

Ecological Impact Assessment

Land off Devizes Road, Hilperton

05 February 2026

Ecology
Arboriculture
Land Management





Report Details

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V1	05 February 2026	Nick Hargreaves BSc MSc MCIEEM	Faye Midmore BSc MSc MCIEEM	Lindsay Taylor BSc MSc ACIEEM	

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Site Name and Location	Land off Devizes Road, Hilperton
Central OS Grid Reference	ST 88083 59311
Client	Redcliffe Homes Ltd

Boundary



Executive Summary

Site Location	The Site is located off Devizes Road and Hilperton Drive (A361) in Hilperton, on the northeastern edge of Trowbridge, Wiltshire.
Proposals	Outline application for the construction of residential development of up to 80 units with associated landscaping and access.
Survey Work	Desk-based study, UK Habitat Classification survey, bat activity survey, bat emergence survey, badger survey and reptile survey between 2023 and 2026.
Designated Sites with Potential Impacts	Bath and Bradford on Avon Bat SAC.
Baseline Habitats	The Site comprises several parcels of other neutral grassland, bounded by a mixture of native hedgerows, mixed scrub, trees, specimen trees. The Site includes a complex of agricultural buildings both active and disused.
Protected/ notable Species	The Site provides opportunities for a range of protected species. Confirmed presence of badgers, commuting, foraging and roosting bats including Annex II species, breeding birds, and reptiles were identified during surveys. The Site lies with the Bechstein's Buffer for the Bath and Bradford on Avon Bat SAC and the Yellow Medium Risk Zone and Grey Hatched Zone of the Trowbridge and Westbury Bat Mitigation Strategy.
Mitigation and Compensation	- Construction Environmental Management Plan (CEMP); - Habitat Management and Monitoring Plan (HMMP); - Creation of 50m Wildlife Buffer along eastern boundary; - Comprehensive Landscaping Scheme; - Sensitive Vegetation clearance for mammals, birds and herptiles; - EPS Licence required – mitigation and compensation for roosting bats including bespoke bat roost and installation of bat boxes; and - Sensitive lighting strategy.
Biodiversity Net Gain	A separate BNG Statement Report is provided (Ref: 3131-BNG-NH). - The Site Baseline comprises: 16.47 Habitat Units; and 2.76 Hedgerow Units. - The indicative Post Development BNG is as follows: 16.68 Habitat Units; and 3.51 Hedgerow Units. - This represents 0.21 (+1.28%) increase in Habitat Units and a 0.74 (+26.89%) increase in Hedgerow Units.
Enhancements	- Bird Boxes -20 no. bird nest box (to be integrated into the new buildings); - Bat Boxes – 40no. Manrose Bat Ridge Roosts to be erected onto new dwellings and 15no. tree mounted bat boxes to be installed on retained trees; 2no reptile hibernacula in new open space; - Hedgehog highways comprising 13cm x 13cm cut out through close-boarded fences (or equivalent gaps under fences) to allow hedgehog movement throughout site; and

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1 Introduction

This report presents the results of an Ecological Impact Assessment (EclA) at Land off Devizes Road, Hilperton in relation to an outline planning application. The surveys were commissioned by Redcliffe Homes Ltd.

The area within the application boundary is hereafter referred to as the 'Site'.

1.1 Site Context

The Site is located off Devizes Road and Hilperton Drive (A361) in Hilperton and comprises two separate privately owned land holdings. The land holding to the north comprises a former tenanted (in use at time of survey) horse paddock, with associated yard and stables.

The land holding to the south is within private residential curtilage. There are two stable blocks on the Site; one to the north (Active Stables) and one to the south (Disused Stables). The Site is situated on the outskirts of an urban area and is bordered by farmland interspersed by hedgerows to the north, sports pitches to the east and residential development/roads to the south and west.

1.2 Planning History

The southern parcel of the Site was subject to a planning application in 2022/23 (Wiltshire Council Ref: PL/2022/07977). This application was supported by a suite of ecological survey information and an Ecological Impact Assessment by Engain (Engain, 2023). The application was refused permission in December 2023 primarily on ecological grounds with two of the three reasons for refusal relating to insufficient survey information and inadequate mitigation in respect to the requirements of the Trowbridge and Westbury Bat Mitigation Strategy (TWBMS), and the second being that sufficient and appropriate mitigation was not provided in respect to the loss of bat roosts on Site.

Following the refusal, the client (Redcliffe Homes) commissioned Nicholas Pearson Associates (NPA) to conduct a suite of further surveys in relation to bats, to ensure that sufficient information was collected to inform a future planning application.

In 2025, GE Consulting was brought into the team to compile and coordinate the ecological works to inform the planning submission.

1.3 Description of Proposed Development

Proposals consist of an Outline Planning Application for a residential development of up to 80 dwellings with all matters reserved except for access.

1.4 Aims

The aims of this report are to:

-  Identify and describe the habitats and species likely to be affected by the proposed development and assess the ecological value of these features;
-  Identify key ecological constraints to the proposed development and evaluate the significance of any potential effects; and,
-  Provide recommendations for mitigation and enhancement opportunities in accordance with relevant planning policy, legislation and other published guidance (see **Appendix 2**).

2 Methods

2.1 Ecological Scoping and Baseline Data Collection

2.1.1 Desk Study

Due to the level of detailed information available for the Site (original records request in 2023, and through survey works between 2022 and 2025) and through planning applications in the locality, the Wiltshire and Swindon Biological Records Centre (WSBRC) was not contacted for a fresh records search. It is considered unlikely that a fresh request would return any new information which could significantly affect the scope or findings of the assessment.

Nonetheless an internet search was undertaken to identify statutory sites designated for nature conservation value within a 2km radius of the Site boundary (10km for international sites), using the Government's mapping website MAGIC (www.magic.gov.uk). A search was made of MAGIC for European Protected Species (EPS) Mitigation licences issued by Natural England within 2km of the Site boundary since 2008 and Habitats of Principal Importance (HPI) within 50m of the Site boundaries.

2.2 Field Surveys

As outlined above, the Ecological Impact Assessment (Ref: eg211155 Rev 05. Engain, 2023) as well as the bat survey works conducted by NPA across 2024 were used to inform this report. **Table 1** summarises the surveys undertaken to provide ecological baseline information for the Site. Full methods are provided in **Appendix 3**.

Table 1: Summary of Baseline Data Collection Surveys

Survey Type	Date (s)
Extended UK Habitat Classification Survey and Biodiversity Net Gain (BNG) condition assessment	July 2022 (Engain), September 2025 (GE Consulting)
Badger Survey	September 2025 (GE Consulting)
Building Inspection	July 2022 (Engain), March & April 2024 (NPA), September 2025 (GE Consulting).
Bat Emergence Survey	May to September 2024 (NPA)
Bat Activity Surveys	April to October 2024 (NPA)
Tree Assessment for Bats	April to September 2024 (NPA)
Reptile Survey	Summer 2024 (Engain)

2.2.1 Extended UK Habitat Classification Survey

A UK Habitat Classification Survey was conducted in July 2022 by Engain to inform the previous planning application. This was most recently updated on 30 September 2025 by Nick Hargreaves BSc (Hons) MSc MCIEEM FISC 4 when weather conditions were dry with good visibility to ground truth the previous findings.

All habitats within the Site were identified, described and mapped during the field survey in accordance with the UK Habitat Classification (UKHab) UKHab Ltd., 2023 (V2.0)) and Statutory Biodiversity Metric (Defra, 2024) classifications for hedgerows), with other linear and point features mapped using Phase 1 Habitat Survey symbology (JNCC, 2010).

Primary habitats have been mapped to a minimum mapping unit (MMU) of 25m², although where features of note of a smaller scale are present, these have also been recorded and mapped. Any habitats (e.g. traditional orchard) with no appropriate primary habitat label were assigned a secondary

habitat code. Other secondary UKHab codes were recorded where relevant, although they are described qualitatively within this report for ease of reading. A non-exhaustive botanical species list was compiled, with plant names following Stace (2019).

2.3 Biodiversity Net Gain Assessment

A baseline BNG assessment was undertaken using the statutory biodiversity metric (released in July 2025) to assess the pre-development and indicative post-development value of the habitats on Site following current guidance (Defra, 2024). Further details are provided in the BNG Statement and Assessment Report (GE Consulting, 2026b).

2.4 Consultation

While no consultation has been undertaken specifically for this application, the previous planning application (original application PL/2022/07977) provides context in regard to Wiltshire Council's requirements/expectations in regard to any future planning submission. Additionally, Natural England (NE) commented as a Statutory Consultee on 29th November 2023 and provided detailed comments in regard to impacts on Bath and Bradford on Avon Bat Special Area of Conservation (SAC) and in respect to impacts on bats.

Up-to-date consultation with Wiltshire Council, Natural England and other relevant stakeholders is anticipated as the application progresses.

2.5 Baseline Evaluation and Impact Assessment

Determining the importance of ecological features was undertaken in accordance with the Chartered Institute of Ecology and Environmental Management's Guidelines for Ecological Impact Assessment in the UK and Ireland (CIEEM, 2018). The guidelines recommend a scale of significance from International to Local ecological importance as a frame of reference, however, also notes that it can be adapted to suit local circumstances. As such, where ecological receptors are assessed to be of less than Local value, an additional valuation of 'Site value' has been included.

An assessment was then made of possible ecological impacts of the proposed development on each feature within the development's likely 'Zone of Influence' (Zol). Where uncertainty exists, a precautionary approach has been adopted.

Measures are described to ensure that any impacts can be avoided, minimised or compensated for by applying the mitigation hierarchy in accordance with NPPF (2024) paragraph 193(a) which states:

"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."

2.6 Limitations

Care has been taken to ensure that balanced advice is provided on the information available and collected during the study period (s), and within the resources available for the project. However, the possibility of important ecological features being missed due to survey timings, absence during surveys or the year of survey cannot be ruled out. In addition, the lack of evidence or records of protected species on Site does not preclude their presence from Site.

Survey/camera coverage of the eastern elevation of the Building B1 (Active Stables) was not possible due to the view being obscured by adjacent vegetation. However, given the lack of features identified on

this elevation and the overall limited suitability (i.e. low potential) of the structure, this was not considered a constraint.

This report is based on data collected by third-parties, and as such, while the summary results were made available for analysis, there are some limitations in regard to the presentation of data i.e. all pipistrelle calls have been agglomerated, and noctule, Leisler's and serotine have also been treated as a single group.

The most recent habitat survey was undertaken outside the optimal period for recording flowering plants. While the overall assessment was in line with previous botanical assessments of the Site (Engain, 2023), to ensure that the Site habitats were not undervalued, where appropriate the highest distinctiveness habitat type and best possible condition considered likely to be present were used, given historic survey data and current use/management.

Given the openness of the Active Stable and available positions to deploy the automated detector, it is likely that bat activity (i.e. incidental passes outside of the stable) would not have been recorded, and therefore, this data alone could not be relied upon alone to determine the presence of a night roost. As such the patterns of any records and the searches for evidence on the floor were used to determine likely presence/absence.

3 Baseline Conditions & Evaluation

3.1 Designated Sites

A summary of designated sites within the search area is provided in **Table 8**.

Table 8: Designated sites records within 2km of Site boundary, 10km for European sites

Site Name	Proximity to Site	Description
<i>National Site Network</i>		
Bath and Bradford on Avon Bats SAC (Winsley Mines SSSI)	c. 8km W (nearest component)	Annex II species that are a primary reason for selection of this site: 1304 Greater horseshoe bat <i>Rhinolophus ferrumequinum</i> 1323 Bechstein's bat <i>Myotis bechsteinii</i> Annex II species present as a qualifying feature, but not a primary reason for site selection: 1303 Lesser horseshoe bat <i>Rhinolophus hipposideros</i>
Salisbury Plain SAC & SPA	c. 8.5km S	Annex I habitats that are a primary reason for selection of this site: 5130 <i>Juniperus communis</i> formations on heaths or calcareous grasslands 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites) Annex II species that are a primary reason for selection of this site: 1065 Marsh fritillary butterfly <i>Euphydryas</i> (<i>Eurodryas</i>, <i>Hypodryas</i>) <i>aurinia</i>
<i>Statutory Designated Sites</i>		
Picket and Clanger Wood SSSI	c. 4.4km S	Picket and Clanger Wood is a floristically rich ancient woodland supporting an outstanding range of butterfly species. The combined butterfly and moth faunas include several scarce species with limited national distributions, among them two which are rare and vulnerable in Great Britain. The site also accommodates a diversity of birds characteristic of ancient woodland in southern and western England.
<i>Non-Statutory Designated Sites</i>		
Green Lane Wood LNR / Green Lane Wood & Meadow LWS	c. 1.2km S	Ancient oak woodland. The open part of the wood is coppiced, encouraging woodland flowers to grow. They include Solomon's seal, stinking Iris and greater butterfly orchid. Important bird and invertebrate assemblages. Core Roost for Bechstein's bats.
Kennet and Avon Canal LWS	c. 1.4km N	Part of the 87-mile-long K&A Canal which links London with the Bristol Channel.
Southwick Country Park LWS	c. 4.89km SW	Site comprises c. 150 acres of old farmland situated on the edge of Trowbridge. Primarily species-rich hay meadows.

The Site lies within a consultation zone for the Bath and Bradford on Avon Bat SAC, as outlined in the Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire (Wiltshire Council, 2015); specifically, the 1500m buffer for Bechstein's bats from Green Lane and Biss Woods Local Wildlife Site (LWS) see **Plate 1** below.

The Site is also located within both the Yellow Zone (Medium Risk) and the Grey Hatched Zone (Medium Risk) within the Trowbridge and Westbury Bat Mitigation Strategy (TWBMS) (Wiltshire Council, 2025). The zones have been developed to identify sensitive areas where development could have an effect on the Bath and Bradford-on-Avon Bats SAC and trigger the requirements of the Habitat Regulations (**Plate 2** refers).

Plate 1: Site Location within Bath and Bradford on Avon Bat SAC consultation zone



Plate 2: Site Location within TWBMS Zones



3.1.1 SSSI Impacts Risk Zones and Habitats of Principal Importance

The Site lies within a SSSI Impact Risk Zone (**Plate 3** refers) which highlights “**All Consultations:** All planning applications (except householder applications) where the proposed development is outside or extends outside existing settlements/urban areas and will increase lighting levels or affect trees/woodland, waterbodies, rural buildings/structures (manmade or natural) or linear landscape features such as hedgerows, streams and rivers through direct loss, fragmentation or change of use.”

Review of Habitats of Principal Importance (HPIs) via MAGIC.gov.uk indicates that the Site does not include any HPIs listed under the priority habitats inventory. However, the Site lies within proximity to several small parcels of deciduous woodland (**Plate 4** refers).

Plate 3: Site Location with SSSI Impact Risk Zones

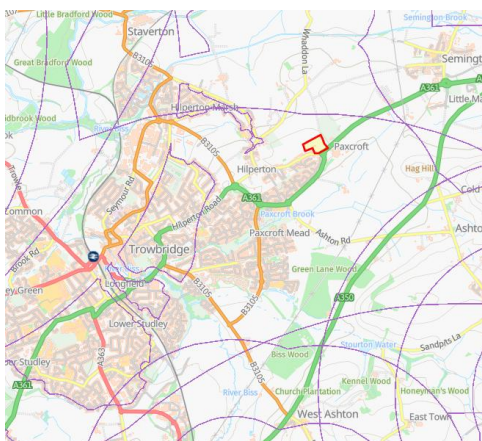
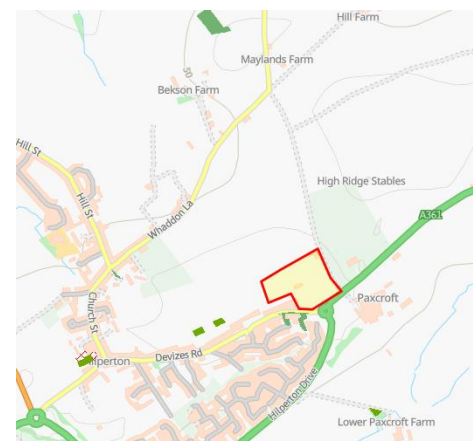


Plate 4: Habitats of Principal Importance within the Locality

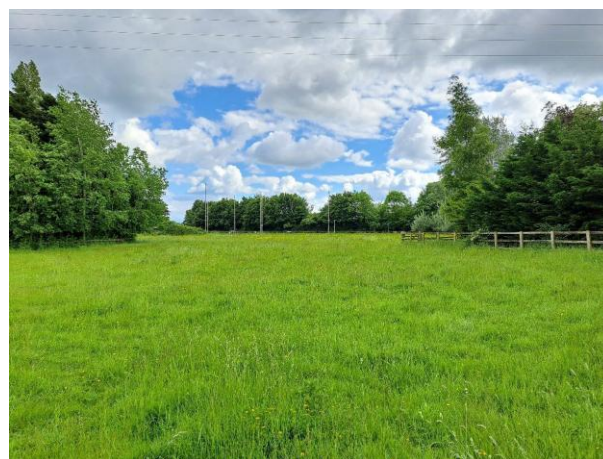


3.2 Habitats and Flora

The distribution of habitats is shown on **Figure 1**.

The Site was subject to habitat survey as part of the Ecological Appraisal to inform the previous planning application (Engain, 2023). As described above, additional field parcels have been included to the north which were not historically subject to survey. The update UKHab survey in 2025 by GE Consulting sought to ground-truth the historic data and update where relevant.

The Site is dominated by two fields of permanent pasture partitioned internally by post and rail, and post and wire fencing for paddocks. It is understood that the fields have been managed historically through a combination of grazing (horse and sheep) and mowing.



At the time of survey the sward was relatively uniform in height and dominated by coarse grasses including cock's foot *Dactylis glomerata*, false oat-grass *Arrhenatherum elatius* and perennial rye-grass *Lolium perenne*, with a reasonable diversity of other common grasses (albeit infrequently) including rough meadow-grass *Poa trivialis*, red fescue *Festuca rubra*, Yorkshire fog *Holcus lanatus*, annual meadow-grass *Poa annua* and creeping bent *Agrostis stolonifera*. Forb diversity was fairly limited with species indicative of agricultural improvement including creeping buttercup *Ranunculus repens*, white clover *Trifolium repens* and dandelion *Taraxacum officinale* agg. being abundant across the sward, though other forbs including yarrow *Achillea millefolium*, ribwort plantain *Plantago lanceolata*, common nettle *Urtica dioica*, daisy *Bellis perennis*, hogweed *Heracleum sphondylium*, broad-leaved dock *Rumex obtusifolius*, spear thistle *Cirsium vulgare*, creeping thistle *Cirsium arvense*, and chickweed *Stellaria media* are present, albeit infrequently or in local aggregations. As evidenced by the species assemblage and displayed through the attached photographs, the grassland is typical of agriculturally improved (but not intensively managed) swards that are ubiquitous throughout the surrounding landscape and is indicative of a modified sward (i.e. g4 – modified grassland). While a detailed botanical assessment was conducted concurrently with the UKHab survey¹, this was outside of the optimal period for botanical assessment and as such a conservative approach has been taken based on the previous assessment conducted by Engain. As such the grassland has been given an interim classification of g3c – Other neutral grassland. Botanical survey will be undertaken in Spring/Summer 2026.

The eastern edge of the Site comprises secondary growth of native trees and scrub (mixed scrub – h3h) surrounding a former area of hard standing (u1b – Developed land sealed surface) that is in part covered in early to late successional vegetation ranging from ephemeral early colonisers, through to tall ruderals with bramble scrub and self-set woody specimens. Woody vegetation (h3h) is dominated by hawthorn

¹ by FISC 4 Accredited Surveyor

Crataegus monogyna and blackthorn *Prunus spinosa*, hazel *Corylus avellana*, elder *Sambucus nigra*, dog rose *Rosa canina*, oak *Quercus robur* and ash *Fraxinus excelsior*.



The Site includes several stands of planted individual native and introduced trees (w1h – other woodland mixed) in isolated patches. The southernmost stand comprises tall non-native trees including Monterey cypress *Cupressus macrocarpa*, purging buckthorn *Rhamnus cathartica*, hornbeam *Carpinus betulus*, red oak *Quercus rubra* and Lombardy poplar *Populus nigra* 'Italica'. The northernmost stand comprises a mix of mostly native woody species including elm *Ulmus procera*, hawthorn and blackthorn.



The Site is bound to the east and north by native hedgerows with trees. The hedgerows are in moderate condition, with a good variety and diversity of native woody species and being fairly mature and extensive. Given their modest extent, and average condition, coupled with the extent of similar such habitats within the locality, the boundary features are considered to be of no more than **Local** importance.



The Site includes a number of buildings including a centrally located Disused Stables and agricultural accommodation building, with a second group of buildings to the northwest including Active Stables, hay store and occupied static caravan. The buildings are described in further detail below in respect to roosting bats.

The fields which dominate the Site are managed for a combination of grazing and mown, with a fairly poor and uniform sward. Areas of dense mixed scrub are associated with the eastern boundary, in discrete stands and around the central complex of agricultural buildings. The modified, grassland and bramble scrub are relatively abundant habitats within the local area; therefore, they are considered to be of **no more than Local** importance.

3.3 Fauna

3.3.1 Amphibians

The Site does not include any waterbodies, and a review of OS Maps and aerial photography does not indicate the presence of any such features within 250m of the Site. The nearest waterbodies include one at Lower Paxcroft Farm c. 550m to the south, with further waterbodies to the SE. A small cluster of three ponds is present c. 800m west adjacent to Church Farm Close. The previous records search returned two records of great crested newts *Triturus cristatus* within 2km of the Site from 2001 and 2006. A review of records via MAGIC does not indicate any records of confirmed presence within proximity, furthermore the nearest European Protected Species Mitigation Licences for GCN are c. 3.2km southwest and Lower Studley and 3.6km northwest at Berryfield.

The Site offers some habitat suitable for amphibian species in their terrestrial phase, however the absence of suitable breeding habitat and the absence of GCN within ponds in the locality indicates that the Site is **Negligible** for amphibians. As such, they are not discussed further within this report.

3.3.2 Badger

Potential evidence of foraging and commuting activity by badger is present across the Site via well used paths and snuffle holes. A two entrance (one active entrance) outlier sett was identified in the eastern boundary of the Site adjacent to Whaddon Lane which bounds the Site to the east (as shown below). No other evidence of sett construction was noted across the Site.



Badger is not listed as a species of principal importance for the conservation of biodiversity in England and has therefore not been assigned a scale of importance in this case, but will be considered further in this assessment in relation to their legal protection only.

3.3.3 Bats

As a function of the Site's location and the extensive level of ecology survey work conducted both at the Site and throughout the wider landscape, there are extensive records both field and roosting for bats within the locality, with records for 12 bat species including for Annex II species greater horseshoe, lesser horseshoe and Bechstein's bat which are associated with the Bath and Bradford on Avon Bat SAC. As discussed above, the Site is located within the Consultation Buffer for Bechstein's bat as outlined in the Planning Guidance for Wiltshire and is within both the Yellow and Grey Hatched Zones as per the Trowbridge and Westbury Bat Mitigation Strategy; specifically, for the Core Roosts for Bechstein's bats at Green Lane and Biss Woods, c. 1.2km (**Plates 1 and 2** refer).

In addition, eleven European Protected Species Mitigation Licences have been granted within 4km with the closest being c. 120m south (EPSM 2012-5169) for the destruction of a common pipistrelle resting site.

3.3.3.1 *Roosting – Trees*

The Site contains a number of mature trees, both specimen field trees and associated with the Site boundaries. No evidence of roosting bats was identified on any of the tree inspections. Further details are provided in **Table 9** below.

Table 9: Tree Assessment

Tree No.	Description/Evidence	Further Survey & Findings	Suitability
T1 Elder	1no. south facing knot hole on southern stem, with a cavity extending to approximately 2ft.  1no. south-facing knot holes on southern stem, with a cavity extending to approximately 1.5ft. 1no. upwards facing tear-out on southern stem. Single rot hole on dead limb on east side of tree.	3no. inspections via endoscope. No evidence of roosting bats	PRF-M
T2 Elder	Fallen tree with south-facing pruning cut on dead stem.	3no. inspections via endoscope. No evidence of roosting bats	PRF-I
T3 Purging Buckthorn	Compression fork/barn occlusions	No further inspection required	Negligible
T43 Hornbeam	Low-level / open fissure on main stem.	No further inspection required	Negligible
T54 Red Oak	Lifting bark	No further inspection required	PRF-I
T56 Ash	Pruning cut on main stem	No further inspection required	PRF-I
T57 Elder	South facing knot hole	3no. inspections via endoscope. No evidence of roosting bats	PRF-I
T58 Ash	Wound feature with exposed heartwood on west side of main stem 	3no. inspections via endoscope. No evidence of roosting bats	PRF-I

Tree No.	Description/Evidence	Further Survey & Findings	Suitability
T59 Standing Deadwood	Loose/lifting bark around entire main stem. 3no. woodpecker holes  1no. woodpecker hole (6 x 6cm; narrowing to 3 x 3cm) on main stem (6m high / east facing) with a depth of approximately 10cm; 1no. woodpecker hole (2 x 3cm) on main stem (6.5m high / north-east facing) with a depth of approximately 2cm; and 1no. woodpecker hole (4 x 3cm) on main stem (7m high / north facing) with a depth of approximately 2cm. All woodpecker holes were open, clean and dry.	1no. endoscope inspections via MEWP. Confirmed as PRF-I – no further inspection undertaken. No evidence of roosting bats	PRF-I

3.3.3.2 Roosting – Buildings

The Site includes several buildings including a centrally located stable complex, a hay store and an active stable and static caravan.

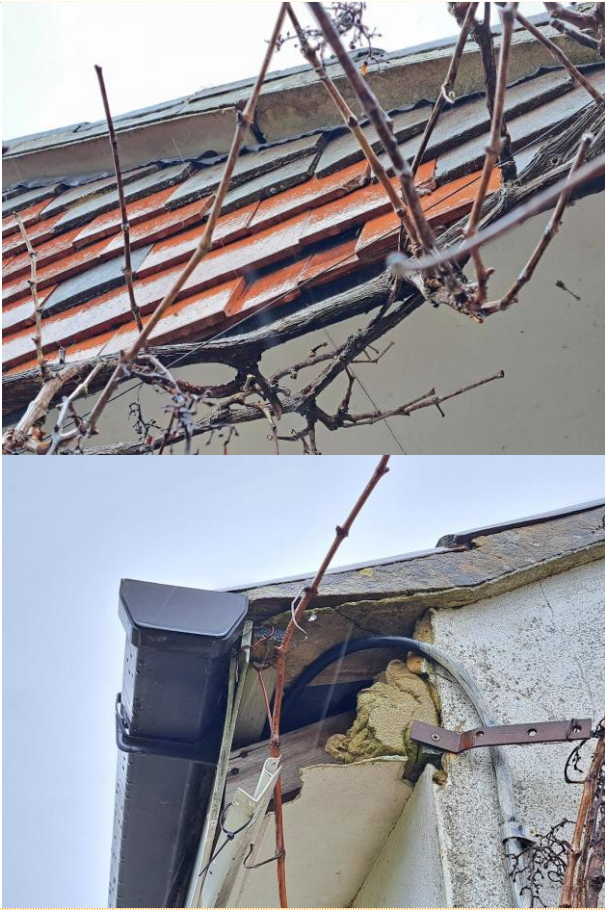
Internal and external inspection surveys of all Site buildings (the two stable blocks and a hay store) was undertaken on the 28 March and 18 April 2024 by a licenced bat worker (NPA, 2025). Further details are outlined in **Table 10** below.

An update Building Inspection was conducted by GE Consulting in September 2025. This was to ground-truth and validate the previous surveys. No new evidence or any change in conditions was identified which would result in a material change to the previous assessment.

Table 10: Assessment of Buildings

Building No.	Description	Bat Evidence/ Access Points/ Potential Features	Photograph	Category (Collins, 2023)
B1 (Disused Stables)	Large central building complex. Split into two broad sections – a stable block/kitchen comprising six stalls to the west; and a house/accommodation to the east. The floors of the stable blocks have been constructed from concrete. The canopy floor has been constructed from brick. The buildings were constructed from brick and block with a stucco/textured render. All stalls have timber windows and doors. The accommodation building is of the same construction with some timber cladding on its eastern elevation as well as a metal up and over garage door and external decorative balcony on the western elevation. The roof of the stable block and attached house has been constructed from timber trusses (standard fink), with a reinforced plastic membrane overlay. Double roman common roof tiles and clay ridge tiles used throughout. Extending from the south side of the stable units is a thin canopy,	- Gap where drainage pipe exits exterior wall. - Linear gaps in mortar below ridge tiles. Numerous linear gaps behind overlapping timber cladding. Gap below roof tiles where mortar has fallen out. Hole at end of soffit board on attached house. Gap where soffit board has loosened/dropped on southern canopy. - Linear gap where fascia board has detached from canopy. - Hole in mortar at end of ridge tile. - Linear gaps between soffit and fascia boards. - Single stable door permanently open, allowing bat access into roof void above stables/ southern canopy. - Holes in plaster boarding on underside of canopy. - Gap where soffit board has loosened/dropped. - Gaps between fascia board and lead flashing. - Gap where hanging tile is missing. - Gap in mortar below eaves. - Gaps at edge of roof, between mortar and roof tiles.	 	Confirmed Roost (LHS and GHS)

Building No.	Description	Bat Evidence/ Access Points/ Potential Features	Photograph	Category (Collins, 2023)
	supported by timber pillars. Clay vertical wall tiles are present at the ends of this canopy. To the underside of the canopy, there is plaster boarding with circular lights along its length. At the apex of the attached house, there is a timber louvre vent with lead flashing (part of roof void).	- Gaps under lead flashing (cobwebbed present around entrance). - Hole (c. 200mm x 200mm) where end of fascia board is missing. - Gaps between canopy wall and fascia board. - Gap under lead flashing where hanging tile is missing. - Linear gap where ridge tiles mortar has blown. - Gap below lead flashing in roof valley. - Hole (c. 350mm x 150mm) where soffit board is missing on attached house. - Hole in broken roof tile. Gap between mortar and lead flashing. - Gap at side of fascia board. - Hole in fascia board above metal garage door. - Gap between external wall and fascia board. - Linear gaps behind overlapping timber cladding. - Gaps below lead flashing between attached house wall and canopy. 1 no. LHS was observed hanging from ridge beam in one of the stables. - Aggregations of droppings were found throughout the stable units,		

Building No.	Description	Bat Evidence/ Access Points/ Potential Features	Photograph	Category (Collins, 2023)
		and within the loft void above the stable kitchen. DNA analysis confirmed presence of GHS.		

Building No.	Description	Bat Evidence/ Access Points/ Potential Features	Photograph	Category (Collins, 2023)
B2 (Active Stables)	The stable block comprises a timber framed and clad single storey building with corrugated metal roofing panels. The stables are partitioned into 4 stalls (c. 5m x 4m). At the northern side of the stables, there is a storage unit with a single glass window and a flat roof. An open, timber lean-to is present on its northern aspect.	- Opening in roof on northern elevation where corrugated metal roofing sheet is missing. - Linear gap above doorway of store. Numerous gaps in broken canopy support brackets. Hole in timber cladding, leading to cavity behind. - Linear gap behind barge board (heavily cobwebbed). Hole in cladding on gable end. Gap at side of fascia board leading into cavity behind cladding.		Low

Building No.	Description	Bat Evidence/ Access Points/ Potential Features	Photograph	Category (Collins, 2023)
B3 (Hay Store)	Large hay store c. 16m x 7m in size. Constructed from timber cladding with corrugated metal panel roof.	- No suitable features identified. - No evidence of roosting bats identified.		Negligible

3.3.4 Bats – Emergence Surveys

Surveys were undertaken by Engain in 2022 of the central stable building (B1). A single lesser horseshoe bat was recorded in August 2022, though no activity was recorded during the re-entry survey in September 2022. They concluded the building may be used occasionally as a day roost by a single bat that dispersed after the maternity period and was of low to moderate conservation significance.

NPA conducted a bat emergence survey between June and September 2024. On the 19 June 2024, a single horseshoe bat was seen (i.e. no echolocation recorded) light-sampling from the open stall of Building B1 at 22:03 (35 minutes after sunset). Based on a review of automated detector data (i.e. which recorded early records of GHS bats in June), this was attributed to greater horseshoe bat. On the 18 July 2024, two greater horseshoe bats were recorded entering Building B1 through the open stall at 22:23 (68 minutes after sunset). On the 24 September 2024, a single horseshoe bat was seen (i.e. no echolocation recorded) light sampling beneath the southern canopy of Building B1 between 19:25 – 19:27. Based on the time recorded (i.e. 24 minutes after sunset) and records of GHS bats recorded around the same time on the automated detector deployed in the stable block, this was attributed to greater horseshoe bat. **Plate 5** below shows the emergence/entry point (in red) for all three surveys.

Plate 5 - Greater Horseshoe Emergence Point (Building B1)



On the 18 July 2024, a single common pipistrelle emerged from under a roof tile on the northern elevation of building B1 at 21:57 (42 minutes after sunset), heading north (**Plate 6** refers).

Plate 6: Common Pipistrelle Emergence July 2024



On the 24 September 2024, a single common pipistrelle emerged from beneath the canopy on the southern elevation of Building B1 at 19:21 (20 minutes after sunset), heading south (**Plate 7** refers).

Plate 7: Common Pipistrelle Emergence September 2024



Table 11: Summary Emergence Results.

Building Ref.	Species	Peak Count	Date of Emergences
B1	Greater horseshoe bat	2	19/06/24, 18/07/24 and 24/09/24
B1 (main roof)	Common pipistrelle	1	18/07/24
B1 (stable roof)	Common pipistrelle	1	24/09/24

NPA also conducted supplementary deployments of trail cameras and static bat detectors within both the disused and Active Stables for periods of between 10 and 12 nights in June, July, August and September.

The automated detector deployed internally recorded early GHS registrations (i.e. indicative of day roosting) on 39 occasions and late GHS registrations (i.e. indicative of night roosting) on 7 occasions. Additionally, it recorded early LHS registrations (i.e. indicative of day roosting) on 4 occasions, late LHS registrations (i.e. indicative of night roosting) on 20 occasions and no registrations on 22 occasions (see **Appendix 5** for further detail).

The static detector deployments within the Active Stables returned a total of 27 GHS and 379 LHS registrations across the deployment period. Given the lack of droppings/feeding remains recorded within the stable and short duration of calls, this suggests that the Active Stables does not represent a GHS or LHS night roost.

The trail camera deployed in August recorded low numbers (max. 2no.) of horseshoe bats using the stable for roosting.

3.3.4.1 *Foraging and Commuting*

2022 Surveys

The 2022 surveys identified that at least 10 species were utilising the Site to some extent. Overall bat activity was substantially greater at the western edge of the Site than along the east. The western detector, which was placed on a boundary comprising scattered mature trees along a private drive, recorded a total of 1,162.72 passes per night of all species over the period between April and October. By contrast the eastern detector, which was placed on the inside (Site) face of the tree-lined path, only recorded a total of 199.63 passes per night over the same period (17% of the activity recorded on the

west). On both detectors the most frequently recorded species was common pipistrelle (around 50% of all calls at both locations).

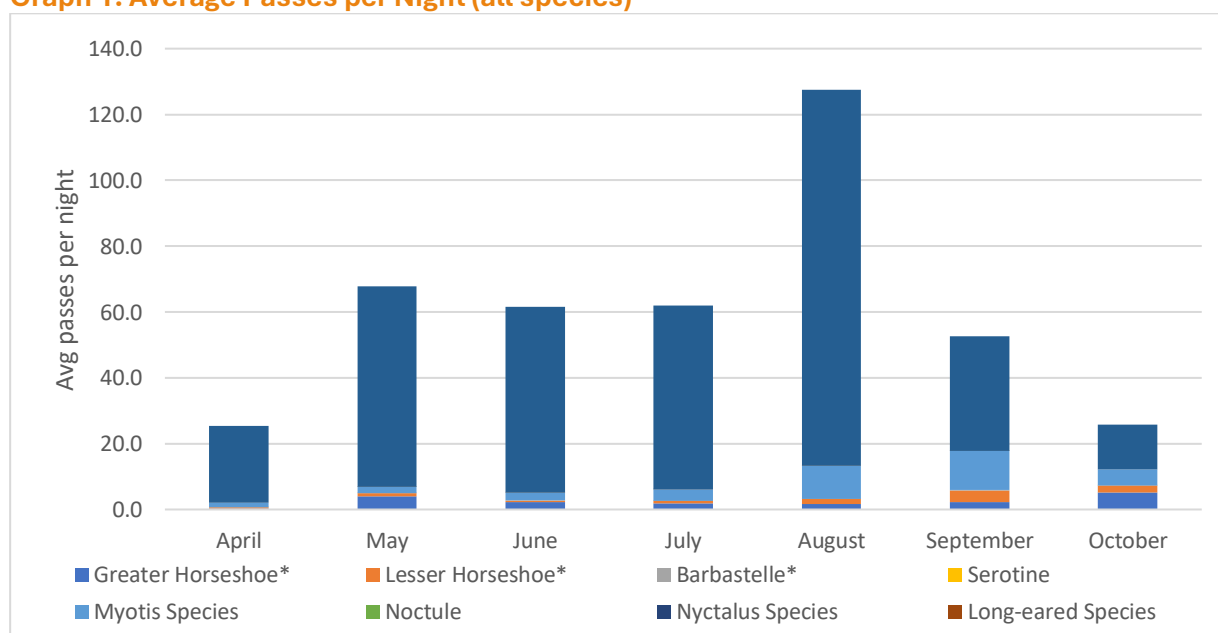
Greater horseshoe bats were recorded on the western detector in May (5.8 passes per night), June (0.6 passes per night), July (2.6 passes per night), August (2.6 passes per night), September (74.4 passes per night) and October (0.25 passes per night). On the eastern detector they were recorded in April (0.2 passes per night), May (1.2 passes per night), August (0.29 passes per night) and September (2.2 passes per night). Activity levels were therefore similarly low in both locations, with a peak in the west in September indicating that an individual bat likely foraged around the detector in that period. This indicates that the Site is used by an individual bat or small numbers of bats commuting through the Site, with greater levels of activity on the west (if the September results are excluded, the total passes per night across the recording period are 10.6 in the west and 0.8 in the east).

Lesser horseshoe bats were recorded on the western detector in May (0.6 passes per night), August (0.3 passes per night) and September (0.2 passes per night). They were recorded on the eastern detector in September only (0.2 passes per night). This indicates that the Site is used infrequently by an individual bat or small numbers of bats commuting through the Site, with more activity on the western edge of the Site compared with the east.

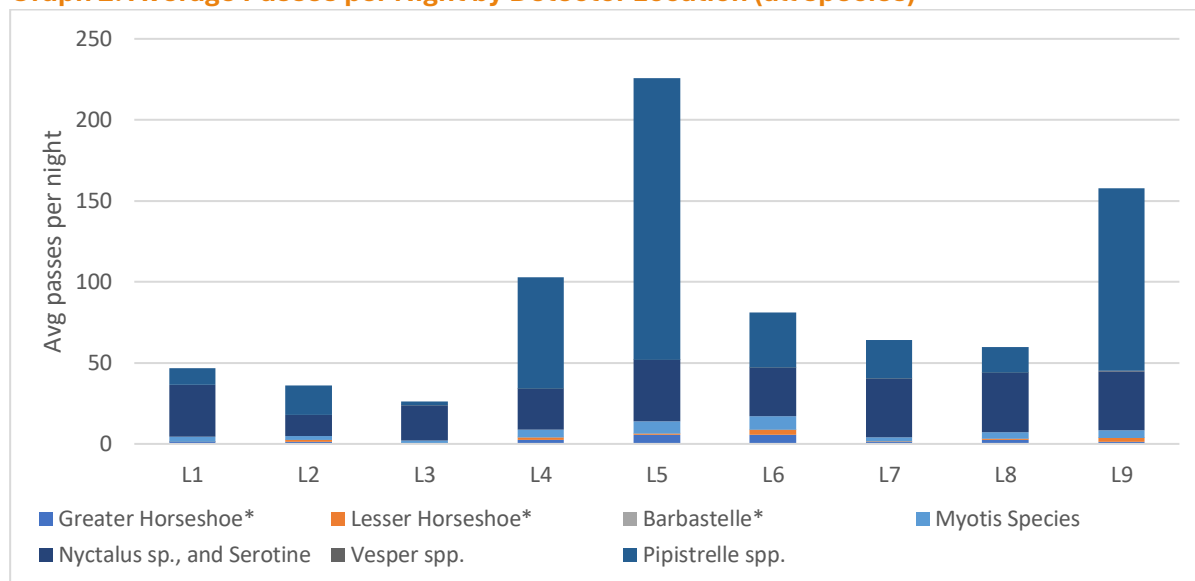
2024 Survey

Further survey work was undertaken in 2024 by NPA in line with the requirements of the TWBMS. These surveys recorded at least 10 bat species using the Site for foraging/commuting with a cumulative 39,836 passes across the 50-night period (~796 passes per night), with pipistrelle bats being the most abundant species accounting for 57.67% of all bats (22,974 registrations). Average number of passes per night was highest in August, was almost double the next highest month (May), with a more even distribution across the rest of the main active season (**Graph 1** refers). **Graph 2** below shows relative activity across detector locations. They were most abundant at Locations A3, A5 and A6 in close proximity to the confirmed roosts in Building B1 and at A9 on the eastern boundary of the Site.

Graph 1: Average Passes per Night (all species)



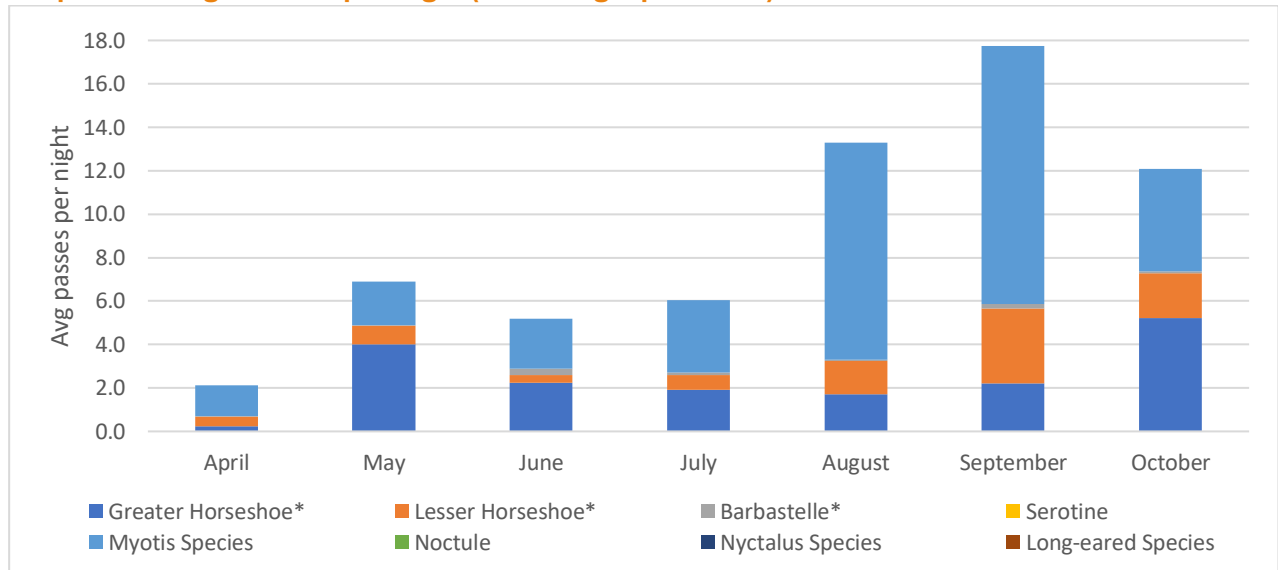
Graph 2: Average Passes per Night by Detector Location (all species)



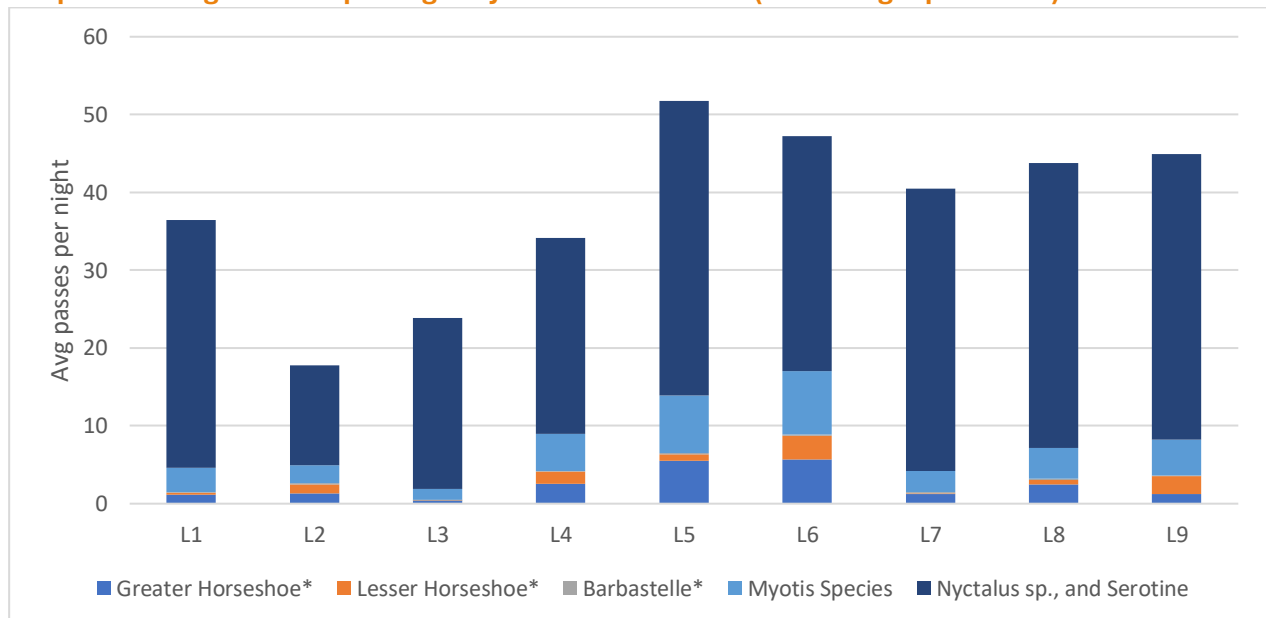
Big bats (*Nyctalus* sp. and serotine - NLS) were the next most abundant accounting for 33.39% of all calls (13,300 registrations) with the highest average NLS activity occurring in June (81.02 passes per night), with the highest average passes by location recorded within the centre of the southern field / location A7 (115.4 passes per night). The majority of these passes are associated with commuting behaviour (i.e. single passes), with records indicative of foraging activity (multiple registrations within a short period of time) recorded only occasionally. Both foraging and commuting activity by noctule and serotine were recorded during the NBW surveys. **Graph 3** below refers.

Myotis bats (including Annex II Bechstein's for which the SAC is in part designated) account for 4.82% of total calls (1,921 *Myotis* registrations). The highest *Myotis* activity was recorded in August (9.98 passes per night) and September (11.87 passes per night). The majority of these records are suggestive of commuting behaviour. The NBW surveys recorded both foraging and commuting activity by *Myotis*, with the vast majority recorded close to the eastern boundary of the Site. On average the detectors at A6 and A5 in proximity to Building B1 the recorded the highest *Myotis* activity, though similar levels of activity were noted across the southern part of the Site at detectors A7, A8 and A9. The higher activity recorded at location A5 in August (40.8 passes per night) is due to a single night (20 August 2024) of higher foraging activity (as suggested by 122 continuous records between 21:31-21:50, with no corresponding records at detectors A4 or A6). On this night *Myotis* activity was recorded much earlier on Site at detectors A6 (centre of Site), A1 (western boundary), A2 (northern boundary) and A9 (eastern boundary) (in order from earlier-later), suggesting the bats were foraging around the Site boundary features. Throughout the NBW surveys no *Myotis* were observed/recorded at Stopping Points 3 or 10 on the southern transect.

Graph 3: Average Passes per Night (excluding Pipistrelles)

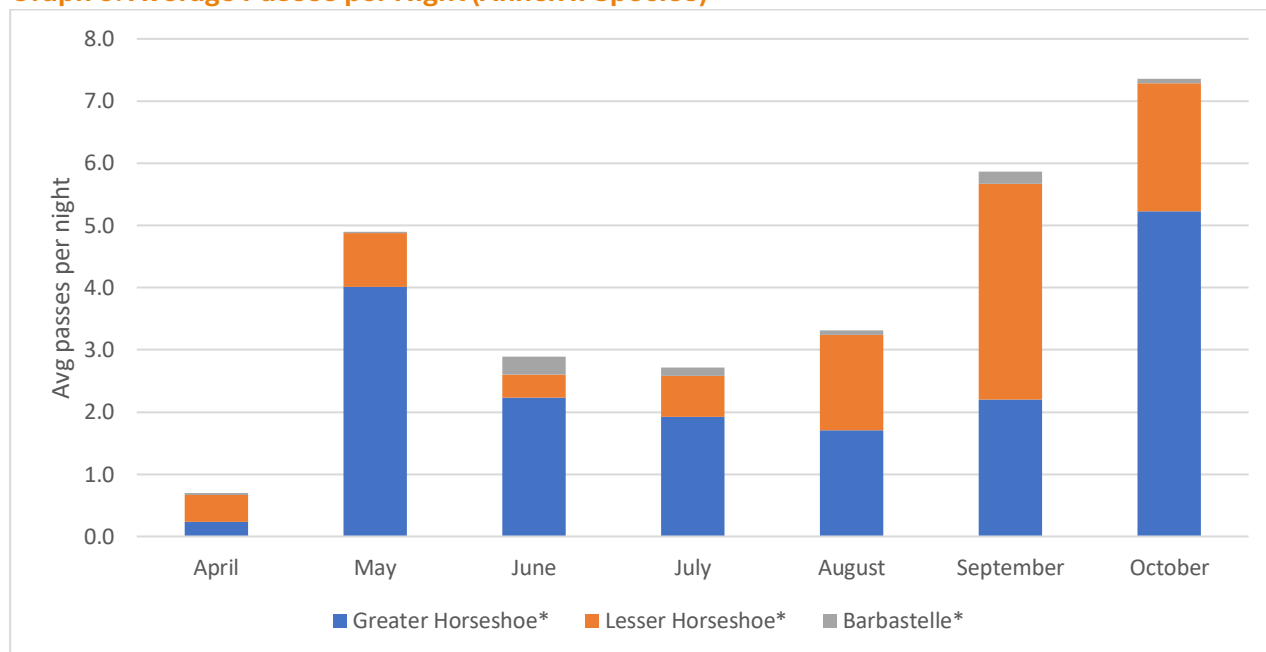


Graph 4: Average Passes per Night by Detector Location (excluding Pipistrelles)

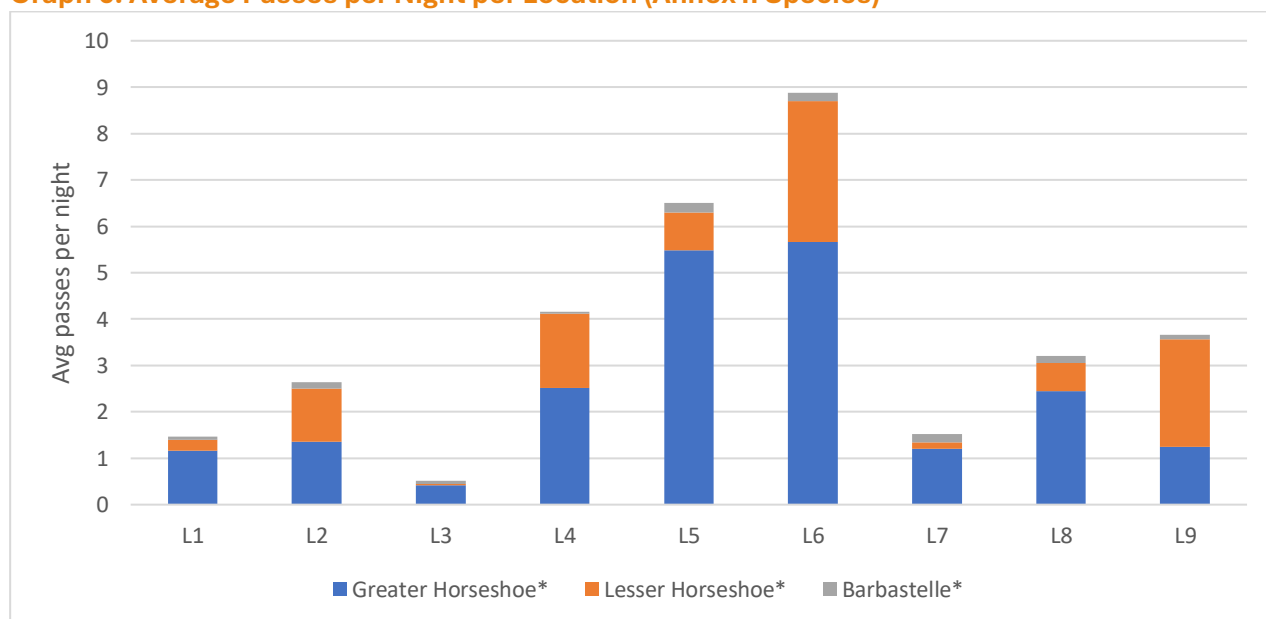


The Annex II species greater horseshoe, lesser horseshoe and barbastelle were all recorded at the Site, albeit in relatively modest proportions of total calls – 1.25% (497 registrations); 2.70% (1074 registrations); and 0.14% (56 registrations) respectively. Activity for horseshoe bats was recorded in all seven months of the active period with peaks in May and October (GHS) and September (LHS), with registrations in April being the lowest, and roughly half the registrations in June, July and August when compared to September and October (**Graph 5** refers). The largest number of calls were associated with A5 and A6 (in close proximity to the confirmed roosts in Building B1), with activity across the Site otherwise being fairly uniform. This suggests that while the Site certainly provides foraging opportunities for horseshoe bats, it appears to be of less importance during the key maternity period (June/July).

Graph 5: Average Passes per Night (Annex II Species)



Graph 6: Average Passes per Night per Location (Annex II Species)



The assemblage of bats recorded during these surveys is considered to be fairly typical given the Site's geographic location and the habitats on and adjacent to the Site. Overall bat activity was dominated by pipistrelle bats and, with all other species combined accounting for <10% of the total recorded activity with GHS and LHS representing 1.25% and 2.70% of total calls. Due to the difficulty in identifying *Myotis* bats to species level, they have been grouped together. They account for a cumulative 4.82% of total calls, a modest number considering that Annex II Bechstein's will likely account for a proportion of that total. More common *Myotis* species (Natterer's and Daubenton's) and the more uncommon species (whiskered, alcahloe, Brandt's), likely make up a larger proportion.

The activity surveys undertaken found that the Site habitats offer a resource for a variety of species including Annex II bats (including day roosting) that are associated with the SAC. However, taking into consideration the modest scale of the Site, its context in the landscape, its proximity to the SAC and the assemblage, and numbers of bats identified, there is no evidence to suggest the Site or either of its boundaries represent a significant/landscape commuting corridor for any of these species (as had been

suggested in consultation responses for planning application PL/2022/07977). As such the Site is considered to be of **Local** to **District** importance for bats.

3.3.5 *Birds*

Numerous records for birds were returned from WSBRC including those listed on the red and amber Birds of Conservation Concern (BoCC) lists, Species of Principal Importance (SPIs) and Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). This included records for greylag goose, green sandpiper, hobby and barn owl.

Greylag goose and green sandpiper are unlikely to use the Site, and the records are likely associated with the nearby Kennet and Avon Canal (to the north), the Rivers Avon or Biss, or potentially Stourton Water to the south. Hobby and barn owl could potentially forage over the Site as part of a wider network of such sites, with the Disused Stables and Active Stables to the north offering potential nest sites.

Evidence of nesting barn swallow (droppings, nest sites etc) is present within the stables where access permits. The Site is likely to support common and widespread species within boundary features, scrub and mature trees, however based on the modest size of the Site, and nature of habitats present, there is no indication that a notable breeding bird assemblage could be supported and the Site is considered to be important for nesting birds at a **Local** level.

3.3.6 *Dormouse*

No records of dormouse were returned in previous data searches, and the nearest EPS Licence for dormouse is c. 9km to the north near Lacock, Bath. While dormouse are present across Wiltshire, freely available records indicate their presence to the north east and Melksham, and south of Trowbridge at Yarnbrook and Westbury. There are no substantial blocks of woodland within proximity to the Site, the nearest being Green Lane Wood c. 1.2km south.

The Site includes some features with potential suitability for dormouse should they be present, including the small stands of mixed scrub, and boundary hedgerows. Surveys were not considered necessary to inform the previous planning application, taking into consideration the scale and nature of the habitats present i.e. being small and relatively isolated from each other and from the surrounding landscape.

Taking into consideration the limited amount of suitable habitat present, its relative isolation from the surrounding landscape, and more optimal habitat (woodland - particularly ancient woodland), the absence of records from within the locality and the previous consultation response from WC that such an approach was acceptable, dormice can be considered absent from the Site and are not considered further in this assessment.

3.3.7 *Invertebrates*

The original EcIA (Engain, 2023) highlighted that records of notable invertebrate species are present in the locality, specifically from Green Lane Wood (c. 1.2km south). Notable species recorded from that site include dragonflies, butterflies and beetles.

Due to the scale of the Site, the nature and condition of the habitats present, and their abundance in the wider landscape, it is unlikely that the Site would support a significant number of notable invertebrates, and thus further surveys were scoped out. Furthermore, the previous consultation response from WC indicated that no further surveys were deemed necessary. The Site is likely to provide opportunities to a range of common invertebrate species and as such is considered to be of no more than **Local** importance.

3.3.8 Reptiles

WSBRC returned two records of grass snake and 10 records for slow worms within 2km of the Site. As the grassland which dominates the Site and the extensive edge habitat provides suitable opportunities for common reptiles. Surveys in 2023 found no evidence of reptiles, and as such reptiles were deemed to be absent from the Site (Engain, 2023). As a result of the historic absence, and prior consultation response from WC regarding the acceptability of the approach, these surveys have not been updated.

3.3.9 Other Notable Species

The grassland, scrub and hedgerows provide suitable opportunities for foraging and sheltering hedgehog. As a Species of Principal Importance under S41 of the NERC Act 2008, LPAs must give due regard to them when making decisions. As such, the Site is considered to be of up to **Local** value for hedgehogs.

4 Further Survey Work

An update botanical assessment will be conducted in Spring/Summer 2026.

No further ecological survey work is considered necessary for this application; however, any changes to the proposed masterplan or if any significant amount of time has passed since the date of this report, a re-appraisal may be required.

5 Impact Assessment And Mitigation

5.1 Designated Sites

Due to the intervening distances between the Site and designated sites within the locality, no direct impacts are anticipated. There is however the potential for indirect impacts to the Bath and Bradford on Avon SAC through two primary pathways – loss of supporting habitat for Annex II species; and the impact of increased recreational pressures. Full details are provided in a separate shadow Habitat Regulations Assessment (sHRA) (GE Consulting, 2025 – Ref: 3131-sHRA-NH) to enable the Competent Authority, in this case Wiltshire Council, to assess the impacts of the proposals.

5.1.1 Bath and Bradford on Avon Bats SAC

The Site lies in close proximity to Green Lane and Biss Woods, two woodlands known to represent Core Roosts for Annex II Bechstein's bats for which the Bath and Bradford on Avon Bat SAC is designated. The SAC is designated for its populations of greater horseshoe and Bechstein's bats as the primary reason for designation, with lesser horseshoe listed as a qualifying species but not a primary reason for designation. This SAC is primarily an underground site which provides stable hibernation conditions and swarming conditions for significant number of the qualifying species. The SAC includes the hibernation sites associated with 15% of the UK greater horseshoe bat population and is selected on the basis of the importance of this exceptionally large overwintering population. The SAC support small numbers of Bechstein's bats hibernating in abandoned mines, though maternity sites are predominantly in the woodlands (like those highlighted above through the County).

Within Wiltshire, the key guidance document is the "Bath and Bradford on Avon Bat SAC Planning Guidance for Wiltshire" (Wiltshire, 2015). The guidance states *"In order to maintain the integrity of the SACs, it is important to protect the network of 'sensitive features' used by the designated bat populations (as set out in 3.1). These species can be highly mobile and although individual bats are known to occasionally migrate tens of kilometres between roost sites, there are a number of roosts where large numbers of these bats are known to regularly hibernate and breed. These have been identified as 'Core Roosts' for the purposes of this guidance."* Additionally, the landscapes surrounding these Core Roosts which are used regularly for foraging and commuting are also of particular importance and have been identified as 'Core Areas'. The size of these Core Areas is dependent upon the typical ranging behaviour of the species involved. The guidance document defines these as:

-  4km surrounding greater horseshoe Core Roosts;
-  2km surrounding lesser horseshoe Core Roosts;
-  1.5km surrounding Bechstein's Core Roosts; and

As discussed above, the Site lies within the 1.5km zone for Bechstein's and lies within proximity to the 4km Zone greater horseshoe bats.

In addition, Wiltshire Council published an updated Trowbridge and Westbury Bat Mitigation Strategy in July 2025. The TWBMS was prepared in support of the Wiltshire Local Plan Review 2020-2038 with an aim to provide a clear and detailed approach to considering the impact of development in the Trowbridge and Westbury area on the Bath and Bradford-on-Avon Bats SAC.

The Site lies within both the Yellow (Medium Risk) and the Grey Hatched Zone for Recreational Pressures.

5.1.1.1 *Impacts in the Absence of Mitigation*

As the Site provides suitable commuting/ foraging for all three species for which the SAC is designated, there is potential for Likely Significant Effects (LSEs) to occur to the population of the SSSI/SAC bats as the habitats may be functionally linked to SAC designated roost sites. The SAC Guidance (Wiltshire, 2015) identified a number of potential impacts from development within Core Areas including – Physical Changes; Lighting; Noise and Vibration; Recreational Disturbance; Pollution; and Mortality.

5.1.1.2 *Direct Loss of Roosting Habitats*

The scheme will not directly impact upon the Bath and Bradford on Avon Bat SAC, however Building B1 has been identified to represent infrequently used roosts for small numbers of day roosting lesser horseshoe (1no.) and greater horseshoe bats (2no.). As a result of the Site's location, it is reasonable to conclude that these bats could be associated with the Bat SAC, and that the day roosts identified form part of a wider network of such sites across the wider landscape. In the absence of mitigation, the scheme will result in the loss of roosts for Annex II species lesser and greater horseshoe, which for those reasons discussed above, have the potential to be associated with the Bat SAC. While the loss of these roosts, is not likely to exceed the threshold for a Likely Significant Effect on the SAC, it could cumulatively (i.e. with the loss of other lower status roosts) result in an adverse effect on the integrity of the SAC.

Due to the nature of the development, it has not been possible to retain the roosts in-situ, and as such the creation of a bespoke bat house within the 50m wildlife buffer will ensure that sufficient opportunities are created within the wider Site to mitigate for impacts to existing horseshoe roosts (see **Section 5.3.2** for full details). This will ensure that impacts to roosting Annex II bats likely associated with the Bath and Bradford on Avon Bat SAC are suitably mitigated.

5.1.1.3 *Direct Loss of Foraging/Commuting Habitat and Fragmentation*

In the absence of mitigation, the proposed development has the potential to affect commuting and foraging bats through the severance of commuting/foraging routes due to hedgerow removal resulting in bats using less energy-efficient routes (Russ & Montgomery 2002) or abandoning roosts/ foraging areas altogether.

To mitigate, the scheme has been designed as per the requirements of the TWBMS to include a substantial dark corridor (c. 50m in width) along the eastern boundary of the Site. This will be set aside with its primary function as Core Bat Habitat in order to retain a permeable and functioning landscape for the target species. This is significantly in excess of the minimum 15m as required in the TWBMS, with the c. 50m being agreed with Wiltshire Council historically, as part of the wider Site Allocation. This extensive buffer will avoid severance of commuting routes/fragmentation but also provide high quality habitat for foraging. Additionally, the scheme seeks to retain permeability around the Site periphery (though to a more modest extent – c. 5-10m), which can be used by foraging and commuting bats, allowing them to continue to move through and around the Site between offsite roosts and foraging grounds. The buffers will comprise a mosaic of grassland, native mixed scrub and native specimen trees, with new SUDs features providing seasonal waterbodies to both attenuate water and to enhance foraging. New attenuation features will include wet meadow mixtures which is also likely to increase invertebrate prey, along with new areas of diverse grassland, mixed native scrub, trees and woodland. These areas will be kept dark. This will form a significant area of enhanced foraging and commuting habitat for bats, which is well connected to the current core foraging and commuting habitat at the Site. As such this is considered to be a significant enhancement to the current baseline of managed low quality agricultural grassland. It is proposed that this mitigation is implemented prior to the first occupation of dwellings on Site.

Whilst there will be losses of scrub and specimen trees within the development, fragmentation will be minimised by reducing gaps for roads as much as possible, whilst maintaining dark corridors around the development periphery.

As required by the TWBMS, development within the yellow medium risk zone will be expected to firstly, fully mitigate on site for the loss of habitat by ensuring no net loss, to be demonstrated by use of an established metric (preferably the Statutory Biodiversity Metric or subsequent version) based on best practice. A summary of BNG is outlined below (Section 7 refers, with full details in the BNG Statement GE, 2026b), which indicates that the scheme can ensure no net loss of habitats on Site, and that the additionality principal can be met as per government guidance².

In addition, as outlined above, the Site lies within the Yellow (Medium) Risk Zone and new developments must where appropriate, contribute to strategic habitat mitigation, which presumably would include SANG and other habitat provision, albeit this is not particularly clear. The TWBMS costs this at £972.03 per dwelling, which based on the scheme proposals of up to 80 dwellings would result in a cumulative contribution of £77,762.40 to be secured section 106 agreement (s106), a section 111 agreement (s111) or unilateral undertaking (UU).

Cumulatively taking these measures will ensure that the scheme will not result in impacts to foraging/commuting bats associated with the Bath and Bradford on Avon Bat SAC.

5.1.1.4 *Loss/ Disruption of Commuting/ Foraging Habitat through Indirect Impacts e.g. Lighting*

Both horseshoe species and Bechstein's bat associated with the SAC are generally light-averse woodland specialists, preferring to commute/ forage within woodlands, along the edges of woodlands or along glades and rides. In the absence of mitigation, lighting within the new development has the potential to cause disruption or loss of these commuting/ foraging routes and as such impacts upon SAC bats cannot be ruled out.

As highlighted by Engain (2023), the Site's connectivity to the Bechstein's Core Roosts to the south is inhibited by existing sources of artificial lighting from the adjacent A361 (via street lighting) as well as from Trowbridge Rugby Club to the east. The existing lighting illuminates the southern part of the Site and the southern end of the tree-lined path that forms the Site's eastern boundary as shown on Plates 8, 9 and 10 below.

Plate 8: View east towards A361 in southern part of the Site



Plate 9: View east along A361 opposite the Site



² <https://www.gov.uk/guidance/what-you-can-count-towards-a-developments-biodiversity-net-gain-bng>

Plate 10: Trowbridge Rugby Club



In addition, there is some existing residential light spill both from the adjacent dwelling to the west, and via a static caravan in northeast corner of the Site.

Unmitigated, the scheme will result in new sources of artificial lighting which could result in fragmentation/severance to commuting routes for SAC bats.

Historic concerns from WC that the Site forms a choke point along the eastern edge of Trowbridge are not supported by the data collected. However, even if it were the case, that the feature was of significance, it should be acknowledged that development can proceed where adequate mitigation can be put in place to retain the functionality of the habitat. As such the scheme includes an extensive 50m buffer along the eastern boundary of the Site has been included and will be completely unlit to ensure long-term permeability of the Site and the wider landscape as shown in the submitted Lighting Strategy Plan (Highway Lighting Solutions, 2026).

During operation, no lighting is to be directed at the hedgerows and woodland, allowing continuous corridors for bats to be maintained. Whilst a certain level of lighting throughout the Site is necessary for the health and safety of future residents, the strategy includes measures to reduce the impact of this lighting on local fauna including the identification of sensitive zones (in the case of this scheme, the 50m buffer and other boundary buffers) to ensure darker areas are maintained/created to protect important commuting and foraging routes. Lighting within these areas will be kept to an absolute minimum. Best practice technology should be employed to reduce light-spill, for example LED lighting, luminaires with peak wavelengths higher than 550nm, no upward light-spill and/or a part-night lighting regime, in line with current guidelines (Bat Conservation Trust/ Institute of Lighting Professionals, 2023). Key bat habitats, namely the eastern 50m buffer, should be maintained (as per the TWBMS) at no more than 0.2lux on the horizontal plane and less than 0.4lux on the vertical plane lux (or baseline light levels).

Any necessary external lighting throughout the Site will be designed with no spill to exceed the boundaries, particularly along the eastern boundary. Where brighter lighting is necessary, i.e. around parking spaces and primary footpaths, luminaires will be directional with no upward, sideways or outward spill and fitted with shields where necessary to maintain darker areas along the woodland edges.

5.1.1.5 *Disturbance during Construction Works*

Construction will be restricted to daylight hours, finishing at least 30 minutes before sunset and commencing at least 30 minutes after sunrise throughout the year. If this is not possible, no construction lighting will be allowed to spill onto the Site boundaries, ensuring light averse species can continue to utilise the Site during the construction period.

A Construction Ecological Management Plan (CEMP) will be produced providing details and mechanisms through which this area will be protected during construction.

5.1.1.6 *Increased Recreational Pressures*

The TWBMS highlights the potential for increased recreational pressures on woodlands which support bats associated with the Bath and Bradford on Avon Bat SAC. As such a ZOI has been developed around these roosts (the Grey Hatched Zone) within which, new residential development is expected to result in increased recreational pressure (and therefore adverse effects) on key woodland bat sites. The TWBMS requires that “*New residential development proposals for 50 or more houses within this zone will be expected to provide mitigation in the form of SANG / sufficient natural recreational focused greenspace; and new residential development proposals for less than 50 dwellings within this zone will be expected to make a financial contribution towards the delivery of strategic mitigation to address recreational pressure on the woodland sites*”. Suitable Alternative Natural Greenspaces (SANGs) is the term given to greenspaces that are created or enhanced with the specific purpose of absorbing recreation pressure that would otherwise occur at designated nature conservation site, particularly European wildlife sites. SANGs are created, or existing greenspaces enhanced to create a SANG, in order to mitigate for the effects of new housing development, absorbing the level of additional recreation pressure associated with the new development. It is understood that this is in addition to the contributions being sought for ‘strategic’ bat habitat mitigation within the ‘Yellow Zone’, to mitigate for the loss of bat habitat, as opposed to recreational pressure.

The proposals are for 80 dwellings, and therefore it is expected that the site should provide mitigation in the form of SANG / sufficient natural recreational focused greenspace. The revised TBMS is clear throughout that ‘*sufficient natural recreational focused greenspace*’ is an alternative option for mitigation to a strategic-scale SANG, and this is a reasonable approach to take within the guidance given that it cannot reasonably be expected for a 50 dwelling scheme to provide the same level of mitigation as an 800 dwelling scheme. Appendix 1 of the TWBMS provides SANG design standards which requires SANGs to be in the order of 30ha in size, with a further recommendation of 8 hectares of open greenspace per 1,000 new residents / people as detailed in guidelines on SANG creation, which is based on the average of 2.4 people per household. Such SANG ideally would not be delivered on a Site-by-Site basis and needs to be delivered strategically as per the wider national approach to recreational pressures on European Sites (i.e. Thames Basin Heaths SPA, Cotswold Beechwoods SAC, Severn Estuary SPA, Dorset Heaths SPA etc).

Based on the number of dwellings proposed via this outline application (up to 80), this results in an average occupancy level of 192 residents. If one were to utilise the guidance therefore, the scheme should require c. 1.536ha of SANG or ‘*sufficient natural recreational focused greenspace*’.

The proposals incorporate a significant amount of greenspace to the east of the site, as well as additional public open space throughout. When taking only this eastern greenspace into account, this equates to circa 1ha of the Site (which would leave circa 0.46ha remaining for the scheme proposals to mitigate for), and would provide links out to the wider countryside for walking purposes. It is proposed that this greenspace should be delivered prior to first occupation of the development.

In addition to this, it is recognised that the Draft Local Plan puts forward site allocations for major residential development in Trowbridge and Westbury (for which this site forms part of the wider Trowbridge allocation for 600 homes) which have potential to increase recreational / visitor pressure on the woodlands that support Bechstein’s bats. As such, two strategic SANGs have likewise been allocated in the draft Local Plan; one in Trowbridge and one in Westbury. The strategic SANGs / Country Parks proposed in Trowbridge and Westbury have been allocated by means of Policy 54: North Trowbridge Country Park and Policy 63: Westbury Country Park respectively, albeit it should be

recognised that alternative SANG provision could come forward to mitigate for development if those sites weren't to come forward. At the time of writing, the Inspectors who are examining the new Local Plan have not confirmed whether this mitigation is appropriate or acceptable and this will be monitored.

However, the location of the strategic SANGs / Country Parks has been selected by the Council so as to maximise the potential for use by new residents of the site allocations in Trowbridge and Westbury put forward in the draft Local Plan and is currently proposed to be located between the strategic site allocations for major residential development and the closest woodlands that support Bechstein's bat roosts. This is to ensure that the SANGs / Country Parks are appropriately located to intercept residents that may otherwise visit the woodlands.

The allocated SANGs / Country Parks should be designed to provide attractive greenspace alternatives to the sensitive woodlands, as per the guidance set out above.

Accordingly, whilst it is considered that sufficient alternative natural recreational space will be provided on site, it is recognised that the land forms part of a wider allocation and should contribute towards strategic SANG provision. In accordance with the TBMS guidance therefore, it is anticipated that the applicant would provide financial contributions to Wiltshire Council via s106/s111/UU at the rate as outlined in the TWBMS of £925 per dwelling. Assuming up to 80 dwellings, this would comprise total contributions of £74,000.

In conclusion, whilst the scheme will include extensive areas of greenspace (both for wildlife and for recreational uses), it is considered disproportionate and unfeasible to deliver SANG on site, and suitable natural alternative greenspace has been provided instead which will be delivered in advance of the first occupation of homes. In addition, the proposals will contribute to wider SANG provision as per the TBMS guidance.

5.1.2 *National and Non-Statutory Designated Sites*

There are no statutory designated sites within close proximity, with the nearest being Picket and Clanger Wood SSSI, and no direct impacts are anticipated given the intervening distance between them. There are a number of non-statutory sites within proximity, including Green Lane Wood LWS c. 1.3km south and the Kennet and Avon Canal LWS c. 1.6km north. As with the above SSSI no direct impacts are anticipated given their spatial separation.

As discussed above, Green Lane Wood represents one of the Core Bechstein's Roosts for the Bath and Bradford on Avon Bast SAC, and as discussed above, there is potential for increased recreational pressures. However, no further mitigation than that described above as per the Bat SAC is required.

In summary, due to the spatial separation between these designations and the Site, no adverse impacts are anticipated. Standard airborne and water pollution prevention measures will be employed during construction. Such measures should be detailed within a Construction Environmental Management Plan (CEMP) which could be secured by an appropriately worded planning condition.

All other Sites are located over 2km from the Site and accordingly are not considered likely to be affected by the proposals.

5.2 *Habitats and Flora*

It is anticipated that the proposals will result in the loss of the majority of grassland habitats within the Site. While these habitats are of limited ecological value, their loss will be compensated for through the creation of green infrastructure features along the western, northern and southern boundaries of the Site, as well as the creation of an extensive 50m buffer along the eastern boundary. In addition, linear swathes of informal POS and SUDs/rain gardens will be created throughout the scheme. Mature trees

within the Site will be targeted for retention, or monolithed where dead or structurally unsound. Some removal of trees will be required to facilitate the scheme proposals, though these will be adequately compensated through the schemes landscape proposals.

The 50m buffer will comprise a mosaic of grassland and mixed scrub and tree planting along with retention of existing scrub and tree vegetation providing a variety of habitats with structural diversity.

Whilst it is an outline application and full details of habitat creation are not known, to ensure a biodiversity net gain, habitat creation within the buffers could include wildflower neutral grassland and patches of native scrub, ensuring further structural diversity. A grassland seed mix containing yellow rattle, a hemi-parasitic species, is recommended to reduce the dominance of competitive grass species and allow the growth of a wider variety of species including forbs/ wildflowers. For the area within the attenuation basins, a seed mix suitable for occasional inundation will be sown. The addition of raingardens and street trees will also provide enhanced foraging and nesting opportunities for a wide variety of species, including birds and bats.

The boundary features will be retained and enhanced. New hedgerow planting is proposed along the southern boundary of the Site, to help screen the new access off the A361, and to provide a soft edge to development and the adjacent POS.

There is potential for accidental damage to tree and hedgerow species during construction activities. To avoid such impacts, Root Protection Areas (RPAs) will be identified, and suitable protective fencing installed where required in line with best arboricultural practice during construction (BS5837:2012) and all existing and newly created habitats will be managed to maximise biodiversity. It is recommended that measures to restore and enhance existing habitats, to ensure successful establishment of new habitats, and to maintain the value of all ecological features in the long-term are detailed within a Habitat Management and Monitoring Plan (HMMP) which could be controlled through an appropriately worded planning condition.

5.3 Fauna

5.3.1 Badger

Badgers and their setts receive protection under the Protection of Badgers Act 1992, which protects them from deliberate harm and injury.

An active two-hole outlier sett was identified on the eastern Site boundary. This feature will be retained and buffered from proposals by at least 50m and as such no impacts are anticipated. However, mindful that badgers are highly mobile and frequently establish new setts, suitable habitats which are to be affected by development, such as hedgerows could support badger setts in the future. As a precaution, it is recommended that an update walkover for badger is undertaken no less than one month prior to works commencing to ensure the species hasn't moved in in the meantime.

In addition, good practice construction measures to ensure badgers are either unable to access the construction site or cannot become trapped in excavations (e.g. through covering up at night or inserting an 'escape ramp') should be implemented during the construction phase.

The habitats creation and enhancement measures proposed above would maintain and enhance foraging opportunities for badgers post-development.

5.3.2 Bats

All species of bat and their breeding sites or resting places (roosts) are protected under Regulation 41 of The Conservation of Habitats and Species Regulations 2017 (as amended) and Section 5 of the Wildlife and Countryside Act 1981 (as amended).

5.3.2.1 *Commuting/ Foraging*

The potential unmitigated impacts to bats during construction and operation are from disturbance from lighting leading to fragmentation of commuting corridors. Mitigation for these potential impacts is described above in **Section 5.1.1.3** and **5.1.1.4** above.

It is anticipated that habitat retention and enhancement measures can be designed in which will provide greater diversity and quality of habitats on the Site. The future management of the Site under the provisions of a HMMP will ensure successful establishment and long-term management of these features and as such will increase their value to foraging and commuting bats.

5.3.2.2 *Roosting Bats – Trees*

GLTA and further endoscopy did not identify any tree roosts within the Site, as such no impacts upon tree roosting bats is anticipated. Bat roosts in trees are by their very nature difficult to identify, being hard to locate and often transient in nature. For example, features such as flaking bark (popular as a roosting site for some of our bat species) change in a relatively short period of time. Some of these relatively delicate and short-lived roost types are lost and others appear; hence tree roosting bats move between a number of roosts.

As such, should works to trees be required, or should future amendments to the scheme design necessitate tree removal, further assessment via endoscope, and involving climbing assessments where necessary to identify presence/likely absence of roosting bats will be undertaken. In the event that evidence of roosting bats is identified, works will cease and further information collected in order to inform a mitigation licence application to Natural England.

5.3.2.3 *Roosting Bats – Buildings*

The surveys indicate that the buildings are used by three different species as summarised below.

Table 12: Summary of Loss of Roosting Habitats

Building	Species	Max No. of Bats Recorded	Roost Type and Impact	Geographical Importance (Based on CIEEM 2023)
B1	Lesser horseshoe bat	1	Day roost to be lost through demolition of building. Compensation through bespoke bat roost.	Local
B1	Greater horseshoe bat	2	Day roost to be lost through demolition of building. Compensation through bespoke bat roost.	Local to District
B1 (main roof)	Common pipistrelle	1	Day roost to be lost through demolition of building.	Site

Building	Species	Max No. of Bats Recorded	Roost Type and Impact	Geographical Importance (Based on CIEEM 2023)
			Compensation through bespoke bat roost and bat boxes.	
B1 (stable roof)	Common pipistrelle	1	Day roost to be lost through demolition of building. Compensation through bespoke bat roost and bat boxes.	Site

The surveys indicate that Building B1 is being for used for roosting by three different species of bats including Annex II greater and lesser horseshoe associated with the Bath and Bradford on Avon Bat SAC.

The lesser and greater horseshoe bat roosts are of greatest conservation significance with an individual lesser horseshoe noted on occasion with at least two greater horseshoe day roosting. These horseshoe bats, are likely using the features as part of a network of such features both within the Site itself and within the locality, subject to environmental conditions. There was some correlation between the presence of greater horseshoe bats and the absence of lesser horseshoe bat, suggesting that interspecies competition may be a factor.

Individual common pipistrelle day roosting was also recorded via the emergence surveys. The buildings which dominate the Site provide ample opportunities for these species, however, due to the small numbers present, as with the horseshoe bats, Building B1 is likely being used as one of many such roosts within the locality.

In the absence of mitigation, the demolition of this building (B1) could result in injury/ mortality to several species of bat along with the loss of roost sites. This would be an offence under UK legislation. The Site will therefore require a **European Protected Species (EPS) Mitigation Licence (Bats)** from Natural England prior to works to the buildings. A licence cannot be applied for until full planning permission is granted, and all wildlife related conditions are discharged.

As no roosts have been identified within Buildings B2, B3 works to these buildings will not require a licence.

Licensing Requirements

During the licencing process there is a requirement to demonstrate that the application meets the 'Three Tests' under the Conservation of Habitats and Species Regulations 2017 (as amended). If met, these tests provide for derogations via the licensing process which allow what would under normal circumstances be illegal acts, to take place legally. When considering planning applications local authorities also have a duty to consider whether it is likely that these tests can be met and therefore the likelihood of the licence being granted by NE.

The three tests are as follows:

1. Regulation 55(2) (e) states: a licence can be granted for the purposes of "preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment".
2. Regulation 55(9) (a) states: the appropriate authority shall not grant a licence unless they are satisfied "that there is no satisfactory alternative".

3. Regulation 55(9) (b) states: the appropriate authority shall not grant a licence unless they are satisfied “that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.”

The three tests will be met in this case as follows:

1. The licence would be applied for under ‘other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment’.
2. This project would meet this test to satisfy the need for housing in the area and no satisfactory alternative for development is available.
3. The loss of the roosting sites in their current location will not be detrimental to the population of bats in their natural range as proportionate mitigation measures will be put in place to allow bats to continue to roost on Site.

In order to ensure that the ‘Favourable Conservation Test’ can be met, a mitigation statement will need to be submitted as part of the licence application. This includes measures to ensure that bats are not harmed during works and to ensure that there is long term provision of alternative roosting opportunities on Site (exact quantum of mitigation to be informed by further surveys). Input from a licensed bat worker will be required during licensable activities at the site (such as roof removal, soft demolition, conversion etc).

The table within **Appendix 8** lists types of works that have the potential to disturb roosting bats. Prior to commencing any works on the building, this form should be completed and returned to the ecologist at the earliest opportunity. This is to ensure that both the developer and ecologist have a detailed understanding of the works that may impact roosting bats prior to the licence application process and commencement of works.

Outline Mitigation and Compensation

Mitigation measures will be required to ensure that bats are not harmed during demolition works and that there is long term provision of roosting opportunities for all species of bat on Site. Detailed specifications will be included within the subsequent licence application; however, a summary is provided below.

Due to the nature of the development, it has not been possible to retain the roosts in-situ, as such the creation of a bespoke bat house to the east of the Site, associated with the 50m buffer coupled with erection of bat boxes on retained trees will ensure that sufficient opportunities are created within the wider Site to mitigate for impacts to existing roosts.

This purpose-built bat house will provide a range of opportunities for both crevice and void dwelling species including those found to be roosting within the buildings at the Site.

Common pipistrelles are very adaptable, typically roosting in cracks and crevices in buildings, behind hanging tiles, soffit and barge or eaves boarding as well as between roofing felt and roof tiles or in cavity walls.

Lesser horseshoe and greater horseshoe bats both require open, uncluttered roof spaces with access that provides uninterrupted flight to the roof apex and allows them to hang freely within their roosts. Their roosting requirements are similar, though due to their larger size greater horseshoes require a larger access point. While the two species can often be found utilising the same roosts, mitigation

should be designed carefully to provide separate areas for each species due to the known interspecies competition.

The mitigatory roost should be constructed in accordance with the following guidelines:

- 🦇 The bat house should include a roof with an apex, unobstructed by constructional timbers, with a height to apex of c. 2.8m.
- 🦇 Ideally one of the roof pitches should be south facing to maximise solar gain.
- 🦇 The recommended size of the roost is c. 5m x5m (or of similar internal volume).
- 🦇 The primary entrance to the roost for free flying species (greater horseshoe bats in particular) would be via a horizontal slot of 400mm width and 300mm height.
- 🦇 The roost should have internal baffles and a hot-box comprising triangular panels with additional timber flooring and a secondary access hole provided via a horizontal slot 300mm in width by 200mm in height (to provide a feature not accessible by greater horseshoe to prevent interspecies competition).
- 🦇 The roof of the replacement void within the bat house should be constructed of the same/similar tiles to those used on other buildings within the Site and should be lined with traditional Type 1 bituminous felt.
- 🦇 Modern breathable roofing membranes/ manmade will not be used due to potential for bat mortality.
- 🦇 4no. bat access tiles/ridge tiles will be installed on the roof to provide opportunities for crevice dwellers such as pipistrelles.
- 🦇 The bat house should include internal crevice dwelling features via 2 no. Kent style bat boxes affixed to the interior walls.
- 🦇 As horseshoe species are light-sensitive, light spill onto the roost needs to be considered within the scheme. As horseshoe bats typically undertake 'light sampling' prior to emergence, a covered area will be created around the entrance where bats can undertake this activity.
- 🦇 One of the key limiting factors for bats is the availability of roosting sites, with bats typically utilising a network of sites across their territory. As such a very effective ecological enhancement is the installation of tree mounted bat-boxes, to be located on retained trees within the 50m buffer. It is recommended that a number of bat boxes are erected on mature trees - 5no. Schwegler 1FD and 5no. Schwegler 2F to be erected in pairs
- 🦇 All boxes should be erected on mature trees at varying heights and aspects between 3-6 metres and ideally sited in more open and sunny positions.
- 🦇 In addition, Manrose Ridge Roosts should be installed on all gable ends of every other dwelling.
- 🦇 A sensitive lighting strategy will be developed in accordance with the ILP Guidance Note 08/23 on Bats and Artificial Lighting as described above.

An indicative bat house design, and other mitigatory features are included in **Appendix 7**.

Important Information

Once the licence has been granted, the following will be required:

- 🦇 A tool-box talk and a precautionary check for bats by a licenced ecologist will be required immediately prior to all works.
- 🦇 Works to key features will need to be supervised by a licensed ecologist and exclusions of lesser horseshoe bats will be required.
- 🦇 Enabling works will be conducted under the supervision of the Named Ecologist or an Accredited Agent to the Named Ecologist on the licence.
- 🦇 While no evidence of hibernating bats was found within the buildings, as a precaution, a pre-commencement check by the Named Ecologist or an Accredited Agent to the Named Ecologist on the licence will be undertaken immediately prior to any structural works the fabric of the buildings.

5.3.3 Birds

All wild birds, their nests and eggs are protected by the Wildlife and Countryside Act 1981 (as amended), with certain species afforded additional protection measures.

Any removal of or disturbance to any vegetation on Site that is considered to offer potential nesting habitat for breeding birds (i.e. the hedgerows), should be undertaken between September and February inclusive or following inspection for active nests by a suitably qualified ecologist. If nesting birds are found to be present then a buffer will be implemented around the nest, in which no works can take place until all birds have fledged.

To compensate for the loss of nesting opportunities resulting from hedgerow losses, integrated bird bricks will be included (see **Section 8** below). Detailed locations and specifications would be provided in the HMMP however integrated swift bricks provide suitable opportunities for a range of species and would be appropriate in this location.

5.3.4 Invertebrates

Invertebrates will be impacted at no more than local level through the removal of grassland and scrub, with those habitats identified as being of greatest ecological importance i.e. the mature and veteran trees and boundary hedgerows being retained and enhanced through incorporation into the schemes POS and green infrastructure.

Enhancement will be facilitated through new scrub and tree planting and via the inclusion of wildlife friendly species, such as natives or those selected from RHS Plants for Pollinators List as part of the soft landscaping scheme.

5.3.5 Reptiles

No reptiles were found during the historic surveys. Despite this, suitable habitat is present on Site in the form of scrub vegetation at the base of hedgerows and Site grassland (subject to annual management).

In order to protect reptiles which could be present onsite during construction and enabling works, the following Method Statement will be followed when removing any habitat considered suitable for reptiles (as described above):

Habitat manipulation will be undertaken to encourage reptiles to disperse to areas of retained habitat around site margins and beyond the eastern boundary. These works will only be undertaken during the reptile active season of April to October inclusive, in suitable weather conditions when temperatures exceed 10°C.

Habitat suitability will be reduced by strimming vegetation using a staged cutting process;

-  Initially, any grassland, scrub and hedgerow vegetation to be removed will be cut to approximately 150mm, with the arisings removed and habitats left for a minimum of 48 hours in suitable weather conditions i.e. no rain or high winds;
-  A further cut will then be made to 50mm, beginning at one end of the Site and moving in one direction, to encourage any remaining reptiles towards the retained areas of suitable habitat.
-  Once complete, the vegetation will be maintained at a low-level (<50mm) until the start of development works.

5.3.6 Other Notable Species

During the construction and enabling works, there is potential to harm hedgehogs. The measures outlined above for reptiles and badgers will also ensure that hedgehogs will be safeguarded. Any individuals encountered during enabling works will be moved to a place of safety, namely the 50m buffer associated with the eastern boundary. The retention of the majority of hedgerow areas will ensure foraging opportunities on Site are maintained whilst new habitat creation as part of the soft landscaping proposals will provide new enhanced opportunities for the species.

6 Summary of Assessment and Mitigation

The above measures detail the avoidance, mitigation and compensation measures required to minimise significant impacts to ecological features. This demonstrates that the mitigation hierarchy has been adhered to by focusing on the **avoidance** of ecological features of greatest importance, mitigating unavoidable impacts and, as a last resort, providing **compensation**.

7 Biodiversity Net Gain

7.1 National Mandatory Biodiversity Net Gain Information

Table 13 provides the BNG information required to support the planning application under Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

Table 13: National Mandatory Baseline BNG Information

Information required	Description	
Would the planning permission, if granted, be subject to the biodiversity gain condition?	Yes – meets criteria of a major development.	
Pre-development biodiversity value of the on-Site habitat on the date of application	Habitats	16.47
	Hedgerows	2.76
	Watercourses	N/A
Publication date of the biodiversity metric calculation tool used	July 2024	
Is an earlier date proposed?	No – the relevant date is the date of the planning application submission.	
Is there any evidence of habitat degradation?	No – there is no evidence of any unauthorised habitat degradation since the statutory cut-off date of 30 January 2020.	
Is there any irreplaceable habitat on Site?	No – there is no irreplaceable habitat within the Site boundary.	
Plan of on-Site habitat on the date of the application (or earlier date)	Refer to Figure 1 .	

An indicative BNG assessment suggests that the Site is likely to be capable of delivering 16.68 habitat units, and 3.51 hedgerow units providing a 1.28% and 26.89% net gain respectively. As such with the current proposals offsetting is likely to be required. **As discussed above an update botanical survey will be undertaken in Spring/Summer 2026 to confirm this baseline.**

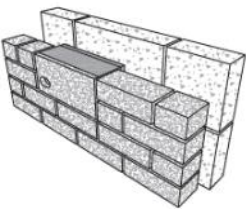
Further details are provided in the BNG Statement and Assessment Report (GE Consulting, 2025a), which provides the BNG information required to support the planning application under Article 7 of The

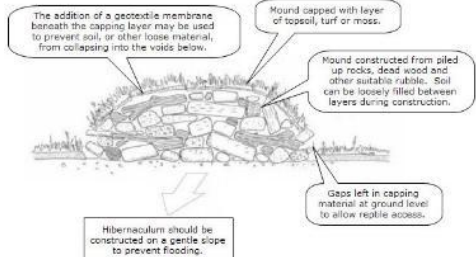
Town and Country Planning (Development Management Procedure) (England) Order 2015 as well as local information required by Wiltshire Council, and in the submitted statutory biodiversity metric (GE Consulting, 2025b).

8 Protected/Notable Species Features

The following enhancements/ mitigation features detailed in **Table 14** are recommended in line with national guidance and local planning policy.

Table 14: Enhancement and Mitigation Features

Quantity & Type	Illustrations	Description & Installation
20 no. integrated bird nest box	 WoodStone Build-in Swift Nest Box Deep (nhbs.com)  Installation – integral nestbox installed in outer leaf of brickwork in a traditional cavity wall construction	- N.B. Swifts and house sparrows are colony nesters so multiple can be put on same building as long as >50cm apart. - Fully integrated boxes to be built into the fabric of the building. - Suitable models include the PRO UK Rendered Build-in Swift Box or the WoodStone Build-in Swift Nest Box Deep which can be chosen to suit the finishing of the building. Suppliers include www.nhbs.com and www.wildcare.co.uk. - Swift boxes are recommended as they are considered a universal box suitable not only for swifts but also for house sparrows and other small birds (CIEEM, 2021). - Install at the highest point of the building, ideally at least 5m above ground level. - To be sited under the shelter of eaves or overhanging roofs where possible. - Entrance out of direct sun and the prevailing weather and away from perches/ledges where birds are at risk from predators. See swift-conservation.org for additional advice.
40no. Manrose Bat Ridge Roosts		To be installed on southern gable ends of buildings.

Quantity & Type	Illustrations	Description & Installation
15no. tree mounted bat boxes	 Schwegler 2F bat box  Schwegler 1FF bat box	5no. to mitigate for the loss of common pipistrelle roosts, 10no. to provide enhancements for roosting bats. - To be externally mounted in pairs on trees at a height of at least 3m above ground level. - Fix securely to an open section of tree trunk. - Boxes are to be made of a durable material such as woodstone or woodcrete. - Suitable models include the Schwegler 2F bat box, and 1FF bat box or similar approved. Suppliers include www.nhbs.com and www.wildcare.co.uk. - Locate where there is a clear, unlit flight path for bats to linear vegetation (e.g. hedgerows) and away from windows. - Install away from any lighting.
2 no. hibernaculum/ habitat piles	 Example hibernacula design	- Provide hibernacula/ resting places for fauna such as reptiles, mammals and invertebrates. - Constructed from dead wood and rubble, topped with loose soil and turf. Dimensions to be a minimum of 2m length x 1m width x 1m height. - Located in suitable locations such as within the western POS in a relatively undisturbed marginal area of the Site.
Hedgehog holes		- Include 13cm x 13cm cut out through close-boarded fences (or equivalent gaps under fences) to allow hedgehog movement throughout site. - These can be holes created during fence construction, or purpose made products such as the Durapost Hedgehog Hole and Hedgehog Gravel Boards (or similar) available from suppliers including www.jacksons-fencing.co.uk or www.wickes.co.uk. - To reduce the risk of these being blocked by future residents, a small 'Hedgehog Highway Sign' should be attached. Available from www.nhbs.com.

Quantity & Type	Illustrations	Description & Installation
		 Further information is available at: https://www.hedgehogstreet.org/help-hedgehogs/link-your-garden/

9 Monitoring

Monitoring should be undertaken to ensure that the mitigation described in this report has been undertaken to a satisfactory standard. This applies to both the construction and operation phases of the development. Details and frequency will be provided within the HMMP, which will be a 'live' document and subject to regular updates and iterations, or the method statement for any mitigation licences required to ensure successful establishment and delivery of mitigation and enhancement measures. Additionally, the required EPS Licence will require some level of post-development monitoring (to be agreed as part of the licence application) to ensure Favourable Conservation Status of the population.

10 Conclusions

In summary, the development of the Site has the potential to impact on a variety of protected species including foraging, commuting and roosting bats (including those associated with the Bath and Bradford on Avon Bat SAC), nesting birds, badger and common species of reptile. The main impacts identified will be through a result of direct habitat losses and indirect impacts caused by disturbance factors both during construction and operation.

Suitable avoidance and mitigation measures have been incorporated into the design to ensure that the proposal and work programme is designed to minimise adverse impacts on protected species and ensure legislative compliance.

Enhancement recommendations have also been outlined and detailed planting plans will be developed at the Reserved Matters stage with the aim of providing a 10% biodiversity net gain on-Site, contributing to the aims of National Planning Policy Framework and local policy, and meeting legislative requirements

11 References

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Key:

- Site Boundary
- Rural Tree (Broadleaved)
- 1160 - Introduced shrub
- 17 - Ruderal/ephemeral
- g3c - Other neutral grassland
- g4 - Modified grassland
- h3h - Mixed scrub
- u1b - Developed land, sealed surface
- u1b5 - Buildings
- u1c - Artificial unvegetated unsealed surface
- Vegetated Garden
- w1h - Other woodland mixed
- Native Hedgerow
- Native Hedgerow with trees
- Ornamental Hedgerow
- Wall
- Fence

Plan is to Scale
Scale at A3: **1:1,500**



Imagery ©2024 CNES / Airbus, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies. Map data ©2024 Google

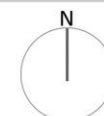
Figure 1:
UK Habitat Map

Project:
Devizes Road, Hilperton

Client:
Redcliffe Homes

Date:
29/1/2026
Ref:
3131-ECIA-F1

Drawn:
NH
Revision:
-





Key:

- ◆ Automated Detector Locations
- Tree GLTAs
- Transect North
- Transect South
- Listening Points - Transect South
- Listening Points - Transect North

Imagery ©2025 Airbus, Maxar Technologies, Map Data ©2025

Source: Nicholas Pearson Associates

Figure 2:
Night-time Bat Walkover Survey Plan

Project:
Land off Devizes Road, Hilperton

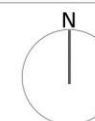
Client:
Redcliffe Homes

Date:
27/1/2026

Ref:
3131-EclA-F2

Drawn:
EB

Revision:
-





Key:

- Site Boundary
- ★ Static Locations
- All bats
- All bats excluding pipistrelle species
- Annex II

Circles are indicative of the average number of bat passes per night for monthly surveys conducted between April and October



Imagery ©2026 CNES / Airbus, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies. Map data ©2026 Google

Figure 3:
Automated Bat Detector Survey Results

Project:
Land off Devizes Road, Hilperton

Client:
Redcliffe Homes

Date:
27/1/2026

Ref:
3131-EclA-F3

Drawn:
EB

Revision:
-





Key:

- New Urban Tree (Broadleaved)
- Retained Urban Tree (Broadleaved)
- g3c - Other neutral grassland
- g4 - Modified grassland
- h3h - Mixed scrub
- u1b - Developed land, sealed surface
- u1b5 - Buildings
- Vegetated Garden

Plan is to Scale
Scale at A3: **1:1,500**



Imagery ©2024 CNES / Airbus, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies. Map data ©2024 Google

Figure 4:
Post Development Biodiversity Net Gain Plan

Project:
Hilpertown, Trowbridge

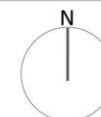
Client:
Redcliffe Homes

Date:
4/2/2026

Ref:
F4

Drawn:
NH

Revision:
-



Appendix 1 – General Glossary of Terms

Annex I	Threatened bird listed on Annex I of the EC Birds Directive/ Habitats listed on Annex I of the EC Habitats Directive
Annex II	Species of community interest whose conservation requires the designation of SACs
BAP	Biodiversity Action Plan
BNG	Biodiversity Net Gain
BoCC	Bird of Conservation Concern
CEMP	Construction Environmental Management Plan
EPS	European Protected Species
EPSL	European Protected Species Licence
HPI	Habitat of Principal Importance required under Section 41 of the NERC Act 2006
HSI	Habitat Suitability Index
JNCC	Joint Nature Conservation Committee
LBAP	Local Biodiversity Action Plan
LEMP	Landscape and Ecology Management Plan
NERC Act	Natural Environment and Rural Communities Act 2006
NPPF	National Planning Policy Framework
NVC	National Vegetation Classification Survey
SAC	Special Area of Conservation
SPA	Special Protection Area
SPI	Species of Principal Importance required under Section 41 of the NERC Act 2006
SSSI	Site of Special Scientific Interest
TWBMS	Trowbridge and Westbury Bat Mitigation Strategy
WCA	Wildlife and Countryside Act 1981(as amended)
ZOI	Zone of Influence

Appendix 2 – Planning Policy and Legislation

Habitat and Species Legislation

Species and habitats receive legal protection in the UK under various legislation, including:

- 👉 The Wildlife and Countryside Act (WCA) 1981 (as amended);
- 👉 The Conservation of Habitat and Species Regulations 2017 (as amended);
- 👉 The Countryside Rights of Way (CROW) Act 2000;
- 👉 The Hedgerows Regulations 1997;
- 👉 The Protection of Badgers Act 1992; and
- 👉 The Natural Environment and Rural Communities (NERC) Act 2006.

Where relevant, this report takes into account the legislative protection afforded to specific habitats and species.

Environment Act 2021

The Environment Act 2021 operates as the UK's legal framework for environmental protection and provides legislation on environmental governance, principles, targets and improvement plans, waste and resource efficiency, nature protection, and water and air quality.

Part 6 of the Environment Act 2021 requires a minimum 10% biodiversity net gain for all new developments (with specified exemptions), and amends Schedule 7a (Biodiversity Gain in England) of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021) to mandate this in England. This will apply to most major developments from 12th February 2024 and to small sites from 2 April 2024.

The biodiversity net gain regulations most directly relevant to planning are:

- 👉 The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations (2024)
- 👉 The Biodiversity Gain Requirements (Exemptions) Regulations (2024)
- 👉 The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations (2024)
- 👉 The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2024).

In addition, there are regulations for the Biodiversity Gain Site register established under section 100 of the Environment Act 2021 for registered off-site biodiversity gains.

National Planning Policy Framework 2024

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how local planning authorities should incorporate them into their own policies and plans. Section 15 of the NPPF contains several policies targeted at enhancing the natural environment and requires local authorities to consider how impacts on biodiversity can be minimised and provide net gains in biodiversity. Paragraph 187 (a-f) states that:

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

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

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

- 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.”*

In addition, paragraph 192 (b) ensures that to protect and enhance biodiversity and geodiversity, plans should:

“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.”

Additional Planning Practice Guidance (PPGs) supports the NPPF and includes guidance on:

-  Agricultural land, soil and brownfield land of environmental value;
-  Green infrastructure;
-  Biodiversity, geodiversity and ecosystems; and
-  Landscape.

Wiltshire Local Planning Policy

Wiltshire Council adopted the Wiltshire Core Strategy Development Plan Document in January 2015 which provides an overarching policy framework for Wiltshire up to 2026. Core Policies (CP) which were considered as part of this report include:

-  CP50: Biodiversity and Geodiversity
-  CP52: Green Infrastructure

UK Post-2010 Biodiversity Framework

The UK Biodiversity Action Plan (UK BAP) was succeeded in 2012 by the ‘UK Post-2010 Biodiversity Framework’ which demonstrates a whole-environment strategy on how the UK contributes to achieving the Convention on Biological Diversity’s (CBD) 20 Aichi Biodiversity Targets. In England, ‘Biodiversity 2020: A strategy for England’s wildlife and ecosystem services’ (Defra, 2011) sets out the strategic direction for biodiversity policy in the future. The former UK BAP was used to draw up lists of species and habitats of ‘principal importance’ which continue to be regarded as priorities under the Post-2010 Biodiversity Framework and are identified under Section 41 of the NERC Act 2006; these species have been considered throughout this report.

Wiltshire Biodiversity Action Plan

The latest available Wiltshire Biodiversity Action Plan (BAP) was produced by the Wiltshire Biodiversity Partnership in 2008. The plan includes a Generic Action Plan, ten Habitat Action Plans and a Bat Species Action Plan, which covers all bat species in Wiltshire. The Wiltshire and Swindon Biodiversity Action Plan Steering Group have since published Landscape Biodiversity Areas which provides an additional framework for landscape-scale conservation with which to coordinate conservation efforts in Wiltshire and Swindon.

Bat Special Areas of Conservation (SAC) – Planning Guidance for Wiltshire

This guidance has been prepared jointly by Natural England (NE), Wiltshire Council and local experts and researchers. It is aimed at applicants, agents, consultants and planners involved in producing and assessing development proposals in the landscapes surrounding Wiltshire's most sensitive bat roosting sites which are protected by European wildlife legislation. Within these areas there will be a requirement for adequate survey information, mitigation and compensation for bats in order to demonstrate that development proposals will not impact on the designated bat populations. The guidance applies to all types of development that are subject to planning control.

The guidance explains how development activities can affect Wiltshire's bat SACs and what must be done to avoid or mitigate any impacts. It aims to flag up the types and locations of development that present risks to the SACs so that the needs of bats can be taken into consideration as early as possible in order to avoid unnecessary delays to development projects.

Trowbridge and Westbury Bat Mitigation Strategy (2025) TWBMS

The Trowbridge and Westbury Bat Mitigation Strategy (TWBMS) is aimed at developers, consultants and planners involved in assessing development proposals in the landscapes in and surrounding Trowbridge and Westbury.

The overall aim is to provide a clear and detailed approach to considering the impact of development in the Trowbridge and Westbury area on the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC). This will help inform strategic planning for the area's future housing needs.

The TWBMS sets out survey and mitigation requirements to ensure forthcoming development in the Trowbridge and Westbury areas will deliver robust mitigation and that planned development will not result in adverse effects on the integrity of the Bath and Bradford-on-Avon Bats SAC and functionally linked woodlands to the east and south-east of Trowbridge either alone or in combination with other plans and projects. Any planning applications for speculative development that fall within the bat sensitivity zones set out in this document would also need to adhere to the requirements detailed herein and would be assessed accordingly.

Appendix 3- Field Survey Methodology

Badger Survey

Badger surveys were undertaken by Engain to inform the previous planning application. The survey was most recently updated on 30 September 2025 by Nick Hargreaves BSc (Hons) MSc MCIEEM. The survey involved a thorough search of the Site for evidence of badger activity based on the methodology outlined by Harris, Creswell and Jefferies (1991). A search was made for:

- 🦡 Setts, including earth mounds/ spoil, evidence of bedding and runways between setts;
- 🦡 Latrines, often located close to setts, at territory boundaries or adjacent to favoured feeding areas;
- 🦡 Prints and paths;
- 🦡 Hairs within sett entrance or caught on nearby fencing; and,
- 🦡 Other evidence including snuffle holes, feeding and playing areas and scratching posts.

All burrows on Site were inspected to identify badger setts, with a torch where necessary to confirm dimensions of at least 25cm wide by 17cm high in both the entrance and visible tunnel sections (these are the minimum dimensions of badger setts under normal circumstances; Natural England 2009; Neal & Cheeseman 1996; Roper, 2010). This included inspection of all burrows in and around rabbit warrens, as badgers often start new setts by extending from an entrance of a pre-existing rabbit warren and the two species often coinhabit even in main setts.

Where setts were observed, their status and the level of activity were noted. Sett status can be broadly classified as:

Main sett – Sett with at least five entrances and a high level of activity. Main setts always have active badger runs leading away from them and are normally marked by latrines. Social groups usually only have one main sett, which is the most important sett in the territory. It is used throughout the year and is the breeding sett used by the dominant boar and sow.

Annexe sett – Setts are categorised as annexe setts where they are assumed to form part of the main sett area but where the sett is unlikely to be directly linked by an underground passage to the main sett either due to a barrier (e.g. separated by a watercourse or ditch) or by distance. Annexe setts are normally linked to the main sett by a well-used path and lie within 150m of a main sett entrance.

Subsidiary sett – Setts that offer an alternative sett complex to the main sett are categorised as subsidiary setts. Subsidiary setts are normally, at least, 50m from the main sett and are not always obviously linked by a well-used path to the main sett (unlike annexe setts). Subsidiary setts often exhibit moderate levels of activity, are larger than outlier setts but smaller than main setts. They can be used intermittently, and are normally unoccupied throughout winter, when all members of a social group will usually sleep together at the main sett to save body heat. Subsidiary setts are often marked by latrines.

Outlier sett – These setts only have one or two entrances, and tend to have much simpler internal architecture than the other sett categories – often having only one or two blind-ended tunnels with associated sleeping chamber/s. They are normally unoccupied throughout winter when all members of a social group will usually sleep together at the main sett to save body heat, and will often go unoccupied for more than a month between spring and autumn. Often found at the boundaries of a badger social group's territory.

Activity levels were noted as either used, partially used or disused based on field signs around entrances, including freshly-excavated spoil outside any entrances, entrances with little accumulation of leaf litter, other debris or weeds, prints, bedding (on sunny days), fresh droppings in any nearby latrines. Badgers often only use one small area of the sett for a period, and therefore the entrance/s with the highest activity levels determine the overall sett activity rating.

Preliminary Roost Assessment

A detailed Preliminary Roost Assessment (PRA) for bats was undertaken by NPA on 28th March and 19th April 2024 by a Licenced Bat Worker. This was most recently updated on 30 September 2025 by Nick Hargreaves BSc (Hons) MSc MCIEEM, Natural England Level 2 licence holder (2024-11871-CL18-BAT) in accordance with current best practice methodology (Collins, 2023). All buildings within the Site boundary were assessed.

This involved an external and internal inspection using close focusing binoculars, high-powered torches, extendable ladder and endoscope where appropriate. A search was made for features which could provide suitable roosting spaces for bats.

The building was/ The buildings were then prescribed a category based on their potential to support roosting bats as detailed in **Table 3.1**. If evidence of a bat roost was identified during the PRA, this was noted as a 'confirmed roost'.

Table 3.1: Bat Roost Potential (adapted from Collins, 2023)

Potential Suitability	Description of bat roosting potential
None	No habitat features likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels.
Negligible	No obvious habitat features likely to be used by roosting bats; however a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable habitat to be used on a regular basis or by a larger number of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status e.g. a maternity or hibernation roost.
High	A structure 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 due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.

Where bat species could not be identified during the survey, droppings were collected following the BCT bat dropping collection protocol (Collins, 2023). A combined sample of droppings were sent to Swift Ecology for DNA analysis to confirm species identification (**Appendix 4** refers).

Tree Assessment for Bats

Ground Level Tree Assessment (GLTA)

The trees on Site were subject to a Ground Level Tree Assessment (GLTA) by NPA on 18th April 2024.

Trees were inspected from ground-level for Potential Roost Features (PRFs) such as rot holes, hazard beams, cracks or splits, woodpecker holes, knot holes, man-made holes, cankers, gaps between overlapping stems/branches, loose bark, dense ivy, epicormic growth and bat, bird or dormouse boxes. Signs indicating possible use by bats were also recorded such as bat droppings, odour, scratches, staining and audible sounds. Information collected about PRFs included a description, the height of the feature above ground level and the orientation of the feature in relation to the trunk.

Trees were then prescribed a category based on their potential to support roosting bats as detailed in **Table 3.2**. Locations are shown in **Figure 2**.

Table 3.3: Assessment of Tree Bat Roost Potential from Ground Level (adapted Collins, 2023)

Suitability	Description of bat roosting potential
None	Either no PRFs in the tree or highly unlikely to be any
PRF-I	PRF is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats. Estimate only during GLTA.
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony. Estimate only during GLTA.

PRF Aerial Inspections

Where a tree was categorised with potential PRF-Is and PRF-Ms and was considered likely to be impacted by the proposals, a more detailed inspection involving the use of a Mobile Elevating Work Platform (MEWP) was undertaken. Based on the findings of the detailed inspection, each feature was re-categorised based on the criteria listed in **Table 3** above.

PRF-Is were subject to a single aerial inspection. Where features were deemed unsuitable to support bats (e.g. aerial inspection revealed the PRF did not support conditions conducive to roosting), or the feature was confirmed as a PRF-I, no further surveys were undertaken.

Any features with the potential to support multiple bats were subject to a detailed endoscope inspection by a licensed bat worker from NPA on the 11 June 2024. Those that were then confirmed to have PRF-M status were endoscoped on 2 further occasions, on the 18 July and 25 September 2024. Some PRF-I trees were also endoscoped on those occasions where they could easily be inspected from the ground.

Bat Emergence Surveys

Four dusk emergence surveys were conducted in accordance with best practice guidelines (Collins, 2023) on the dates detailed in **Table 3.3**.

Surveyors and Night Vision Aids (NVAs) were positioned around the building with a good view of any potential bat access points and roost features. At manned positions, surveyors were equipped with a bat detector, and where possible, with night vision aids (NVAs) to assist in visual identification. There were also unmanned positions, where appropriate NVAs were left with a bat detector to record a certain feature or elevation. An additional surveyor was responsible for ensuring all NVAs at unmanned positions were positioned appropriately and recorded throughout the survey.

The dusk surveys commenced 15 minutes before sunset and continued for approximately one and a half hours after sunset. All surveys were completed during optimal weather conditions of at least 10°C temperature at the start of the survey, dry and with very little or no wind.

Table 3.3: Emergence Survey

Building	Survey	Date	Sunset (Start/Finish)	No. of Surveyors	No. of NVAs	Weather Conditions			
						Temp (°C)	Wind (Bf)	Rain	Cloud Cover (%)
B1	1/3	19/06/24	21:28 (21:13 – 23:13)	4	3	14.4-11.5	0	N/A	5-60%
	2/3	18/07/24	21:15 (21:00 – 22:45)	4	3	20.6-14.5	0	N/A	0%
	3/3	24/09/24	19:01 (18:46 – 20:31)	4	3	13.5-12.2	0-1	N/A	100%
B2	1/1	29/05/24	21:13 (20:58 – 22:58)	2	2	14.2-10.7	1-2	N/A	0-5%

The bat detectors used included a combination of AnaBat Walkabout, Echometer Touch 2, Petterson M500. The NVAs used were Sony Handycam FDR-AX53, Nightfox Whisker and Canon AX 70.

Following the survey, the latest version of Wildlife Acoustics Kaleidoscope Pro software was used to process and analyse the bat detector data. Calls were cross referenced with surveyor's observations to corroborate the species that were identified or were used to aid identification of bat emergences observed on the camera footage. Calls by *Myotis*, *Nyctalus* and long-eared species were identified to genus level. Camera footage was analysed using VLC media player video software to review points of interest and clip confirmed emergences/re-entries as required.

For all NVAs used, a still shot was taken at the darkest point of survey to illustrate the field of view and that there was appropriate illumination (**Appendix 4**).

Automated Detector Survey (Buildings)

Two automated detectors were installed, one a piece in Building B1 and B2 on the dates shown in **Table 3.4**.

Table 3.4: Automated detector details (2024)

Month	Deployment Dates (Total No. of Nights)	
	Building B1 (Disused Stables)	Building B2 (Active Stables)
June	21 st – 30 th (10 nights)	21 st – 30 th (10 nights)
July	19 th – 30 th (12 nights)	19 th – 30 th (12 nights)
August	19 th – 1 st (Sep) (14 nights)	-
September	0 th – 29 th (10 nights)	20 th – 29 th (10 nights)
October	-	22 nd – 3 rd (Nov) (13 nights)

Bat Activity Surveys - Night-time Bat Walkover Surveys

NBW surveys were undertaken on 10 occasions over the course of the survey season, as required due to the Site's location within the Yellow (Medium Risk) Zone of the TWBMS (Wiltshire Council, 2025). Either two individual transects or one combined transect were used to cover the Site.

Experienced bat surveyors using handheld bat detectors (Anabat Walkabout) stood at fixed listening points (i.e. near potential flight lines/roosting features, at the boundaries of suitable commuting/foraging habitat) for up to 1 hour after sunset; recording all bat activity within range. After 1 hour, surveyors then followed a pre-determined transect route stopping at pre-defined listening points for approximately five minutes (see **Figure 2** for listening points and transect route).

Where species identification could not be determined during the NBW, acoustic recordings were analysed using bat sound analysis software (Anabat Insight). As the calls of *Myotis* bat species are very similar, with most of the variation between their calls attributable to the habitat in which they occur, the *Myotis* recordings have not been attributed to a particular species.

Surveys were undertaken in suitable weather conditions (temperature $\geq 10^{\circ}\text{C}$ at start of survey, little or no rain and no strong winds over Beaufort 3). The surveys commenced at sunset and continued up to 2hrs thereafter.

Table 3.5: Bat activity transect survey dates and personnel

Survey No.	Date	Sunset (Start/End)	No. Surveyors	Weather Conditions			
				Temp	Wind (B)	Rain	Cloud (%)
1	23/04/2024	20:19 (20:19 – 22:19)	2	9.3 – 5.7	0 – 1	None	0
2	23/05/2024	21:05 (21:05 – 23:05)	1	12 – 10	1 – 2	None	90
3	26/06/2024	21:29 (21:29 – 23:29)	1	19.7 – 16.	6 0 – 1	None	0
4	18/07/2024	21:15 (21:00 – 23:15)	1	20 – 18	0	None	5 – 10
5	05/08/2024	20:48 (20:48 – 22:48)	2	18.9 – 18.3	1 – 2	Light rain for 10 mins	100
6	21/08/2024	20:17 (20:17 – 22:17)	2	16 – 15	2 – 3/4	None	20 – 80
7	04/09/2024	19:47 (19:47 – 21:47)	1	17 – 16	1	None	100
8	26/09/2024	18:57 (18:57 – 20:57)	1	13.1 – 11.9	0 – 3	None	50 – 100
9	14/10/2024	18:17 (18:17 – 20:17)	1	13	1	None	100
10	24/10/2024	17:56 (17:56 – 19:56)	1	14.5 / 14.6	1 – 2	None	95 – 100

Bat Activity Surveys - Automated Detector Surveys

Night-time bat walkover surveys were supplemented with the use of static automated detectors to increase survey effort. This involved the deployment of 9no. automated/static bat detectors (Anabat Rangers) across the Site (**Figure 3** refers) on a monthly basis from April – October 2024, and for at least 5 nights in each month. In accordance with the guidelines set out within TWBMS Planning Document (Wiltshire Council, 2025), a minimum of 50 nights were analysed over the course of the survey season (**Table 3.6** below shows the selected nights that were analysed). The automated detectors were programmed to turn on 30 minutes before sunset and turn off 30 minutes after sunrise.

Table 3.6: Automated Detector Deployments

Month	No. Nights	Dates
April	8	18 th – 25 th
May	8	17 th , 20 th – 25 th , 27 th
June	10	21 st – 30 th
July	9	19 th – 27 th
August	5	19 th – 23 rd
September	5	20 th – 21 st , 24 th , 26 th – 27 th
October	5	22 nd – 26 th
Total no. of nights	50	

Bat Data Analysis

Analysis of data was undertaken by NPA in 2024/2025 through use of the automated species identification feature within Kaleidoscope Pro (Version 5.6.6). Based on a review of historic data collected on other projects using the AnaBat Rangers, the automated species identification in Kaleidoscope Pro works well for certain species (e.g. pipistrelles) but is less accurate for others (e.g. identification of a particular *Myotis* species). As such the following protocols were followed:

- 🦇 Myotis bats were grouped together;
- 🦇 The larger bat species; Noctule *Nyctalus noctula*, Leisler's bat *Nyctalus leisleri* and serotine *Eptesicus serotinus* were grouped together as NLS;
- 🦇 Pipistrelle species were grouped together;
- 🦇 Files labelled as Barbastelle *Barbastella barbastellus* and long-eared bats *Plecotus* sp. were analysed manually;
- 🦇 Files labelled as No ID (i.e. what Kaleidoscope identifies as a bat but is unsure of what species) were analysed manually;
- 🦇 Files labelled as Noise (i.e. what Kaleidoscope does not identify as a bat) that passed a scan for bat calls within AnaLookW, were analysed manually; and
- 🦇 Where a call was of insufficient quality to determine a particular bat species/group, but it was clear it was not a horseshoe species it was labelled as *Vespertilionidae/Vesper*.
- 🦇 Files that were labelled as noctule, Leisler's or serotine (which Kaleidoscope can mistakes as insect noise) were manually analysed.

Recorded echolocation calls were run through filters for both horseshoe bat species within AnaLookW to identify likely horseshoe bat calls. These were then analysed manually to verify if they were attributable to either lesser *Rhinolophus hipposideros* (LHS) or greater *Rhinolophus ferrumequinum* horseshoe bats (GHS).

Assessment of analysed NPA data was undertaken by GE Consulting in 2025/2026 in order to inform this impact assessment.

Appendix 4 – Emergence Survey Night Vision Aid Positions (NPA)

Building No.	Survey No. (Date)	Description / Still
B1	Survey 1 (19/06/2024)	 Building B1 Disused Stable; south view (East)
		 Building B1 Disused Stable; south view (West)
		 Building B1 Disused Stable; south-west view
	Survey 2 (18/07/2024)	

Building No.	Survey No. (Date)	Description / Still
		Building B1 Disused Stable; north view 
		Building B1 Disused Stable; south view 
	Survey 3 (24/09//2024)	Building B1 Disused Stable; south-west view 
		Building B1; Disused Stable; north view 

Building No.	Survey No. (Date)	Description / Still
		Building B1; Disused Stable; south view 
B2	Survey 1 (29/05/2024)	Building B1; Disused Stable; south-west view 
		Building B2 Active Stable; north-west view  Building B2 Active Stable; south-west view



Appendix 5 – DNA Analysis Results (Swift Ecology)

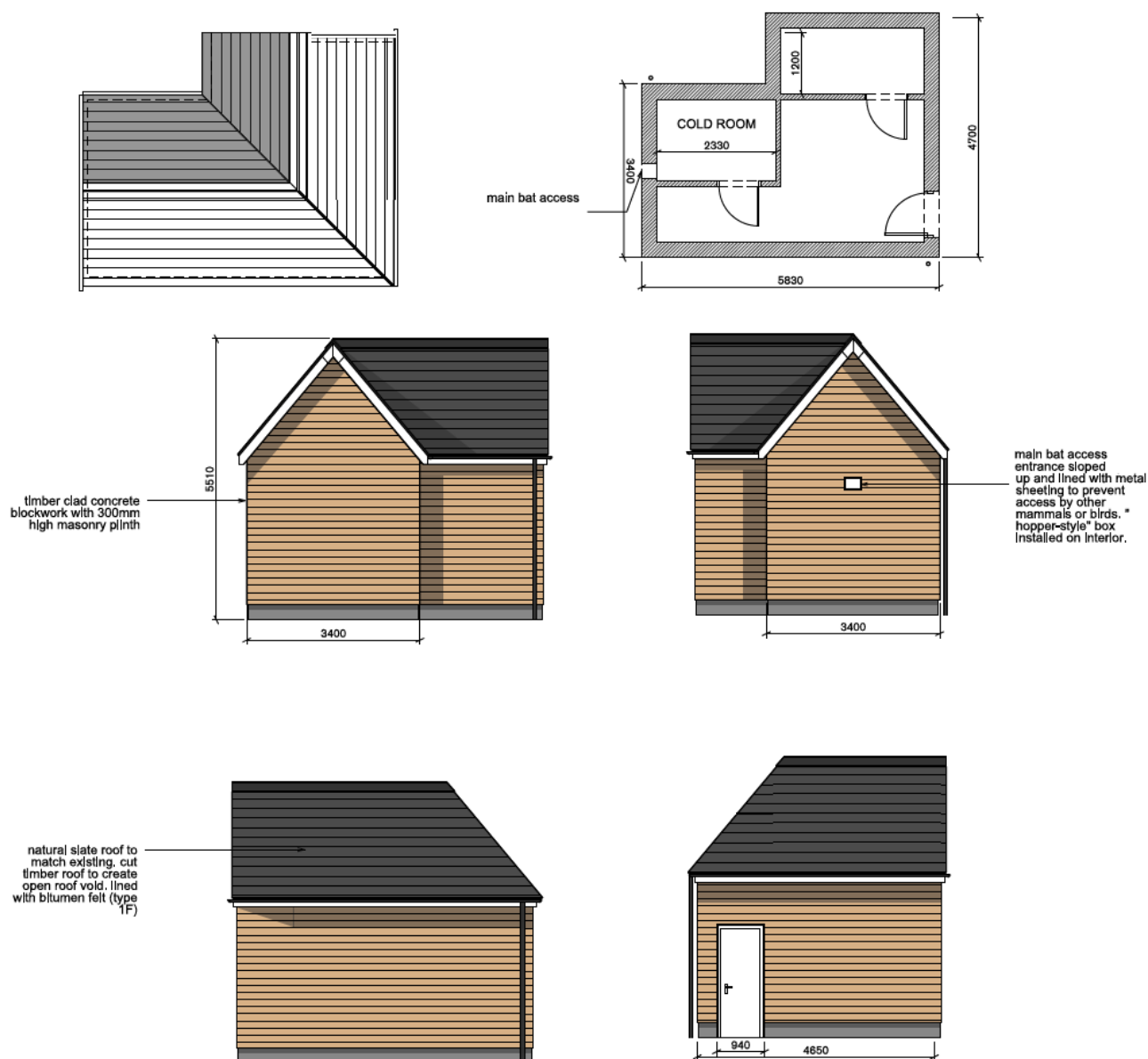
Appendix 6 - Disused Stable Automated Detector Results (NPA, 2024)

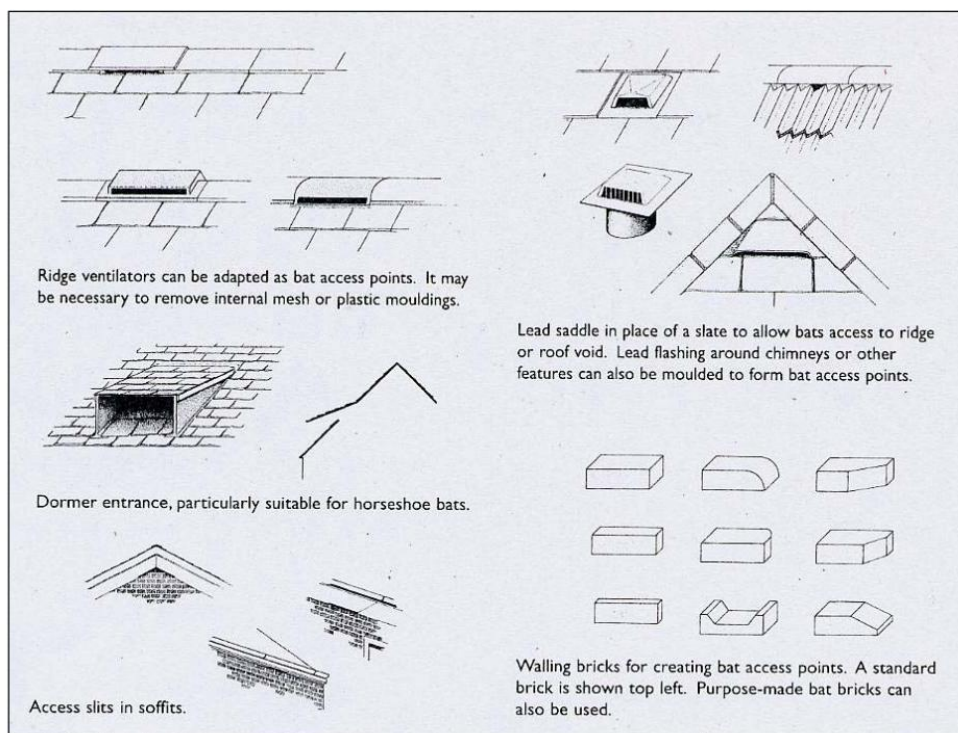
Deployment Date	Greater Horseshoe		Lesser Horseshoe
June 2024			
21	D		A
22	D		N
23	D		N
24	D		N
25	D		N
26	D		N
27	D		A
28	N		N
29	D		N
30	D		N
July			
19	N		A
20	D		A
21	D		N
22	N		A
23	D		A
24	D		A
25	D		A
26	N		A
27	N		A
28	D		A
29	N		A
30	N		A
August			
19	D		D
20	D		A
21	D		D
22	D		D
23	D		D
24	D		A
25	D		N
26	D		N
27	D		A
28	D		N
29	D		N
30	D		A
31	D		N
September			
01	D		N
20	D		N
21	D		N
22	D		N
23	D		A
24	D		N
25	D		A
26	D		N
27	D		A
28	D		A
29	D		A

D – Day Roosting; N – Night Roosting; A - Absent

Appendix 7 – Example Bat Mitigatory Roost and Enhancement Features

Indicative Bat Roost





Examples of Bat Access Features



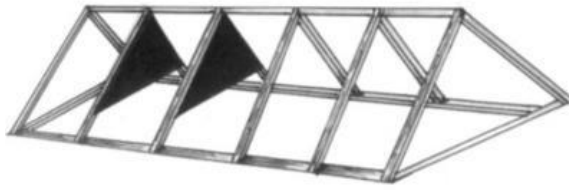
Example of cladding based crevice roost



Examples of externally mounted and integrated features



Example of bat access slot



Internal 'Baffle Boards'



Example of 'Hot Box'

Appendix 8 – Works That May Impact Roosting Bats

This form should be completed prior to commencing any works on the building and prior to applying for a licence. It does not relate directly to the planning process and is included in this report for information only.

As part of the bat licence process, it is important for the ecologist to have a detailed understanding of the works involved with the development. An ecologist must be contacted to seek further advice before undertaking any of these works to ensure no adverse impacts occur to roosting bats. The table below gives a summary of these works, please fill out this table and return to the Ecologist before works commence.

Type/ location of works	Impacted/ required?	Brief description of works	Time schedule
For example: Soffits	✓	Soffits to be removed and replaced	Winter 202X
Soffits/ barge boards			
Wall tops/ eaves			
Lead flashing			
Windows and doors			
Guttering			
Porch			
Wood/ tile cladding			
Chimney			
Tiles e.g. repair/ removal/ replacement			
Re-thatching			
Felt/ lining removal/ replacement			
Mortar repair/ replacement			
Repairs to walls, shingles and weatherboards, and other gaps			
Installing insulation including cavity wall insulation			
Roof joists			
Timber treatment			
Dry rot treatment			
Controlling flies, other insects and 'pests'			
Rewiring, plumbing and other service work within cellars and/ or loft void			
Removing internal ceilings			
Any other works within the cellar/ loft void			
Use of scaffolding poles, plastic sheeting or mesh			
Works that cause vibration/ noise near the roost			
Existing bat features e.g. bat boxes			
Building site lighting			
Vegetation removal within proximity of works			
Any other works you may feel are relevant			

Website: www.ge-consulting.co.uk
Phone: 01647 253652
Email: info@ge-consulting.co.uk

GE Consulting is a trading name for
GE Consulting Services (UK) Ltd
registered number 08435536

Registered office: Unit 11A, Gidleys
Meadow Business Park, Christow,
Devon, EX6 7QB.
VAT Number 160595992

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