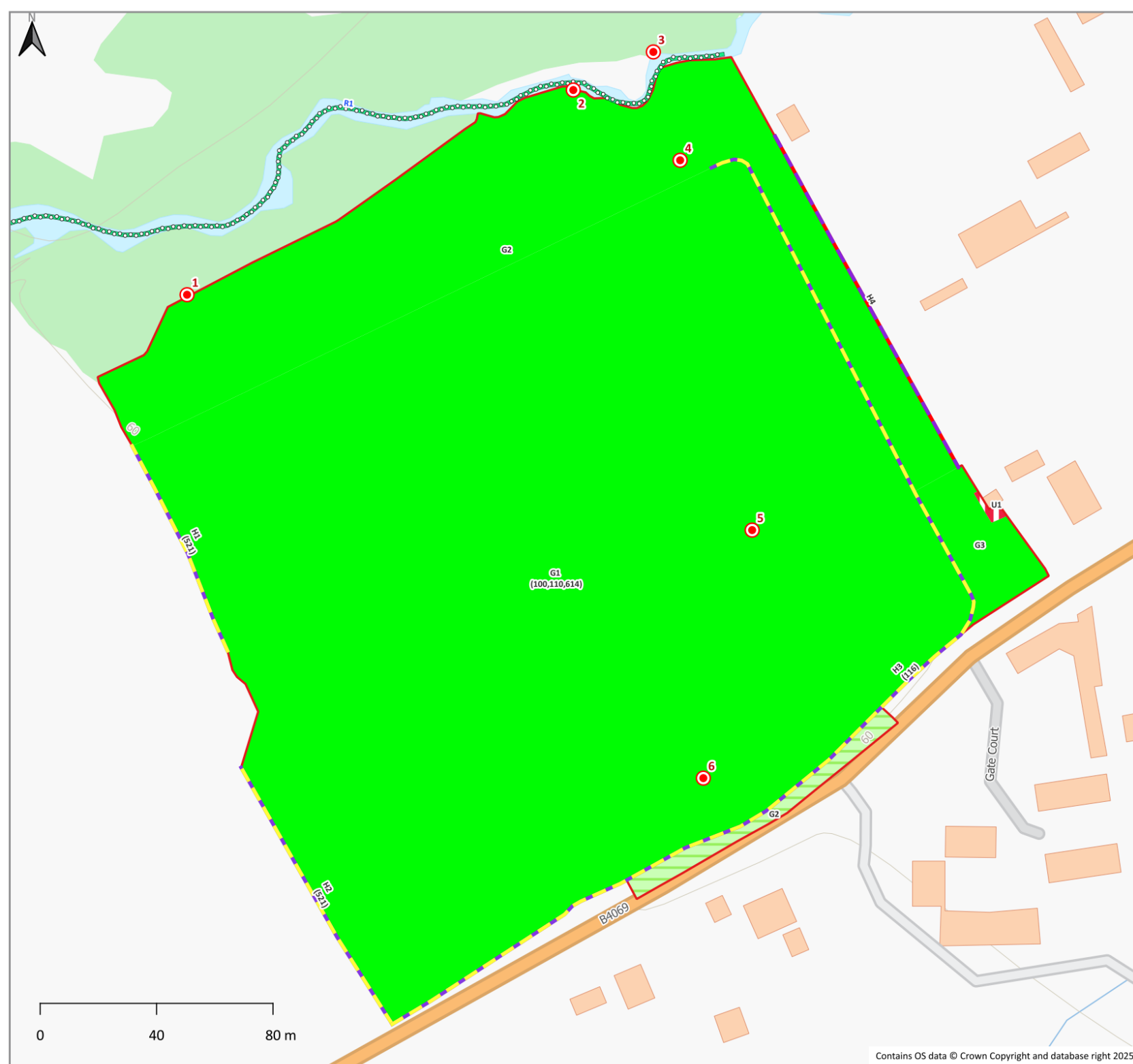


Figure 4: UKHab Habitat Plan and target notes

Key

- Target Notes
- Other rivers and streams
- Other native hedgerow
- Non-native and ornamental hedgerow
- Other neutral grassland
- Modified grassland
- Developed land, sealed surface
- Survey boundary

UKHab Secondary Code	
100	- Grazed
110	- Silage and haylage
116	- Flailed hedgerow
521	- Unmanaged
614	- Permanent agricultural grassland



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Gleeson Land		
Land at Gate Farm, Sutton Benger		
UKHab Survey Plan		
11/12/2025	Created by: RS	Scale at A3 1:1,250

Target Note no.	Description
1	Woodland to north of site contains mature and dead trees which may have potential features for roosting bats and nesting birds.
2	A stream averaging 2–3 m in width and < 0.3m deep. The stream had a silty substrate, a slow to moderate flow rate, and received its water supply from a lake upstream via a weir. Marginal vegetation included pendulous sedge, opposite-leaved golden saxifrage, common nettle, hemlock water-dropwort, meadowsweet and wild angelica.
3	Cherry laurel, a non-native species was present in woodland just outside site boundary.
4	A storage container containing stacked firewood was present, with evidence of a rabbit warren located beneath it.
5	The grassland on site appeared to be managed through the application of fertiliser, grazing, and silage cutting. It was generally species-poor and grass-dominated; forbs included common sorrel, bulbous buttercup, meadow buttercup, and lesser trefoil.
6	Brash pile from recently removed tree offered temporary refuge for reptiles, hedgehog and nesting birds.

Figure 5: Ecological Constraints and Opportunities Plan



Key - Site boundary - Survey boundary - The Shrubbery LWS (ancient woodland) - Broadleaved woodland 15m buffer along woodland/watercourse - New native hedgerow to be created - Native hedgerow to be removed - Retained native hedgerow - Watercourse			
Project Information Project workspace - V:\1456 Sutton Bengers, Wiltshire\GIS\QGIS Master Template.qgz Contains OS data © Crown Copyright and database right 2025			
Client: Gleeson Land Site: Land at Gate Farm, Sutton Bengers Plan Title: Ecological constraints and opportunities plan			
Date: 13/11/2025	Created by: EG	Scale: at A3 1:1,500	

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Appendix 1: Wildlife legislation, species legislation and conservation status

Wildlife legislation

Environment Act 2021

The Environment Act 2021 includes various provisions for improving the natural environment, including:

- The requirement that planning permission in England will be granted subject to a pre-works commencement condition that requires approval of a Biodiversity Net Gain (BNG) plan with a minimum 10% gain;
- The requirement for preparation and publication of Local Nature Recovery Strategies (LNRSs), which will include a statement of biodiversity priorities and a local habitat map that covers the whole strategy area;
- The requirement for Natural England to produce Species Conservation Strategies (SCSs) and Protected Site Strategies (PSSs);
- Extension of the general biodiversity duty placed on public authorities by Section 40 of the NERC Act from being 'a duty to conserve biodiversity' to being 'a duty to enhance biodiversity' and introduction of a requirement that, in so doing, they must have particular regard to any relevant LNRS and any relevant SCSs and PSSs.

Conservation of Habitats and Species Regulations 2017 (as amended)

These Regulations, also referred to as the 'Habitats Regulations', provide for the designation and protection of 'European Sites' (the National Site Network). They convey a statutory requirement for local planning authorities to undertake a 'Habitats Regulations Assessment' of the potential impacts of plans and projects, including development proposals, on European Sites. The provisions also include protection of 'European Protected Species' (EPS). Under the Regulations, local planning authorities have to consider three 'derogation tests' when deciding whether to grant permission for a development that affects an EPS, which are as follows:

- the development must be for over-riding public interest or for public health and safety;
- there are no satisfactory alternatives to the proposed development; and
- the favourable conservation status of the EPS concerned must be maintained.

Wildlife and Countryside Act 1981 (as amended)

This Act is the principal wildlife legislation in Great Britain. It includes provisions for important habitats to be designated and protected as Sites of Special Scientific Interest (SSSIs). Numerous plant and animal species, and the places that they use for shelter and protection, are also protected under the Act, including all birds, their nests and eggs.

Countryside and Rights of Way Act 2000

Referred to as the CROW Act, this legislation increases the protection of SSSIs and strengthens wildlife enforcement action. The Act also strengthens the protection of protected species under the Wildlife and Countryside Act 1981 (as amended) through the introduction of a new offence of 'reckless disturbance'.

Natural Environment and Rural Communities Act 2006

This Act places a duty on all public bodies and statutory undertakers to have due regard to the conservation of biodiversity in all their functions. It also requires the publication of a list of habitats and species of principal importance for the conservation of the biodiversity. This list, known as the Section 41 list, includes all Priority Habitats and Species of Principal Importance for the Conservation of Biodiversity in England.

Protection of Badgers Act 1992

This Act was introduced primarily for animal welfare reasons, as opposed to species conservation. It provides protection of badgers and their setts.

Hedgerow Regulations 1997 (as amended)

These Regulations include provisions for the protection of hedgerows and make it an offence to remove 'important' hedgerows without consent from the local planning authority. Where planning permission is granted for a development proposal, the removal of 'important' hedgerows is deemed to be permitted.

Species legislation and conservation status

Invertebrates

A number of UK invertebrates are protected under UK legislation, including the Wildlife and Countryside Act 1981 (as amended). In addition, numerous species are Priority Species.

Plants

All wild plants are protected against unauthorised removal or uprooting under Section 13 of the Wildlife and Countryside Act 1981 (as amended). Plants listed on Schedule 8 of the Act (e.g. stinking goosefoot, red helleborine, monkey orchid) are afforded additional protection against picking, uprooting, destruction and sale. Bluebell (*Hyacinthoides non-scripta*) is protected against sale only. Further species are also protected under the Conservation of Habitats and Species Regulations 2017.

Notable plant species include those that are listed as:

- Nationally vulnerable – A taxon is Vulnerable when the best available evidence indicates that it meets any of the criteria A-E for Vulnerable, and is therefore considered to be facing a high risk of extinction in the wild (Cheffings C M & Farrell L (Eds) (2005) *Species Status No. 7 – The Vascular Plant Red Data List for Great Britain*, JNCC (online).
- Nationally scarce – species recorded in 16-100 hectads in Great Britain.
- Nationally rare – species occurring in 15 or fewer hectads in Great Britain.

Section 14 of the Wildlife and Countryside Act 1981 (as amended) prohibits the planting of certain invasive plant species in the wild, or otherwise causing them to grow there. Prohibited plants are listed on Part 2 of Schedule 9 and include Japanese knotweed, Himalayan balsam and giant hogweed.

Amphibians

There are seven native amphibian species present in Britain. These are afforded varying degrees of protection under UK legislation. Great crested newts (*Triturus cristatus*) and their habitat are afforded full protection under the Wildlife and Countryside Act 1981 (as amended), the Countryside and Rights of Way (CROW) Act 2000 and the Conservation of Habitats and Species Regulations 2017 (as amended). Together, this legislation makes it illegal to:

- Deliberately capture, injure or kill a great crested newt.
- Damage or destroy any place used for shelter or protection by great crested newts, including resting or breeding places; or intentionally or recklessly obstruct access to such a place.
- Deliberately, intentionally or recklessly disturb great crested newts.

Great crested newt and common toad (*Bufo bufo*) are Priority Species.

Reptiles

Slow-worm (*Anguis fragilis*), viviparous/common lizard (*Zootoca vivipara*), adder (*Vipera berus*) and grass snake (*Natrix natrix*) are protected under the Wildlife and Countryside Act 1981 (as amended) against intentional killing and injuring. These species are also Priority Species.

Birds

The bird breeding season generally lasts from March to early September for most species. All birds are protected under the Wildlife and Countryside Act (1981) (as amended) and the Countryside & Rights of Way (CROW) Act 2000. This legislation makes it illegal, both intentionally and recklessly, to:

- kill, injure or take any wild bird.
- take, damage or destroy the nest of any wild bird while it is being built or in use.
- take or destroy the eggs of any wild bird.

Furthermore, birds listed on Schedule 1 of the Wildlife & Countryside Act 1981 (as amended) are protected against intentional or reckless disturbance whilst nest building and when at or near a nest containing eggs or young. Dependent young of Schedule 1 species are also protected against disturbance.

In addition to this legal protection, the leading governmental and non-governmental conservation organisations in the UK have reviewed the population status of the birds regularly found here and produced a list of birds of conservation concern. Of the 245 species assessed, 70 were placed on the Red List of high conservation concern, 103 on the Amber List of medium conservation concern and 72 on the Green List of low conservation concern:

- Red list species are those that are Globally Threatened according to IUCN criteria; those whose population or range has declined rapidly in recent years; and those that have declined historically and not shown a substantial recent recovery.
- Amber list species are those with an unfavourable conservation status in Europe; those whose population or range has declined moderately in recent years; and those with internationally important or localised populations.

Badgers

Badger (*Meles meles*) is a widespread and common species. However, they are legally protected under The Protection of Badgers Act 1992, due to animal welfare concerns. Under this legislation it is illegal to:

- Wilfully kill, injure, take, or cruelly ill-treat a badger, or attempt to do so.
- Intentionally or recklessly interfere with a sett by disturbing badgers whilst they are occupying a sett, damaging or destroying a sett, or obstructing access to it.

A badger sett is defined in the legislation as “any structure or place, which displays signs indicating current use by a badger”.

Bats

There are 18 species of bats found in the UK, 17 of which are known to breed here. The conservation status of these species is summarised in the table below:

Common name	Scientific name	IUCN Red List*	Priority Species
Greater horseshoe	<i>Rhinolophus ferrumequinum</i>	LC	Yes
Lesser horseshoe	<i>Rhinolophus hipposideros</i>	LC	Yes
Daubenton's bat	<i>Myotis daubentonii</i>	LC	No
Brandt's bat	<i>Myotis brandtii</i>	LC	No

Common name	Scientific name	IUCN Red List*	Priority Species
Whiskered bat	<i>Myotis mystacinus</i>	LC	No
Natterer's bat	<i>Myotis nattereri</i>	LC	No
Bechstein's bat	<i>Myotis bechsteinii</i>	NT	Yes
Alcathoe bat	<i>Myotis alcathoe</i>	DD	No
Greater mouse-eared bat	<i>Myotis myotis</i>	LC	No
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	LC	No
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>	LC	Yes
Nathusius' pipistrelle	<i>Pipistrellus nathusii</i>	LC	No
Serotine	<i>Eptesicus serotinus</i>	LC	No
Noctule	<i>Nyctalus noctula</i>	LC	Yes
Leisler's bat	<i>Nyctalus leisleri</i>	LC	No
Barbastelle	<i>Barbastella barbastellus</i>	NT	Yes
Brown long-eared bat	<i>Plecotus auritus</i>	LC	Yes
Grey long-eared bat	<i>Plecotus austriacus</i>	LC	No

*IUCN categories: LC Least Concern, NT Near Threatened, DD Data Deficient

All bat species are afforded full protection under UK legislation, including the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). Together, this legislation makes it illegal to:

- Deliberately capture, injure or kill a bat.
- Damage or destroy a bat roost; or intentionally or recklessly obstruct access to bat roosts.
- Deliberately, intentionally or recklessly disturb a bat, including in particular any disturbance which is likely:
 - to impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or
 - in the case of animals of a hibernating or migratory species, to hibernate or migrate; or
 - to affect significantly the local distribution or abundance of the species to which they belong.

A bat roost is defined in the legislation as “any structure or place which a bat uses for shelter or protection”. Roosts are protected whether or not bats are present at the time.

Otter

Otters (*Lutra lutra*) are fully protected under UK legislation, including the Wildlife and Countryside Act 1981 (as amended), the Countryside and Rights of Way (CROW) Act 2000 and the Conservation of Habitats and Species Regulations 2017 (as amended). Together, this legislation makes it illegal to:

- Deliberately capture, injure or kill an otter.
- Damage or destroy any structure or place used for shelter or protection by an otter; or intentionally or recklessly obstruct access to such a place.
- Deliberately, intentionally or recklessly disturb an otter whilst it is occupying a structure or place which it uses for shelter or protection.

Otter is a Priority Species.

Water vole

Water vole (*Arvicola amphibious*) are afforded full protection under the Wildlife and Countryside Act 1981 (as amended), which make it illegal to:

- Kill, injure or take a water vole.

- intentionally or recklessly destroy, damage or obstruct access to any structure or place that is used by a water vole for shelter or protection.
- intentionally or recklessly disturb a water vole whilst it is in a place used for shelter or protection.

Water vole is a Priority Species.

Common/Hazel dormouse

The hazel dormouse (*Muscardinus avellanarius*) is fully protected under UK legislation, including the Wildlife and Countryside Act 1981 (as amended), the Countryside and Rights of Way (CROW) Act 2000 and the Conservation of Habitats and Species Regulations 2017 (as amended). Together, this legislation makes it illegal to:

- Deliberately capture, injure or kill a dormouse.
- Damage or destroy any structure or place used for shelter or protection by a dormouse; or intentionally or recklessly obstruct access to such a place.
- Deliberately, intentionally or recklessly disturb a dormouse whilst it is occupying a structure or place which it uses for shelter or protection.

Hazel dormouse is a Priority Species.

Appendix 2: National planning policy

National Planning Policy Framework (2024)

The National Planning Policy Framework (NPPF) includes the Government's policy on the protection of biodiversity through the planning system. The following policies are relevant to the Proposed Development:

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

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;*
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

188. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

192. 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 biodiversity³; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation and*

³ Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geodiversity conservation and their impact with the planning system.

- 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 gain for biodiversity.*

193. 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 reasons⁴ 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.*

195. 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 sites.

⁴ For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.

Appendix 3: Local planning policy

Wiltshire Core Strategy (adopted 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 where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.

Biodiversity enhancement

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

Local sites

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

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

Development proposals affecting local sites must make a reasonable contribution to their favourable management in the long-term. The Council will have regard to the environmental implications of development and will promote and encourage enhancement of the environment. Development will not be permitted where it would result in material detriment to the environment by virtue of:

- a) loss or damage to important environmental assets, such as buildings of historical or architectural interest, local watercourses, important archaeological sites and monuments and areas of conservation, ecological or landscape value;
- b) harm to the visual character and distinctiveness of a locality, particularly in respect of the design and scale of the development and its relationship to its surroundings;
- c) loss of general amenity, including material loss of natural light and privacy enjoyed by neighbours and disturbance resulting from the emission of noise, light or vibration;
- d) levels of traffic which are incompatible with the local highway network or cause significant environmental harm by virtue of noise and disturbance;
- e) potential pollution of air, land or water, including that arising from light pollution and from the storage and use of hazardous substances.

The Council will seek, as part of a development proposal, to resolve or limit environmental impacts. This may include the submission of a flood-risk/run-off assessment to determine the potential flood risk to the development, the likely effects of the development on flood risk to others, whether mitigation is necessary, and if so, whether it is likely to be effective and acceptable. The Council will also seek remedial measures to deal with existing problems such as land contamination.

North Wiltshire Local Plan 2011

‘Saved’ Policy NE14: Trees and the control of new development

Permission will not be granted for proposals that would result, or be likely to result, in the loss of trees, hedges, lakes/ponds or other important landscape or ecological features that could be successfully and appropriately incorporated into the design of a development. Planning conditions will be imposed and Tree Preservation Orders made, for safeguarding single and small groups of trees in the interests of public amenity.

It is the duty of the local planning authority to ensure, whenever it is appropriate, that in granting planning permission for any development adequate provision is made, by the imposition of conditions, for the preservation or planting of trees. The latter should be substantially native tree species of local provenance.

It will be expected that assessments to determine the nature conservation and landscape value features both within and adjacent to sites will be undertaken. Details of any assessment should be submitted with a planning application.

For example, a tree survey should be carried out of the site and directly adjacent land by a competent expert to establish the quality and condition of trees potentially affected by development as appropriate.

Development shall be designed to ensure the longevity of retained vegetation and features through appropriate management and mitigation measures. British Standard 5837: 1991 - Guide for Trees in Relation to Construction, offers relevant guidance for trees.

Wiltshire Local Plan Pre-Submission Draft 2020-2038 (Regulation 19 consultation)

Policy 88: Biodiversity and geodiversity

Protection

Development proposals will need to clearly demonstrate how the mitigation hierarchy has been sequentially applied.

Development proposals must demonstrate how they protect features of nature conservation value, both terrestrial and aquatic, and geological value as part of the design rationale. There is an expectation that such features shall be retained, sufficiently buffered, and managed favourably to maintain their ecological value, connectivity and functionality in perpetuity. Furthermore, development proposals must secure and implement measures, including appropriate compensatory measures where necessary, to ensure no net loss of biodiversity and the local biodiversity resource, and to 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 UK National Site Network site must provide avoidance measures in accordance with the strategic plans or guidance where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the UK National Site Network. Any development that would have an adverse effect on the integrity of a European nature conservation site and where the impacts cannot be satisfactorily mitigated, will not be supported.

Local sites, priority habitat and habitats of principal importance and local ecological networks

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

1. cannot reasonably be avoided;
2. are reduced as far as possible;
3. are outweighed by other planning considerations in the public interest; and
4. 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. Development proposals should avoid negative impacts upon priority habitat, habitats of principal importance, ecological networks, and wildlife corridors, instead promoting their conservation, restoration, and enhancement alongside the recovery of priority species.

Biodiversity in the built environment

In addition to features required as part of biodiversity net gain, mitigation or compensation, all proposals are required to incorporate features of biodiversity value tailored to the specific proposals, relevant local receptors and in accordance with best practice to maximise potential benefits.

As a minimum, the following are required within new proposals:

1. integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;
2. provision of integrated bat boxes;

3. provision of overhanging eaves suitable for nesting house martins in all major development, supplemented by the provision of nest cups; and
4. hedgehog highways integrated throughout the design of development (e.g., suitable gaps in garden fences) between gardens and the wider ecological network to facilitate movement of protected species.

Other features that should be included (but are not limited to):

1. provision of wildflower verges and meadows throughout the development managed to ensure their longevity (e.g., provision of suitable native seeding and topsoil provisions)
2. undertake nature friendly native planting schedules throughout development (e.g., planting wildlife friendly show gardens, incorporating native hedgerows and tree planting);
3. design site lighting to avoid harm and optimise nature conservation (e.g., designing in dark corridors);
4. optimise the ecological value of sustainable urban drainage systems where required (e.g., through the provision of swales and pools, connected to the wider ecological network, planted with native vegetation);
5. incorporate features within the public realm to facilitate nature recovery and access to nature (e.g., bat walls/lofts, swift towers, log piles, insect hotels, invertebrate/bee bricks, reptile hibernacula, green and brown roofs / walls).

Policy 89: Biodiversity net gain

Development (except where exemptions, modifications or exclusions have been made by legislation) must achieve a minimum of 20% biodiversity net gain, or higher as stipulated in national legislation and/or policy or supplementary guidance, over the pre-development biodiversity value as measured by the latest Biodiversity Metric. Exempted development must achieve no net loss of biodiversity and should achieve appropriate net gains, aspiring to deliver at least 20% biodiversity net gain.

Biodiversity net gain must be delivered in the following hierarchical manner:

1. Onsite delivery: where delivered on site habitats should be functionally linked to the wider habitat network creating coherent ecological networks.
2. Offsite delivery: should prioritise contributing to nearby habitat recovery and creation strategies as identified within adopted mitigation strategies, strategic wildlife corridors, Local Nature Recovery Strategy and, Green and Blue Infrastructure Strategy.
3. Offsite delivery: on an alternative suitable site, prioritising strategic delivery in the Local Nature Recovery Strategy area.
4. Credits: as a last resort, and where it is agreed by the local planning authority no suitable alternatives exist, through the purchase of an appropriate amount of national biodiversity units/ credits.

Planning applications subject to mandatory biodiversity net gain must submit a Biodiversity Gain Plan at the application stage that should include:

- how the mitigation hierarchy has been adhered to;
- justification for the baseline date and assessed value of the site prior to development, including a brief synopsis of the site's historic biodiversity value and appointing strategic significance in metric;
- pre- and post-development biodiversity value of onsite habitats and created off site habitats;

- demonstrate how net gains are achieved through onsite, offsite or purchased credits, clarifying and explaining the predicted biodiversity outcomes both qualitatively and quantitatively;
- how a positive proportionate contribution has been made to the ecological networks and priorities as outlined within the Local Nature Recovery Strategy and regional Nature Recovery Networks and for maintaining or creating local ecological networks through habitat creation, protection, enhancement, restoration and management.

The assessments underpinning, and the Biodiversity Gain Plan itself, must be undertaken by a suitably qualified and/or experienced ecologist and be submitted together with baseline and proposed habitat mapping in a digital format with the application.

Sites where net gain is provided (on or off site) must be managed and monitored by the applicant or an appropriate body funded by the applicant for a minimum period of 30 years. Annual monitoring reports detailing the sites condition must be submitted to the council each year over this period. A management plan must be provided at the application stage detailing how the postdevelopment biodiversity values of the site and any supporting off-site provision will be secured, managed, and monitored in perpetuity.

Where there is evidence of neglect or damage to any of the habitats on development sites reducing their biodiversity value their deteriorated condition will not be taken into consideration and steps will be taken to establish the previous ecological baseline⁶¹ of the site in order to decide the acceptability of any development proposals.

Development proposals where the principal objective is to conserve or enhance biodiversity and geodiversity interests will be supported in principle.

Policy 90: Woodland, hedgerows, and trees

Proposals for major development shall make provision for the retention and enhancement of Wiltshire's woodlands, hedgerows, and trees, and shall incorporate these assets into development design as part of the wider Green and Blue Infrastructure (GBI) Network, by:

- contributing to the tree planting targets of Wiltshire Council's Climate Strategy and woodland, hedgerow and tree strategy, following the principles of 'Right Tree, Right Place';
- supporting the economic benefits of woodland and tree planting from agroforestry, leisure, tourism as well as wider ecosystem services such as natural flood management and climate resilience;
- where applicable, supporting the aims and objectives of the Great Western Community Forest;
- where applicable and acceptable in highway terms, ensuring on major developments that tree lined streets, community orchards and garden tree planting, are fully integrated into proposals;
- seeking, where applicable, to increase woodland and street tree cover in existing urban areas in Wiltshire to create shade, mitigate storm water runoff, improve air quality, sequester carbon, and improve the health and well-being of local communities;
- ensuring the long-term sustainability of woodland, hedgerow, and tree planting, through the appropriate specification of plants, planting accessories, soil volumes, and long-term management to ensure the establishment to maturity of planting schemes in Wiltshire and minimise wastage.

Appendix 4: Botanical species list

Scientific name	Common name
Trees and shrubs	
<i>Acer campestre</i>	Field maple
<i>Acer pseudoplatanus</i>	Sycamore
<i>Corylus avellana</i>	Hazel
<i>Crataegus monogyna</i>	Hawthorn
<i>Cupressus</i>	Cypress sp
<i>Fagus sylvatica f. purpurea</i>	Copper beech*
<i>Fraxinus excelsior</i>	Ash
<i>Populus tremula</i>	Aspen*
<i>Prunus laurocerasus</i>	Cherry laurel*
<i>Prunus spinosa</i>	Blackthorn
<i>Quercus robur</i>	Pedunculate oak
<i>Rosa sp.</i>	Rose species
<i>Sambucus nigra</i>	Elder
<i>Ulmus procera</i>	Elm
Herbs	
<i>Anacamptis pyramidalis</i>	Pyramidal orchid
<i>Angelica sylvestris</i>	Wild angelica*
<i>Arum maculatum</i>	Lords-and-ladies
<i>Ballota nigra</i>	Black horehound
<i>Cerastium fontanum</i>	Common mouse-ear
<i>Chrysosplenium oppositifolium</i>	Opposite-leaved golden saxifrage*
<i>Cirsium arvense</i>	Creeping thistle
<i>Convolvulus arvensis</i>	Field bindweed
<i>Filipendula ulmaria</i>	Meadowsweet*
<i>Galium aparine</i>	Cleavers
<i>Galium mollugo</i>	Hedge bedstraw
<i>Glechoma hederacea</i>	Ground ivy
<i>Hedera helix</i>	Ivy
<i>Heracleum sphondylium</i>	Hogweed
<i>Lamium purpureum</i>	Red dead-nettle
<i>Oenanthe crocata</i>	Hemlock water-dropwort*
<i>Prunella vulgaris</i>	Self-heal
<i>Ranunculus repens</i>	Creeping buttercup
<i>Ranunculus acris</i>	Meadow buttercup
<i>Ranunculus bulbosus</i>	Bulbous buttercup
<i>Rumex acetosa</i>	Common sorrel
<i>Rumex obtusifolius</i>	Broad-leaved dock
<i>Silene dioica</i>	Red campion
<i>Taraxacum officinale</i>	Dandelion
<i>Trifolium dubium</i>	Lesser trefoil
<i>Trifolium repens</i>	White clover
<i>Urtica dioica</i>	Common nettle
<i>Veronica chamaedrys</i>	Germander speedwell
Grasses, sedges, rushes and ferns	
<i>Agrostis stolonifera</i>	Creeping bent
<i>Anthoxanthum odoratum</i>	Sweet vernal grass

Scientific name	Common name
<i>Bromus hordeaceus</i>	Soft brome
<i>Cynosurus cristatus</i>	Creeping dog's tail
<i>Dactylis glomerata</i>	Cock's-foot
<i>Festuca rubra</i>	Red fescue
<i>Holcus lanatus</i>	Yorkshire fog
<i>Hordeum brachyantherum</i>	Meadow barley
<i>Lolium perenne</i>	Perennial ryegrass
<i>Lolium pratense</i>	Meadow fescue
<i>Phleum pratense</i>	Timothy
<i>Poa trivialis</i>	Rough meadow grass

*recorded outside of the site but within the survey boundary

Appendix 5: Hedgerow and invasive species survey

Hedgerow and invasive species survey

1 Methodology

Hedgerow survey

The hedgerow survey was undertaken on 19 June 2025 in accordance with survey guidelines published by Defra (2007). The survey focused on the ecological component of the assessment; no cultural heritage aspects were assessed. For each hedgerow, a 30m section(s) was surveyed in detail, identifying any woody and woodland indicator species present. Other features, such as the presence of a bank, gaps or hedgerow trees were also noted. Each hedgerow was then assessed against the criteria set out in the Hedgerow Regulations to establish whether or not it was 'important'.

Invasive species survey

The invasive species survey was also completed on 19 June 2025 by suitably experienced ecologists. The purpose of the survey was to identify and map any legally-controlled plant species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

2 Limitations

There were no limitations to the surveys.

3 Results

Hedgerow survey

There were four hedgerows within the survey area, three of which were surveyed. On the western border of the survey area there was a native hedgerow 81m long (Hedgerow 1 on Figure A5.1); further south along this boundary was another native hedgerow 96m long. On the southern border and along the eastern field margin was a native hedgerow approximately 425m long (Hedgerow 3). On the eastern border was an ornamental non-native hedgerow (Hedgerow 4); the Hedgerow Regulations did not apply to this hedgerow as it adjoined residential properties, so it was not surveyed.

None of the hedgerows within the survey area were considered 'important' under Hedgerow Regulations criteria. Refer to Table A5.1 for the survey results.

Invasive species survey

No invasive plant species were recorded during surveys, and their presence within the survey area was considered unlikely.

4 References

Defra (2007) *Hedgerow Survey Handbook - a standard procedure for local surveys in the UK*. Defra, London.

Table A5.1 Hedgerow survey results

Hedgerow number (refer to Hedgerow survey plan)	Length (m approx.)	Presence of protected/notable species	Parallel to right of way	Gaps <10% hedgerow length	Parallel to hedgerow within 15m	Wall/bank over half length of hedgerow	Ditch over half length of hedgerow	Number of connections	At least one standard tree per 50m length	Woody species	Average number of woody species in 30m length	Woodland indicator species	Number of woodland indicator species	Important
H1	81	No	No	Yes	No	No	No	0	No	3 (hazel, hawthorn & blackthorn)	2		0	No
H2	96	No	No	Yes	No	No	No	2	No	4 (blackthorn, hazel, hawthorn & field maple)	2		0	No
H3	425	No	No	No	No	No	No	2	Yes (7)	7 (blackthorn, hazel, hawthorn, elm, elder, rose & field maple)	3	Lords-and-ladies	1	No

Figure A5.1: Hedgerow Survey Plan

Appendix 6: Great crested newt survey

Great crested newt survey

1 Pond search

Methodology

A desk-based search for ponds within 250m of the site boundary was undertaken, using Ordnance Survey mapping (1: 10,000 scale) and online aerial photography, on 23 April 2025, refer to Figure A6.1.

Results

Three ponds within the 250m buffer were provisionally identified (refer to Figure A6.1). Upon communication with the landowner, it became apparent that Pond 3 no longer existed. This was corroborated by the site survey on 4 May 2025 and was therefore discounted from further surveys.

2 Habitat Suitability Index

Methodology

A Habitat Suitability Index (HSI) assessment was undertaken on 4 May 25, based on the scoring system developed by Oldham *et al* (2000). The HSI incorporates ten suitability factors and scores them on a numerical index; zero indicates unsuitable, 1 indicates optimal.

Limitations

Access to Pond 1 was restricted to a few areas due to presence of cattle, dense vegetation and fencing. This did not impede the ability of the surveyor to accurately assess the pond. There were no limitations considered to significantly effect the survey validity.

Results

Pond 1 scored 0.34 on the HSI meaning it was considered 'poor' quality for GCN. Pond 2 scored 0.51 meaning it was considered 'below average' for GCN. See Tables A6.1 & A6.2 below for a full breakdown of results.

Table A6.1: Habitat Suitability Index score: Pond 1

Habitat Suitability Index			SI value
SI1. Map location	A/B/C	A	
SI2. Surface area	rectangle/ellipse/irregular	irregular	
	length (m)		
	width (m)		
	OR estimate (m2) if irregular		
	area (m2) =	11500	
SI3. Dessication rate	never/rarely/sometimes/frequently	never	
SI4. Water quality	good/moderate/poor/bad	moderate	
SI5. Shade	% of margin shaded 1m from bank	60	
SI6. Waterfowl	absent/major/minor	major	
SI7. Fish population	absent/possible/minor/major	possible	
SI8. Pond density	number of ponds within 1km	4	
SI9. Terrestrial habitat	good/moderate/poor/isolated	good	
SI10. Macrophyte cover	%	20	
HSI =			0.34

Table A6.2: Habitat Suitability Index score: Pond 2

Habitat Suitability Index			SI value
SI1.	Map location	A/B/C	A
SI2.	Surface area	rectangle/ellipse/irregular	irregular
	length (m)		
	width (m)		
	OR estimate (m2) if irregular		
	area (m2) =	482	
SI3.	Dessication rate	never/rarely/sometimes/frequently	never
SI4.	Water quality	good/moderate/poor/bad	moderate
SI5.	Shade	% of margin shaded 1m from bank	70
SI6.	Waterfowl	absent/major/minor	minor
SI7.	Fish population	absent/possible/minor/major	major
SI8.	Pond density	number of ponds within 1km	4
SI9.	Terrestrial habitat	good/moderate/poor/isolated	moderate
SI10.	Macrophyte cover	%	30
HSI =			0.51

3 Environmental DNA survey

Methodology

Ponds 1 & 2 were sampled for GCN environmental DNA (eDNA) on 4 May 2025. This was carried out by a Natural England-licensed surveyor (licence number 2025-13101-CL08-GCN) in accordance with the methods outlined in the technical report that accompanies Defra's research project into eDNA (Biggs *et al* 2014). Samples were subsequently analysed by RSK ADAS Ltd using quantitative polymerase chain-reaction (qPCR) testing.

Limitations

Access to Pond 1 was restricted to a few accessible areas along the southern edge of the pond due to presence of cattle, dense vegetation and fencing. Samples were therefore taken at fewer than the recommended locations, so the survey may not have detected historic settled eDNA if it was present along the northern edge of the pond. However, as samples were taken from a sufficient number of locations along the entire southern edge of the pond, any recent eDNA still suspended in the water column will have been identified and the survey is therefore considered to be valid.

Results

The eDNA results of Ponds 1 & 2 were both negative (refer to Appendix 6.1). Therefore, GCN is considered absent from the two ponds and their presence on site is considered very unlikely.

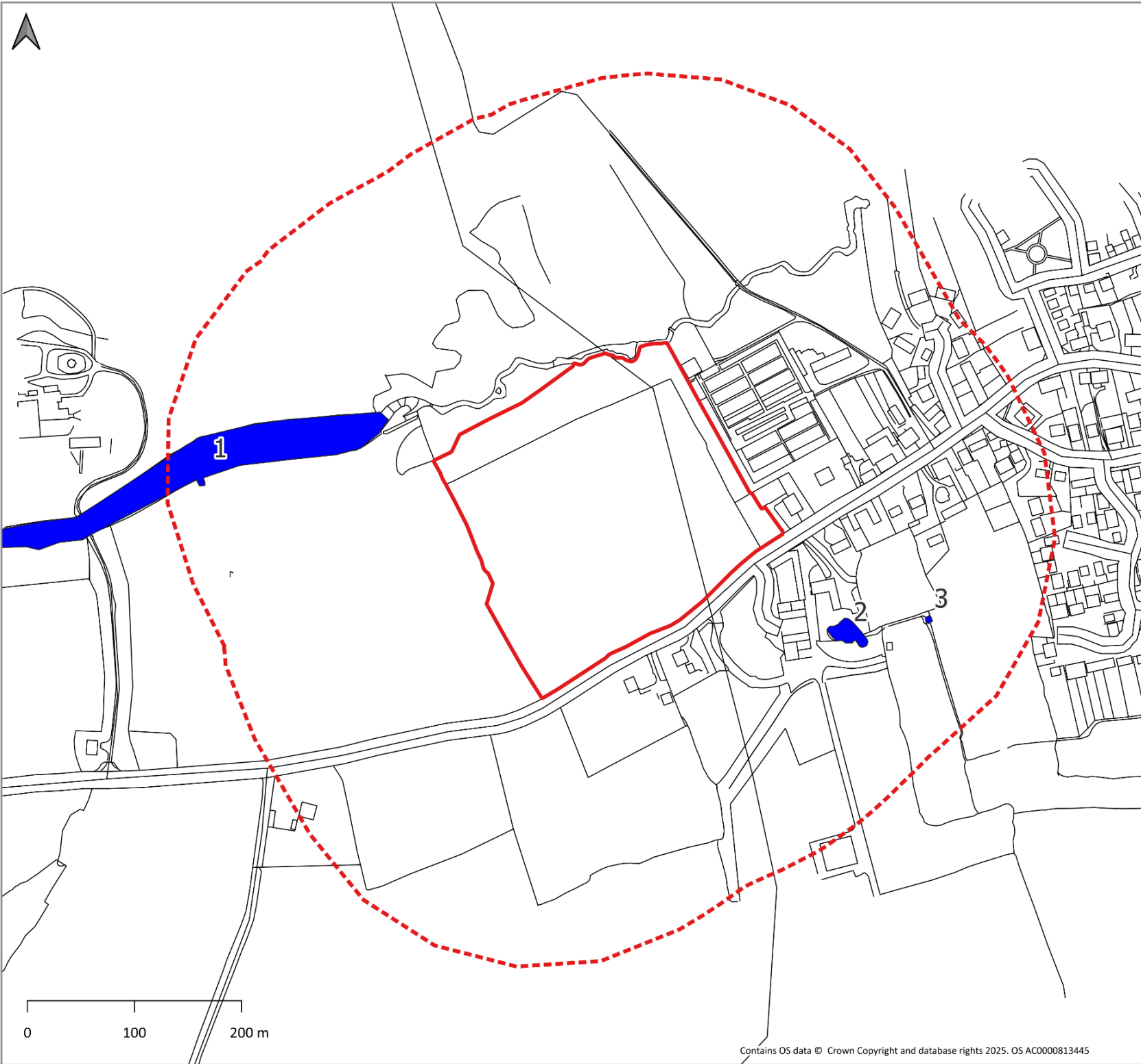
4 References

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

English Nature/Natural England (2001) *Great Crested Newt Mitigation Guidelines*. English Nature, Peterborough.

Oldham RS, Keeble J, Swan MJS, Jeffcote M (2000) *Evaluating the suitability of habitat for the great crested newt* (*Triturus cristatus*). *Herpetological Journal* 10 (4), 143-155.

Figure A6.1: Great Crested Newt Survey Plan



Key

- Survey boundary
- Pond
- 250m buffer

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Gleeson Land		
Land at Gate Farm, Sutton Benger		
Great Crested Newt Survey Plan		
11/11/2025	Created by: YS	Scale at A3 1:3,420

Appendix 6.1: Great crested newt eDNA results

Client:
P1456, Amy Clack, EAD Ecology
1040079-AC-EAD, P1456, version 1



RSK ADAS Ltd
Spring Lodge
172 Chester Road
Helsby
WA6 0AR

Tel: 01159 229249
Email: Helen.Rees@adas.co.uk

www.adas.uk

Sample ID: ADAS-7838

Client Identifier: Pond2

Grid references/coordinates: Not Supplied

Description: pond water samples in preservative

Condition on Receipt: Good

Date of Receipt : 06/06/2025

Volume: Passed

Determinant	Result	Method	Date of Analysis
Inhibition Control [†]	2 of 2	Real Time PCR	11/06/2025
Degradation Control [§]	Within limits	Real Time PCR	11/06/2025
Great Crested Newt*	0 of 12 (negative)	Real Time PCR	11/06/2025
Negative PCR Control (Nuclease Free Water)	0 of 4	Real Time PCR	As above for GCN
Positive PCR Control (GCN DNA 10 ⁻⁴ ng/μL) [#]	4 of 4	Real Time PCR	As above for GCN
Report Prepared by:	Dr Helen Rees	Report Issued by:	Dr Ben Maddison

Signed:

Signed:

Position:

Director: Biotechnology

Position:

MD: Biotechnology

Date of preparation:

12/06/2025

Date of issue:

12/06/2025

eDNA analysis was carried out in accordance with the stipulated methodology found in the Technical Advice Note (WC1067 Appendix 5 Technical Advice Note) published by DEFRA and adopted by Natural England.

** If all PCR controls and extraction blanks give the expected results a sample is considered: negative for GCN if all of the replicates are negative; positive for GCN if one or more of the replicates are positive.*

[†] Recorded as the number of positive replicate reactions at expected C_t value. If the expected C_t value is not

[§] No degradation is expected within time frame of kit preparation, sample collection and analysis.

[#] Additional positive controls (10⁻¹, 10⁻², 10⁻³ ng/μL) are also routinely run, results not shown here.

Client:
P1456, Amy Clack, EAD Ecology
1040079-AC-EAD, P1456, version 1



RSK ADAS Ltd
Spring Lodge
172 Chester Road
Helsby
WA6 0AR

Tel: 01159 229249
Email: Helen.Rees@adas.co.uk

www.adas.uk

Sample ID: ADAS-7839

Client Identifier: Pond1

Grid references/coordinates: Not Supplied

Description: pond water samples in preservative

Condition on Receipt: Low Sediment

Date of Receipt : 06/06/2025

Volume: Passed

Determinant	Result	Method	Date of Analysis
Inhibition Control [†]	2 of 2	Real Time PCR	11/06/2025
Degradation Control [§]	Within limits	Real Time PCR	11/06/2025
Great Crested Newt*	0 of 12 (negative)	Real Time PCR	11/06/2025
Negative PCR Control (Nuclease Free Water)	0 of 4	Real Time PCR	As above for GCN
Positive PCR Control (GCN DNA 10 ⁻⁴ ng/μL) [#]	4 of 4	Real Time PCR	As above for GCN
Report Prepared by:	Dr Helen Rees	Report Issued by:	Dr Ben Maddison

Signed:

Signed:

Position:

Director: Biotechnology

Position:

MD: Biotechnology

Date of preparation:

12/06/2025

Date of issue:

12/06/2025

eDNA analysis was carried out in accordance with the stipulated methodology found in the Technical Advice Note (WC1067 Appendix 5 Technical Advice Note) published by DEFRA and adopted by Natural England.

** If all PCR controls and extraction blanks give the expected results a sample is considered: negative for GCN if all of the replicates are negative; positive for GCN if one or more of the replicates are positive.*

[†] Recorded as the number of positive replicate reactions at expected C_t value. If the expected C_t value is not

[§] No degradation is expected within time frame of kit preparation, sample collection and analysis.

[#] Additional positive controls (10⁻¹, 10⁻², 10⁻³ ng/μL) are also routinely run, results not shown here.

Appendix 7: Reptile survey

Reptile survey results

1 Methodology

A reptile survey was undertaken according to standard methodology (English Nature 1994; Froglife 1999). 50 artificial refuges (0.5m x 0.5m roofing felt tiles) were deployed on 23 July 2025 and checked on seven occasions in appropriate weather conditions between 6 August and 22 September 2025.

2 Limitations

Due to the presence of livestock, refuges were not deployed in the majority of the site due to risk of damage/interference by livestock. Refuges were predominantly deployed in adjacent habitat to the north and east (refer to Figure A7.1); this is not considered to be a significant limitation as the habitat was the same (modified grassland) and the findings of the survey can be applied to the site.

Several refuges were damaged by livestock between visit 4 and 5. These were re-deployed before visit 6, therefore this is not a significant limitation and it is not considered to affect the validity of the results.

3 Results

Survey results are provided in Table A7.1 with locations shown on the Figure A7.1. A cumulative total of 11 slow worms was recorded across the survey period; the maximum count in any single visit was three. The site was therefore considered to support a 'low' population of slow worms.

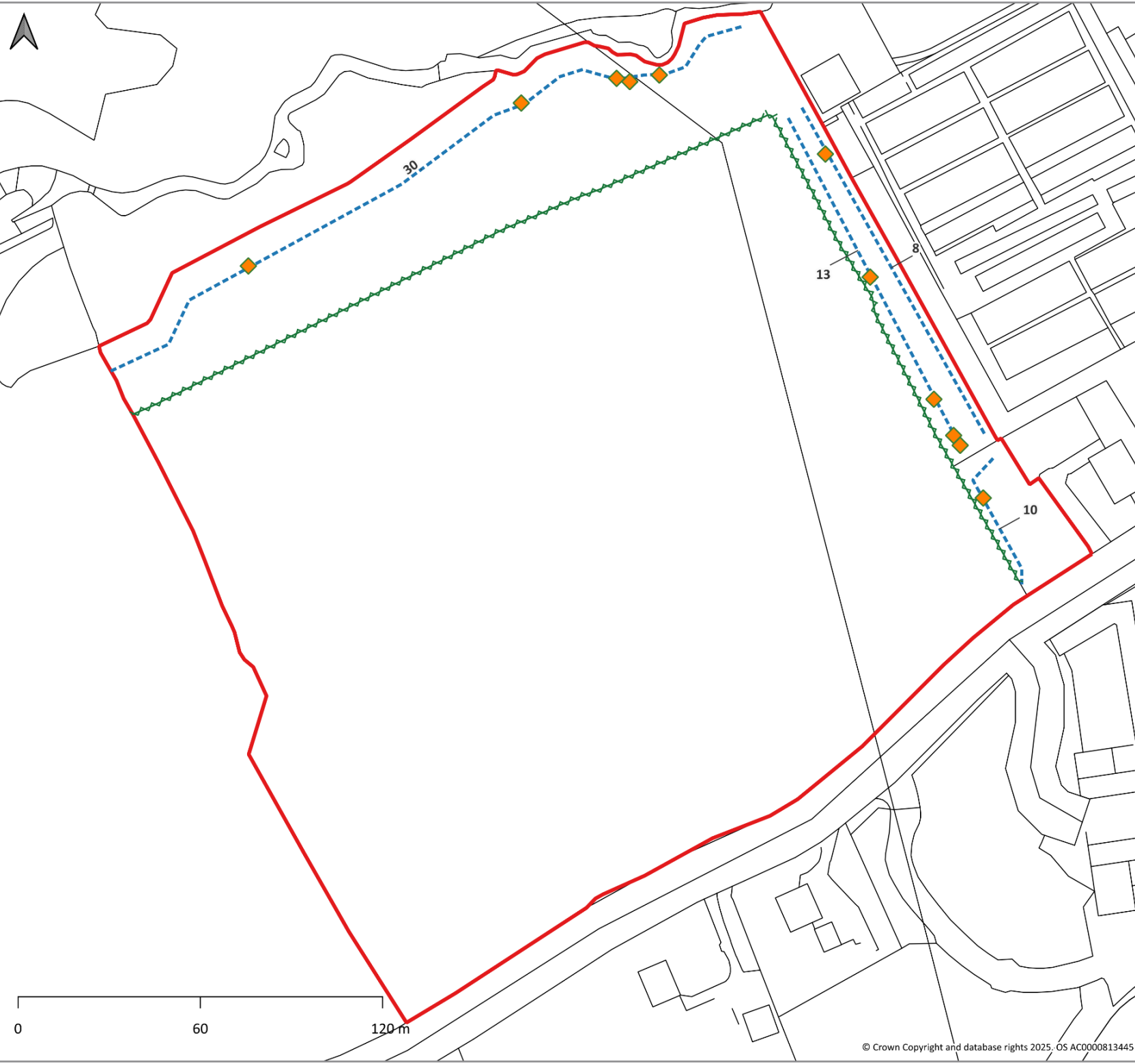
Visit	Date	Start time	Weather	Results
1	06/08/2025	07:45	Cloud 0/8, temperature 14°C, wind 1/12	No reptiles found
2	13/08/2025	09:40	Cloud 3/8, temperature 21°C, wind 2/12	1 male slow worm, 2 female sub-adult slow worms
3	18/08/2025	11:45	Cloud: 6/8, temperature 17°C, wind 1/12	1 female slow worm, 2 female sub-adult slow worms
4	22/08/2025	10:30	Cloud: 2/8, temperature 18°C, wind 5/12	1 Juvenile slow worm
5	05/09/2025	10:00	Cloud: 2/8, temperature 19°C, wind 1/12	1 female slow worm
6	07/09/2025	10:00	Cloud: 4/8, temperature 17°C, wind 3/12	3 female slow worms
7	22/09/2025	12:45	Cloud: 0/8, temperature 14°C, wind 1/12	No reptiles found

4 References

English Nature, (1994). *Species Conservation Handbook*. JNCC, Peterborough.

Froglife (1999). *Reptile survey: an introduction to planning, conducting and interpreting surveys for snake and lizard conservation*. Froglife Advice Sheet 10. Froglife, Halesworth.

Figure A7.1: Reptile Survey Plan



Key

- Survey boundary
- Hedgerow/fence
- Reptile felt location
- Slow worm location



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Gleeson Land		
Land at Gate Farm, Sutton Benger		
Reptile Survey Plan		
11/11/2025	Created by: Y5	Scale at A3 1:1,200

Appendix 8: Breeding bird survey

Breeding bird survey

1 Methodology

A breeding bird survey was undertaken based on an adapted Common Bird Census (CBC) methodology (Gilbert *et al* 1998) and the Breeding Bird Survey Methodology (Bird Survey & Assessment Steering Group 2025). Three survey visits were carried out between May and July 2025 by an experienced ornithologist, following a transect route that allowed full coverage of the survey area. Since the site lacked significant areas of complex habitats such as broadleaved woodland or wetland, it was considered that three visits were sufficient to adequately record breeding bird activity and value the breeding bird assemblage of the site.

Visits were made during the morning in suitable weather conditions (avoiding heavy rain and strong winds); refer to Table A8.1. The locations of all birds seen and/or heard during each visit were mapped and any breeding-related behaviour was recorded (e.g. singing, displaying or carrying food). Data from the three visits was analysed to produce an estimate of the number of breeding pairs or territories within the survey area.

2 Limitations

Due to project timescales, it was not possible to undertake a breeding bird survey in the month of April. This is not considered to be a significant limitation since three surveys were completed during the breeding bird season with each visit spaced by three weeks, which was considered to provide sufficient data to undertake an assessment on breeding birds.

3 Results

Survey dates, times and weather conditions are presented in Table A8.2.

Table A8.2 Survey conditions

Visit	Date	Time	Weather at start
1	21/05/2025	06:00-06:45	Cloud: 8/8, temperature 12°C, wind 1/12. Light rain at start.
2	11/06/2025	06:00-06:45	Cloud: 8/8, temperature 14°C, wind 1/12. Misty at start.
3	02/07/2025	06:30-07:15	Cloud: 6/8, temperature 14°C, wind 2/12. No precipitation.

Table A8.2 provides a summary of the survey results and categorises each species' breeding status within the site based on the BTO's categories of breeding evidence:

- Confirmed breeding (e.g. recently fledged young, adult carrying food to nest);
- Probable breeding (e.g. permanent territory, courtship display);
- Possible breeding; (e.g. singing male in suitable nesting habitat); or
- Non-breeding (e.g. flying over only).

Figure A8.1 identifies the locations of key species recorded during the surveys. Where possible, an estimate of the number of breeding pairs/ territories within the survey area was made.

A total of 29 species were recorded within or adjacent to the survey area, of which 24 were confirmed, probably or possibly breeding. These included the following Amber/Red-listed and/or Priority Species:

- Starling, which possibly bred. This is a Red-listed Priority Species.
- Song thrush, which possibly bred. This is an Amber-listed Priority Species.
- Moorhen, which was confirmed breeding. This is an Amber-listed species.
- Dunnock, rook, woodpigeon and wren, all of which probably bred. These are Amber-listed species.

Moorhen was not recorded during the breeding bird survey, however a nest was uncovered alongside the watercourse during the otter and water vole survey, providing confirmation of breeding.

A further three Priority and/or Amber/Red-listed species were recorded flying over or passing through the survey area, or were considered not to be breeding due to a lack of appropriate habitat:

- House sparrow (numerous individuals recorded foraging over the south-east of the survey area and may be nesting in buildings to the south/east). This is a Red-listed Priority Species.
- House martin (numerous individuals recorded foraging over south-east of the survey area and may be nesting/roosting in buildings to the south/east). This is a Red-listed species.
- Mallard (pair recorded flying over the south-east of the survey area and may be roosting in pond to the west). This is an Amber-listed species.

4 References

Bird Survey & Assessment Steering Group (2025). *Bird Survey Guidelines for assessing ecological impacts*, <https://birdsurveyguidelines.org> (first accessed April 2025).

Gilbert G, Gibbons DW, Evans J (1998). *Bird Monitoring Methods*. RSPB, Sandy, Bedfordshire.

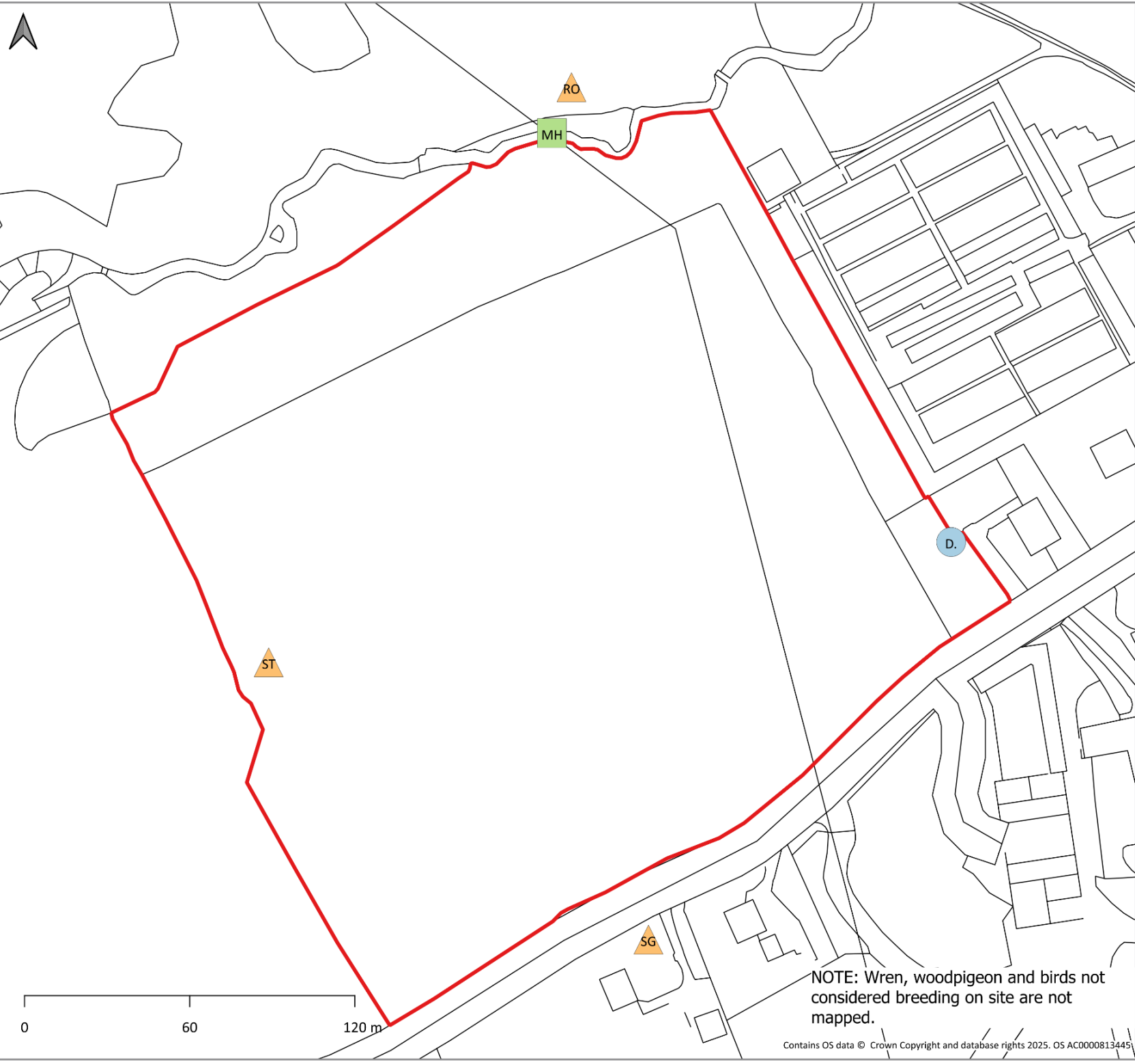
Stanbury, A., Eaton, M., Aebischer, N., Balmer, D., Brown, A., Douse, A., Lindley, P., McCulloch, N., Noble, D., and Win I. (2021). *The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain*. *British Birds* 114: 723-747.

Table A8.2: Breeding bird survey results

Common name	BTO species code	Legal & Conservation Status (standard protection and Green/unlisted unless stated)	Date & no. recorded			Breeding status				Notes
			21 May 2025	11 June 2025	2 July 2025	Confirmed	Probable	Possible	Non-breeding	
Blackbird	B		2	0	4		✓			1-2 pairs. Seen calling in appropriate habitat.
Blackcap	BC		4	5	1		✓			2-4 pairs. Males seen singing in appropriate habitat.
Blue tit	BT		4	16	9	✓				2-8 pairs. Males seen calling in appropriate habitat, juveniles seen on site.
Buzzard	BZ		0	0	1			✓		1 pair. Seen calling in appropriate habitat.
Carrion crow	C		2	4	3			✓		1-2 pairs. Seen foraging and calling near appropriate nesting habitat.
Chaffinch	CH		2	1	0		✓			1-2 pairs. Seen singing in appropriate habitat.
Coal tit	CT		0	1	0		✓			1 pair. Singing in appropriate habitat.
Dunnock	D	Priority, Amber	2	1	2		✓			1-2 pairs. Singing in appropriate habitat.
Goldcrest	GC		0	1	1			✓		1 pair. Singing in appropriate habitat.
Goldfinch	GO		1	0	3			✓		1-3 pairs. Males singing in appropriate habitat.
Great tit	GT		0	0	2			✓		1-2 pairs. Calling in appropriate habitat.
Green woodpecker	G		0	0	1			✓		1 pair. Calling to the north of site in appropriate habitat.
House martin	HM	Red	0	1	18				✓	No appropriate nesting sites within survey area.
House sparrow	HS	Priority, Red	5	6	12				✓	No appropriate nesting sites within survey area.
Jackdaw	JD		1	3	4			✓		1-2 pairs. Calling to north of site in appropriate habitat.
Long-tailed tit	LT		1	5	10			✓		4-6 pairs. Calling in groups in appropriate habitat on site.
Magpie	MG		0	1	1			✓		1 pair. Seen calling in appropriate habitat.
Mallard	MA	Amber	2	0	0				✓	No appropriate nesting habitats on site.
Pheasant	PH		0	0	1			✓		1 pair. Seen in appropriate habitat.
Robin	R		12	7	3		✓			3-6 pairs. Seen singing on site in appropriate habitat.
Rook	RO	Amber	0	1	0			✓		1 Pair. Seen calling in appropriate habitat.
Song thrush	ST	Priority, Amber	1	0	0			✓		1 pair. Calling in appropriate habitat.
Starling	SG	Priority, Red	0	1	1			✓		1 pair. Calling in appropriate habitat.

Common name	BTO species code	Legal & Conservation Status (standard protection and Green/unlisted unless stated)	Date & no. recorded			Breeding status				Notes
			21 May 2025	11 June 2025	2 July 2025	Confirmed	Probable	Possible	Non-breeding	
Swallow	SL		0	1	22				✓	No appropriate nesting sites on site.
Treecreeper	TC		0	0	1			✓		1 pair. Calling in appropriate habitat.
Woodpigeon	WP	Amber	4	8	7		✓			2-5 pairs. Singing in appropriate habitat.
Wren	WR	Amber	5	13	11		✓			6-7 Pairs. Singing in appropriate habitat.

Figure A8.1: Breeding Bird Survey Plan



Key

- D. Dunnock
- MH Moorhen
- RO Rook
- ST Song Thrush
- SG Starling
- Confirmed breeding
- Probable breeding
- Possible breeding
- Survey boundary

NOTE: Wren, woodpigeon and birds not considered breeding on site are not mapped.

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ead ecology www.eadecology.co.uk	Gleeson Land		
	Land at Gate Farm, Sutton Benger		
	Breeding Bird Survey Results		
	11/11/2025	Created by: YS	Scale at A3 1:1,323

Appendix 9: Hazel dormouse survey results

Hazel dormouse survey

1 Methodology

The hazel dormouse survey was undertaken following standard methodology (Bright *et al* 2006) and under a Natural England dormouse survey licence. Dormouse nesting tubes were installed within hedgerows and woodland edge on 22 May 2025 and surveys of these were subsequently completed once a month until October 2025. A total of 50 dormouse nest tubes were installed, giving an index score of 22; the suggested minimum index score for adequate survey effort is 20 (Chanin & Woods 2003). A search for chewed hazelnuts was also undertaken on 22 October 2025.

2 Limitations

Low numbers of tubes throughout the survey period were damaged or removed by livestock and/or strong winds. These tubes were replaced as needed and therefore this did not represent a significant limitation to the survey.

3 Results

No hazel dormice, or signs of hazel dormice were recorded during the course of the survey. Refer to Table A9.1 for survey results. Refer to the Figure A9.1 for the location of dormouse nesting tubes.

Table A9.1: Hazel dormouse survey results

Date	Results
22/05/2025	No signs of dormice or their nests.
26/06/2025	No signs of dormice or their nests.
23/07/2025	No signs of dormice or their nests.
26/08/2025	No signs of dormice or their nests.
29/09/2025	No signs of dormice or their nests.
22/10/2025	No signs of dormice or their nests.

4 References

Bright, P., Morris, P and Mitchell-Jones, T (2006). *The Dormouse Conservation Handbook 2nd edition*. English Nature, Peterborough.

Chanin, P & Woods, M (2003). *Surveying dormice using nest tubes. Results and experiences from the South West Dormouse Project*. English Nature Research Report No. 5.

English Nature (2004) *Species Conservation Handbook*. English Nature, Peterborough

Figure A9.1: Hazel Dormouse Survey Plan



Key

- Dormouse tube location
- Suitable dormouse habitat- woodland
- Suitable dormouse habitat- hedgerow
- Survey boundary



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Gleeson Land		
Land at Gate Farm, Sutton Benger		
Dormouse Tube Placement Plan		
11/11/2025	Created by: Y5	Scale at A3 1:1,200

Appendix 10: Badger survey

Badger survey

1 Methodology

A badger survey was undertaken in accordance with the Mammal Society publication 'Surveying badgers' (Harris *et al*, 1989). A search for badger setts and other badger activity (e.g. hairs, pathways, latrines, and foraging signs) was carried out within the site and surrounding area (30m from site boundary where access allowed) on 4 June 2025.

2 Limitations

There were no limitations to the survey.

3 Results

No badgers, setts or other evidence of badgers were identified during the survey.

4 References

Harris, S, Cresswell P & Jeffries D (1989) *Surveying Badgers*. The Mammal Society, London.

Appendix 11: Bat activity survey results

Bat activity survey

1 Methodology

Night-time bat walkover

Following Bat Conservation Trust (BCT) guidelines (Collins [4th ed.] 2023), night-time bat walkover (NBW) surveys were undertaken between May and October 2025 (28 May, 15 August and 7 October 2025). For each survey, ecologists were initially stationed at predetermined locations primarily at potential flight lines close to potential roost sources such as groups of buildings or trees. The survey commenced at sunset and the ecologists remained in position for 30-60 minutes to count, observe behaviour and make acoustic recordings of bat activity with bat detectors (Anabat Scouts). The ecologists then walked a predetermined route taking acoustic recordings and noting a timestamped narrative of their observations. All echolocation calls were recorded and subsequently analysed using 'Anabat Insight' (Titley Electronics) to species or genus. Refer to Figure A11.2 for the transect route.

Static detector survey

Stratified sampling of the site using static bat detectors was undertaken between May and October 2025 (inclusive). Four static bat detectors (Anabat Express) were deployed for a minimum of five nights per month on habitat features likely to be of value for commuting and foraging bats; refer to Table A11.1 and Figure A11.1. Detectors were programmed to record from 30 minutes prior to sunset to 30 minutes post-sunrise.

Table A11.1 Static detector survey details (refer to Figure A11.1 for locations)

Static detector position	Static detector location description	Survey periods	Total number of nights
1	Northern boundary – along woodland and stream edge in the north-east of site. Detector attached to willow tree, with microphone facing south-west.	• 25/05/25-29/05/25 • 21/06/25-25/06/25 • 23/07/25-27/07/25 • 28/08/25-01/09/25 • 22/09/25-26/09/25 • 17/10/25-21/10/25	30
2	Eastern boundary – along native hedgerow in the south-east of site. Attached to a fence post, with microphone facing west.	• 25/05/25-29/05/25 • 21/06/25-25/06/25 • 23/07/25-27/07/25 • 21/08/25-25/08/25 • 22/09/25-26/09/25 • 17/10/25-21/10/25	30
3	Southern boundary – along native hedgerow. Attached to a fencepost within hedge, microphone facing north.	• 25/05/25-29/05/25 • 21/06/25-25/06/25 • 23/07/25-27/07/25 • 21/08/25-25/08/25 • 22/09/25-26/09/25 • 17/10/25-21/10/25	30
4	Eastern boundary – along native hedgerow. Attached to fence post within hedge, microphone facing east.	• 25/05/25-29/05/25 • 21/06/25-25/06/25 • 23/07/25-27/07/25 • 21/08/25-25/08/25 • 22/09/25-26/09/25 • 17/10/25-21/10/25	30

2 Limitations

Due to project timescales, it was not possible to undertake any bat surveys in the month of April. This is not considered a significant limitation due to the large dataset collected in other months (May to October inclusive).

In August 2025 the detector at Position 1 malfunctioned, meaning no data was recorded. The detector was re-deployed at the earliest possible opportunity after this (on 28 August) in order to gather 5 consecutive nights of data; the final night was 1 September. The results from this position and the wider dataset are still considered to be representative of the site and valid however Bat Activity Index (BAI) comparisons between the months may be slightly affected. Where this is the case, it is described below.

3 Analysis

General

All bat detector data was downloaded and analysed using 'Anabat Insight v2.0.8' (Titley Electronics). The BAI was calculated using R v.3.6.2 (R Core Team, 2019). For both the NBW and static detector surveys, bat registrations for each species were defined as a series of pulses within a single Anabat Insight Full Spectrum (WAV) file. The maximum WAV file length of recordings was set to five seconds to optimise the performance of the British Trust for Ornithology (BTO) Acoustic Pipeline software.

Night-time bat walkover

The bat registrations recorded during the NBW survey were analysed manually by EAD Ecology staff, using Anabat Insight, against bat call characteristics using reference data from known bat roosts, as well as stock recordings from other bat workers and call parameters detailed in relevant literature.

Static detector survey

All recordings were analysed using species identification algorithms (BTO Acoustic Pipeline; <https://www.bto.org/our-science/products-and-technologies/bto-acoustic-pipeline/how-acoustic-pipeline-works>). The BTO pipeline processes recordings from the UK with regional classifiers using full spectrum data processing. Each five-second file was assigned to species level using this system, along with an independent estimate of error in species identification. Following this analysis, all low confidence calls (less than 0.5 probability) were discounted and all non-Pipistrellus calls (excluding *Pipistrellus nathusii*) were manually checked by EAD Ecology staff to confirm identification, using Anabat Insight v2.0.08 (Titley Electronics). Bat activity is represented as a Bat Activity Index (BAI) of registration per hour of recording.

Species groups

Species identification from sound files and use of associated sonogram analysis software is constrained where overlaps in the parameters of call structure occur between closely related species. In addition, bats will alter their call characteristics in relation to both habitat structure and their behaviour. This can limit the ability to accurately analyse calls to species level, particularly in the genera *Myotis* and *Nyctalus/Eptesicus*.

Myotis species

Registrations from *Myotis* genus bats are virtually impossible to separate to species level due to their plasticity in call structure and as such, where no other information was available, such as visual observation of bat behaviour, habitat structure, position in relation to known roosts, or clear registrations allowing detailed slope profile analysis, identification to species has not been attempted and registrations were grouped as '*Myotis* sp'.

'Big bats'

Registrations from *Nyctalus* and *Eptesicus* genera bats demonstrate overlapping sound characteristics and can therefore be subject to misclassification. For the purposes of this assessment, registrations have only separated to species level where clear distinction can be made. Calls showing some of the characteristics but not meeting all of the parameters set out in Table 11.2 were identified as 'big bat' or *Nyctalus* / *Eptesicus* bats.

Table A11.2 Registration parameters used to distinguish *Nyctalus* / *Eptesicus* bats

Species	Characteristic registration parameters
Noctule <i>Nyctalus noctula</i>	Registration shows two types of alternating frequency Peak frequency below 21 kHz
Leisler's bat <i>N. leisleri</i>	Registration shows two types of alternating frequency Peak frequency above 24 kHz
Serotine <i>Eptesicus serotinus</i>	Registrations are of a single, consistent type Peak frequency between 24 kHz and 32 kHz

4 Results

At least 10 bat species were recorded during transect and static detector surveys. Species name abbreviations used in the results hereafter are provided in Table A11.3.

Table A11.3: Bat name abbreviations used in results

Common name	Scientific name	Species code
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	Pp
Soprano pipistrelle	<i>P. pygmaeus</i>	Ppyg
Nathusius' pipistrelle	<i>P. nathusii</i>	Pn
Undetermined pipistrelle bat	<i>Pipistrellus sp.</i>	Pip
Noctule	<i>Nyctalus noctula</i>	Nn
<i>Nyctalus</i> bat	<i>Nyctalus sp.</i>	Nysp
Serotine	<i>Eptesicus serotinus</i>	Es
Noctule, serotine or Leisler's bat	<i>Eptesicus</i> / <i>Nyctalus sp.</i>	EorNy
Greater horseshoe bat	<i>Rhinolophus ferrumequinum</i>	GHS
Lesser horseshoe bat	<i>Rhinolophus hipposideros</i>	LHS
Barbastelle	<i>Barbastelle barbastellus</i>	Bb
<i>Myotis</i> bat	<i>Myotis sp.</i>	My sp.
Long-eared bat	<i>Plecotus sp.</i>	Pl sp.

Night-time bat walkover

At least eight bat species were recorded during the NBWs, with the majority of registrations from soprano pipistrelle and noctule. These are both relatively common and widespread species. The following observations were made during the surveys:

- Soprano pipistrelles were recorded foraging on the northern boundary of the survey area, along the woodland edge/watercourse. Noctule and serotine were also recorded foraging along this boundary.
- Several instances of Leisler's bat and *Myotis* bats were recorded commuting through the survey area.
- A single barbastelle registration was recorded along the northern boundary.
- A total of 14 long-eared bat (presumed brown long-eared bat) registrations was recorded.

Weather conditions during the NBWs are provided in Table A11.4.

Table A11.4: Weather conditions during NBW surveys

Date	Start - end times	Sunset	Cloud (Oktas)	Wind speed (Beaufort)	Temp. (C)
28 May 2025	21:11	21:11	6	2	13
	23:11		7	2	14
15 August 2025	20:32	20:32	1	0	23
	22:32		0	0	19
7 October 2025	18:34	18:34	5	1	13
	20:34		4	1	11

Static detector surveys

General bat assemblage

At least 10 bat species were recorded during the static detector surveys, with an overall total of 17,604 registrations; refer to Table A11.5. Soprano and common pipistrelle bats were most abundant and together accounted for 65.29% of all registrations, with 39.12% and 26.17% respectively. Other species recorded in order of frequency were *Nyctalus / Eptesicus* bats (10.44%), *Myotis* bats (7.04%), noctule (6.05%), *Nyctalus* bats (4.89%) and greater horseshoe bat (2.65%). Other species recorded but accounting for less than 1% of registrations each were long-eared bats (presumed brown long-eared bats), lesser horseshoe bat, *Nathusius'* pipistrelle, serotine and barbastelle.

Soprano pipistrelle was the most abundant species at Position 1 (Bat Activity In 13.79) and Position 3 (BAI 1.43), and common pipistrelle was most abundant at Position 2 (BAI 3.39) and Position 4 (BAI 6.06). At Positions 1, 2 and 4, *Nyctalus / Eptesicus* bats constituted the third biggest species group (BAIs 2.14, 0.97 and 2.2 respectively). At Position 3 *Myotis* bats were the third largest species group (BAI 0.53). Overall species BAI across positions and months is presented below in Graphs A11.1 & A11.2, and Table 11.5; refer to Figure A11.1 for static detector locations.

'Big bats'

Nyctalus / Eptesicus bats were recorded at all positions across all months apart from Position 1 in October, with a BAI of 2.2 across the survey period. There was increased activity at Position 1 in September (327 registrations, BAI 4.3) and Position 4 in August (397 registrations, BAI 7.3). In September over half the registrations (188) occurred in quick succession within 30 minutes of sunset, and in August at Position 4 nearly all registrations (357) occurred within one hour of sunset; this suggests the site may be in close proximity to a roost, although noctule is one of the earliest species to emerge and can commute over distance quickly. The BAI and number of registrations for each 'big bat' species (and other species) are provided in Table 11.5.

Light-sensitive bats

Light-sensitive bats were recorded at all static detector positions; these comprised greater and lesser horseshoe bats (overall BAI 0.36 & 0.12 respectively), *Myotis* bats (BAI 0.95), long-eared bats (BAI 0.16) and barbastelle (0.13).

There were 467 registrations of greater horseshoe bats (GHS) across the survey period of which the majority (408; 87.37%) were recorded across two positions and a total of seven nights in September and October (Position 3 on 20-21 October, and Position 4 on 23-26 September and 17 October). Apart from 21 October, when GHS activity was reflective of commuting activity, the majority of registrations occurred in very quick succession which suggested concentrated localised foraging by individual or small number of GHS. Across the remainder of the survey period and at other positions, very few GHS registrations were recorded. This suggests that the site does not represent core commuting/foraging habitat for GHS, rather the site is used sporadically or opportunistically for foraging. Refer to Graphs A11.3 & A11.4.

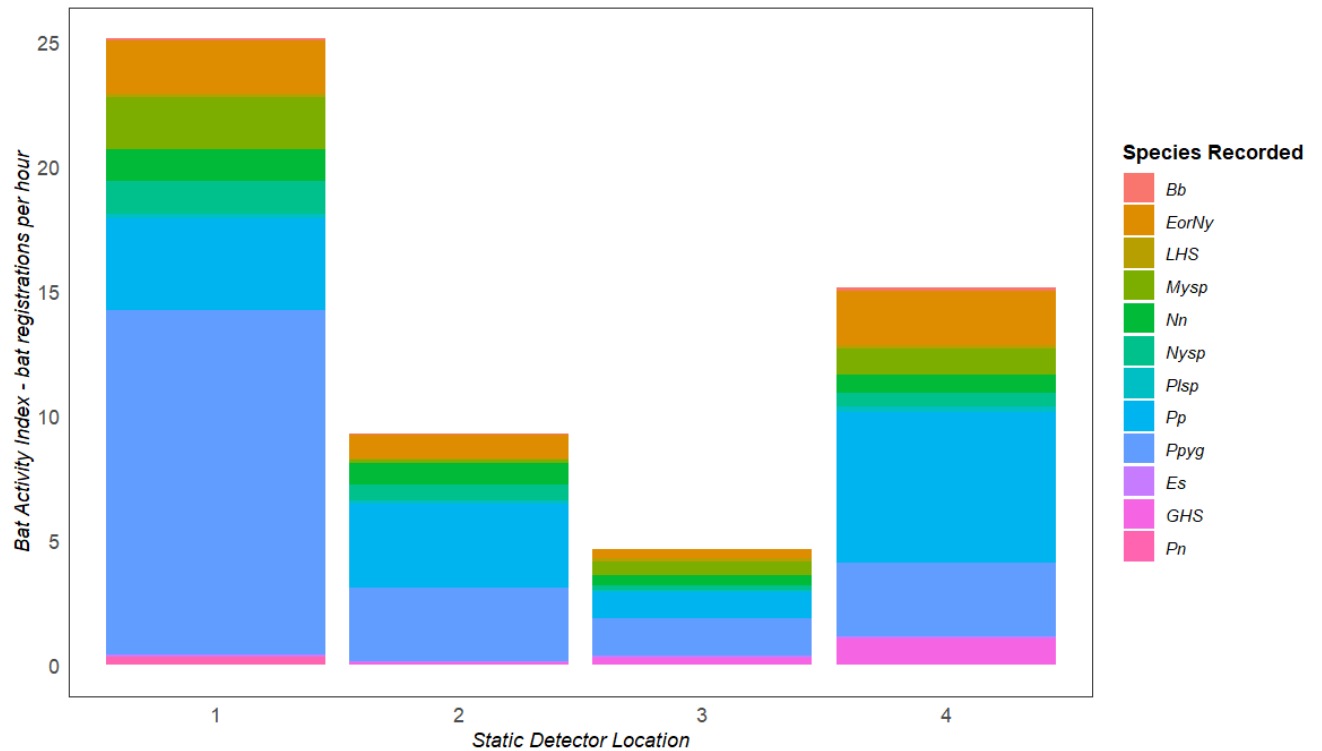
Lesser horseshoe bat (LHS) registrations were recorded 157 times across the survey period. The highest levels of LHS activity were recorded at Positions 1, 3 & 4 (BAI 0.15), with 50 registrations at each between May and October, followed by Position 2 with 33 registrations (BAI 0.02). There was monthly variation in LHS activity with highest activity levels occurring in May at Position 3 (33 registrations, BAI 0.75) and Position 4 (29 registrations, BAI 0.66), and in September at Position 1 (39 registrations, BAI 0.51). Only two LHS registrations occurred within 30 minutes of sunset or sunrise, with 10 occurring within the hour after sunset and two within the hour before sunrise. This suggests that the site is not associated with a large roost nearby. The low BAI recorded at each position suggests that the site does not support core commuting/foraging habitat for this species; refer to Graphs A11.5 & A11.6.

Myotis bat activity was highest at Position 1, along the northern boundary with the woodland/watercourse (BAI 2.08). Approximately two-thirds of all registrations at this position occurred in August; of these the vast majority (81.76%) were attributed to individual or small numbers of foraging bats due to the continuous occurrence of registrations across two periods on consecutive nights (20:39-23:00 on 28 August and 20:47-23:03 on 29 August).

Both long eared bat species (total 205 registrations; BAI 0.16,) and barbastelle (total 75 registrations; BAI 0.06) were recorded sporadically throughout the survey period in low numbers. There was no particular pattern associated with the registrations and therefore the survey area was considered to be an occasional foraging/commuting location for these species.

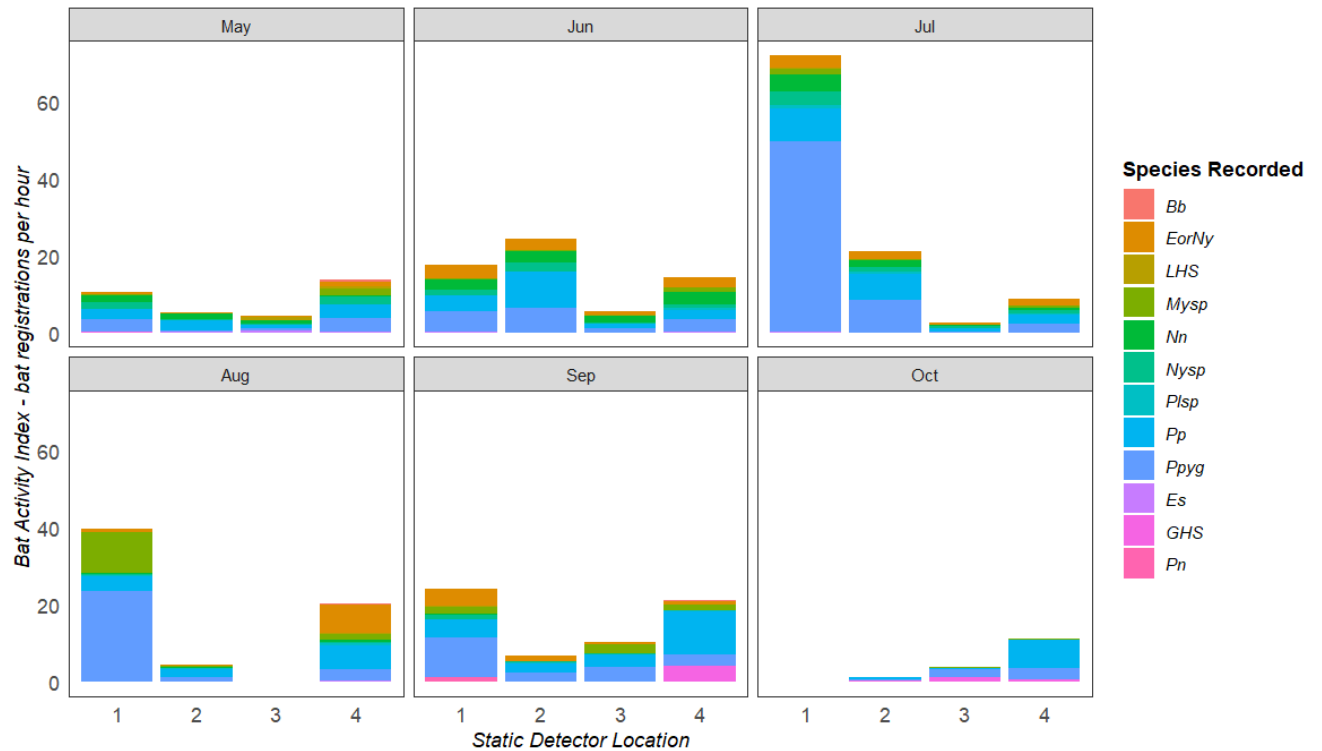
Graph A11.1: Static detector survey - overall Bat Activity Index (BAI) by position

B.A.I at each static detector location

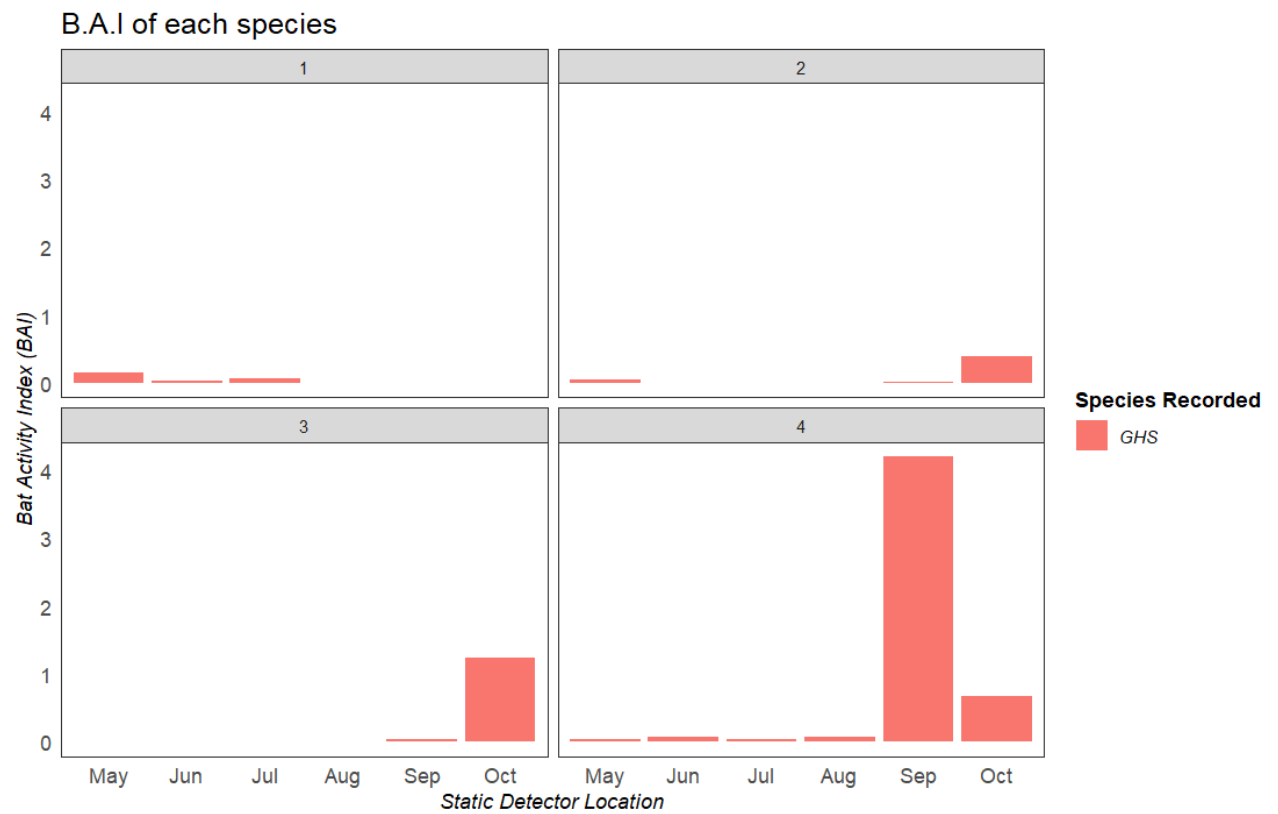


Graph A11.2: Static detector survey - overall Bat Activity Index (BAI) by month

Monthly B.A.I

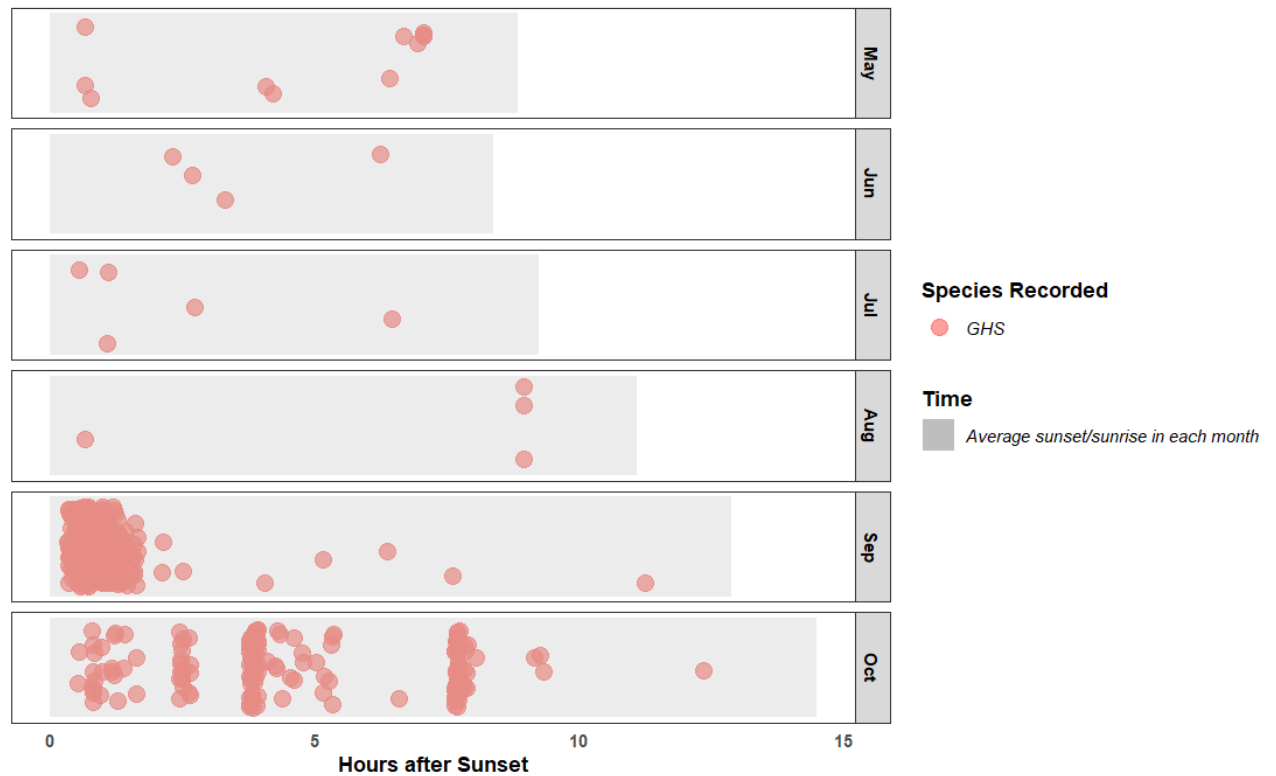


Graph A11.3: Spatial distribution of greater horseshoe bat registrations

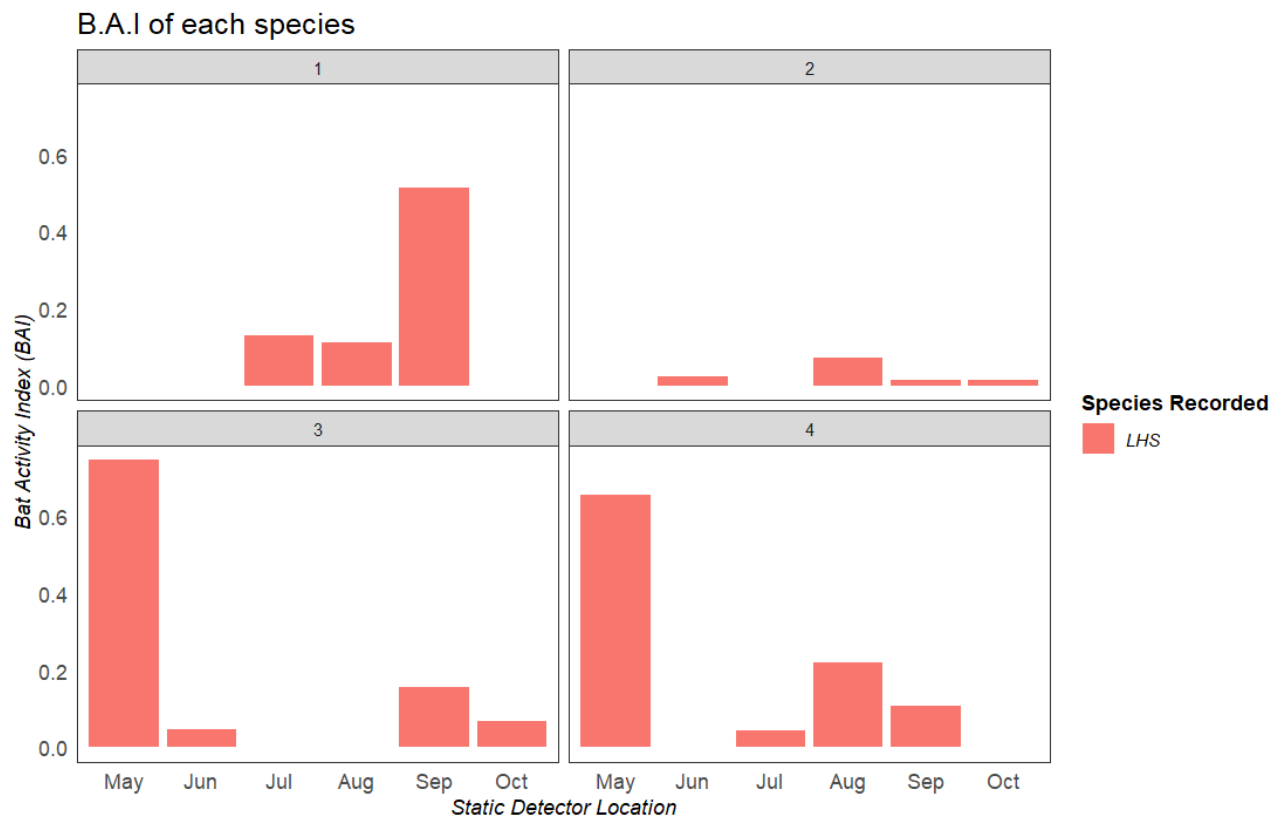


Graph A11.4: Temporal distribution of greater horseshoe bat registrations

Greater horseshoe registrations recorded across the Site



Graph A11.5: Spatial distribution of lesser horseshoe bat registrations



Graph A11.6: Temporal distribution of lesser horseshoe bat registrations

Lesser horseshoe registrations recorded across the Site

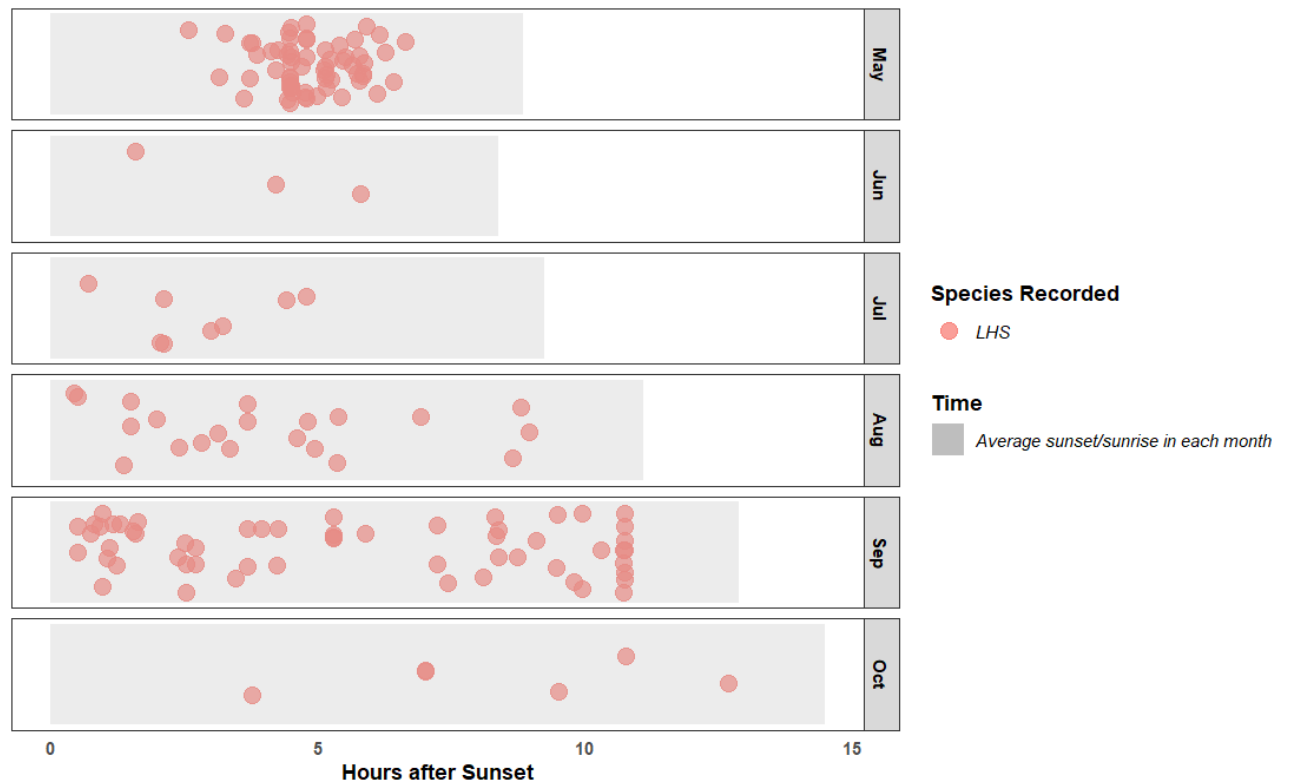


Table A11.5: Static detector survey results – number of registrations and Bat Activity Index (BAI)

Detector	Month	Bb	EorNy	LHS	Mysp	Nn	Nysp	Plsp	Pp	Ppyg	Es	GHS	Pn	Total
1	May	0	34	0	11	71	83	0	117	140	5	7	0	468
	Jun	1	148	0	20	106	55	5	174	217	13	1	0	740
	Jul	6	152	6	67	205	165	47	390	2290	6	3	0	3337
	Aug	6	38	5	466	17	15	12	172	1068	0	0	0	1799
	Sep	8	327	39	116	20	101	7	343	785	3	0	98	1847
	Oct	0	0	0	0	0	0	0	6	0	0	0	0	0
	Total	21	699	50	680	419	419	71	1202	4500	27	11	98	8197
2	May	0	4	0	1	70	9	2	114	20	5	2	0	227
	Jun	1	125	1	14	116	104	5	387	267	3	0	0	1023
	Jul	1	94	0	10	75	66	21	307	397	2	0	0	973
	Aug	2	8	4	9	23	5	9	109	75	0	0	0	244
	Sep	4	84	1	9	3	10	10	153	162	0	1	3	440
	Oct	0	1	1	5	0	2	0	28	29	0	28	0	94
	Total	8	316	7	48	287	196	47	1098	950	10	31	3	3001
3	May	0	15	33	3	39	13	0	38	23	26	0	0	190
	Jun	0	38	2	4	73	10	7	43	48	2	0	0	227
	Jul	0	19	0	0	24	24	2	32	16	0	0	0	117
	Aug	0	1	0	3	0	0	0	2	0	0	0	0	6
	Sep	2	34	10	147	2	5	13	203	248	1	3	2	670
	Oct	1	3	5	15	0	4	1	26	146	0	90	0	291
	Total	3	110	50	172	138	56	23	344	481	29	93	2	1501
4	May	14	53	29	74	16	88	6	154	153	14	2	0	603
	Jun	5	112	0	48	137	37	14	105	136	6	3	0	603
	Jul	2	88	2	15	33	44	17	105	102	1	2	0	411
	Aug	13	397	12	92	32	15	20	336	171	13	4	0	1105
	Sep	9	62	7	88	4	7	7	732	184	0	272	0	1372
	Oct	0	2	0	22	0	0	0	532	212	0	49	0	817
	Total	43	714	50	339	222	191	64	1964	958	34	332	0	4911
Total	-	75	1839	157	1239	1066	862	205	4608	6889	100	467	103	17604

Detector	Month	Bb	EorNy	LHS	Mysp	Nn	Nysp	Plsp	Pp	Ppyg	Es	GHS	Pn	Total
1	May	0.00	0.77	0.00	0.25	1.61	1.88	0.00	2.65	3.17	0.11	0.16	0.00	10.58
	Jun	0.02	3.54	0.00	0.48	2.53	1.31	0.12	4.16	5.18	0.31	0.02	0.00	17.68
	Jul	0.13	3.28	0.13	1.45	4.43	3.56	1.02	8.42	49.47	0.13	0.06	0.00	72.09
	Aug	0.13	0.84	0.11	10.32	0.38	0.33	0.27	3.81	23.66	0.00	0.00	0.00	39.85
	Sep	0.11	4.30	0.51	1.52	0.26	1.33	0.09	4.51	10.31	0.04	0.00	1.29	24.27
	Oct	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	0.06	2.14	0.15	2.08	1.28	1.28	0.22	3.68	13.79	0.08	0.03	0.30	25.11
2	May	0.00	0.09	0.00	0.02	1.58	0.20	0.05	2.58	0.45	0.11	0.05	0.00	5.13
	Jun	0.02	2.99	0.02	0.33	2.77	2.48	0.12	9.25	6.38	0.07	0.00	0.00	24.44
	Jul	0.02	2.03	0.00	0.22	1.62	1.43	0.45	6.63	8.58	0.04	0.00	0.00	21.02
	Aug	0.04	0.15	0.07	0.17	0.42	0.09	0.17	2.00	1.38	0.00	0.00	0.00	4.49
	Sep	0.06	1.30	0.02	0.14	0.05	0.15	0.15	2.37	2.51	0.00	0.02	0.05	6.80
	Oct	0.00	0.01	0.01	0.07	0.00	0.03	0.00	0.38	0.40	0.00	0.38	0.00	1.29
	Total	0.02	0.97	0.02	0.15	0.89	0.60	0.14	3.39	2.93	0.03	0.10	0.01	9.26
3	May	0.00	0.34	0.75	0.07	0.88	0.29	0.00	0.86	0.52	0.59	0.00	0.00	4.30
	Jun	0.00	0.91	0.05	0.10	1.74	0.24	0.17	1.03	1.15	0.05	0.00	0.00	5.42
	Jul	0.00	0.41	0.00	0.00	0.52	0.52	0.04	0.69	0.35	0.00	0.00	0.00	2.53
	Aug	0.00	0.02	0.00	0.06	0.00	0.00	0.00	0.04	0.00	0.00	0.00	0.00	0.11
	Sep	0.03	0.53	0.15	2.27	0.03	0.08	0.20	3.14	3.84	0.02	0.05	0.03	10.36
	Oct	0.01	0.04	0.07	0.21	0.00	0.05	0.01	0.36	2.01	0.00	1.24	0.00	4.00
	Total	0.01	0.34	0.15	0.53	0.43	0.17	0.07	1.06	1.48	0.09	0.29	0.01	4.63
4	May	0.32	1.20	0.66	1.67	0.36	1.99	0.14	3.48	3.46	0.32	0.05	0.00	13.63
	Jun	0.12	2.68	0.00	1.15	3.27	0.88	0.33	2.51	3.25	0.14	0.07	0.00	14.41
	Jul	0.04	1.90	0.04	0.32	0.71	0.95	0.37	2.27	2.20	0.02	0.04	0.00	8.88
	Aug	0.24	7.30	0.22	1.69	0.59	0.28	0.37	6.18	3.14	0.24	0.07	0.00	20.31
	Sep	0.14	0.96	0.11	1.36	0.06	0.11	0.11	11.32	2.85	0.00	4.21	0.00	21.22
	Oct	0.00	0.03	0.00	0.30	0.00	0.00	0.00	7.31	2.91	0.00	0.67	0.00	11.23
	Total	0.13	2.20	0.15	1.05	0.68	0.59	0.20	6.06	2.95	0.10	1.02	0.00	15.15
Total	-	0.06	1.42	0.12	0.95	0.82	0.66	0.16	3.55	5.30	0.08	0.36	0.08	13.56

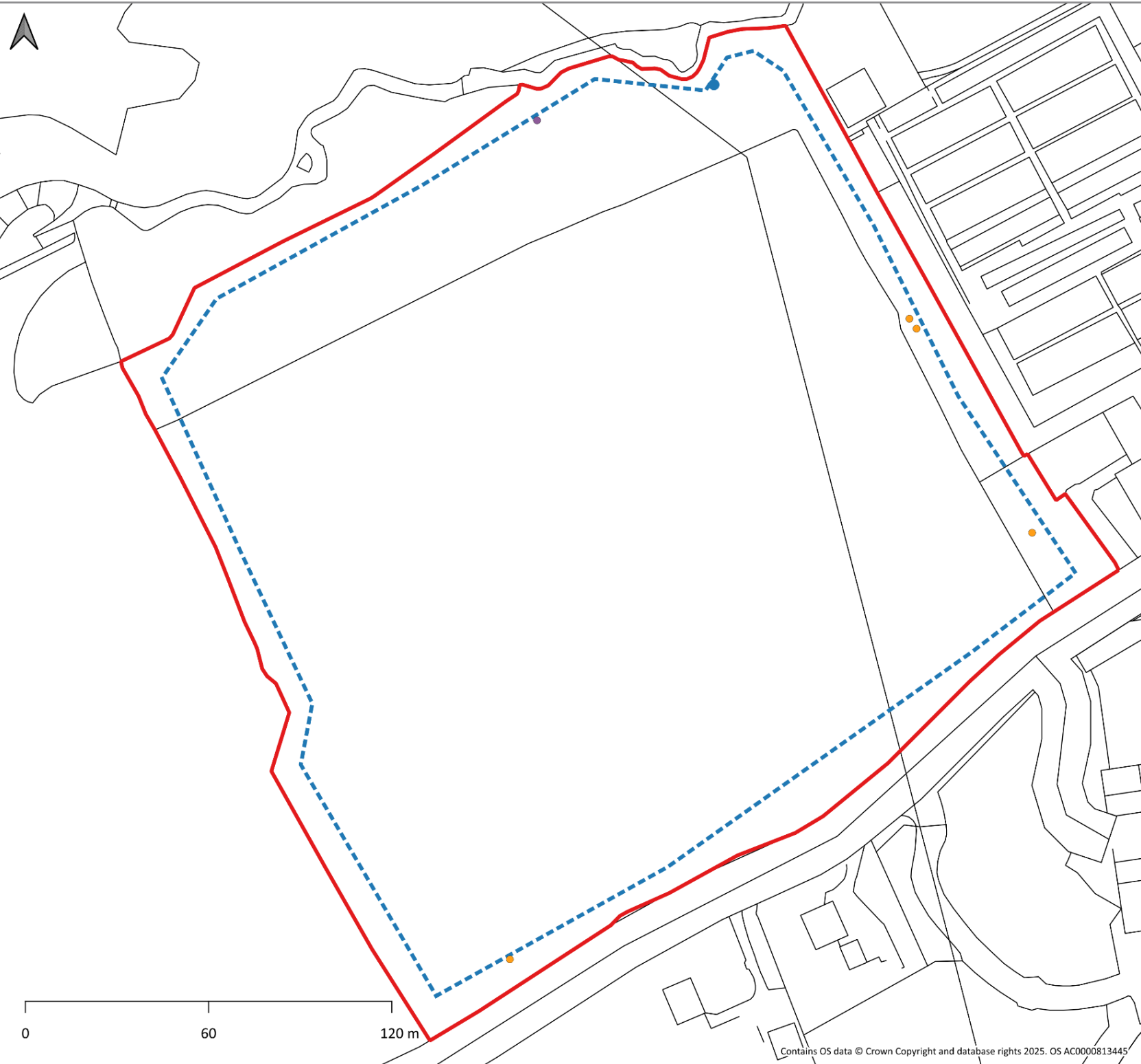
5 References

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

R Core Team (2019). *R: A language and environment for statistical computing*. R Foundation for Statistical Computing, Vienna, Austria. URL <https://www.R-project.org/>.

Russ, J. (2012). *British Bat Calls: A Guide to Species Identification*. Pelagic Publishing, Exeter

Figure A11.1: Night-time Bat Walkover Survey Plan



Key

- Transect route 1
- Start point
- Plasp Species
- Barbastelle
- Survey boundary



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Gleeson Land		
Land at Gate Farm, Sutton Bengers		
Bat Activity Plan		
11/11/2025	Created by: YS	Scale at A3 1:1,200

Figure A11.2: Static Detector Survey Plan



Key

-  Static detector location
-  Survey boundary

 www.eadecology.co.uk	Gleeson Land		
	Land at Gate Farm, Sutton Benger		
	Static Position Plan		
	11/11/2025	Created by: YS	Scale at A3 1:1,271

Appendix 12: Bat roost survey

Bat roost survey

1 Methodology

Trees

All trees within and bordering the site were subjected to a Ground Level Tree Assessment (GLTA) on 19 June 2025 to evaluate their potential for supporting roosting bats, in accordance with Bat Conservation Trust (BCT) Guidelines (Collins [ed.] 2023); refer to Table A12.1. The GLTA included a detailed inspection of all trees using binoculars to identify potential bat roosting features (PRFs) such as rot holes, woodpecker holes and hazard beams. Surveys were undertaken by, or under the supervision of, Natural England-licensed bat ecologists. The survey aimed to determine the requirement for a more detailed assessment through aerial surveys (i.e. tree-climbing) to evaluate the suitability of any identified PRFs from the ground assessment, including the presence or likely absence of roosting bats.

Table A12.1: Guidelines for assessing the potential suitability of PRFs on a proposed development site

Suitability	Description of roosting habitats
FAR	Further assessment required to establish if PRFs are present in the tree.
PRF-I	PRF is only suitable for individual bats or very small numbers either due to size or lack of suitable habitats.
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony.

Buildings

There were no buildings on site or nearby with the possibility of being directly impacted by the development, therefore no roost surveys of buildings were undertaken.

2 Limitations

There were no limitations to the survey.

3 Results

Trees

No trees considered to have bat roost potential, or requiring further investigation, were identified that could be potentially affected by the proposed development.

4 References

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

Appendix 13: Otter and water vole survey

Otter and water vole survey

1 Methodology

The survey for otter and water vole followed general survey guidelines published by Dean et al (2016) and the National River Authority (1993). The survey was undertaken on 4 June and 21 August 2025 by two ecologists. The focus was on the watercourse to the north of the site which was surveyed for the following signs:

Otter

- Holts/couches.
- Riparian pathways, tail slides and footprints.
- Feeding signs (tables).
- Spraint and jelly.

Water vole

- Burrows and lawns.
- Riparian pathways.
- Feeding signs.
- Latrines.

2 Limitations

There were no limitations to the survey.

3 Results

The first survey found one otter spraint and no signs of water vole. The second survey uncovered five spraints along the same stretch of river (see Figure A13.1 for locations) and no signs of water vole. This suggested, as assumed, that otters use the river on a regular basis for commuting and foraging.

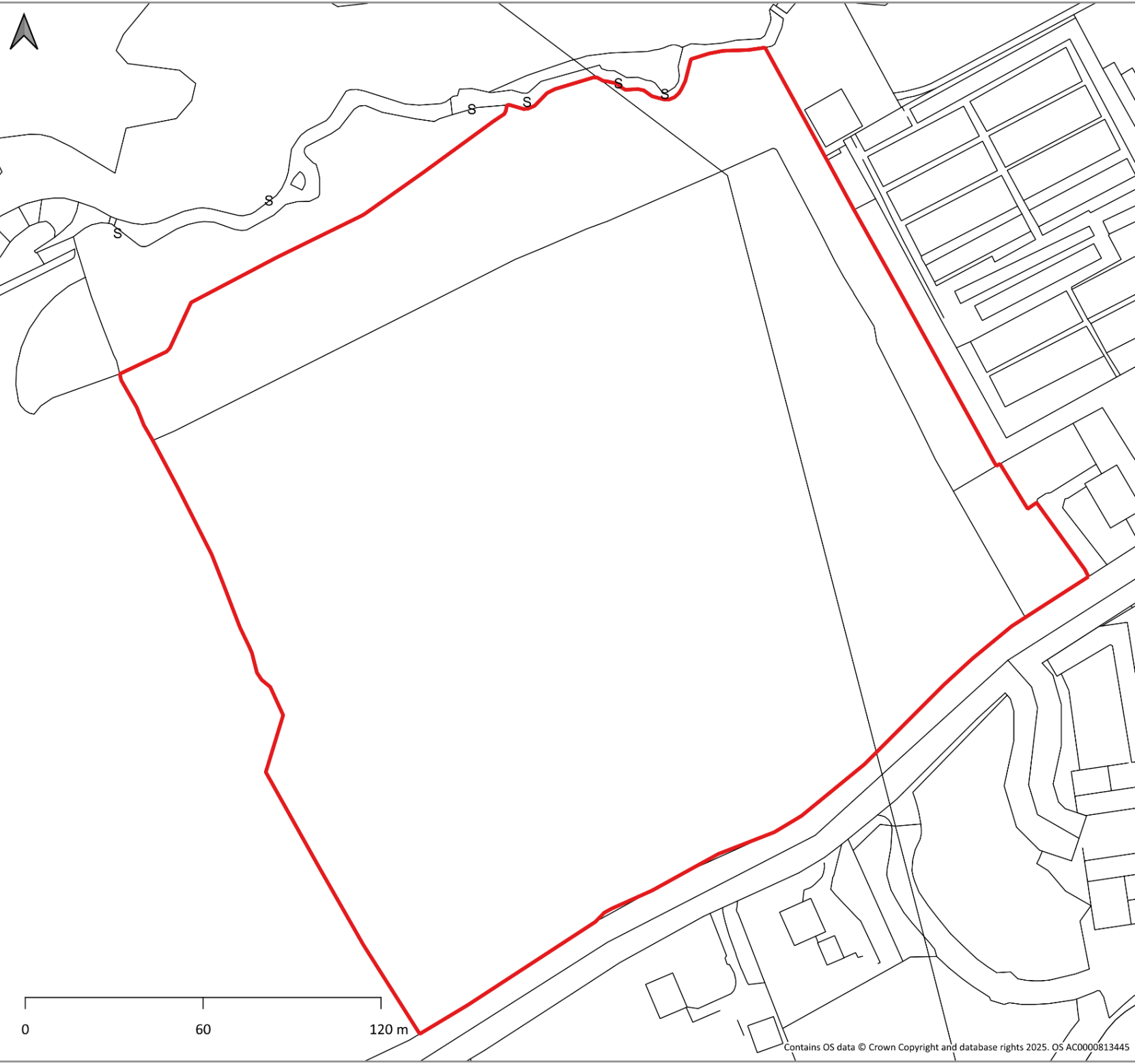
4 References

Dean M, Strachan R, Gow D and Andrews R (2016). The Water Vole Mitigation Handbook (*The Mammal Society Mitigation Guidance Series*). Eds Fiona Mathews and Paul Chanin. The Mammal Society, London.

National Rivers Authority (1993) *Otters and River Habitat Management*. Conservation Technical Handbook Number 3.

Strachan & Moorhouse (2011) *Water Vole Conservation Handbook*. 3rd Edition. WildCRU, Oxford.

Figure A13.1: Otter and Water Vole Survey Plan



Key

- S Otter spraint
- Survey boundary

 www.eadecology.co.uk	Gleeson Land		
	Land at Gate Farm, Sutton Benger		
	Otter and Water vole Survey Results		
	11/11/2025	Created by: YS	Scale at A3 1:1,230

Appendix 14: Biodiversity Net Gain assessment

Biodiversity Net Gain assessment

1 Methodology

A Biodiversity Net Gain (BNG) assessment was undertaken to quantify the estimated net biodiversity change resulting from the proposed development. The assessment utilised the Defra Statutory Metric calculation tool (Defra, 2025a), with reference to supporting documents and the Biodiversity Metric principles (Defra 2025b and 2025c). The completed metric is available as a digital file (Excel spreadsheet).

In line with Statutory BNG Guidance (Defra 2025b), this assessment has been undertaken with reference to the Biodiversity Metric principles (Defra 2025b). As the application is at Outline stage, the calculations are based on the Illustrative Landscape Mitigation and Enhancement Plan (drawing no. 17958/P08) refer to Figure A14.1. The assessment followed Defra Statutory Metric methodologies, also referencing the relevant supporting documents (Defra 2025b and 2025c).

Pre-development habitats

The on-site habitat and hedgerow baseline was informed by a Habitat Condition Assessment (HCA) survey undertaken by experienced botanists from EAD Ecology (Field Identification Skills Certificate (FISC) Level 4 / 5) on 19 June 2025 (majority of site) and 10 December 2025 (B4069 verge only); refer to Figure A14.2.

Habitat area measurements

Measurements of both pre-development and post-development habitats were undertaken with QGIS using the Biodiversity Metric QGIS Import Tool, then incorporated into the Metric using the Defra Statutory Metric GIS Import Tool (Natural England, 2023). Areas for individual trees were calculated in accordance with guidance (Defra, 2025b), using the integrated Statutory Metric Tree Helper.

On-site post-development habitats

Post-development on-site habitat areas are based on the Illustrative Landscape Mitigation and Enhancement Plan (drawing no. 17958/P08) refer to Figure A14.1. This represents the results of an iterative process to maximise on-site biodiversity value in accordance with the ecological hierarchy, the biodiversity gain hierarchy and the biodiversity net gain good practice principles (CIEEM, CIRIA and IEMA, 2016), considering all other layout constraints; refer to Table A14.1.

Table A14.1: Application of Biodiversity Gain Hierarchy

Biodiversity Gain Hierarchy	Scheme response
First, in relation to on-site habitats which have a Medium, High and Very High distinctiveness (a score of four or more according to the statutory biodiversity metric), the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects.	Medium distinctiveness habitats were retained within the design of the scheme (no High or Very High distinctiveness habitats were present). Habitat loss was limited to habitats of Low distinctiveness (modified grassland and species-poor hedgerows). New Medium distinctiveness habitats were proposed as shown in the illustrative 'Landscape Components Plan for BNG'.
Second, in relation to all on-site habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing on-site habitats, creation of new on-site habitats, allocation of registered off-site gains and finally the purchase of biodiversity credits.	Creation of new on-site habitats was proposed where existing habitats were being lost or retained habitats were not considered appropriate for enhancement. These options were maximised within the site boundary.

Determination of expected post-development on-site habitat conditions are based on the relevant habitat condition criteria in the Statutory Metric (Defra 2025c). In the professional opinion of EAD Ecology, all measures and targeted habitat conditions are considered realistic and achievable and assume the implementation of a Biodiversity Gain Plan, including a Habitat Management and Monitoring Plan (HMMP) detailing the establishment requirements for habitats and long-term management of retained, enhanced and created habitats. The HMMP would be produced in accordance with the Natural England Habitat Management and Monitoring Plan Template (JP058) and companion document.

Strategic significance

The strategic significance of both baseline and post-construction habitats applied to the Metric has been assigned in accordance with the Statutory Biodiversity Metric guidance (Natural England 2025b), with reference to site-specific information. The site is within an area covered by a Local Nature Recovery Strategy (LNRS; Wiltshire and Swindon LNRS), therefore the strategic significance has been assigned with reference to Table 7 within the Statutory Biodiversity Metric guidance (Natural England 2025b).

Assumptions and limitations

The following assumptions and limitations were identified in this BNG assessment:

- The post-development habitats were mapped in accordance with the Illustrative Landscape Plan and the percentage habitat cover was extracted from details within this.
- Hedgerow and tree loss were assessed against the Illustrative Landscape Plan.
- The B4069 roadside verge was surveyed in December 2025, which is outside the optimal survey period. However, sufficient information was obtained to determine grassland condition.
- All proposed hedgerows would be species-rich in accordance with the UKHab 2.0 criteria. Existing hedgerows would be enhanced where appropriate.
- Appropriate site tests, such as soil analyses, would be required to inform and confirm the feasibility of proposed habitat creation/enhancement measures for the BNG Plan condition.

2 Results

The pre-development biodiversity value of the site, based on Figure A14.2 is 20.55 'Habitat Units' and 2.47 'Hedgerow Units'. The post-development biodiversity value of the site, based on Figure A14.3, would be 11.43 'Habitat Units' and 4.24 'Hedgerow Units'. The proposed development would therefore result in a net loss of -9.12 'Habitat Units' (-44.40%) and a net gain of 1.77 'Hedgerow Units' (+71.41%). Refer to Table A14.2 and Figure A14.4.

The baseline conditions of the habitats and hedgerows located within the site are provided in Tables A14.3 – A14.5. The indicative post-construction conditions of habitats and hedgerows are provided in Table A14.6.

Table A14.2: BNG Metric Summary⁵

On-site baseline pre-development	Habitat units	20.55
	Hedgerow units	2.47
On-site post-development (Habitat retention, creation & enhancement)	Habitat units	11.43
	Hedgerow units	4.24
On-site net % change (Habitat retention, creation & enhancement)	Habitat units	-44.40%
	Hedgerow units	+71.41%
Total net unit change (Habitat retention, creation & enhancement)	Habitat units	-9.12
	Hedgerow units	+1.77

⁵ Headline figures reflect metric outputs which include built in rounding of two decimal places.

Trading rules

Where the above on-site habitat delivery is applied, all 'trading rule' requirements specified in the Statutory Metric would be met for Hedgerow Units. Post-development delivery of Habitat Units indicate a net loss and therefore does not meet 'trading rules' for this component of the Metric. This would be satisfied through off-site biodiversity offsetting.

Additionality

In accordance with current guidance, mitigation or compensation for impacts to Special Areas of Conservation (SAC) / Special Protection Areas (SPA) / European Protected Species (EPS) / further listed schemes⁶ (FLS) can be used 'in part' towards achieving Biodiversity Net Gain. This means that at least 10% of the development's biodiversity units must be related to habitat proposals not providing SAC/SPA/EPS/FLS mitigation/compensation (i.e. mitigation/compensation can contribute up to the point of no net loss). No mitigation/compensation for SAC/SPA/EPS/FLS is proposed in this development; therefore, there are no additionality matters to address.

Irreplaceable habitats

No irreplaceable habitats have been identified within the site. The area of ancient woodland to the north is approximately 40m from the site boundary, and appropriate measures have been included in this EclA to avoid/mitigate potential impacts to the woodland.

3 Biodiversity Net Gain Strategy

On-site habitat delivery

The HMMP would set out the on-site habitat protection, enhancement, establishment and management strategies together with a framework for monitoring to provide certainty for the achievement of long-term maintenance of the predicted units for on-site post-intervention habitats.

The HMMP will include detailed habitat establishment methods and programme, proposed management activities which can be implemented for 30-year period and a detailed work programme to ensure successful establishment/restoration of habitat, together with details of monitoring to evaluate the success of ongoing management activities and provide regular condition reporting to Wiltshire Council. The extent and frequency of monitoring reporting will be agreed with Wiltshire Council.

On-site habitat delivery

To ensure that the mandatory 10% BNG is achieved for the proposed development, the following 'biodiversity offsetting' measures could be included in the offsetting strategy:

- Delivery of Habitat Units outside of the Site boundary through creation of a Habitat Bank.
- Purchase of Habitat Units for an existing Habitat Bank.
- Purchase of Statutory Credits from the government; this is considered as a last resort.

4 Conclusions

The BNG calculations based on the Illustrative Landscape Plan (Figure A14.1) demonstrates that the development would not deliver net gain on-site or satisfy the Metric trading rules without providing off-site mitigation/compensation. The Biodiversity Net Gain calculations demonstrate that the proposed development would be predicted to deliver a net loss of -44.40% in 'Habitat Units' and a net gain of 71.41% in 'Hedgerow Units'. An additional 11.18 'Habitat Units' would be required from offsetting to achieve 10% Biodiversity Net Gain.

⁶ <https://www.gov.uk/guidance/what-you-can-count-towards-a-developments-biodiversity-net-gain-bng>

As this BNG Assessment is based upon an Illustrative Landscape Plan, an updated BNG Assessment will need to be undertaken based on the detailed Reserved Matters landscape design to satisfy BNG planning conditions and inform discharge of the Biodiversity Gain Plan.

5 References

CIEEM, CIRIA and IEMA (2016) *Biodiversity Net Gain Good practice principles for development* <https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf>

Defra (2025a) *The Statutory Biodiversity Metric - Auditing and accounting for biodiversity calculation tool*. July 2025.

Defra (2025b) *The Statutory Biodiversity Metric User Guide*. July 2025.

Defra (2025c) *The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology*. January 2025.

Natural England (2023) *Biodiversity Metric GIS Import Tool*. ISBN: 978-1-7393362-5-7. November 2023.

Figure A14.1: Illustrative Landscape Plan for BNG



Key:

- Site Boundary
- Existing and Retained Vegetation
- Proposed Open Space Trees
- Proposed Street Trees
- Proposed Ornamental Shrub Planting
- Proposed Attenuation Basin
- Proposed Marginal Planting
- Proposed Species Rich Seeding
- Proposed LEAP
- Proposed Benches
- Public Right of Way



Project	Sutton Benger
Drawing Title	Illustrative Landscape Mitigation and Enhancement Plan
Scale	A3: 1:1500
Drawing No	17958/P08
Date	October 2025
Checked	EE/TRS



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**Figure A14.2: Pre-Development (Baseline) Habitat
Condition Assessment Plan**



Key

Site boundary

Individual Trees

- Existing Medium Rural Tree
- Existing Small Rural Tree

Individual tree Condition

- Moderate

Hedgerows

- Native hedgerow

Habitats

- Modified grassland
- Other neutral grassland

Habitat Condition

- Good
- Moderate

ead ecology www.eadecology.co.uk	Gleeson Land		
	Sutton Benger		
	Biodiversity Net Gain Assessment: Baseline Plan		
	11/12/2025	Created by: RS	Scale at A3 1:1,250

**Figure A14.3: Post-Development Habitat Retention,
Creation and Enhancement Plan**



Key

Site boundary

Individual Trees

- Proposed Small Urban Tree
- Retained Medium Rural Tree
- Retained Small Rural Tree

Individual tree Condition

Moderate

Hedgerows

- Native hedgerow
- Species-rich native hedgerow

Habitats

- Artificial unvegetated, unsealed surface
- Built linear features
- Developed land; sealed surface
- Modified grassland
- Other neutral grassland
- Ponds (non-priority habitat)
- Vegetated garden

Habitat Condition

- Good
- Moderate
- Poor
- N/A - Other
- Condition Assessment N/A

Gleeson Land

Sutton Benger

Biodiversity Net Gain Assessment: Post-intervention Plan

11/12/2025

Created by: RS

Scale at A3 1:1,250

Table A14.3: Baseline Condition Assessment criteria - habitats

Habitat ref	Habitat	Condition Assessment Criteria. Including grassland quadrat (Q) data (P = Pass, F = Fail)	Condition
G1	Modified grassland	A – P, B – F, C – P, D – P, E – F, F – P, G – P Q1 – Perennial rye-grass, Yorkshire fog, sweet vernal grass, cock's-foot, rough meadow grass, creeping bent Q2 – Perennial rye-grass, Yorkshire fog, creeping bent, crested dog's-tail, field bindweed, common mouse-ear, sweet vernal grass, cock's-foot, creeping buttercup Q3 – Yorkshire fog, sweet vernal grass, meadow foxtail, creeping bent, cock's-foot, perennial rye-grass, dandelion, bulbous buttercup Q4 – Cock's-foot, perennial rye-grass, Yorkshire fog, rough meadow grass, bulbous buttercup, common mouse-ear Q5 – Perennial rye-grass, cock's-foot, meadow foxtail, Yorkshire fog, field bindweed, soft brome, creeping bent, red fescue, common mouse-ear Q6 – Perennial rye-grass, Yorkshire fog, bulbous buttercup, common mouse-ear, sweet vernal grass, red fescue, rough meadow grass, meadow foxtail	Moderate
G2	Other neutral grassland	A – P, B – P, C – F, D – P, E – P, F – P Q2 – Dove's-foot crane's-bill, yarrow, hedge bedstraw, common vetch, hogweed, cock's-foot, hairy bittercress, false oat grass, common nettle Q3 – common vetch, yarrow, false oat grass, hedge woundwort, dandelion, dove's-foot crane's-bill, lesser celandine, common field speedwell, thistle species Q4 – cleavers, common nettle, false oat grass, hedgerow crane's-bill, groundsel, field speedwell, perforated St John's-wort, burnet saxifrage, oxeye daisy, yarrow, common nettle, curled dock, common knapweed	Good

Table A14.4: Baseline Tree Condition Assessment Results

Tree ref	BNG Condition Criteria (Parks et al 2023) P= Pass, F = Fail						Size	Condition
	A	B	C	D	E	F		
T17	P	P	F	P	F	P	Medium	Moderate
T18	P	P	F	P	F	P	Small	Moderate
T19	P	P	F	P	F	P	Small	Moderate

Table A14.5: Baseline Hedgerow Condition Assessment Results

Hedge Ref	Hedgerow Type	BNG Condition Criteria P= Pass, F = Fail										Condition
		A1	A2	B1	B2	C1	C2	D1	D2	E1	E2	
H1	Native hedgerow	P	P	F	P	P	P	P	F	N/A	N/A	Moderate
H2	Native hedgerow	P	P	F	F	P	F	P	F	N/A	N/A	Moderate
H3	Native hedgerow	F	P	F	F	P	P	P	F	N/A	N/A	Moderate

Table A14.6: Post-Construction Management and Interventions

Habitat	Predicted condition	Justification
Modified grassland	Poor	Precautionary assessment – areas of amenity grassland are unlikely to have a species richness of 6-8 species per m ² . Therefore, 'Poor' condition assumed.
Other neutral grassland	Moderate	Proposed management of wildflower grassland will ensure development of a diverse, species-rich sward, meeting the following condition criteria as a minimum, i.e.: A – The appearance and composition of the vegetation closely matches characteristics of the specific grassland habitat type. Wildflowers, sedges and indicator species for the specific grassland habitat type are very clearly and easily visible throughout the sward. B – Sward height is varied. D – Cover of bracken <20% and cover of scrub <5%.
Other neutral grassland	Good	Proposed management of B4069 roadside verge grassland will maintain a diverse, species-rich sward, meeting the following condition criteria as a minimum: A – The appearance and composition of the vegetation closely matches characteristics of the specific grassland habitat type. Wildflowers, sedges and indicator species for the specific grassland habitat type are very clearly and easily visible throughout the sward. B – Sward height is varied. D – Cover of bracken <20% and cover of scrub <5%. E – Combined cover of species indicative of sub-optimal conditions and physical damage accounting for less than 5% of total area. F – An average of 10 or more vascular plant species per m ²
Ponds (non-priority habitat)	Poor	Proposed management of SUDS would result in the following condition criteria being met: C – Less than 10% of the water surface is covered with duckweed Lemna spp. or filamentous algae. F – There is an absence of listed non-native plant and animal species. G – Pond is not artificially stocked with fish. If the pond naturally contains fish, it is a native fish assemblage at low densities. I – Pond surface is no more than 50% shaded by adjacent trees and scrub.
Urban trees	Moderate	Once established, urban trees are expected to pass condition criteria A, B, D and F as a minimum.
Species-rich native hedgerow	Moderate	Once established, proposed management will ensure new hedgerows are likely to meet the following condition criteria; i.e.: A1 – has to be >1.5m high on average. A2 – has to be >1.5m wide on average. B1 – no gaps of >0.5m beneath canopy for majority of hedge. B2 – gaps make up less than 10% of hedge length with no gaps >5m. C2 – nettles, docks and cleavers present in <20% hedge length. D1 – invasive/introduced species make up <10% hedge length.

Figure A14.4: BNG Headline Results

Detailed results are provided within the Statutory Biodiversity Metric, which has been issued separately.

Land at Gate Farm, High Street, Sutton Benger		Return to results menu	
Headline Results			
Scroll down for final results ▲			
On-site baseline	Area habitat units	20.55	
	Hedgerow units	2.47	
	Watercourse units	0.00	
On-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	11.43	
	Hedgerow units	4.24	
	Watercourse units	0.00	
On-site net change (units & percentage)	Area habitat units	-9.12	-44.40%
	Hedgerow units	1.77	71.41%
	Watercourse units	0.00	0.00%

On-site net gain is less than target set ▲

Off-site baseline	Area habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site net change (units & percentage)	Area habitat units	0.00	0.00%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%

Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-9.12
	Hedgerow units	1.77
	Watercourse units	0.00
Spatial risk multiplier (SRM) deductions	Area habitat units	0.00
	Hedgerow units	0.00
	Watercourse units	0.00

FINAL RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-9.12
	Hedgerow units	1.77
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-44.40%
	Hedgerow units	71.41%
	Watercourse units	0.00%
Trading rules satisfied?	No - Check Trading Summaries ▲	

Total net gain achieved is less than target set ▲

Unit Type	Target	Baseline Units	Units Required	Unit Deficit	
Area habitat units	10.00%	20.55	22.61	11.18	
Hedgerow units	10.00%	2.47	2.72	0.00	No additional hedgerow units required to meet target ✓
Watercourse units	10.00%	0.00	0.00	0.00	No additional watercourse units required to meet target ✓

Appendix 15: Baseline evaluation criteria

Baseline evaluation criteria

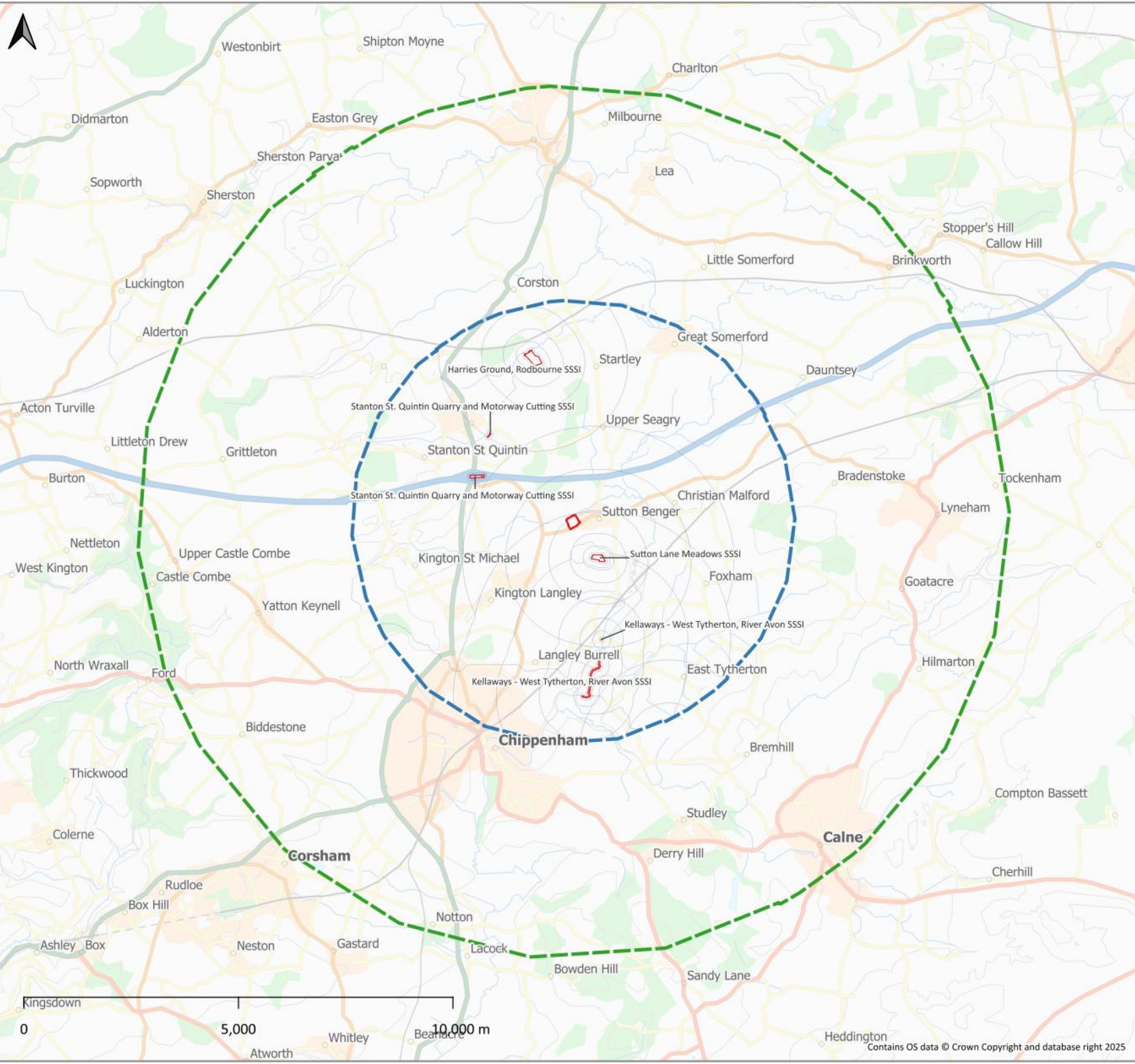
Key evaluation categories are as follows:

- International value (internationally designated sites, or sites meeting criteria for international designation. Sites supporting populations of internationally important species);
- UK value (sites with UK importance);
- National value (nationally designated sites (e.g. SSSIs) or sites meeting SSSI selection criteria. Sites containing viable areas of threatened Priority Habitat or supporting a viable population of Red Data Book species or supplying critical elements of their habitat requirements);
- Regional value (sites exceeding county-level designations but not meeting SSSI criteria. Sites containing viable areas of threatened habitats on the Regional BAP, supporting viable populations of species that are nationally scarce or included in the regional BAP due to rarity);
- County value (sites meeting criteria for county or metropolitan designations. Site containing a viable area of a threatened habitat identified on the county BAP or supporting viable populations of county or metropolitan rarities e.g. county BAP or county 'Red Data Book' species);
- District value (undesignated sites or features that are considered to appreciably enrich the habitat resource within the context of the Borough or District);
- Parish value (areas of habitat considered to appreciably enrich the habitat resource within the context of a parish or neighbourhood);
- Sub-Parish (ecological resource not meeting any of the above criteria).

Additional criteria employed were from the following:

- Schedules and Annexes of UK and European wildlife legislation (e.g. Wildlife and Countryside Act (1981) (as amended) and The Conservation of Habitats and Species Regulations 2017 (as amended);
- International conventions on wildlife (e.g. Bern Convention, Bonn convention);
- Habitats and species of Principal Importance.
- Local Biodiversity Action Plans.
- Taxon-specific conservation lists (e.g. Red Data Lists; Red/Amber Lists).

Appendix 16: Designated nature conservation sites and ancient woodland locations

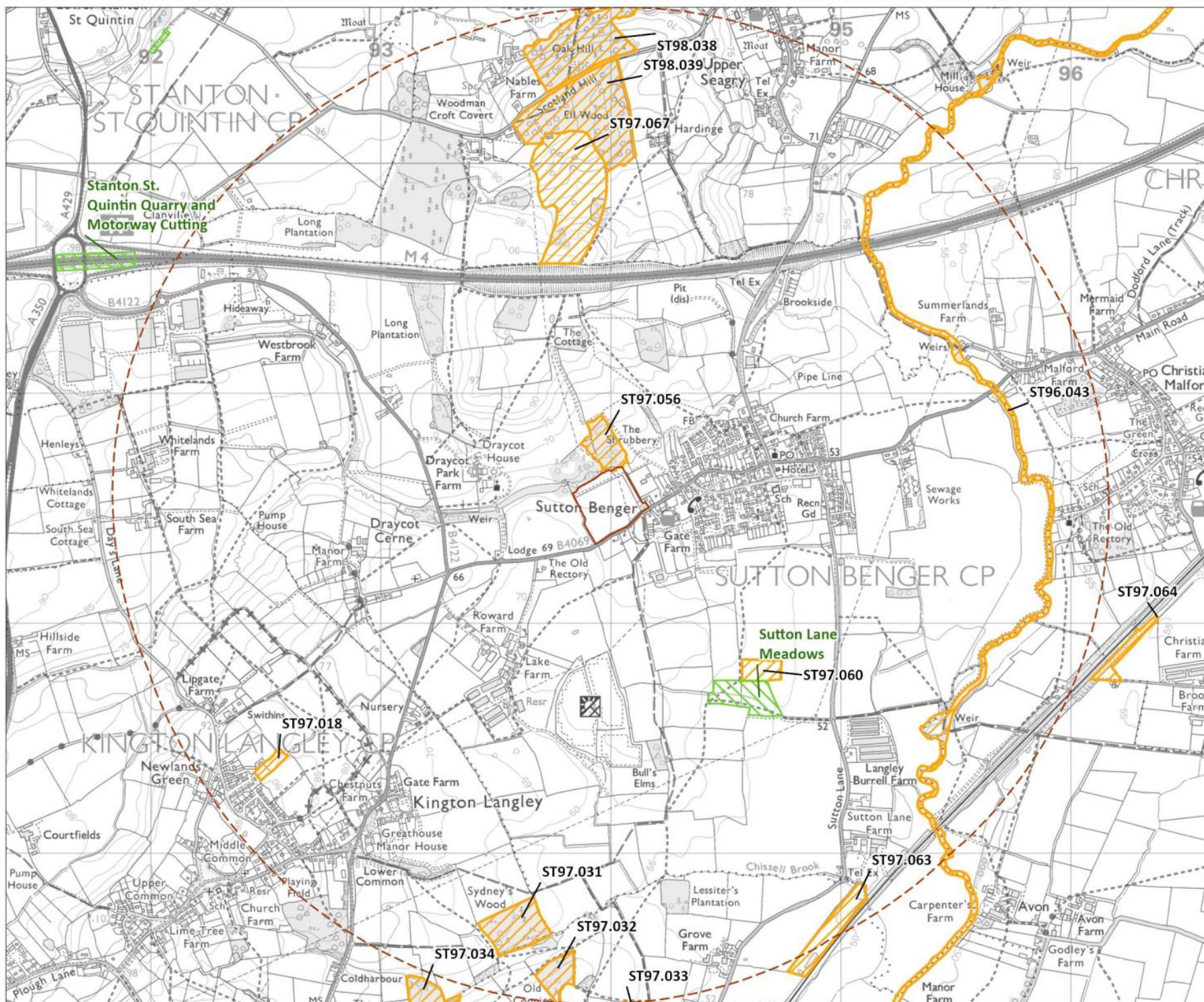


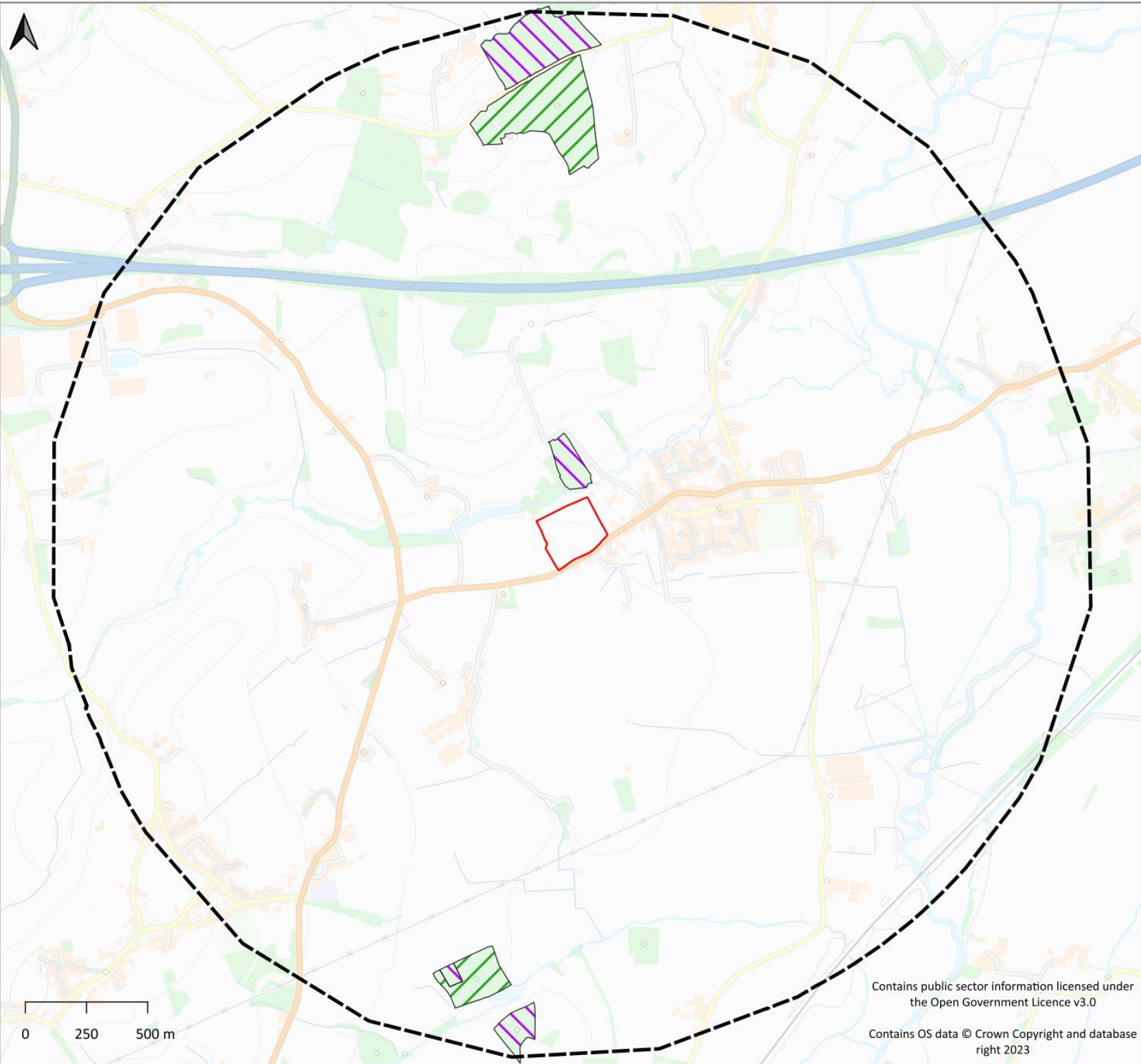
Key

- Site boundary
- Site Buffers
 - 5km buffer
 - 10km buffer
- Statutory Designated Sites
- Nationally Designated Sites (located within 5km of the site)
 - Site of Special Scientific Interest (SSSI)
 - SSSI Risk Zones

Notified Sites Within
2000 metres of
Land at Gate Farm, Sutton
Benger: ST9399778533

Exported: 25/04/2025





Key

 Site boundary

Site buffer

 2km buffer

Ancient Woodland Inventory (AWI)

 Ancient Semi-Natural Woodland (ASNW)

 Plantation on Ancient Woodland Site (PAWS)

Plan details habitat data held within the Natural England Ancient Woodland Inventory (AWI).

Habitat data held by Local Environmental Record Centres is not displayed.

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Gleeson Land

Sutton Benger

Ancient Woodland Inventory Plan

17/11/2025

Created by: EH

Scale at A3 1:15,000

Appendix 17: Consultation with Natural England and the National Trust regarding Sutton Lane Meadows

Meeting with Natural England (15 July 2025)

Attendees

- Will Salmon (EAD Ecology) - WS
- Daniel Millward (Gleeson Land) - DM
- Kyle Conroy (Natural England) - KC

Minutes

- WS provided a brief presentation outlining the location and scale of the proposed development ('the site'), potential ecological constraints and opportunities, and highlighted potential footpath links to Sutton Lane Meadows SSSI from the site.
- WS queried whether the site would be classified as 'residential' or 'rural residential' under Natural England's SSSI Impact Risk Zones. KC indicated that the site would be classified as 'rural residential' but that this would be checked with colleagues.
- KC suggested that increased recreational pressure from the site may have an impact on the SSSI due to increased footfall, and confirmed that this is the impact pathway of concern.
- KC was not aware of any precedents locally in respect of mitigation for recreational pressures on the SSSI. WS and DM highlighted the recent development at Land off High Street, Sutton Benger (reference number PL/2023/06204) which was approved at appeal without any mitigation for the SSSI.
- If mitigation was considered necessary, KC indicated that a financial contribution towards wardening, signage and/or visitor management at the SSSI may be acceptable, and this could take the form of a one-off payment. The Monitoring of Engagement with the Natural Environment (MENE) survey may provide a framework for the level of financial contribution potentially required.
- KC advised contact with the National Trust, who own and manage the site, to gain a better understanding of current recreation levels and associated impacts (and whether mitigation may be required).
- KC confirmed that Natural England would be happy to sign off an agreement with the National Trust, should an impact be identified and suitably mitigated.

Meeting with The National Trust (30 September 2025)

Attendees

- Will Salmon (EAD Ecology) - WS
- Daniel Millward (Gleeson Land) - DM
- Stephen Beal (The National Trust) - SB
- Joseph O'Shea (The National Trust) - JOS
- Mark Funnell (The National Trust) - MF
- Peter Oliver (The National Trust) - PO

Minutes

- WS provided a brief presentation outlining the location and scale of the proposed development ('the site') and highlighted potential footpath links to Sutton Lane Meadows from the site.
- PO – recreation at Sutton Lane Meadows is encouraged, but the biggest impacts are dog walkers and the site is quite wet (and getting wetter). Many walkers let their dogs off across the site; the most popular time for this is April/May during the orchid display. Dog faeces impacts the sale of the annual hay cut. Any increase in recreation may therefore be negative.
- SB – eutrophication from dogs/trampling is the main issue. People themselves are generally not harming the site, but difficult to quantify recreational impacts.
- PO / SB / JOS – there is currently no infrastructure on site to manage dog waste. A dog waste bin has been considered, but the bigger issue is emptying the waste bin on a regular basis.
- PO – there is signage on site (and has been for a while) but this has had limited success. Responses from the public have been mixed.
- JOS – costs associated with management would drop if the National Trust could sell the hay.
- PO - only a small proportion of visitors travel to the site to see the orchids.
- MF – The National Trust is happy to be involved in discussions at this early stage to discuss potential mitigation (normally comments later on planning applications) however wouldn't want to be seen to facilitate proposed development.
- MF – regular monitoring/emptying of dog waste bins is likely to be the main issue that could be addressed through a financial contribution.



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