



Ecological Appraisal

Southpoint Business Park,
Chippenham

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Report	Ecological Appraisal
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Executive Summary

Ecosupport Ltd was instructed by David Lloyd Leisure Ltd to undertake an Ecological Appraisal at Southpoint Business Park, Chippenham. This was required in order to identify any potentially important ecological features that may be affected by the proposed development. As part of this assessment, the following surveys were undertaken:

- Walkover survey with UK Habs habitat assessment (February 2026)
- Data request submitted to the Wiltshire & Swindon Biological Records Centre (WSBRC) (February 2026)

Extensive survey work was previously carried out in 2008 by Nicholas Pearson Associates, and in 2012, 2015, 2019 and 2020 by Engain. This has been used to inform the ecological appraisal for this application.

The following important ecological features were identified on site following the conclusion of the above survey work and may be subject to adverse impacts in the absence of suitable mitigation / compensation:

- High potential for commuting and foraging Badgers and other terrestrial mammals
- Low potential for reptiles
- Site of regional value for commuting and foraging bats around the boundary vegetation
- Low potential for breeding and nesting birds

In the absence of any mitigation measures, the proposed works are anticipated to result in **likely adverse impacts**. However, mitigation has been outlined within **Section 6.0** of this document to protect features of value as well as provide targeted recommended ecological enhancements to ensure there will not be any residual adverse impacts and to provide a net gain.

1.0 INTRODUCTION

1.1 Brief & Background

Ecosupport Ltd was commissioned by David Lloyd Leisure Ltd to conduct an updated Ecological Appraisal at Southpoint Business Park, Chippenham (hereafter referred to as 'the site'). The purpose of this survey was to assess any ecological impacts that may arise as a result of the proposed development.

This site forms part of the wider site that has granted outline planning for a large employment development under reference N/13/00308/OUT and this proposed development is for a new application. Parts of this outline planning have already been approved including the roundabout access to the site and the site immediately east of this one has been granted under planning reference PL/2024/03204.

Extensive survey work was previously carried out in 2008 by Nicholas Pearson Associates, and in 2012, 2015, 2019 and 2020 by Engain to inform the outline planning permission. This has been used to inform the baseline information for this updated ecological assessment. In addition, Ecosupport Ltd. carried out an updated habitat assessment in February 2026 to update conditions on site and an updated data search obtained from Wiltshire and Swindon Biological Records Centre (WSBRC) has been obtained to inform this assessment.

NB: If the works do not take place within 18 months of this report¹ then the findings of this survey will no longer be considered valid and may require updating.

1.2 Site Description & Location

The site comprises a series of a parcel of land located to the north of the A350 in Chippenham (central grid reference of ST 90576 71142) (**Fig 1**). The site is bordered by hedgerows and a bank leading up to a railway line on the western boundary, by the A350 on the southern boundary, and by a newly built road on the eastern boundary. To the north of the site is marked by fields and hedgerows forming part of the wider outline application. The immediate wider environ is a mix of newly developed areas, arable fields and pasture, and residential areas associated with Chippenham.

¹ <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>

Figure 1. Approximate redline boundary of the site (Google Maps, 2026).



1.3 Proposed Development

The proposals are for the development of a David Lloyd leisure club and with a tennis court enclosure, external pool, terrace areas, external sports facilities, associated parking, and landscaping (**Fig 2**).

1.4 Pre-app Consultation

The site was submitted for pre-application consultation in 2025. A response was received from Ecology Officer Kirsten Pryde on 3rd June 2025. Points were raised on the site lying within the Bath and Bradford-on-Avon Bats Special Area for Conservation (SAC) and nearby bat roosts, presence of nearby habitats of importance, ponds within 500m and general protected species and biodiversity net gain.

This site has a strong history of ecological survey to support the previous outline planning permission. The scope of this site is of a similar size / nature to the approved outline condition and has a similar approach and retains larger areas of buffer habitat than the previous. Therefore, this report relies heavily on the previous survey information which is still considered valid to the baseline. With greater buffers / habitat retention included in this scheme compared to the approved masterplan, it is considered that this updated assessment combined with the previous survey results has allowed an accurate assessment of the site to be made.

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2.0 RELEVANT LEGISLATION AND POLICY

2.1 Legislation

2.1.1 *The Conservation of Habitats and Species Regulations 2019 (EU Exit)*

The Conservation of Habitats and Species Regulations 2017 transposes the EU Habitats Directive (Council Directive 92/43/EEC) into UK domestic law. It provides protection for sites and species deemed to be of conservation importance across Europe. It is an offence to deliberately capture, kill or injure species listed in Schedule 2 or to damage or destroy their breeding sites or shelter. It is also illegal to deliberately disturb these species in such a way that is likely to significantly impact on the local distribution or abundance or affect their ability to survive, breed and rear or nurture their young.

The Conservation of Habitats and Species Regulations 2019 (EU Exit) makes changes to the three existing instruments which transpose the Habitats and Wild Birds Directives so that they continue to work (are operable) upon the UK's exit from the European Union (EU). These include The Conservation of Habitats and Species Regulations 2017 and The Conservation of Offshore Marine Habitats and Species Regulations 2017. This instrument also amends section 27 of the Wildlife and Countryside Act 1981 to ensure existing protections continue. The intention is to ensure habitat and species protection and standards as set out under the Nature Directives are implemented in the same way or an equivalent way when the UK exits the EU.

In order for activities that would be likely to result in a breach of species protection under the regulations to legally take place, a European Protected Species (EPS) licence must first be obtained from Natural England.

2.1.2 *The Wildlife and Countryside Act (1981) (as amended)*

This is the primary piece of legislation by which biodiversity is protected within the UK. Protected fauna and flora are listed under Schedules 1, 5 and 8 of the Act. They include all species of bats, making it an offence to intentionally or recklessly disturb any bat whilst it is occupying a roost or to intentionally or recklessly obstruct access to a bat roost. Similarly, this Act makes it an offence to kill or injure any species of British reptiles and also makes it an offence to intentionally kill, injure or take any wild bird or to take, damage or destroy their eggs and nests (whilst in use or being built).

The Wildlife & Countryside Act (1981) states that it is an offence to 'plant or otherwise cause to grow in the wild' any plant listed in Schedule 9 part II of the Act. This list over 30 plants including Japanese Knotweed (*Fallopia japonica*), Giant Hogweed (*Heracleum mantegazzianum*) and Parrot's Feather (*Myriophyllum aquaticum*).

2.1.3 *The Countryside and Rights of Way Act (2000)*

This Act strengthens the Wildlife & Countryside Act by the addition of "reckless" offences in certain circumstances, such as where there is the likelihood of protected species being

present. The Act places a duty on Government Ministers and Departments to conserve biological diversity and provides police with stronger powers relating to wildlife crimes.

2.1.4 Natural Environment and Rural Communities Act (2006)

The Natural Environment and Rural Communities (NERC) Act 2006 requires that public bodies have due regard to the conservation of biodiversity. This means that Planning authorities must consider biodiversity when planning or undertaking activities. Section 41 of the Act lists species found in England which were identified as requiring action under the UK Biodiversity Action Plan and which continue to be regarded as conservation priorities under the *UK Post – 2010 Biodiversity Framework*.

2.1.5 Protection of Badgers Act

The Protection of Badgers Act (1992) relates to the welfare of Badgers (*Meles meles*) as opposed to nature conservation considerations. Provisions are included within the Act to allow for the lawful licensing of certain activities that would otherwise constitute an offence under the Act. The Act prevents:

- The wilful killing, injury, ill treatment or taking of Badgers and / or
- Interference with a Badger sett
- Damaging or destroying all or part of a sett
- Causing a dog to enter a set and
- Disturbing a Badger while it is occupying a sett

2.1.6 The Environment Act (2021)

The Environment Act 2021 is the UK's new legislation for environmental protection in the UK, which includes protection of water quality, clean air, and biodiversity among other key protections. This Act provides the government power to set targets to reach long-term aims relating to the environment, which will be periodically reviewed and updated. This legislation also establishes a new environmental watchdog organisation, the Office for Environmental Protection (OEP), which will hold the government accountable on environmental issues.

Part 6 of The Environment Act relates to nature and biodiversity. This section makes provision for biodiversity net gain to be a condition of planning permission in England and a requirement for nationally significant infrastructure projects. Biodiversity net gain will require maintenance for a period of at least 30 years after the completion of enhancement works to be achieved.

The legislation also includes updates to existing environmental legislation, such as the NERC Act 2006, to strengthen biodiversity enhancement rather than just conservation and includes a requirement for local, or relevant, authorities to publish biodiversity reports. Further, The Environment Act places a requirement on responsible authorities to prepare local nature recovery strategies, which will outline nature conservation sites and priorities and opportunities for recovering or enhancing biodiversity within the local area. Within England, the legislation also provides Natural England with the power to publish 'species conservation strategies' and 'protected site strategies' to identify activities that may affect a species or site's status and outline their opinions on measures that would be appropriate to avoid, mitigate or compensate any adverse impacts.

2.2 Policy

2.2.1 National

The National Planning Policy Framework (NPPF) (2024) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.

Chapter 15 'Conserving and enhancing the natural environment' states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing sites of biodiversity, the wider benefits from natural capital and ecosystem services, minimising impacts on and providing net gains for biodiversity.

The NPPF states that plans should distinguish between the hierarchy of international, national and locally designated sites and that the scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

To protect and enhance biodiversity plans should:

identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and 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.

The NPPF states determining planning applications, local planning authorities should apply the following principles:

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

developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

2.2.2 Local

The current Local Plan is the Wiltshire Core Strategy, adopted in 2015.

Core Policy 50 – Biodiversity and Geodiversity

Protection:

Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services. All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy

Biodiversity enhancement:

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

Local sites:

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

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

Development proposals affecting local sites must make a reasonable contribution to their favourable management in the long-term.

In addition, the following policies within the Chippenham Neighbourhood Plan 2023-2038 (Chippenham Town Council, 2024) are considered relevant:

Policy GI1 – Protection and Enhancing Biodiversity

Features of significant biodiversity value should be retained and enhanced as follows:

- i. Retain ancient trees and hedgerows and/or trees and hedgerows of arboricultural value, additional planting should extend tree cover
- ii. Retain blue infrastructure and where sustainable drainage systems (SuDS) are being created these should be multifunctional
- iii. Retain native plants and wildflower areas and extend through landscaping proposals
- iv. Protect bat habitats
- v. Incorporate into new construction:
 - Green/brown roofs (where appropriate)
 - Integrated bird and bat boxes
 - Swift bricks and bee bricks
 - 13cm x 13cm holes in fencing for hedgehogs and other small mammals to pass through

Major development proposals must demonstrate a Biodiversity Net Gain of at least 10%, secured for at least 30 years. Proposals are encouraged to deliver in excess of 10% Biodiversity Net Gain.

Development proposals on sites which are located adjacent to existing green spaces and/or open countryside will demonstrate, through their layout and/or landscape design, that they provide an appropriate and sensitive interface to existing adjoining habitats.

Accreditation of proposals as meeting Building with Nature standards will greatly assist their assessment against this Policy.

Policy GI4 – Green Corridors

Strategic Green Corridors

The following are identified on Figure 6.3 as Strategic Green Corridors: a)

- a) River Avon Corridor
- b) Hardenhuish Brook Corridor
- c) Railway Line Corridor
- d) Wilts & Berks Canal Corridor
- e) Chippenham-Calne Corridor

All development located within, or adjacent to, Strategic Green Corridors must be designed to ensure that these Corridors allow for the movement of wildlife and humans between the surrounding countryside and urban area of the town.

Green Corridors

Development which takes the opportunities to link Green Corridors to the surrounding countryside at the Countryside Connection Points, or to Strategic Green Corridors, will be supported.

Development which takes the opportunities to realise or improve the missing links or connections for wildlife within Green Corridors, identified as Link Enhancements on Figure 6.3, will be supported.

All development located within, or adjacent to, the Green Corridors identified on Figure 6.3 must be designed to protect and enhance these Corridors by:

- i. Not compromising their integrity and their principal open space use and function for wildlife and biodiversity, visual amenity, flood protection and movement networks
- ii. Ensuring that wherever possible new open space connects to them
- iii. Prioritising investment in enhancement of open space and informal recreation, where appropriate
- iv. Using developer contributions to facilitate improvements to the quality of Green Corridors, including establishing missing links and resolving poor connections within the network
- v. Avoiding the installation of new lighting where possible. Where it is deemed necessary to install new lighting it should comply with the Institute of Lighting Professionals minimum standards for Environmental Zone E2

New Green Corridors

Green and blue infrastructure shall be strategically located along contours and the edges of greenfield development sites to help screen and filter harmful urbanising effects from new development and to avoid the creation of harsh new urban settlement edges fronting countryside.

New or improved sustainable transport routes shall be designed to include Green Corridors along their length in a manner that balances safe use by humans and allows free movement for wildlife.

Policy GI5 – Trees, Woodland and Hedgerows

Existing Trees, Woodlands & Hedgerows

Proposals should seek to protect existing trees, woodland and hedgerows and avoid removal wherever possible. Ancient, veteran and mature trees or trees and hedgerows of ecological, arboricultural or amenity value should be retained. Protection before and after development should be in accordance with British Standard BS5837.

Development proposals must consider with care the separation between construction and the edge of a woodland or tree belt and it must be satisfactorily demonstrated, through the detailed design process, that the proposal would have no adverse impacts on trees, ecology, people, or property. A buffer zone of at least 15m, consisting of semi-natural habitat, is considered appropriate between new construction and woodland.

New and Replacement Tree Planting

Development proposals should, appropriately to their scale:

- a) Incorporate gateway or landmark trees for placemaking purposes
- b) Deliver new street trees

Where there is an unavoidable loss of trees on site, the number of replacement trees shall have regard to the advice set out in the Tree Planting Guide (Annexe 4).

In selecting new or replacement tree species regard shall be had to the advice set out in the Tree Planting Guide – with a preference for native, large-canopied and orchard species.

Tree Canopy Cover

Development proposals on sites outside of the town centre and greater than 0.5 ha in size should demonstrate an increase in site tree canopy cover of at least 6%. This will principally be achieved through planting of additional and replacement trees, but where it can be demonstrated that this is impractical, the use of other green infrastructure (e.g. green roofs) can be used to deliver equivalent benefit. On residential development sites, some of this tree canopy cover will be expected to be met through incorporation of new trees within rear gardens. Reference should be made to the advice set out in the Tree Planting Guide (Annexe 4).

3.0 METHODOLOGY

3.1 Desk Study

3.1.1 Data Request

A data request was submitted to the Wiltshire & Swindon Biological Records Centre (WSBRC) to ascertain any records held of nature conservation designations and protected species within 2km of the site.

The data searched covered:

- Statutory and non-statutory designated sites
- Records of protected and notable species
- Priority habitats

3.1.2 Waterbodies

Any ponds located within 500m of the proposed development were searched for using Ordnance Survey maps and available aerial images.

3.2 Field Survey

3.2.1 Habitats

The field survey work which forms the basis of the findings of this report was carried out by Grace Roberts MSci and Laura Purnell BSc (Hons) AMRSB on the 3rd February 2026.

Habitats on site pre-development were identified in accordance with the categories specified for a UK Habitats survey, using Habitat Definitions Version 2.0 (UKHab Ltd., 2023). This was chosen as an appropriate habitat categorisation system as it fits within the Statutory Biodiversity Metric calculation. Where appropriate primary habitat codes were used although for some habitat types, the use of secondary habitat codes was necessary as well.

3.2.2 Badger

The site was thoroughly searched for evidence of use by Badgers (*Meles meles*), with the specific aim of identifying the presence and location of any setts. In accordance with the *Badgers and Development: A Guide to Best Practice and Licensing* (Natural England, 2011) guidance, the survey accounted for a 30m from the site's boundary (observed where possible i.e. does not conflict with private dwellings). Evidence of Badgers could include latrines, dung pits, feeding remains and foraging evidence, trails and setts.

3.3 Assessment Methodology

3.3.1 Introduction

The methodology for the assessment of the likely ecological effects of the proposed development is based on CIEEM's *Guidelines for Ecological Assessment in the UK* (CIEEM 2018). Although this assessment does not constitute a formal Ecological/ Environmental Impact Assessment, the CIEEM guidelines provide a useful framework for assessing ecological impacts at any level.

3.3.2 Valuation

Features of ecological interest are valued on a geographic scale. Value is assigned on the basis of legal protection, national and local biodiversity policy and cultural and/or social significance.

3.4 Limitations

The survey was conducted outside the optimum timing for the identification of botanical species (February). However, extensive survey work has previously been carried out and thus it is possible to accurately identify the habitats present on site with this as supplementary information. This survey does not constitute a full site assessment for invasive species, such as Japanese Knotweed (*Reynoutria japonica*).

4.0 ECOLOGICAL BASELINE

4.1 Designated Sites

4.1.1 Internationally Designated Sites

Fig 3 displays a map provided by WSBRC with the internationally designated sites located within 2km of the site. No internationally designated sites were identified within 2km of the site.

However, the site lies within the consultation zone for the Bath and Bradford-on-Avon Bats SAC. The pre-app advice has identified the site lies within a Bechstein 1.5km Core Roost buffer for two maternity roosts.

4.1.2 Nationally Designated Sites

Fig 3 displays a map provided by WSBRC with the nationally designated sites located within 2km of the site. Mortimor's Wood LNR (grid reference ST919716) was identified as being 1.3km north-east of the site.

4.1.3 Locally Designated Sites

Fig 3 displays a map provided by WSBRC with the locally designated sites located within 2km of the site. These sites are summarised in **Table 1** below.

Table 1. Locally designated sites within 2km of the site.

Site Code (as per Fig 3)	Site Name & Designation	Reason for Designation	Grid Reference
ST87.200	Mynte Wood – LWS	Mature broadleaved woodland with a long history or ornamental planting on a low limestone ridge.	ST885715
ST96.043	Bristol Avon River – LWS	One of the main river systems draining north-west Wiltshire.	ST905643
ST97.061	Mortimor's Wood - LWS	A small ancient, semi-natural broadleaved woodland on a steep northwest-facing slope above a bend in the River Avon.	ST919717
ST96.051	Notton (near Lacock) – PRV	-	ST912691

4.1.4 Priority Habitats

Fig 4 displays a map provided by WSBRC with the priority habitats located within 2km of the site. There are no priority habitats on site or within the immediate vicinity. The priority habitats identified within 2km are lowland mixed deciduous woodland, lowland meadows, lowland calcareous grassland, and rivers.

Figure 3. Internationally, nationally, and locally designated sites located within 2km of the site.

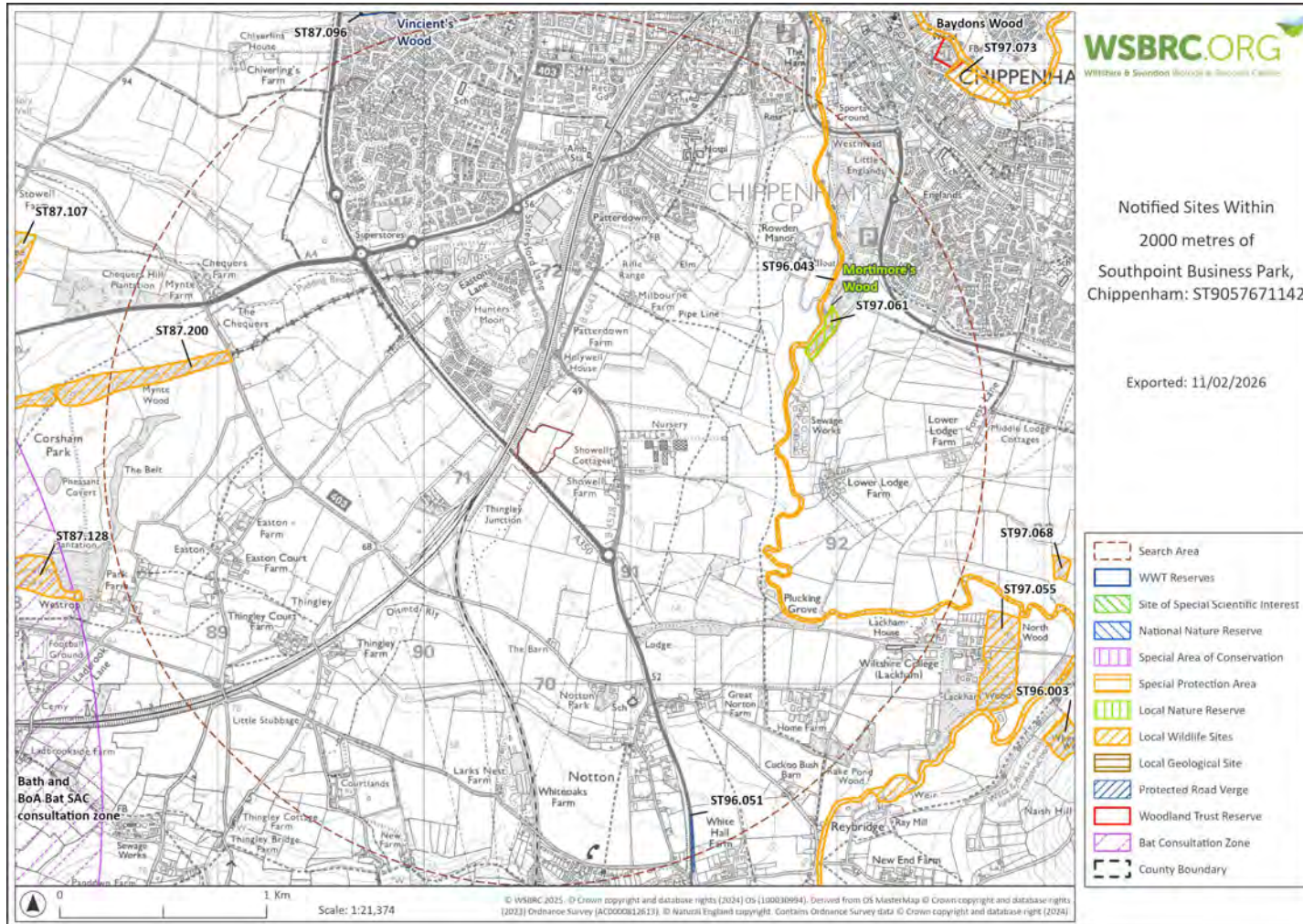
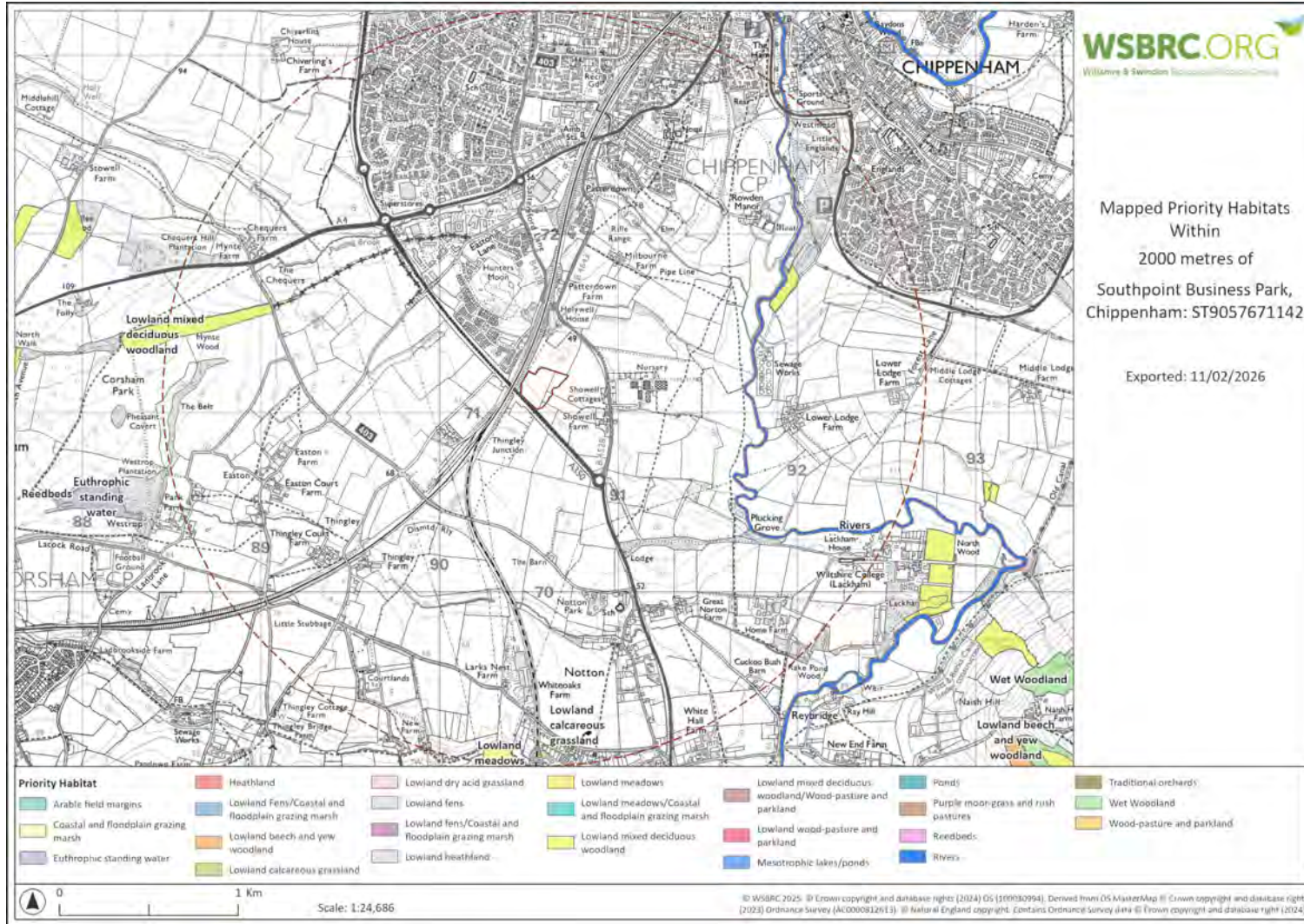


Figure 4. Priority habitats located within 2km of the site.

4.2 Vegetation Survey Results

The vegetation within the site has been described below using the UK Habs Habitat Definitions Version 2.0 (UKHab Ltd., 2023). The below species noted should not be considered an exhaustive list and instead refer to dominant, characteristic and other noteworthy species associated with each community within the survey area. A baseline habitats map has been appended. The habitat types on site comprise:

- Modified Grassland (g4) (secondary codes 510 Bare Ground and 16 Tall Forbs)
- Bramble Scrub (h3d) (secondary code 32 Scattered Trees)

4.2.1 Modified Grassland g4 (with secondary codes 510 Bare Ground and 16 Tall Forbs)

The field is predominantly modified grassland (**Fig 5**). Species identified include Spear Thistle (*Cirsium vulgare*), White Clover (*Trifolium repens*), Cow Parsley (*Anthriscus sylvestris*), Hairy Bittercress (*Cardamine hirsuta*), Ribwort Plantain (*Plantago lanceolata*), Common Field Speedwell (*Veronica persica*), Greater Burdock (*Arctium lappa*), Creeping Buttercup (*Ranunculus repens*), Sheperd's Purse (*Capsella bursa-pastoris*), Perennial Ryegrass (*Lolium perenne*) and *Poa* species (*Poa sp.*). Along the grassland boundaries there are small areas of tall forbs (**Fig 6**). There are also large areas of bare ground created by vehicles accessing the fields (**Fig 7**).

Through previous survey work, the fields were intensively farmed up until 2020 when works commenced and the site has been consistently of low biodiversity value.

Figure 5. View of the modified grassland on site (February, 2026).



Figure 6. Tall forbs along the southern boundary (February, 2026).



Figure 7. View of the bare ground on site (February, 2026).



4.2.2 Bramble Scrub (h3h) (with secondary code 32 Scattered Trees).

There is an area of bramble scrub with some scattered trees within the south-western corner of the site (**Fig 8**). While a large portion of this patch is outside the redline boundary, a small portion is encroaching into the site.

Figure 8. View of the bramble scrub and trees within the south-western corner (February, 2026)

4.2.3 Offsite Habitat – Native Hedgerows (h2a)

There are native hedgerows present outside the site area, on the northern boundaries of the site. While they are fully outside the boundary and will not be impacted, they are worth noting as they are a priority habitat and will require protection during the works.

4.3 Bats

4.3.1 Pre-existing Information

WSBRC have provided the following bat records from within 2 km of the site (**Table 2**).

Table 2. Bat records as provided by WSBRC within 2km of the site

Taxon Name	Species Name	Number of Records
<i>Chiroptera</i> spp.	Unspecified Bat	17
<i>Eptesicus serotinus</i>	Serotine	10
<i>Myotis</i> spp.	Myotis bat	1
<i>Barbastella barbastellus</i>	Barbastelle	1
<i>Myotis bechsteinii</i>	Bechstein's Bat	15
<i>Myotis brandtii</i>	Brandt's Bat	4
<i>Myotis mystacinus</i>	Whiskered Bat	6
<i>Myotis mystacinus/ brandtii</i>	Whiskered/Brandt's bat	2
<i>Myotis daubentonii</i>	Daubenton's bat	11
<i>Myotis nattereri</i>	Natterer's Bat	20
<i>Nyctalus leisleri</i>	Leisler's Bat	3
<i>Nyctalus noctula</i>	Noctule Bat	13
<i>Pipistrellus</i> spp.	Pipistrelle species	22
<i>Pipistrellus pipistrellus</i>	Common Pipistrelle	23
<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle	43
<i>Plecotus</i> spp.	Long-eared Bat	1

<i>Plecotus auritus</i>	Brown Long-eared Bat	27
<i>Rhinolophus hipposideros</i>	Lesser Horseshoe Bat	11
<i>Rhinolophus ferrumequinum</i>	Greater Horseshoe Bat	6

4.3.2 Previous Survey Work

Ten bat transects were carried out and static detectors were deployed on three occasions between September 2011 and August 2012. In 2015, two more bat transects were completed and two more static bat detectors were deployed. During the transect and static detector surveys, 13 bat species were recorded. The majority of the activity recorded was along the hedgerows and within the field to the north of the site outside of the boundary. Common Pipistrelles (*Pipistrellus pygmaeus*) and Soprano Pipistrelles (*Pipistrellus pygmaeus*). Greater Horseshoe bats (*Rhinolophus ferrumequinum*) and Bechstein's bats (*Myotis bechsteinii*) were recorded in small numbers (max 3no Greater Horseshoe and 6no Bechstein records).

The majority of activity was recorded alongside the hedgerows and around the trees. The hedge along the north boundary of this site was identified as having the highest levels of bat activity which connects from the railway line to further habitat to the east. The figure of highest bat activity can be seen in **Fig 9**.

Figure 9. Plan created by Engain (2020) showing the areas of high bat activity on site

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Development Site Boundary

ON BEHALF OF

Baylis Estates Ltd

PROJECT

South Point Business Park

SCALE

NTS

PROJECT NO

eg19889

DATE

Jan 2020

APPROVED

MD

TITLE

Figure 5: Bat Map

4.3.3 Updated Site Assessment

The site is largely dominated by modified grassland and bare ground which offers limited foraging diversity and is of little value to invertebrates (and as such provides limited foraging habitat for bats). However, the site is bordered by a hedgerow and trees to the north (which was previously identified as having highest bat activity) and by scrub with trees to the west which could provide some suitable commuting and foraging habitat and connect the site to the wider landscape. Close to the eastern boundary of the site there were previously two hedgerows and a tree identified as having bat roosting potential, which would have been present when the bat transects and static detector surveys took place. These have since been translocated to the north of the outline site (as part of previous permission for access construction) and are no longer present in this site and thus have reduced the potential of the site to support foraging and commuting bats. The proposed development will not affect the hedgerow to the north of site where the majority of bat activity was recorded.

Overall, there remains bat potential within the site restricted to the boundary vegetation, in particular the northern and western boundaries. It is considered the habitats remain relatively similar and would be likely to support similar bat activity (or reduced bat activity due to removal of the hedgerow). Therefore the results and recommendations of the previous survey work are considered to still be valid, which classified the site as of **regional value** for bats.

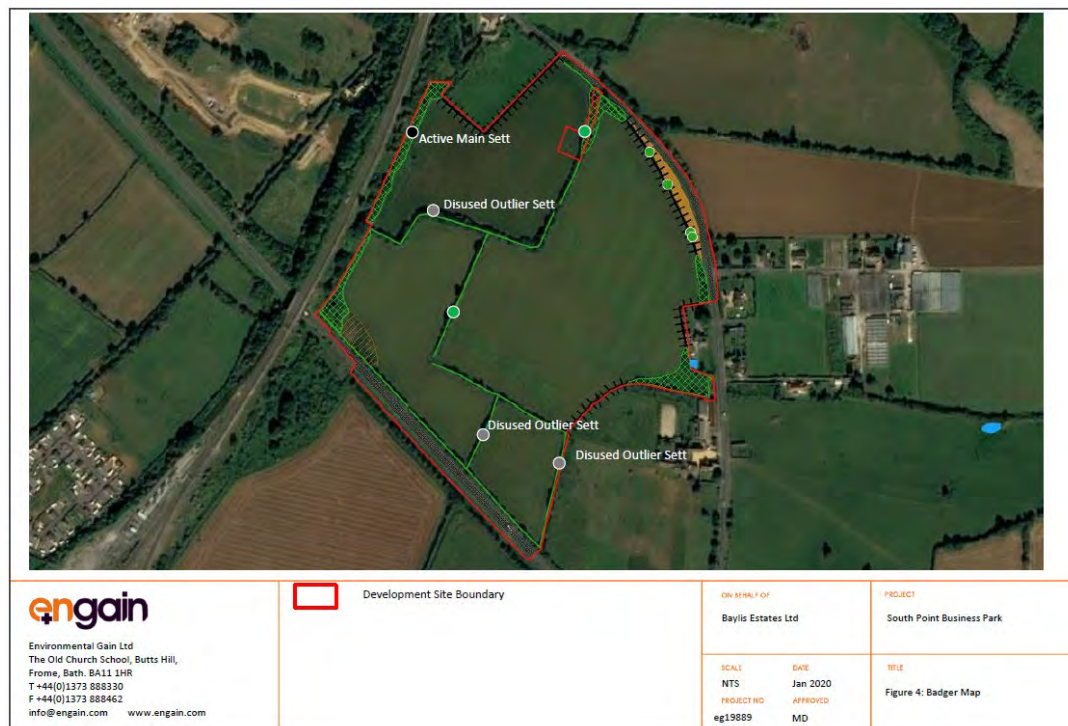
4.4 Badgers & Other Terrestrial Mammals

4.4.1 Pre-existing Information

WSBRC returned 52 records of Badger (*meles meles*) within 2km of the site.

4.4.2 Previous Survey Work

Badger walkovers were completed in 2011, 2015, and 2020 for the wider outline site. In 2011 three outlier setts were identified and a main sett was identified on the railway embankment (only one of which is within 30m of this site). In 2020 the railway embankment sett was still found to be active but the other setts were considered to be inactive (**Fig 10**).

Figure 10. Plan created by Engain (2020) showing the locations of badger setts on site

4.4.3 Updated Site Assessment

During the updated walkover, no evidence of potential badger setts was noted on or within the close vicinity of the site. However, mammal trails were noted near the western boundary and the site has suitable foraging habitat for badgers, such as areas of shorter sward grassland. Therefore, it is considered there are no setts present within the area of impact but that there is **high potential** foraging and commuting badgers may be present on site.

4.5 Reptiles

4.5.1 Pre-existing Data

WSBRC returned records for the following reptile species from within 2km of the site:

- 23 records of Grass Snake (*Natrix helvetica*)
- 57 records of Slow Worm (*Anguis fragilis*)
- 1 record of Adder (*Vipera berus*)
- 1 record of Common Lizard (*Zootoca vivipara*).

4.5.2 Previous Survey Work

Ten reptile surveys were carried out in 2012 using artificial refugia. The surveys identified the presence of small populations of slow worms in the field beyond the northern site boundary, with small grass snake populations identified to the east of the site where another development is already taking place. However, no reptiles were identified within the boundary of this site.

4.5.3 Site Assessment

The majority of the site is considered to be unsuitable for reptiles with short-sward grassland and bare ground dominant. However, minor areas along the northern and southern boundary edges can be considered to offer some limited potential for reptiles where grassland areas

have both long and short sward height with some tall forb, adjacent boundary vegetation. The previous surveys identified that reptiles are unlikely to be using the site, but it is considered there is **low potential** for reptiles along the boundary edges.

4.6 Great Crested Newts

4.6.1 Pre-existing Data

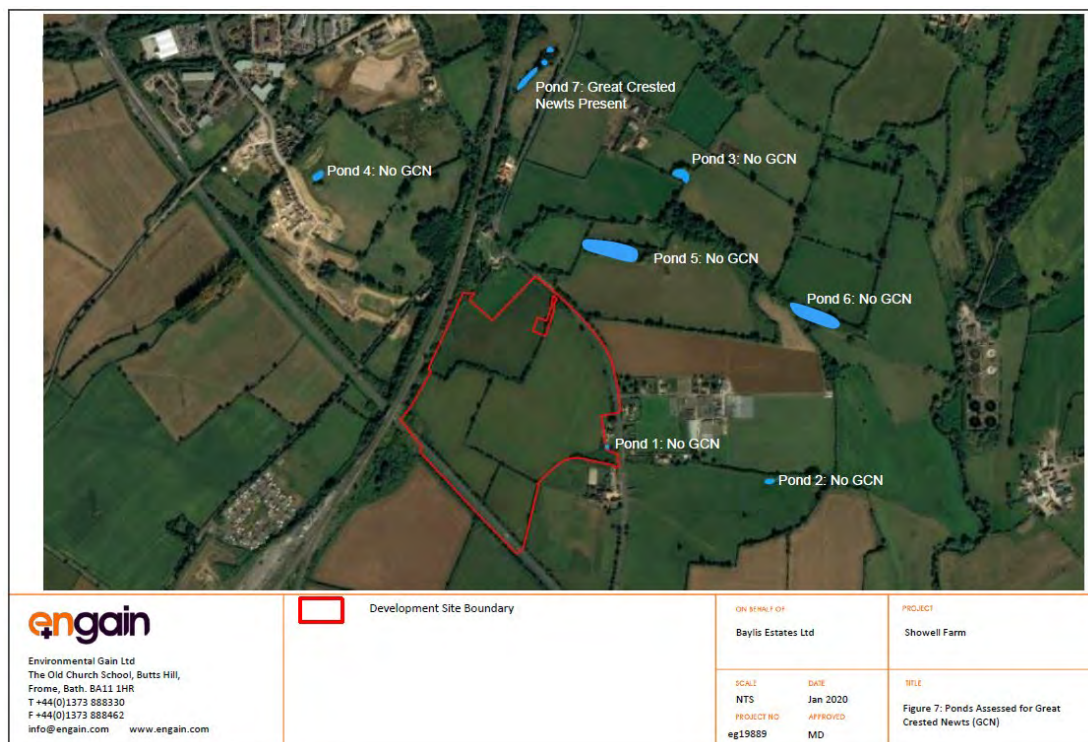
DERC returned a total of 24 records for Great Crested Newts (*Triturus cristatus*) within 2km of the site.

4.6.2 Previous Survey Work

Previously, seven ponds were identified within 500m of the site boundary for the outline application and were subject to a Habitat Suitability Index (HSI). The ponds were either assessed as being of 'average' or 'poor' suitability and presence/absence surveys showed that GCN were not using any of the ponds. Pond 3 previously supported a population of GCN, but surveys in 2017, 2018, and 2019 showed that they were no longer using the pond. Pond 7 was identified as having Great Crested Newts present (**Fig 11**).

It is important to note that many of the previously identified waterbodies are no longer present or are isolated due to development activities in the surrounding area. Pond 7 is 680m from the site at the closest point and now entirely surrounded by development with new roads likely posing fairly significant barriers to movement. The site boundary for this development is also smaller than that shown in **Fig 11**, and as such only ponds 1 and 5 are within 500m of this site. Pond 5 is not currently seen on either OS mapping or satellite imagery. Pond

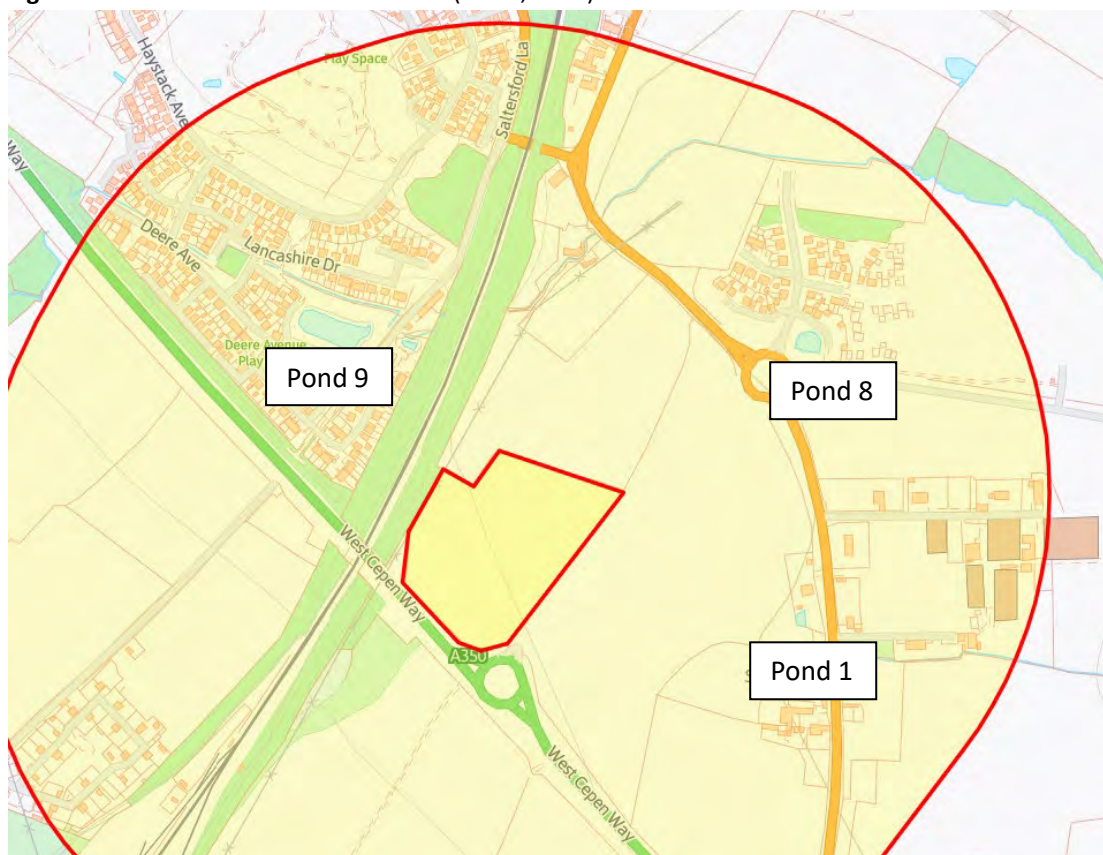
Figure 11. Engain (2020) showing the locations of ponds within 500m of the site.



4.6.3 Updated Site Assessment

Similarly to reptiles, the habitats on site are largely unsuitable for GCN with minor suitability along the boundaries where the grassland is less managed. Three waterbodies were identified within 500m of the site boundary based on an updated search, although they were not subject to a formal updated HSI assessment (**Fig 12**). Pond 1 is the same pond previously identified, which was previously confirmed as negative presence for GCN. Pond 8 is a recently constructed attenuation basin for the new development to the northeast (located 300m NE). Pond 9 is another relatively recent pond built for the development to the east of the railway. The railway is considered to be a significant barrier for movement of amphibians to the site. It is also unlikely that the GCN would have colonized the two new ponds in the area given their recent construction, surrounding habitat and separation and distance from GCN populations.

Figure 12. Ponds within 500m of the site (Defra, 2026)



As there are no waterbodies on site, the habitat is largely unsuitable for GCN, and the ponds within 500m are unlikely to hold GCN and over 250m or separated from the site, it is considered there is **negligible potential** for GCN to be present on site.

4.7 Hazel Dormouse

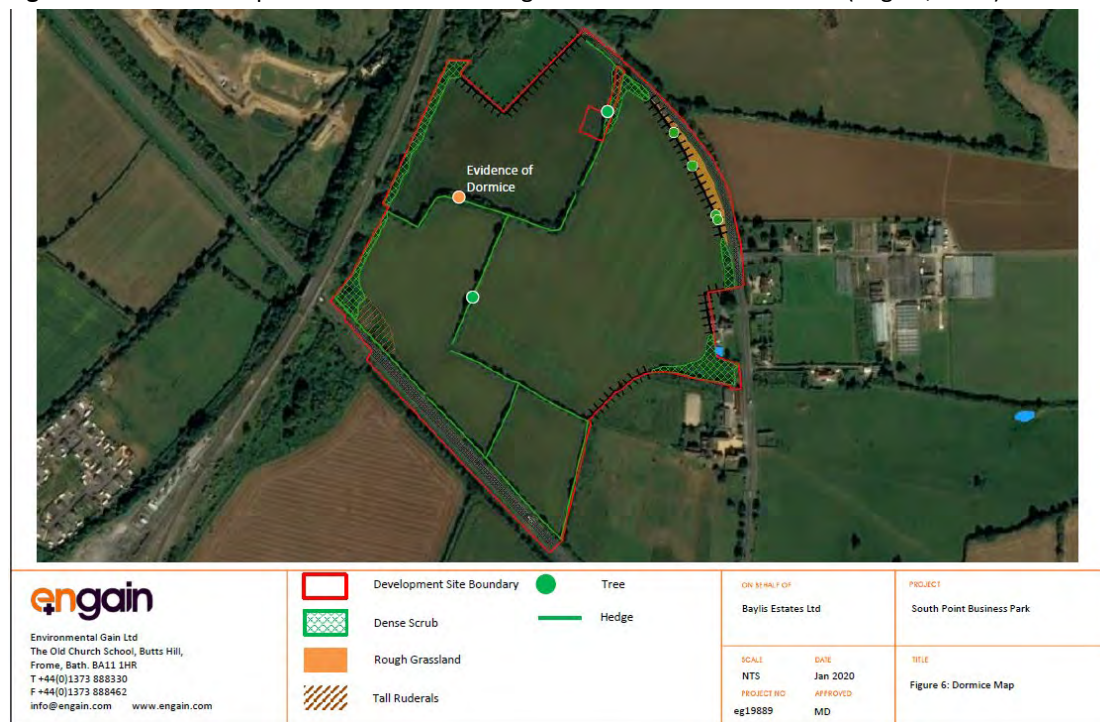
4.7.1 Pre-existing Information

WSBRC returned 1 record of Hazel Dormouse (*Muscardinus avellanarius*) within 2km of the site.

4.7.2 Previous Survey Work

Nut searches and nest tube surveys were carried out in 2011 and 2012, which did not find any evidence of dormice using the site. However, a nut search conducted in 2019 identified some nuts which appeared to have been opened by Hazel Dormice. These were located close to the hedgerow adjacent to the northern site boundary, outside the redline boundary for this site (Fig 13).

Figure 13. Dormice Map of 2020 results showing location of evidence of nuts (Engain, 2020)



4.7.3 Site Assessment

The site itself supports very limited habitat for Dormice as the hedgerows are outside of the site boundary and there is only a small section of scrub within the south-western corner encroaching from outside the redline boundary that would be considered suitable for dormice. Therefore, there is **low potential** for dormice on site only within the small section of scrub.

4.8 Breeding and Nesting Birds

4.8.1 Pre-existing Information

WSBRC returned a number of records for birds of conservation concern (BoCC) within 2km of the site, including numerous records of red and amber-listed species. Due to the quantity of records, they have not been reproduced within this report.

4.8.2 Previous Survey Work

Three breeding bird surveys were carried out in 2012 with a further survey in 2019. Five wintering bird surveys were also conducted in 2011-2012 with a further survey in 2020. Three species were recorded as breeding, though none were of conservation concern. Typical summer and winter species expended to be present in farmland/ grassland habitats were found to be using the site.

4.8.3 Site Assessment

There is some bird nesting habitat on site, limited to two trees and a small patch of scrub and the hedgerows outside the north/west boundaries would also be considered suitable. The grassland is considered largely unsuitable for ground nesting birds or wintering birds and further, the current construction works surrounding the site would likely cause significant disturbance. Therefore, it is considered there is **low potential** for nesting birds on site.

4.9 Invertebrates

4.9.1 Pre-existing information

A number of invertebrate records were identified by WSBRC within 2km mainly comprising *Lepidoptera* and *Diptera* species.

4.9.2 Assessment

Engain carried out a general assessment in 2012 for invertebrates, in particular for the Duke of Burgundy fritillary butterfly (*Hamearis lucina*) and it was considered that invertebrates are unlikely to pose a significant constraint.

Currently, the site is considered of very low value to invertebrates. The site is largely species-poor grassland and where there is bare ground this is due to recent construction disturbance and would not provide suitable opportunities for invertebrates. While the off-site hedgerows could provide some opportunities for invertebrates, the encroaching scrub on site was dominated by Bramble and while it would provide opportunities during the fruiting / flowering season particularly, it is unlikely to support diverse species throughout the year. Therefore, the site is considered of relatively low value for invertebrates.

5.0 LIKELY ECOLOGICAL IMPACTS IN ABSENCE OF MITIGATION

5.1 Introduction

The CIEEM guidelines (CIEEM, 2018) require that the potential impacts of the proposals should be considered in absence of mitigation. In order for a significant adverse effect to occur, the feature being affected must be at least of local value. However, in some cases, features of less than local value may be protected by legislation and/or policy and these are also considered within the assessment. Although significant effects may be identified at this stage of the assessment, it is often possible to provide appropriate mitigation.

5.2 Site Preparation and Construction

5.2.1 Impacts to Habitats

It is assumed the proposals will involve the loss of the modified grassland, bramble scrub, and immature trees which were only considered to be of value at the **site** level of significance. The likely development works would also take place adjacent to the offsite hedgerows of **local** value.

The hedgerows could be damaged by machinery and particularly by root zone compaction during the works. The loss of habitat and potential indirect effects could have a **moderate adverse** impact to habitats at the **local** scale.

5.2.2 Impacts to Wildlife

5.2.2.1 Bats

The site has been identified as having habitat of importance for commuting and foraging bats just beyond the site boundaries. The works will only result in the loss of a small section of scrub near the south-western corners, as the vegetation beyond the site boundaries (hedgerows) will remain undisturbed with buffers included. Therefore, the construction works are likely to only have a **minor impact** due to habitat loss to bats which are of **regional value**.

5.2.2.2 Reptiles

Although no reptiles were recorded on the site itself, the previous surveys identified 'Low' populations of Slow Worms, and Grass Snakes to the north and east of the site. While reptiles are unlikely to be using the site, the vegetation close to the boundaries provide some suitable habitat and the removal of this habitat would have a **possible adverse impact at a local level**.

5.2.2.4 Breeding & Nesting Birds

Whilst the hedgerows situated beyond the site boundaries will be retained, some scrub and tree removal may be required. This has the potential to directly impact nests and/or create disturbance if undertaken during bird nesting season. Therefore, it is considered the development will result in a **minor adverse impact** at the **local level** of significance.

5.2.2.5 Badgers

During the construction phase, excavations and pipework could pose a danger to commuting mammals such as Badgers as they could fall in and/or become entrapped. Therefore there is a **potential adverse impact** at the **local level**.

5.2.3 Impacts to Designated Sites

The site lies within the consultation zone for Bechstein Bats associated with the Bath and Bradford-on-Avon Bats SAC and a small number of Bechstein bats were previously recorded on the site. All suitable habitat for this species is off-site. The works will only result in the loss of a small section of scrub near the south-western corners, as the vegetation beyond the site boundaries (hedgerows) will remain undisturbed with buffers included. Therefore, this is considered to be a likely **minor impact** at the **international level**.

5.3 Site Operation

5.3.1 Impacts to Wildlife & Designated Sites

The development will result in an increase in lighting within the general area from the external lights around the proposed leisure club and car park. This can affect the behaviour, particularly foraging, of nocturnal wildlife. Therefore, an **adverse impact is likely** on bats and badgers or other nocturnal wildlife at up to the **regional level**.

5.3.2 Impacts on Designated Sites

Similarly, new lighting could result in impacts on Bechstein bats within an area that forms part of the Bath and Bradford-on-Avon Bats SAC consultation zone. In the absence of mitigation, an **adverse impact is likely** at the **international level**.

6.0 MITIGATION, COMPENSATION AND ENHANCEMENTS

6.1 Introduction

The below sections outline proposed mitigation and compensation where appropriate and proportionate to ensure protection of features of value. In addition to this, enhancements are included to provide a gain to biodiversity post development.

6.2 Bats & Bath and Bradford-on-Avon SAC

6.2.1 Site Design

The hedgerows of importance for commuting bats are just outside of the site boundary and will not be affected by the proposed works. To ensure bats using this habitat are protected, significant buffers have been included around the southern, western and particularly the northern boundaries of the site where the highest activity levels were identified. This encompasses a much wider buffer than was previously included in the approved design for N/13/00308/OUT included a large hard standing area to the edge of the western boundary. The large buffers provide good connectivity around the edges of the site and will be kept as natural habitat corridors, connecting into the wider environment.

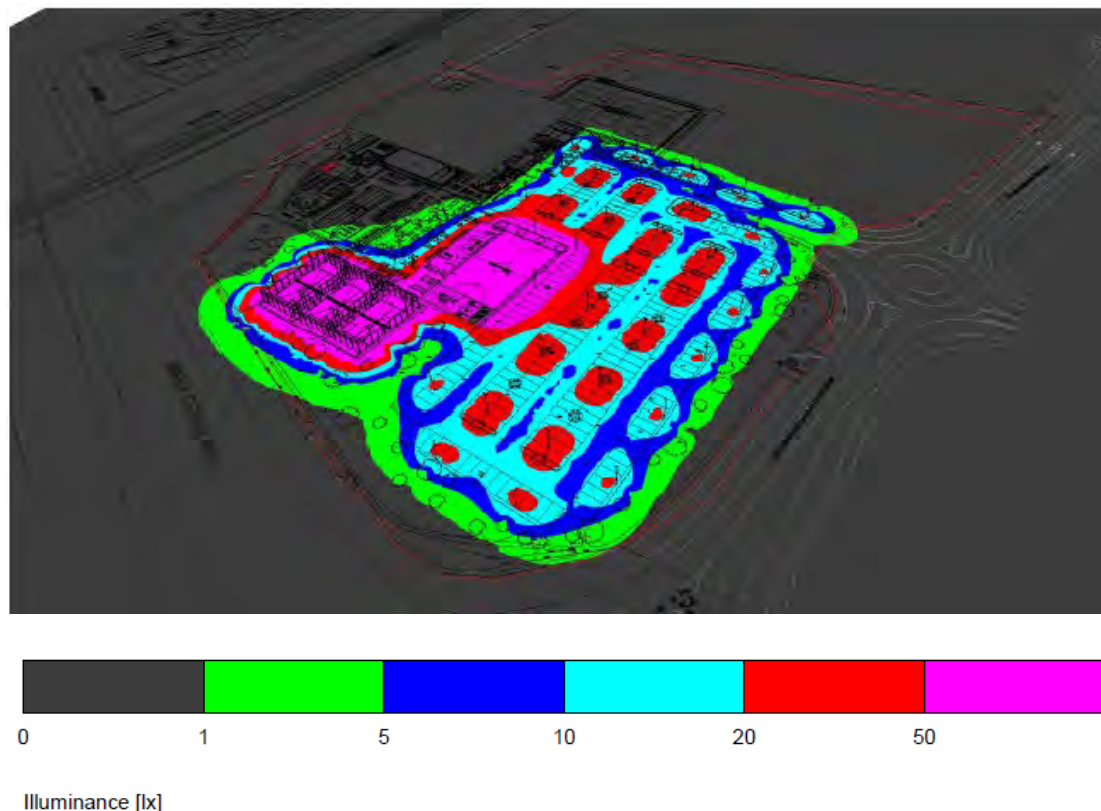
A very small area of bramble scrub is proposed for removal which could be considered minor supporting habitat. Significant compensation and enhancement planting is proposed on site including close to the northern boundary of the site (where the highest activity levels of bats were identified) in the form of a SuDS planted with water-tolerant grassland species to improve invertebrate diversity. A number of areas along other perimeters will also be enhanced through new meadow grassland planting, scrub, woodland, trees and herbaceous species. Overall, it is considered that the habitats on site will be improved for bats including Bechstein bats that may be using the perimeters of the site.

6.2.2 Sensitive Lighting

A lighting strategy has been produced by ELM (2026). As shown in **Fig 14**, the lighting is directed towards the centre of site at the padel courts, MUGA pitch and car park. There is no proposed lighting along the western or northern boundaries that were used as the main corridors by bats. These boundaries connect into the wider site and will continue to allow connectivity within the wider area for bats and other wildlife species.

While the lighting strategy shows the southern boundary will be lit above 1 lux extending from the padel courts, there is currently no supporting habitat for bats along these areas and the A350 road is already well-lit by street lighting. Therefore this is considered acceptable within the proposed scheme as it is unlikely to impact on light-sensitive bats.

Figure 14. Model produced by ELM (2026) showing expected illuminance levels



6.3 Badgers

During the construction phase any open excavations left overnight should either be covered to prevent commuting Badgers (or other mammals) falling in or escape ladders should be used to prevent them from becoming trapped. Any open pipework should be checked and then capped nightly.

If any potential badger setts are identified within 30m of works prior to or during construction works, an ecologist will be consulted and the potential setts may require further survey work to classify.

6.4 Breeding & Nesting Birds

In order to avoid disturbance of nesting birds or damage to their nests, removal of scrub / trees will be undertaken outside of the bird nesting season (typically March – August dependent on weather). If this is not possible, any areas to be impacted should be thoroughly checked by a suitability qualified ecologist immediately prior to clearance. If any active nests are found they should be left undisturbed with a suitable buffer of vegetation (5m) until the nestlings have fledged. Once the nest has been confirmed as inactive the vegetation can then be cleared.

6.5 Reptiles

As the areas of longer grassland around the boundaries will be largely retained and subject only to habitat management, precautionary measures are considered to be suitable where required. This will involve the grassland being reduced to ground level in two stages, first to

15cm and then to ground level following a period of at least 24 hours to allow reptiles to dispersal. This will be directional toward retained habitat. An ecological clerk of works (ECoW) will be present for these works. No grassland was noted to be structured but if structured habitat and/or potential shelters are identified during these works, a destructive search may be required.

6.6 Enhancements

6.6.1 Biodiversity net gain

Biodiversity net gain will be required for the site, as per relevant legislation and policy, with a minimum gain of 10% required. This will be provided in a separate assessment / report once the full site layout details are known.

6.6.2 Invertebrate hotel

1no. invertebrate hotel will be installed within the northern grassland buffer. This will be a standing model such as the CJ Wildlife Corsica hotel (**Fig 15**). It should be sited in an area that will receive full sun and south-facing. The recommended location is shown in **Fig 16**.

Figure 15. CJ Wildlife Corsica insect hotel



6.6.3 Log piles

In addition, 3no log piles will be installed within the grassland buffers around the edges of the site. This will provide potential sheltering habitat for reptiles, amphibians, invertebrates and small mammals. These should be located in an area receiving at least partial sun, with the recommended locations shown in **Fig 16**.

Figure 16. Enhancement plan**Legend**

-  Invertebrate hotel
-  Log piles

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Appendix 1. Baseline Habitats Plans