



Preliminary Ecological Appraisal

Manor Farm, Easton Piercy, SN14 6JT

For LPC (Trull) Ltd and on behalf of Mr Tim Reynolds

October 2025

DOCUMENT CONTROL SHEET

Project Name: Manor Farm, Easton Piercy, SN14 6JT
Preliminary Ecological Appraisal

Client: Mr Tim Reynolds

Report Reference: 423/R1/2025/V1

Revision Status:

Rev No.	Status	Author	Date
1	Draft for Review	CG	29/09/2025
1	Final	CG	22/10/2025

Disclaimer

This document has been prepared solely for use by the client. Herdwick Ecology accepts no responsibility or liability for any use of this document by third parties or for purposes for which it was not originally commissioned. The summary of wildlife legislation provided is for general guidance only and does not in any way provide legal opinion or a definitive statement of the law. For detailed information, the legislation itself should be reviewed and a legal professional consulted.

Herdwick Ecology cannot be held liable for any information provided by third parties which is referenced within this document.

The evidence which Herdwick Ecology has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional opinions.

1.0 Introduction

1.1 Herdwick Ecology Ltd has been commissioned by LPC (Trull) Ltd and on behalf of Mr Tim Reynolds to undertake a Preliminary Ecological Appraisal (PEA) at Manor Farm, Easton Piercy, SN14 6JT (Central Reference ST 88558 77354) to inform proposals for new farm units.

1.2 This report has been prepared to support a pre-application to North Somerset Council and aims to:

- Describe and evaluate the habitats present within the study area;
- Collate relevant biological records and assess their significance;
- Identify any protected species issues or potential issues that may exist; and
- Assess possible ecological constraints to development and make recommendations to avoid, minimise and mitigate for any potential impacts during the development of a detailed application; and
- Set out opportunities for net gain and ecological enhancements in line with relevant planning policy, legislation and other published guidance to inform a detailed application.

1.3 This report has been prepared by Ceri Griffiths, Director at Herdwick Ecology, who is a Full Member of the Chartered Institute of Ecology and Environmental Management (CIEEM). Reference is made to CIEEM Guidelines for Preliminary Ecological Appraisal¹ and BS 42020:2013 Biodiversity - Code of practice for planning and development².

2.0 Legislation and Planning Policies

2.1 In carrying out this assessment relevant legislation, planning policies, and best practice guidelines were consulted and include:

- Conservation of Habitats and Species Regulations 2017 (as amended);
- Wildlife and Countryside Act 1981 (as amended);
- Countryside and Rights of Way (CROW) Act 2000;
- Natural Environment and Rural Communities (NERC) Act 2006;
- National Planning Policy Framework 2024 (NPPF);
- Local Planning Policies and supplementary planning documents/technical guidance.

National Planning Policy Framework (NPPF) 2024

2.2 National planning policy on biodiversity and conservation is set out in the National Planning Policy Framework (NPPF). This emphasises that the planning system should seek to minimise impacts on biodiversity and provide net gains in biodiversity wherever possible as part of the Government's

¹ CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal* (2nd. Ed.) CIEEM

² BSI (British Standards Institute) BS4202:2013 *Biodiversity – A code of practice for planning and development*. BSI, London.

commitment to halting declines in biodiversity and establishing coherent and resilient ecological networks. Chapter 15: Conserving and Enhancing the Natural Environment, is of particular relevance to this report as it relates to ecology and biodiversity. Relevant policies are set out below:

- 2.3 Paragraph 185: *“To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity...”*
- 2.4 Paragraph 186 states: “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) Relates to developments affecting SSSI
 - c) Relates to developments affecting irreplaceable habitats, such as ancient woodland
 - d) *‘Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity’.*
- 2.5 The Government Circular 06/2005, which is referred to by the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.
- 2.6 The above approach encapsulates the ‘mitigation hierarchy’ described in British Standard BS 42020:2013, which involves the following step-wise process:
- Avoidance – avoiding adverse effects through good design;
 - Mitigation – where it is unavoidable, mitigation measures should be employed to minimise adverse effects;
 - Compensation – where residual effects remain after mitigation it may be necessary to provide compensation to offset any harm; and
 - Enhancement – planning decisions often present the opportunity to deliver benefits for biodiversity, which can also be explored alongside the above measures to resolve potential adverse effects.

- 2.7 The measures for avoidance, mitigation, compensation, and enhancement should be *‘proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development’*

Conservation of Habitats and Species Regulations 2017 (as amended)

- 2.8 In summary these regulations, also referred to as the Habitat Regulations, cover the designation and protection of European sites and the protection of European protected species (EPS).

Environment Bill and Biodiversity Net Gain

- 2.9 The Environment Bill received Royal Assent on 9th November 2021, becoming the Environment Act; this includes the provision of biodiversity gain for developments in England, which will be mandated through an amendment to the Town and Country Planning Act 1990. The two-year transition period that follows Royal Assent means that mandatory Biodiversity Net Gain (BNG) became law on 12th February 2024, with small sites being mandatory on the 2nd April 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)

Local Plan

- 2.10 The Wiltshire Core Strategy Development Plan Document ('the plan') was formally adopted on 20 January 2015. The plan provides a positive and flexible overarching planning policy framework for Wiltshire for the period up to 2026. Policy 50 'Biodiversity and Geodiversity' states that: *‘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.... All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.* The policy goes on to state that all developments should seek opportunities to enhance biodiversity.

Species Protection

- 2.11 A number of species, including all bats and great crested newts, are afforded protection under The Wildlife and Countryside Act 1981 (as amended)
- 2.12 Under this legislation, a person is guilty of an offence if a person intentionally or recklessly:
- disturbs any animal while it is occupying a structure or place which it uses for shelter or protection;
 - obstructs access to any structure or place which any animal uses for shelter or protection.
- 2.13 In addition the protection afforded through UK legislation, further protection is provided to a small group of species, commonly referred to as 'European Protected Species' under the Conservation of

Habitats and Species 2017 (as amended) (also known as the Habitats Regulations)., including bats and great crested newts.

- 2.14 With regards to European Protected Species listed under Schedule 2 of the Act, it is an offence to:
- Intentionally or deliberately capture or kill, or intentionally injure the animal;
 - Deliberately disturb the animal or intentionally or recklessly disturb them in a place used for shelter or protection;
 - Damage or destroy a breeding site or resting place;
 - Intentionally or recklessly damage, destroy or obstruct access to a place used for shelter or protection.
- 2.15 The NERC Act also listed species of principle importance under Section 41 of the Act. This places further duties on the LPA to have due regard for the conservation of these species, such as hedgehog or certain bird species, which may be present on-site.

3.0 Methodology

Data Search

- 3.1 Online sources were reviewed, such as MAGIC³, to search for designated sites, priority habitats and records of local European Protected Species (EPS) licence. In addition, the Wiltshire Council planning portal was searched for nearby applications.
- 3.2 Given the small scale of the development and habitats within the locality, a full data search was not considered necessary.

Preliminary Ecological Appraisal

- 3.3 The site was surveyed on 9th July 2025 by Ceri Griffiths, Director of Herdwick Ecology, with full membership of Chartered Institute of Ecology and Environmental Management (CIEEM) and a Natural England bat and great crested newt licence holder. Weather conditions were dry and clear, with a temperature of 26°C.
- 3.4 Habitats and obvious features within the site were assessed following the Joint Nature Conservation Committee's Phase 1 Habitat Survey Method⁴ (JNCC, 2010) as amended in 1995 by the Institute of Environmental Assessment⁵ (IEA, 1995) and also classified under the UKHab criteria to inform the Biodiversity Net Gain calculations.

³ <https://magic.defra.gov.uk/>

⁴ JNCC 2010. *Handbook for Phase 1 Habitat Survey*. Joint Nature Conservation Committee, Peterborough

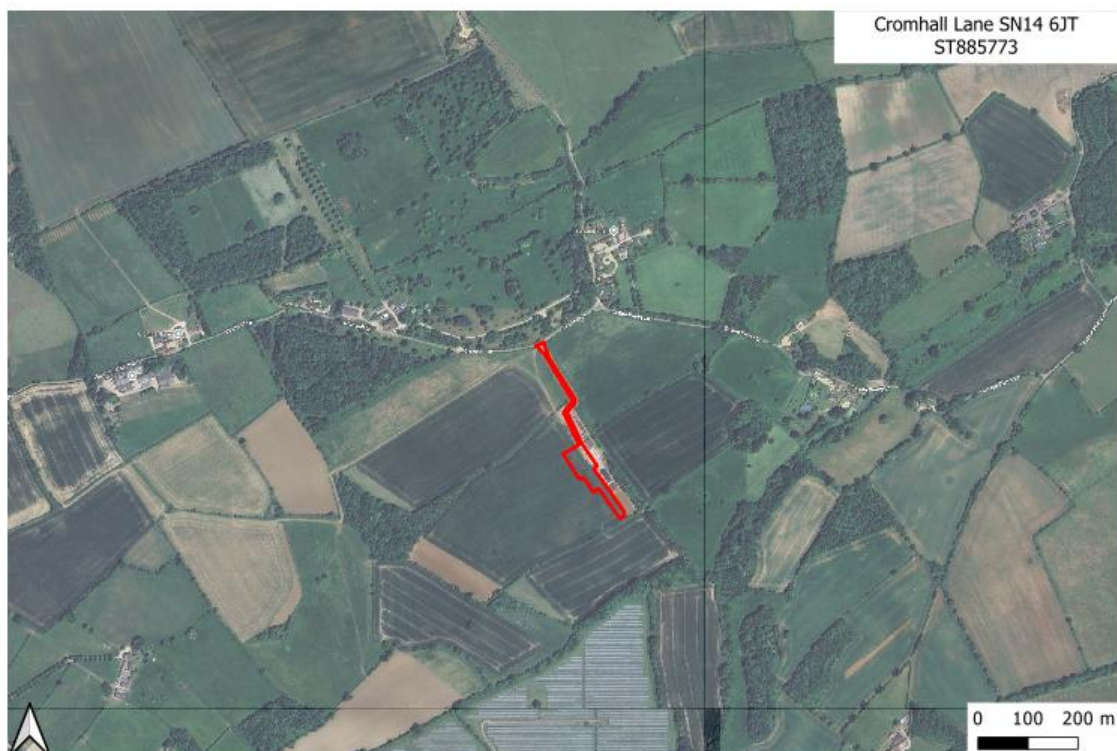
⁵ IEA 2015 *Guidelines for Baseline Ecological Assessment* Institute of Environmental Assessment

Biodiversity Net Gain Assessment

- 3.5 The Statutory Biodiversity Metric is designed to provide a quantitative approach to assessing the changes in biodiversity value brought about by development or changes in land management. It is a habitat-based approach and uses the attributes of a habitat to provide a biodiversity value based on components such as distinctiveness, condition and strategic significance of the existing habitat as well as time to establish and difficulty of creation for proposed habitats.
- 3.6 The baseline Biodiversity Net Gain (BNG) calculations, as outlined below, provides a numerical habitat value which indicates the existing value of the habitats present on the site based on the identified habitat types and their condition score.

4.0 Baseline Conditions

- 4.1 The site is located at Home Farm in a rural location 3km to northwest of Chippenham and to the west of Kingston St. Michael. The M4 lies 1.5km to the north. The wider landscape comprises agricultural land under a mix of pasture/silage and arable. There is an area of parkland to the north of Cromhall Lane, although this is not identified under the Priority Habitat register.

**Plate 1: Site Location**

*Data Search*Statutory Designated Sites

- 4.2 There are no statutory designated sites within 2km of the site. The closet site lies 3.4km to the west – West Yatton Site of Special Scientific Interest (SSSI) with is notified for its unimproved limestone grassland. The Bath and Bradford on Avon lies 9km to the southwest but the application site does not lie within the consultation zone or within a SSSI risk zone.

Habitats

- 4.3 There are blocks of woodland within 500m that lie to the northwest and east, which have been identified as Priority Habitat. In addition, there are three small parcel of Traditional Orchards that lie to the north.
- 4.4 A pond is shown to be onsite, however this was not present and there was no evidence that a waterbody had been there in recent years. A waterbody is present to the south of the application boundary which looks to be an old slurry pit that has recently been cleared and enhanced. See below for further information.

Species

- 4.5 There are no European Protected Species (EPS) licences within 2km of the site boundary. There are two bat EPS licences within 4km:
- Common pipistrelle, lesser horseshoe bat resting place (dated 2016-2026) – 2.7km NW
 - Common pipistrelle, brown long-eared bat resting place (dated 2015-2020) – 3.3km southeast
- 4.6 There is no EPS licence for great crested newts or eDNA survey data within 2km of the site.

Preliminary Ecological Appraisal

- 4.7 The site covers approximately 0.61ha, with a gravel track accessed off Cromhall Lane. There are newly planted trees to each side of the trees. The track leads down to an existing farm yard comprising cattle race, cow barn and silage pit. There is a mix of concrete hardstanding, gravel and bare ground within the yard, with storage areas around the periphery. A crop field extends to the west, with an (offsite) hedgerow to the west. There are minimal habitats onsite, with the exception of the arable fields. To the south, there is a area of disturbed ground, where the tractors have been accessing the silage pit. This is predominately bare with some ephemeral vegetation establishing. Species include black nightshade *Solanum nigrum*, shepherd's-purse *Capsella bursa-pastoris*, poa annua, poppy *Papaver rhoeas*, goosefoot *Chenopodium album* and dandelion *Taraxacum officinale*.
- 4.8 Offsite, further south, there is a newly created pond., with some additional planting and individual trees.



Plate 3: Baseline Habitats

4.9 In summary, the site comprises the following primary UKHab classification habitats onsite:

Table 1: Baseline Habitats

UKHab	BNG SSM Metric	Justification
Urban – Developed Land / Sealed Surfaces u1b6	Urban – Developed Land / Sealed Surfaces	Access track leading from Cromhall Lane down to the farmyard
Other developed land u1b6 73	Urban – Bare ground Poor condition (no criterion met)	Compacted ground where gravel/ hardcore is absent
Non cereal crops c1d	Cropland – cereal crops Condition Assessment N/A	

4.15 The baseline habitat value, as assessed using the Biodiversity Metric is **0.81** habitat units.

Table 2: Baseline Habitat Values

Habitat type	Area (ha)	Strategic significance	Habitat units
Urban – Developed Land, sealed surface	0.218	n/a	0.00
Urban – Bare ground	0.042	n/a	0.08
Cropland – non-cereal crops	0.365	n/a	0.73
Total habitat area	0.63		0.81

Species

Bats – Foraging/Commuting Habitats

- 4.10 There are no buildings or trees within the application boundary and no potential roost features were noted within the tree immediately adjacent. Therefore, there are no bat roosts onsite. The surrounding habitats are likely to offer foraging and commuting habitat for bats. However, due to the small scale of the development and size of Application Site, the loss of a small area of bare ground and crop land will not have a detrimental impact to the local bat population. Therefore, no further survey or assessment is required but avoidance, minimisation and enhancement measures have been set out in Section 5.

Badgers

- 4.11 The wider site may offer some foraging habitat for badgers but the Application Site itself does not provide suitable sett building habitat. Precautionary construction measures have been set out in Section 5.

Breeding Birds

- 4.16 There is no habitat for nesting building within the Application Boundary and the site is too small and disturbed for ground nesting birds. Again, the surrounding habitat will offer good habitat for many species of bird. Best practice avoidance, mitigation and enhancement measures to be implemented are provided in Section 5 below.

Amphibians - Great crested newts (GCN)

- 4.17 There were no ponds identified within 250m of the site. The habitat onsite are of negligible value to GCN and although there has been a newly created pond to adjacent to the site, this is unlikely to be sufficiently established to have been yet populated by newts.
- 4.18 Therefore, GCN are unlikely to be impacted on by the proposals.

Reptiles

- 4.19 As with the amphibians, habitat onsite are of negligible value to reptiles and therefore, the species are unlikely to be impacted on by the proposals.

Other protected/notable species

- 4.20 The wider site has suitable habitat for species such as hedgehog that may cross the Application Site. Again, standard best practice site construction methods should be adopted, where necessary, as detailed in Section 5.

5.0 Avoidance, Mitigation and Enhancement Measures

Mitigation and Enhancement Measures

- 5.1 In line with National and Local planning policies, developments should seek to ensure the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species populations. Therefore the following section sets out avoidance and mitigation measures that should be implemented, together with enhancement opportunities, with the aim of delivering a net gain in biodiversity, in line with the mitigation hierarchy.

Development Description

- 5.2 The proposals will involve the creation of a new agricultural barns adjacent to the existing. There will be minimal loss of habitat, which is predominantly arable land and small areas of bare ground.
- 5.3 No further surveys are required to inform the application but appropriate measures to be implemented during construction are set out below.

Avoidance and Protection of Features

Design and Location of Proposed Development

- 5.4 The site is considered to be of low ecological value comprising of arable land and bare ground which is a common and widespread habitat.

Mitigation Measures

- 5.5 Given the low ecological value of the site, there are minimal mitigation requirements but following measures should be implemented and secured via condition attached to the planning consent:
- The lighting design should be sensitively designed and should adhere to the principles set out in the ILP Guidance Note 08/18 Bats and artificial lighting in the UK to avoid excessive light spill particularly on the boundaries.
 - Foundation trenches and all excavations must either be covered overnight or must have scaffolding boards, or similar, placed within them to ensure that any animals that fall in are able to escape.
 - Raise stored materials (that might act as temporary resting places for species such as amphibians and reptiles) off the ground, e.g. on pallets.

Habitat Enhancements

- 5.6 The proposals include the creation of 'other neutral grassland' and the planting of 10 small trees, along the southern edge of the newly created pond. This will result in the loss of some bare ground (poor condition) and arable land. This will improve the habitats and opportunities for species that may populate the new pond. The above can be secured via planning condition.

Species Enhancements

- 5.7 Habitat boxes or log piles for invertebrates, hedgehogs and reptiles can be placed along the eastern boundaries to provide further opportunities for species.

Biodiversity Net Gain

- 5.8 A separate BNG report has been prepared that implements the mitigation hierarchy and demonstrates a 10% net gain for the site.
- 5.9 In conclusion, there are no ecological constraints to the Proposed Development. The Application Boundary comprises common and widespread habitat of low value and has negligible/low potential to support protected/notable species. The Applicant has already delivered significant ecological enhancements through the construction of a pond and additional hedgerow and tree planting. The Proposed Development will also deliver a 10% net gain, and enhancements for species, in line with National and Local Planning Policies.

Appendix 1 Photographs



Photo 1: Existing barn with sealed surface and bare ground

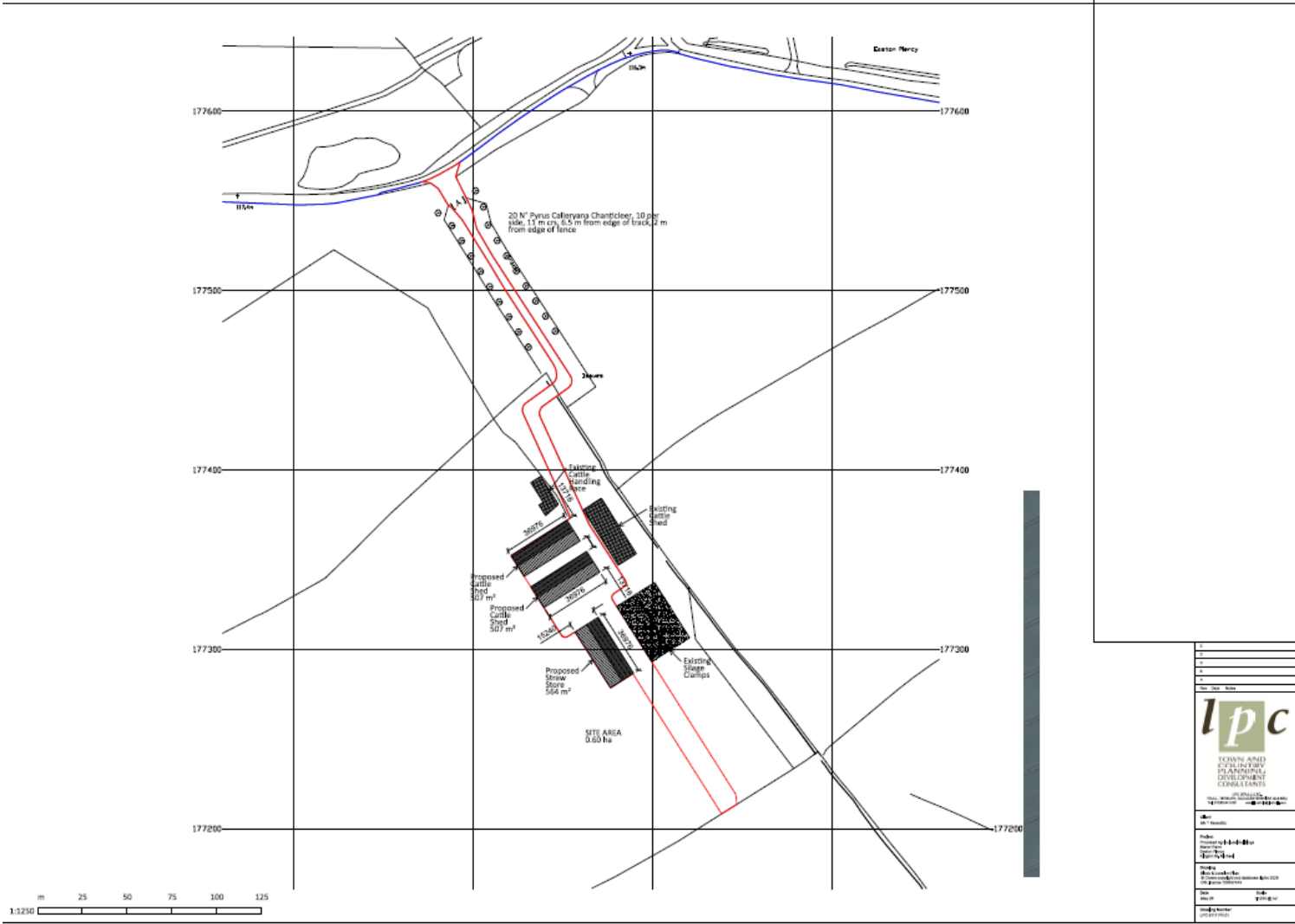


Photo 2 Showing bare ground, crops and hardstanding



Photo 3 Showing bare ground, with silage pit in the distance

Appendix 2: Proposed Site Plan



Appendix 3: BNG Proposed Habitats

