



Preliminary Ecological Appraisal

Report prepared for: Mr M. Smith

Land adjacent to Filands Farm

Filands

Malmesbury

Wiltshire

SN16 9JN

August 2025

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Methods used to prepare this report, including those carried out in the field followed The Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct.

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1 INTRODUCTION

- 1.1 This report provides the results of a Preliminary Ecological Appraisal undertaken on Land adjacent to Filands Farm, Filands, Malmesbury, Wiltshire SN16 9JN (central Ordnance Survey (OS) Reference ST 93615 88690).
- 1.2 A planning application will be submitted to Wiltshire Council in due course. Development proposals are described as the erection of four dwellings.
- 1.3 The findings included in this report are based on a survey undertaken during August 2025 by Cotswold Environmental Ltd. The purpose of the survey was to undertake an appraisal of the site for its potential ecological value to notable and protected wildlife, and to look for evidence of such species. The survey results provide information to determine the likely ecological impact the proposed development will have on wildlife species, and to inform the level of further survey effort and mitigation required to comply with relevant nature conservation policies and legislation. The evaluation and findings in this report can be used by Wiltshire Council in their view of a planning application. Survey results detailed within this report should be considered valid for a period of 18 months from the survey date (subject to consultation with the Local Planning Authority and/or Natural England).
- 1.4 The National Planning Policy Framework (NPPF) (December 2024) sets out the government planning policies for England and how they should be applied. Chapter 15: Conserving and Enhancing the Natural Environment, is of particular relevance to this report as it relates to ecology and biodiversity¹. 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.
- 1.5 The site is located at the northern edge of Malmesbury, to the north of the B4014. The site location is shown in Fig. 1.
- 1.6 All survey and assessment work was completed in accordance with official assessment guidelines² and largely followed that recommended by the Chartered Institute for Ecology and Environmental Management (CIEEM)³ and follows the British Standard Code of Practice⁴.

Survey Objectives

- To determine suitability for protected species
- Ascertain evidence of protected species

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

² Collins J (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th edn. Bat Conservation Trust, London.

³ CIEEM (2017) Guidelines for Ecological Report Writing. CIEEM, Winchester.

⁴ British Standards Institution (2013) BS 42020:2013. Biodiversity – Code of practice for planning and development. British Standards Institution, London.

- Determine potential ecological impacts the proposed development will have on protected species.
- Inform the level of further survey effort that is required.

2 METHODOLOGY

Desk Study

- 2.1 A records search was undertaken using freely available desktop resources such as the Multi-Agency Geographic Information for the Countryside⁵ (MAGIC) website. MAGIC was used to search for records of designated sites, habitats and granted European Protected Species Licenses (EPSLs) within a 2km radius. Google Earth⁶ was also used to study the nearby landscape.

Field Survey

- 2.2 Ecological consultant Jason Skinner (NE Class 2 Bat Survey licence 2020-50774-CLS-CLS, NE Barn Owl licence number 2025-13085-CL29-OWL) carried out a field visit on Wednesday 6th August 2025.

Relevant surveyor experience

- 2.3 Jason Skinner has nine years professional ecological experience, primarily involved with bats and reptiles through consultancy and assisting on research projects. Experienced with small-scale and large-scale development projects and involvement in the management and supervision on multiple bat mitigation licences. Co-author of peer-reviewed research papers on reptiles and amphibians. Member, BBCARG and Wiltshire Bat Group.
- 2.4 The field visit involved a walkover using visual encounter survey techniques. The dominant vegetation structure was assessed, allowing habitats on site to be valued for their ecological importance to protected wildlife. Habitats were classified using the UK Habitat Classification Version 2.0 (UKHab V2)⁷, which provides a standardised framework for describing habitat types in the UK.
- 2.5 Binoculars were also used to scan for features likely to support protected species. All protected species were considered during the assessment and all wildlife species were recorded. The work was completed largely following methodologies set out by the Chartered Institute for Ecology and Environmental Management (CIEEM) and British Standard Code of Practice.

⁵ Multi-Agency Geographical Information for the Countryside (MAGIC). Crown Copyright and database rights [2025]. Ordnance Survey 100022861. Available at: <http://www.magic.gov.uk/>

⁶ https://www.google.co.uk/intl/en_uk/earth/

⁷ UKHab Ltd (2023). UK Habitat Classification Version 2.0. Available at: <https://ukhab.org/>

Species

- 2.6 All protected species were considered during the survey. Only those considered likely to utilise the site are mentioned in this report.

Bats

- 2.7 Survey effort was completed in line with official assessment guidelines⁸ and largely followed that recommended by the Chartered Institute for Ecology and Environmental Management (CIEEM)⁹ and British Standard Code of Practice¹⁰. The assessment followed the standard methodology. The site was searched using visual encounter survey techniques. Potential bat movement corridors and movement barriers were assessed and noted. During the site visit, where possible, all suitable areas were examined for evidence of bats.

Table 1: Guidelines summary for assessing potential bat roost suitability

Suitability	Description of building, tree or structure
None	The building, tree, or structure has no features with the potential to support roosting bats and is entirely unsuitable. This includes structures that are fully sealed, modern, well-lit, and/or in exposed locations with no access points, no internal voids, and high levels of human disturbance.
Negligible	The building or tree has minimal features (e.g. small gaps or cracks), but these are assessed as highly unlikely to be used by bats due to their condition, location, or lack of access to suitable internal voids.
Low	A structure or tree with one or more potential roost sites that could be used by individual bats opportunistically. However, potential roost sites not suitable for larger numbers or regular use (i.e. maternity or hibernation).
Moderate	A structure or tree with one or more potential roost sites that could be used by bats, but unlikely to support a roost of high conservation status.
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time.
Confirmed roost	Evidence of bats or use by bats found.

Badger

- 2.8 All habitats within the site boundary were inspected for badger *Meles meles* activity. Whilst on site, the search included evidence of:

⁸ Collins J (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th edn. Bat Conservation Trust, London.

⁹ CIEEM (2017) Guidelines for Ecological Report Writing. CIEEM, Winchester.

¹⁰ British Standards Institution (2013) BS 42020:2013. Biodiversity – Code of practice for planning and development. British Standards Institution, London.

- Scratching posts
- Faeces
- Latrines
- Guard-hairs
- Paw prints
- Trackways

Dormouse

- 2.9 Hedgerows, scrub and treelines within and bordering the surveyed site were assessed for their suitability to support breeding populations of hazel dormice *Muscardinus avellanarius*, as well as suitability to provide connectivity to nearby suitable breeding habitats.

European Hedgehog

- 2.10 The site was assessed for its suitability to support European hedgehog *Erinaceus europaeus*, a UK Biodiversity Action Plan species and Species of Principal Importance under Section 41 of the NERC Act 2006. Features such as hedgerows, scrub, dense vegetation, log piles, and gaps under fencing were checked for signs of hedgehog activity, including droppings, tracks, or nests. Habitat connectivity with surrounding green spaces was also considered to assess the site's value for hedgehog movement.

Reptiles and Amphibians

- 2.11 Habitats were assessed for their potential to support reptiles and amphibians, including great crested newt *Triturus cristatus* (GCN). Waterbodies typical of those utilised for breeding and foraging activity, and terrestrial refugia suited to sheltering and basking such as waste heaps and plastic/metal/timber sheeting were noted if present (see limitations). In addition, any dense vegetation including tall ruderal and scrub that is connected to hedgerows and linear tree features was inspected during the assessment.

Nesting Birds

- 2.12 The survey also included an internal and external inspection of the surveyed buildings for evidence of common nesting birds as well as notable and protected species. Inside the buildings, artificial light was used to search for birds, dead birds, dead chicks, nesting material and eggs.
- 2.13 All accessible elements of the surveyed buildings containing nesting potential were checked to see if the development would have any adverse effects on nesting birds. The active nests of all wild birds are protected under the Wildlife & Countryside Act 1981 (as amended). An active nest is one that is being built, containing eggs or chicks, or on which fledged chicks are still dependent. Birds within Schedule 1, such as barn owl *Tyto alba*, are also protected from disturbance during the nesting period.

- 2.14 The presence of notable and protected bird species and any signs indicative of their past and present use was taken into consideration during the inspection of the buildings. Likely perches and nesting locations were checked, and all ledges and cavities were examined for nesting debris where accessible.

Limitations

- 2.15 The absence of evidence for a particular species does not confirm its absence from the site. Wildlife, including protected species, can be elusive or transient, and may use habitats or structures intermittently, meaning they can go undetected during a single visit.
- 2.16 Evidence of bat activity, such as droppings or feeding remains, can degrade quickly due to weathering or be removed by wind or rain, particularly around external building features. Therefore, the absence of such signs should not be taken as confirmation that bats are not present.
- 2.17 Many UK bat species are crevice-dwellers and can roost in small or concealed spaces such as gaps under roof tiles, behind fascia boards, or within wall cavities. These features are often inaccessible and cannot always be fully inspected during a Preliminary Roost Assessment (PRA).
- 2.18 For Health & Safety purposes the roofs of the buildings were largely assessed from ground level.
- 2.19 Six ponds were located within a 500 m radius of the site. Access to three of these waterbodies was not obtained for Habitat Suitability Index (HSI) due to lying on private land.
- 2.20 No data was obtained from the Local Environmental Records Centre (LERC). Taking into consideration the overall low ecological value of the site, the absence of records is not considered likely to materially alter the conclusions of this report.
- 2.21 No further limitations are associated with the ecological survey.

3 RESULTS

Desk Study

Designated sites

- 3.1 According to the MAGIC website, the boundary of the Cotswolds Area of Outstanding Natural Beauty (AONB) lies 1.5 km to the west of the site and one statutory designated site exists within a 2 km radius; Conygre Mead Local Nature Reserve (LNR), a 2.53 hectare urban fringe site of biological interest located 1.1 km south of the site, although no non-statutory designated site exist within a 2 km radius and internationally designated sites, such as special areas of conservation (SACs) designated for their bat populations, exist within a 10 km radius of the site.

Granted European Protected Species Licences (EPSL) within a 2km radius

- 3.2 According to the MAGIC website, two EPSLs have been granted within a 2 km radius, these are shown in Table 2 below. No EPS licences have been granted for other protected species and no GCN Class Survey Licence returns or positive Pond Surveys (2017-2019) for GCN were identified.

Table 2: Granted EPSLs within 2km of survey site

Species	Distance	Direction	Year Granted
GCN	740 m	South-West	2019
GCN	1 km	South-West	2021

Surrounding Habitats

- 3.3 The application site is situated within a transitional rural-urban fringe on the northern edge of a market town, directly north of a local access road. The immediate landscape comprises a mixture of enclosed pasture and arable fields, interspersed with residential development to the southwest. The wider landscape retains a largely agricultural character, featuring a mosaic of improved grassland, rotational arable land, and established field boundaries predominantly defined by mature native hedgerows.
- 3.4 A number of woodland parcels occur within a 2 km radius of the site. The closest of these is a block of Deciduous Woodland (a Priority Habitat), located approximately 460 metres to the northeast. Several additional woodland features are present in the northeast quadrant of the desk study area, contributing to local ecological connectivity. Notably, Long Wood—a parcel of Ancient Replanted Woodland listed on the Ancient Woodland Inventory—is located 1.2 km to the east of the site. Further habitat diversity is provided by a small parcel of Woodpasture and Parkland (also a Priority Habitat) situated approximately 1.3 km to the east. No parcels of notable or Priority Grassland habitats were identified within the 2 km search radius.

Local waterbodies

- 3.5 Through use of aerial imagery and the MAGIC website, six ponds were identified within a 500 metre radius of the site. See Table 3 below.

Table 3: Pond Locations within a 500 m radius

Pond	Distance from Site (Metres)	Direction	Grid Reference	Notes
1	210	South-East	ST 93684 88483	Accessed for HSI assessment – Dry at time of survey
2	275	South-West	ST 93340 88484	Accessed for HSI assessment – Dry at time of survey

3	315	South-West	ST 93294 88463	Accessed for HSI assessment – Dry at time of survey
4	420	North	ST 93598 89104	Not accessed for HSI assessment – See limitations
5	470	North	ST 93569 89157	Not accessed for HSI assessment – See limitations
6	490	North-West	ST 93430 89146	Not accessed for HSI assessment – See limitations

Field Survey

- 3.6 Weather conditions during the daytime assessment are shown in the below table. Temperatures were recorded onsite using an Elitech RC-51 Temperature Logger.

Table 4: Weather conditions during Preliminary Ecological Appraisal

Date	Start	Finish	Temp °C	Wind	Cloud %	Rain	Notes
6/08/2025	10:30	12:00	23	Calm	8	Dry	N/A

Onsite Habitats

- 3.7 The application site comprises a parcel of land located at the southern extent of a larger pastoral field, positioned within a rural edge setting. The plot includes four outbuildings situated centrally and to the south, which are accessed via a gravelled driveway leading from a gated entrance along the southern roadside boundary. Gravelled hardstanding forms the driveway and surrounds the buildings.
- 3.8 The dominant habitat type within the survey boundary is short-mown grassland of low structural and botanical diversity. This grassland is regularly maintained and largely uniform in character. The southern and western boundaries of the plot are defined by mature native hedgerows. The eastern boundary comprises a timber post and rail fence, separating the site from a neighbouring parcel of unmanaged grassland. The northern boundary of the survey area is open and not physically demarcated, leading directly into the larger field, which is actively grazed.
- 3.9 Beyond the survey boundary, the wider field is similarly enclosed by native hedgerows to the west and east, while its northern boundary is defined by timber post and wire stock fencing.
- 3.10 No priority habitats exist within the survey area and no ponds are to be destroyed or impacted by the proposed works. The individual habitat types recorded at the site are described under the sub-headings below, using the UK Habitat Classification (UKHab) framework, with the location and extent of each illustrated in the Habitat Map in Figure 2.

u1b5 – Buildings

- 3.11 There are four buildings onsite: an L-shaped workshop/garage (B1), a stable block (B2), a timber-framed stables/storage structure (B3), and a small metal-clad shed (B4).

u1c – Artificial unvegetated unsealed surface

- 3.12 Gravelled hardstanding extends throughout the site, primarily covering the driveway that provides access from the southern roadside boundary and surrounding the built structures. These surfaces are unsealed, permeable, and subject to regular vehicular use. No vegetation was recorded within these areas during the survey, and their condition is typical of frequently disturbed artificial substrates.

g4 – Modified grassland

- 3.13 The dominant habitat type across the site is modified grassland, consisting of short-mown grassland previously used as pasture with an average sward height of less than 5 cm. The grassland is maintained regularly. The sward is dominated by perennial ryegrass *Lolium perenne*, with a low diversity of associated forb species. White clover *Trifolium repens* is abundant, and dandelion *Taraxacum officinale* agg. and ribwort plantain *Plantago lanceolata* are frequent which patches of taller forbs at the grassland margins that included nettle *Urtica dioica* and broad-leaved dock *Rumex obtusifolius*.

h2a5 – Species-rich native hedgerows

- 3.14 Two native hedgerows occur outside though adjacent to the application boundary at the southern and western field margins and are separated from the onsite grassland by post and wire fencing. No impacts to these hedgerows will occur as part of the proposed works.
- 3.15 The southern roadside boundary hedgerow is approximately 35 m in length and is subject to seasonal management. It is dominated by blackthorn *Prunus spinosa*, with frequent field elm *Ulmus minor* and common hawthorn *Crataegus monogyna*, and occasional elder *Sambucus nigra*. A single ash *Fraxinus excelsior* tree with a diameter at breast height (DBH) of approximately 12 cm is located adjacent to the gated access point. Three small dead trees with DBHs under 10 cm were also noted within the hedgerow. While structurally mature, the hedgerow generally lacks a consistent understorey. This feature is to be retained under current development proposals.
- 3.16 A mature species-rich native hedgerow runs for over 250 m along the western boundary. The hedge is dense and structurally complex, having been regularly managed. Dominant species include common hawthorn and field elm, with frequent blackthorn and occasional field maple *Acer campestre* and European plum *Prunus domestica*. Leyland cypress *Cupressus × leylandii* is also present within a short section of the hedgerow. Dog rose *Rosa canina* occurs throughout, and the understorey is consistently populated by bramble *Rubus fruticosus* agg.. This hedgerow is also to be retained in full.

Notable Flora

- 3.17 No notable plant species were identified during the survey and no Schedule 8 or 9 plant species of the Wildlife and Countryside Act 1981 (as amended) were identified on site (see limitations). An indicative plant species list is provided in Table 5: Plant Species Recorded Onsite. Site habitats are shown in Fig 2: Site Map.

Species

Bats

- 3.18 All buildings within the survey boundary were subject to an internal and external inspection for signs of roosting bats and to assess their suitability for bat use. The results of these inspections are summarised below.
- 3.19 B1 is an L-shaped workshop/garage of concrete block construction with vertical timber cladding and a pitched roof of metal box-profile sheets supported by a steel frame. The southern elevation includes two metal roller doors, with a single personnel door on the north-facing rear elevation. The building lacks windows, chimneys, soffit boxes, loft space, internal insulation or cavity wall. Externally, it is in good condition, with no visible crevices, lifted roofing sheets or other Potential Roosting Features (PRFs), and the closely fitted timber cladding does not contain suitable gaps. Internally, there is no insulation beneath the roofing sheets and no evidence of bat presence (droppings, staining or feeding remains) was recorded. All doors were found closed.
- 3.20 B2, located directly west of B1, is a stable block of concrete block construction with partial vertical timber cladding and a mono-pitched metal roof. It is divided internally into two stables, each with a wooden stable door opening to the east. The structure lacks loft voids, soffits, internal insulation, or roof lining, and all doors were found closed. Externally, the timber cladding is tightly spaced and the metal roofing intact, with no gaps, overlaps, or other Potential Roosting Features (PRFs). Internally, no features suitable for bat roosting were present, and no evidence of bats (such as droppings, staining, or feeding remains) was observed.
- 3.21 B3 is a timber-framed stables/storage structure with a mono-pitched roof clad in metal box-profile sheeting. The building is entirely clad externally in the same material and divided internally into two sections. It lacks insulation, enclosed roof spaces, soffits, or loft voids, and both doors on the southern elevation were found closed. The structure is in good condition with sealed construction and no external or internal Potential Roosting Features (PRFs). No evidence of bats, such as droppings, staining, or feeding remains, was recorded.
- 3.22 B4 is a small metal-framed shed entirely clad in metal box-profile sheets, including the pitched roof. The building contains no insulation, internal lining, soffits, or loft voids, and the single door on the

southern elevation was found closed. The structure is in good condition with no suitable PRFs, and no evidence of bats was observed internally or externally.

- 3.23 The hedgerows surrounding the site, particularly H1 along the southern boundary, and the unmanaged grassland located just beyond the eastern boundary, provide some vertical structure and are likely to offer low-level foraging and commuting opportunities for bats.

Badger

- 3.24 The site was searched for signs of badger activity, including sett entrances, latrines, foraging signs, hairs, and footprints. No evidence of badger was recorded within the survey boundary or the accessible adjacent land. The intensively managed, species-poor grassland across the plot offers limited suitability for foraging or sett creation. However, more suitable habitats, such as hedgerows and pastoral fields, are present in the surrounding landscape.

Dormouse

- 3.25 The primary habitat of interest within the survey boundary is the mature native hedgerows. While these may offer some nesting, commuting, or foraging opportunities, they are relatively isolated and lack direct connectivity to broader woodland networks. No evidence of dormouse was observed during the field survey.

European Hedgehog

- 3.26 No direct evidence of European hedgehog, such as tracks, droppings, or day nests, was found during the field assessment. The short-mown, species-poor grassland provides minimal cover or sheltering habitat. However, the mature boundary hedgerows offer limited potential for commuting, foraging, and sheltering activity by hedgehogs, particularly at their base where leaf litter and woody debris may accumulate.

Nesting Birds

- 3.27 None of the buildings within the site were assessed as suitable for nesting by barn owl or other bird species, due to the absence of enclosed roof voids, loft spaces, ledges, or suitable entry points. Additionally, no signs of nesting activity (such as old nests or droppings) were observed internally or externally on any structure. The boundary hedgerows, especially those with bramble understorey and woody structure, offer potential nesting habitat for common bird species. No active nests were observed during the site visit.

Reptiles and Amphibians

- 3.28 The site supports a limited extent of terrestrial habitat for reptiles and amphibians. The short mown modified grassland provides poor structural diversity and low refuge potential. No logs, stone piles, or other natural refugia were recorded. The site lacks permanent water features, and no ponds or aquatic habitats were identified within the survey boundary. However, the bases of the hedgerows may offer marginal sheltering or commuting habitat for common species such as common frog *Rana*

temporaria or slow worm *Anguis fragilis* if present in the surrounding area. No reptiles or amphibians were observed during the survey.

4 DISCUSSION & RECOMMENDATIONS

Proposals

- 4.1 The proposals are for the erection of four new dwellings. A planning application shall be submitted to Wiltshire Council in due course. The purpose of the survey was to undertake an appraisal of the site for its potential ecological value to notable and protected wildlife, and to look for evidence of such species. The survey results provide information to determine the likely ecological impact the proposed development will have on wildlife species, and to inform the level of further survey effort and mitigation required to comply with relevant nature conservation policies and legislation.

Habitats

- 4.2 The application site comprises a parcel of short-mown modified grassland situated within a pastoral field at the edge of a rural town. The plot is bordered to the south and west by mature, species-rich native hedgerows, with the remaining boundaries either open to the wider field or defined by post and rail fencing. A small cluster of utilitarian outbuildings is located centrally within the plot, surrounded by gravelled hardstanding. The dominant habitat onsite is intensively managed modified grassland of low species diversity. Built structures and artificial surfaces provide negligible habitat value.
- 4.3 Surrounding habitats within a 2 km radius are more diverse and include a mosaic of arable and pastoral fields, bounded by hedgerows, with several parcels of Deciduous Woodland (Priority Habitat) to the northeast and east. The nearest block of ancient woodland (Long Wood, classified as Ancient Replanted Woodland) lies approximately 1.2 km to the east, and an area of wood-pasture and parkland occurs 1.3 km to the east. Although Conygre Mead Local Nature Reserve (LNR) lies 1.1 km to the south, the application site is geographically and ecologically separated from it by existing development and infrastructure, and no direct or indirect effects are anticipated.
- 4.4 Proposals will involve the demolition of all existing onsite structures and the construction of four residential dwellings, resulting in the loss of an as-yet undefined area of modified grassland. This habitat is considered to be of low ecological value due to its species-poor composition (see Table 5) and was of limited botanical value, being comprised of common and widespread plant species which are not ecologically notable. This habitat is locally abundant and the required removal of a section of the grassland to facilitate the proposed development is not considered likely to significantly impact local wildlife populations. Therefore, its loss does not represent a constraint to the development. In

addition, follow-up botanical surveying of the site is unlikely to lead to changes within the habitat assessment and is therefore not recommended in this instance.

- 4.5 No Priority Habitats were identified within the survey boundary. However, boundary hedgerows adjacent to the application area are retained and must be protected during construction. A minimum 2 metre buffer from the hedgerow base shall be established and clearly marked prior to works commencing, for example using timber posts and red/white barrier tape, and maintained throughout all excavation and construction activities. No vehicles, plant, or personnel shall enter this buffer zone, and it must not be used for the storage of materials or spoil.
- 4.6 Given the retention of key boundary vegetation, and the limited ecological value of the habitats to be lost, no significant adverse impacts to local habitat networks are anticipated as a result of the proposed development. Nonetheless, nocturnal lighting should be carefully designed to avoid spill onto retained hedgerows and surrounding semi-natural habitats, thereby maintaining dark corridors for nocturnal species.

Species

Bats

- 4.7 No EPSLs have been granted for bats within a 2 km radius of the site, however, habitats surrounding the site are considered to have a moderate level of suitability to support roosting, foraging and commuting activity for bats of various species.
- 4.8 All onsite buildings were subject to a detailed internal and external inspection to assess their suitability for roosting bats. Each building was found to be in good structural condition and lacked features commonly associated with roost use, such as gaps in roof coverings, lifted tiles, soffits, or crevices within timber cladding. No evidence of bat presence - including droppings, staining or feeding remains, was recorded during any part of the inspection. As such, all buildings onsite are considered to offer negligible bat roosting potential, and no further survey effort is recommended in relation to these structures.
- 4.9 All workers should be vigilant and mindful of bats, taking extra care at all times during the demolition of these buildings. In the unlikely event that bats are discovered, work should cease immediately and the appointed ecologist contacted for further advice. It should be noted that further works would not be able to lawfully proceed without confirmation from Natural England, and bats should not be handled at any time for legal reasons. If bats are discovered during works, Natural England will potentially restrict development until further surveys have been completed and a full mitigation and compensation strategy has been designed. It is likely that, if bats are discovered, a European Protected Species Licence (EPSL) will be required from Natural England.

- 4.10 While no potential roosting opportunities are present within the buildings, boundary features such as species-rich hedgerows may provide linear commuting routes for bats and could offer limited localised foraging habitat. The neighbouring unmanaged grassland is also likely to enhance foraging value in the local area. In light of this, careful consideration should be given to nocturnal lighting design during both construction and post-development phases.

Nocturnal lighting measures

- 4.11 The insensitive use of external lighting within the proposed development could have a negative impact upon bats using the site for foraging and commuting activity.
- 4.12 As suitable bat habitat occurs within the nearby surrounding environment, low-level lighting measures should be implemented to avoid indirect disturbance to bats and other nocturnal animal species that may exploit local habitats. Measures must be taken to ensure nocturnal animals are safeguarded from inappropriate use of light and noise throughout the hours of night during the construction period, as well as to protect important commuting corridors for bats. Any external lighting installed as part of the development must be used in accordance with Guidance Note 08/23: Bats and Artificial Lighting¹¹.
- 4.13 Sensitive lighting strategy measures during the construction period are as follows:
- Works must not be carried out after dusk and must not commence until after dawn.
 - Generators and machinery that emit significant noise levels must not be left to run after dusk.
 - LED lighting sources must be used, which generally have a narrower and more directional beam.
 - Light spill must be controlled and if lighting is required at night, hooded shields must be fitted to prevent spill onto nearby habitats that are likely to support wildlife, including nearby trees and hedgerows.
 - Lighting must not be directed towards any bat or bird compensation features.
- 4.14 In addition to the above, when selecting appropriate external lighting, the following specifications should be taken into consideration:
- Any external lighting incorporated into the proposed development should be LED luminaires due to their sharp cut-off, lower intensity, good colour rendition and dimming capability.
 - Luminaires should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats¹².
 - All luminaires should lack UV elements when manufactured. Metal halide, fluorescent sources should not be used¹³

¹¹ <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

¹² Stone, E.L. (2013) *Bats and lighting: Overview of current evidence and mitigation*

¹³ Bat Conservation Trust & Institute of Lighting Professionals (ILP) 2023. *Guidance Note 08/23: Bats and artificial lighting in the UK. Bats and the Built Environment Series.*

Badger

- 4.15 No evidence of badger activity - including setts, latrines, pathways or hair - was identified within the application site or immediately adjacent land. The modified grassland and hardstanding provide poor foraging and commuting value, and the likelihood of sett creation is considered to be negligible. While badgers may occasionally traverse the wider landscape, no direct or indirect impacts to this species are anticipated. No further survey work is recommended. However, in line with good practice, it is advisable that a pre-commencement site walkover is undertaken by a suitably qualified ecologist to check for any recent signs of badger activity before groundworks begin.

Dormouse

- 4.16 The onsite habitats do not support dense understorey or continuous woodland/hedgerow connectivity typically preferred by hazel dormice. However, the mature field boundary hedgerows do provide some potential value for foraging or commuting. These hedgerows are to be retained and protected in full during and after development. Given the absence of direct connectivity to high-value dormouse habitat and the retention of the hedgerows, no direct or indirect impacts to dormice are anticipated and no further survey effort is recommended.

European Hedgehog

- 4.17 The central areas of the site are largely unsuitable for hedgehogs due to the dominance of short, intensively managed grassland and hardstanding. However, boundary hedgerows may offer commuting, foraging and sheltering opportunities. No evidence of hedgehogs (e.g., droppings, tracks, or nests) was discovered during the survey. No impacts are anticipated, however, it is recommended that the developer should ensure provisions are retained that would allow hedgehog to continually access the site for commuting and foraging purposes. This can be achieved through retaining an open nature to the boundary fencing, otherwise if changes to the fencing are proposed it is important that provisions are made in each boundary line (if fenced or gated) with a view to maintain landscape permeability for hedgehogs and other small mammals.

Nesting birds

- 4.18 All buildings were assessed for nesting suitability and were found to be inaccessible and unsuitable for nesting birds due to the lack of cavities, ledges, or sheltered roof spaces. However, the boundary hedgerows and any dense vegetation offer moderate potential for nesting by a range of passerine species. As these features are to be retained in full, no direct impacts are anticipated.
- 4.19 However, if at any point nesting birds are discovered utilising the site, without appropriate mitigation, these may be impacted by the development proposals. Impacts to nesting birds can be avoided by timing works outside the bird nesting season which generally runs between February-August, or by ensuring a site visit is carried out by a suitably qualified ecologist ahead of works commencing. In the event that any nesting birds or suspected nesting activity is discovered prior to works commencing, works must cease and Cotswold Environmental Ltd contacted for further advice.

Reptiles and Amphibians

- 4.20 The site's habitats – consisting primarily of short, intensively managed modified grassland and gravelled hardstanding – are considered unsuitable to support significant populations of amphibians, including great crested newt, due to the absence of structural complexity, cover, or suitable terrestrial refugia. The grassland is heavily mown and subject to regular disturbance, offering negligible sheltering or foraging opportunities. Although three offsite ponds were identified to the south, all were found to be dry at the time of survey, indicating they do not currently function as reliable breeding habitat. The remaining offsite ponds within 500 m could not be accessed, but given the poor terrestrial habitat quality within the site, it is highly unlikely that GCN would commute into the survey area even if present locally.
- 4.21 A review of Natural England's GCN Class Survey Licence returns confirms historic records of GCN within 1 km, with the closest EPSL located 740 m to the southwest. However, the habitats within the survey boundary are of negligible suitability for GCN, being dominated by intensively managed grassland and artificial surfaces with no connectivity to high-value terrestrial or aquatic habitats. In light of this, and given that all accessible ponds were dry at the time of survey, there is no reasonable likelihood of GCN presence within the application site. Accordingly, further survey or licensing is not considered necessary. As a precaution, reasonable avoidance measures can be incorporated within a Precautionary Working Method Statement (PWMS) to ensure compliance with best practice during site clearance and groundworks.

Precautionary Working Method Statement (PWMS)

- 4.22 Although the short grassland is largely considered to hold negligible value to protected species in its current state, it is possible that boundary habitats are used by sheltering, commuting and foraging wildlife. Therefore, in order to further reduce risks to wildlife, measures should be taken to suitably protect species such as GCN and other wildlife such as small mammals, and reptiles and amphibians during the site clearance. This should be achieved by the preparation of a PWMS detailing reasonable avoidance measures which should be adhered to during the phased development. This will include, but is not limited to, measures for:
- The provision of a suitably experienced ecologist on site during the initial stage of site clearance. This will include a finger-tip search of all potential refuge areas prior to works commencing.
 - A toolbox talk to be undertaken for all onsite personnel prior to commencement of refuge and vegetation clearance works, relating to protected species such as GCN and their awarded level of protection.
 - Implementation of Biodiversity Buffer Zones to protect the retained areas of vegetation.

- Timings and methods to be used for sensitive vegetation management and suitable refugia clearance, in a safe and controlled manner.
- How onsite habitats will be maintained following refugia and vegetation clearance to further reduce risks to wildlife, as well as during the construction phase.
- What to do in the event that a protected species is discovered on site during the works.

4.23 Although considered unlikely, should a significant impact to protected species be determined during phased development, then all works must cease immediately and the appointed ecologist contacted for further advice. A European Protected Species Licence would then likely be required from Natural England in order to allow works to proceed further.

Biodiversity Enhancement

4.24 The proposed development constitutes a qualifying residential scheme and therefore falls under the mandatory Biodiversity Net Gain (BNG) requirements set out within the Environment Act 2021. A baseline habitat assessment using the Statutory Biodiversity Metric will be required to demonstrate that the scheme can deliver a minimum of 10% net gain in biodiversity value, either on-site or through a combination of on-site and off-site measures. This should be secured through the planning process via an approved Biodiversity Gain Plan. In addition, the NPPF (2024) outlines obligations of Local Planning Authorities to promote Biodiversity Net Gain where possible.

Bats

4.25 An option to increase biodiversity relating to bats on site would be to affix one or more bat boxes to each of the new buildings within the site boundary, ideally using either Schwegler 1FF boxes (or similar) or Schwegler 2F boxes (or similar). Alternatively, they may also be pole-mounted in an appropriate position. Bat boxes must be positioned no lower than 4m above ground level and they must not face in a northerly direction.

Nesting Birds

4.26 Ways to enhance the site value with regards to bird nesting would be to fit nest boxes to existing trees or buildings. Options include close-hole boxes and open-fronted boxes which would then provide opportunity for a variety of bird species. We recommended that two external bird nest box (Schwegler 1B or similar) is installed onsite. For maximum success, our recommendations are as follows:

- Bird boxes must be positioned away from busy areas where disturbance would be more likely.
- Following British Ornithology Trust guidelines, bird boxes must be positioned no lower than 2m from ground level and preferably above 3 m to prevent possible predation.
- The proposed placement of the bird nest boxes must allow for a clear flight path, without obstruction to the nest box entrance.

- Avoid installing nest boxes in a south-westerly facing direction in order to offer protection from prevailing winds and rain.
- The nest box should ideally be slightly tilted in a downwards position to offer further weather protection.

APPENDIX A: PLANTS RECORDED¹⁴

Table 5: Indicative plant list recorded on site

Scientific Name	Common Name	DAFOR*
g4 - Modified grassland		
<i>Lolium perenne</i>	Perennial ryegrass	D
<i>Poa annua</i>	Annual meadowgrass	O
<i>Festuca rubra</i>	Red fescue	O
<i>Taraxacum</i> sp.	Dandelion	F
<i>Ranunculus repens</i>	Creeping buttercup	O
<i>Bellis perennis</i>	Common daisy	R
<i>Trifolium repens</i>	White clover	F
<i>Urtica dioica</i>	Nettle	O
<i>Rumex obtusifolius</i>	Broad-leaved dock	O
h2a5 – Species-rich native hedgerows		
<i>Ulmus minor</i>	Field elm	D
<i>Crataegus mongyna</i>	Common hawthorn	D
<i>Sambucus nigra</i>	Elder	O
<i>Prunus spinosa</i>	Blackthorn	D
<i>Acer campestre</i>	Field maple	O
<i>Fraxinus excelsior</i>	Ash	R
<i>Rosa canina</i>	Dog rose	F
<i>Rubus fruticosus</i> agg	Bramble	A
<i>Hedera helix</i>	Ivy	R

*D = Dominant, A = Abundant, F = Frequent, O = Occasional, R = Rare

¹⁴ Plant names according to Rose F, O'Reilly C (2006) The Wild Flower Key, Revised Edition. Penguin Books, London.

APPENDIX B: LEGISLATION SUMMARY

Habitats Directive

Species listed in the Habitats Directive 1992 (transposed into UK law through the Conservation of Habitats and Species Regulations 2010 and subsequently 2017 as amended) for which it is illegal to deliberately capture, kill or disturb any individual, or deliberately damage or destroy a breeding site or resting site. In 2007 and 2009, the Habitats Regulations were amended to define illegal disturbance as that which would affect the ability of a significant group of animals of a European Protected Species to survive, breed or to rear or nurture their young, or to hibernate or migrate, or to affect the local distribution or abundance of the species.

Natural Environment and Rural Communities (NERC) Act 2006

The act to makes provision about bodies concerned with the natural environment and rural communities; to make provision in connection with wildlife, Sites of Special Scientific Interest, National Parks and the Broads; to amend the law relating to rights of way; to make provision as to the Inland Waterways Amenity Advisory Council; to provide for flexible administrative arrangements in connection with functions relating to the environment and rural affairs and certain other functions; and for connected purposes.

Countryside and Rights of Way (CRoW) Act 2000

The CRoW applies to England and Wales only, enforcing a statutory policy for biodiversity conservation. The UK Biodiversity Action Plan (BAP) provides the framework for fulfilling the UK's responsibilities towards the Convention on Biological Diversity. The CRoW Act is compliant with the provisions of the European Convention on Human Rights, requiring consultation where the rights of the individual may be affected by these measures.

The Conservation of Habitats & Species Regulations 2017 (the Habitat Regulations) (as amended)

The Conservation of Habitats and Species Regulations 2017 (as amended) consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments. The Regulations transpose Council Directive 92/43/EEC, on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive), into national law. They also transpose elements of the EU Wild Birds Directive in England and Wales. The Regulations came into force on 30th November

2017 and extend to England and Wales (including the adjacent territorial sea) and to a limited extent in Scotland (reserved matters) and Northern Ireland (excepted matters). In Scotland, the Habitats Directive is transposed through a combination of the Habitats Regulations 2010 (in relation to reserved matters) and the and the Conservation (Natural Habitats &c.) Regulations 1994. The Conservation (Natural Habitats, &c) Regulations (Northern Ireland) 1995 (as amended) transpose the Habitats Directive in relation to Northern Ireland.

Bats

In England and Wales, bats and their roosts are protected under the Conservation of Species and Habitats Regulations 2017 (as amended) and the Wildlife & Countryside Act 1981 (as amended). Taken together, this legislation makes it an offence to:

- Deliberately capture (or take), injure or kill a bat
- Intentionally or recklessly disturb a group of bats where the disturbance is likely to significantly affect the ability of the animals to survive, breed, or nurture their young or likely to significantly affect the local distribution or abundance of the species whether in a roost or not
- Damage or destroy the breeding or resting place of a bat
- Possess a bat (alive or dead) or any part of a bat
- Intentionally or recklessly obstruct access to a bat roost
- Sell (or offer for sale) or exchange bats (alive or dead) or parts of bats

A roost is defined as being 'any structure or place that is used for shelter or protection' and since bats regularly move roost site throughout the year, a roost retains such designation whether or not bats are present at the time.

Reptiles

All native British species of reptile (of which there are six) are listed in Schedule Five of the Wildlife and Countryside Act (1981) (as amended) and as such are protected from deliberate killing, injury or trade. Therefore, where development is permitted and there will be a significant change in land use, a reasonable effort must be undertaken to remove reptiles off site to avoid committing an offence. The same act makes the trading of native reptile species a criminal offence without an appropriate licence.

Great Crested Newts

Great crested newts and their habitats receive protection under The Conservation of Habitats and Species Regulations 2017 (as amended). This species is also afforded full protection under the Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). Under such legislation it is an offence to:

- Intentionally or recklessly kill, injure or capture a great crested newt;
- Possess or control any live or dead specimen or anything derived from a great crested newt;
- Intentionally or recklessly* damage, destroy or obstruct access to any structure or place used for shelter or protection by a great crested newt; and

- Intentionally or recklessly* disturb a great crested newt while it is occupying a structure or place which it uses for that purpose.
- Damage or destroy a breeding site or resting place.
- Sell, barter, exchange or transport or offer for sale great crested newts or parts of them.

*Reckless offences were added by the Countryside and Rights of Way Act 2000, which applies only to England and Wales.

Badger

Badger is protected in Britain under the *Protection of Badgers Act 1992* and *Schedule 6 of the Wildlife and Countryside Act 1981* (as amended).

The legislation affords protection to Badgers and Badger setts and makes it a criminal offence to:

- wilfully kill, injure, take, possess or cruelly ill-treat a Badger, or to attempt to do so;
- interfere with a sett by damaging or destroying it;
- to obstruct access to, or any entrance of, a Badger sett; or
- to disturb a Badger when it is occupying a sett.

Dormouse

The dormouse has undergone substantial declines in recent years as a result of habitat loss, deterioration and fragmentation and is consequently protected as a 'European Protected Species' under the 2017 Conservation of Habitats and Species Regulations, which implements the EC Habitats Directive 92/43/EEC in the United Kingdom. In relation to European Protected Species (EPS), the 2017 Regulations make it an offence to:

- Deliberately capture, injure or kill any wild animal of a EPS;
- Deliberately disturb wild animals of any such species, in particular any disturbance which is likely to: (i) impair their ability to survive, to breed or reproduce, or to rear or nurture their young; or to hibernate or migrate or (ii) affect significantly the local distribution or abundance of the species to which they belong;
- Damage or destroy a breeding site or resting place of such an animal; and/or
- To (a) be in possession of, or to control; (b) to transport any live or dead animal or any part of an animal; (c) to sell or exchange or (d) offer for sale or exchange any live or dead animal or part of an animal of an EPS.

In addition, Dormice are protected under the 1981 Wildlife and Countryside Act (as amended).

Dormice are listed on Schedule 5 of the Act and are subject to the provisions of Sections 9.4b and 9.4c, which make it an offence to:

- Intentionally or recklessly disturb a Dormouse while it is occupying a structure or place which it uses for shelter or protection; and/or

- Intentionally or recklessly obstruct access to any structure or place used for shelter or protection by a Dormouse.

Birds

All common wild birds are protected under The Wildlife and Countryside Act 1981 (and as amended).

Under this legislation it is an offence to:

- Kill, injure or take any wild bird
- Take, damage or destroy the nest of any wild bird while it is in use or being built
- Take or destroy the egg of any wild bird

Certain rare breeding birds are listed on Schedule 1 of The Wildlife and Countryside Act 1981 (and as amended). Under this legislation they are afforded the same protection as common wild birds and are also protected against disturbance whilst building a nest or on or near a nest containing eggs/unfledged young.

APPENDIX C: MAPS & SITE PLANS

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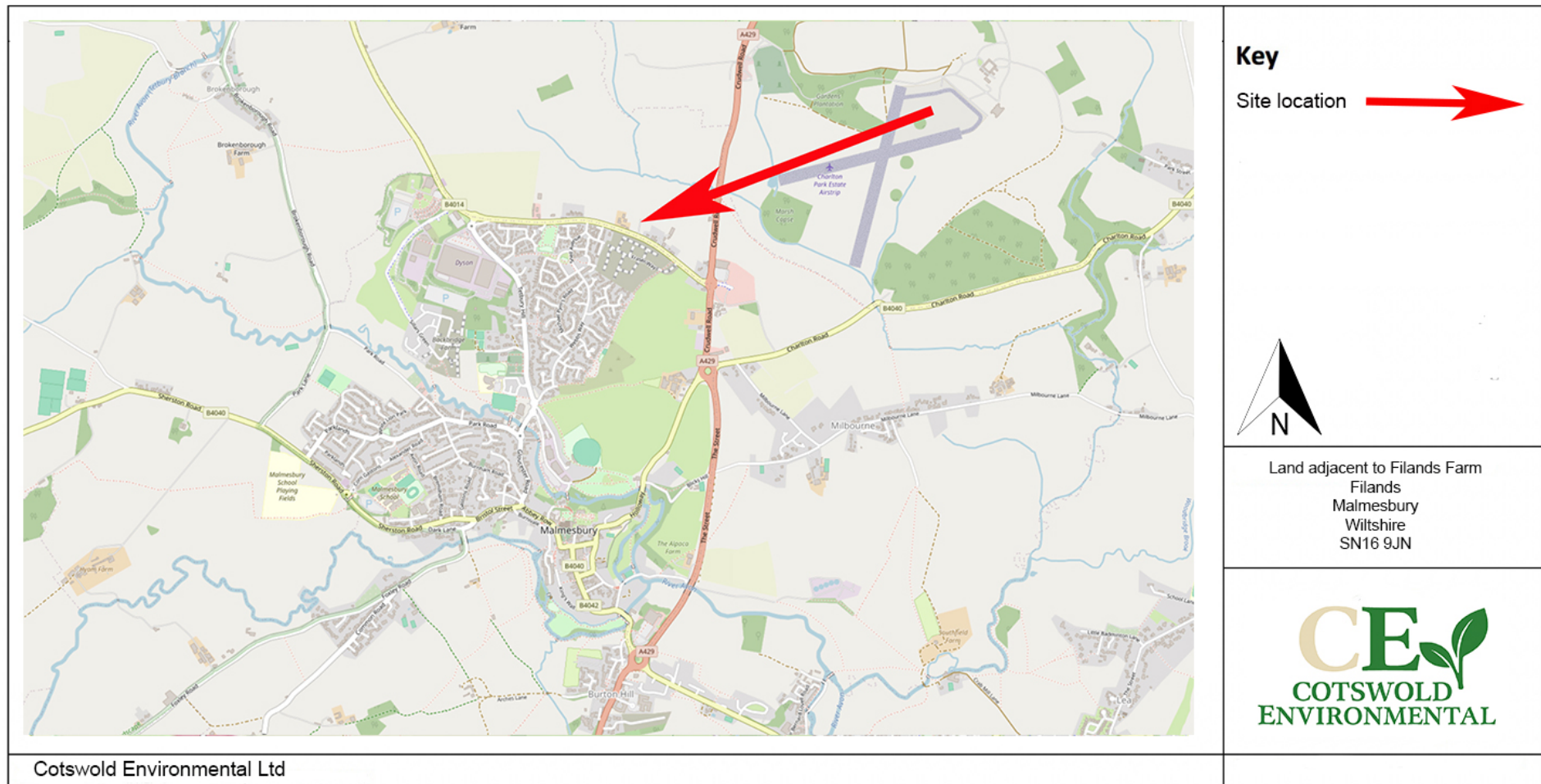


Figure 1: Location Map



Figure 2: Habitat Map

APPENDIX D: SITE IMAGES



Photo 1: Gated entrance at southern extent of survey boundary.



Photo 2: Access driveway along the eastern extent of the site.



Photo 3: General view of the site from the north-east.



Photo 4: General view of the site from the north-west.



Photo 5: Hedgerow which grows along the southern boundary, outside the application boundary.

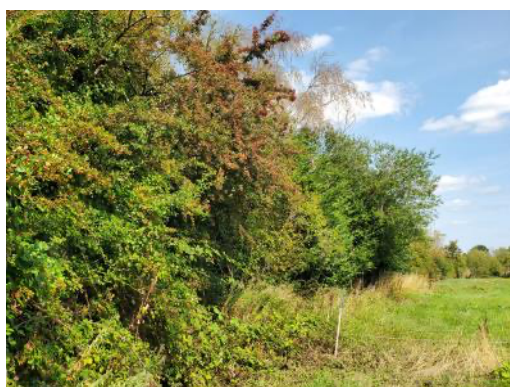


Photo 6: Hedgerow which grows along the western boundary, outside the application boundary.



Photo 7: A southern view of building B1.



Photo 8: An internal view of building B1.



Photo 9: An eastern view of building B2.



Photo 10: An internal view of building B2.



Photo 11: Timber cladding on the walls of B1 and B2.



Photo 12: A southern view of building B3.



Photo 13: An internal view of building B3.



Photo 14: Building B4 viewed from the south.

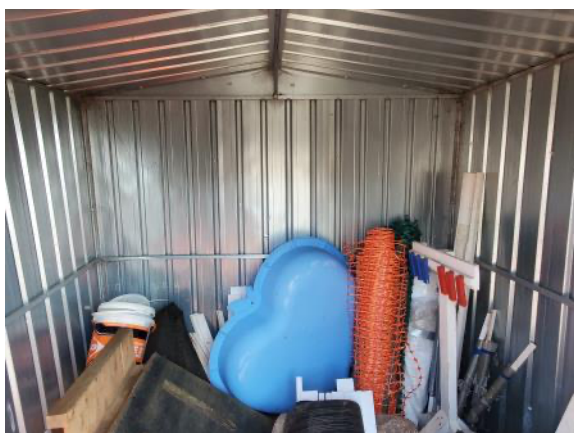


Photo 15: An internal view of building B4.



Photo 16: Gravelled surface which surrounds the buildings.



Photo 17: Modified grassland which dominates the land parcel.



Photo 18: A view of the wider site looking towards the north.



Photo 19: Unmanaged grassland on neighbouring plot.



Photo 20: Pond 1 which was dry at the time of the survey.



Photo 21: Pond 2 which was dry at the time of the survey.



Photo 22: Pond 3 which was dry at the time of the survey.