

Ecological Impact Assessment

Leaffield Padel Courts

February 2026

Ecology | Green Space | Community | GIS

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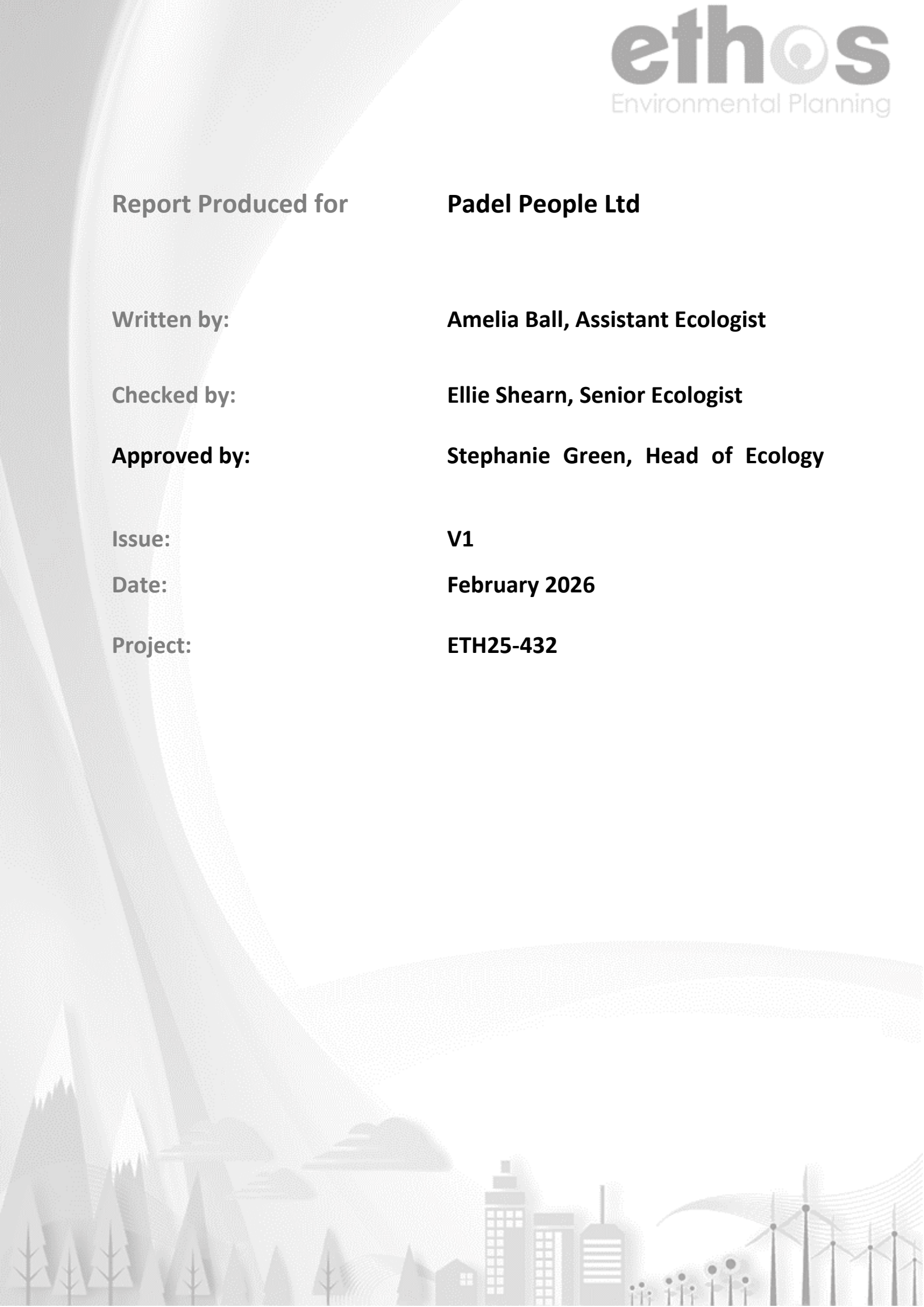
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SUMMARY

Purpose of the Report	This Report has been produced by Ethos Environmental Planning on behalf of Padel People Ltd. It provides an assessment of the likely ecological effects associated with the proposed development of an area of land known as Leafield industrial estate.
Description of the scheme	The development proposals for the site include plans for 3 padel courts. It is noted that the structure on site contains an existing internal padel court infrastructure that is in use.
Methodology	A desk study and UK Habitat Classification survey were undertaken for the site in September 2025. A structure assessment and ground level tree assessment for bats were undertaken in September 2025.
Baseline Ecological Conditions	• The site comprises modified grassland , bramble scrub, an ornamental non-native hedgerow, and other woodland; mixed habitats. • The site is within the 2000m lesser horseshoe buffer bat zone and 4000m greater horseshoe bat buffer zone of the Bath and Bradford on Avon bat Special Area of Conservation (SAC). • The woodland boundary was assessed as suitable habitat for invertebrates, birds, amphibians and reptiles.
Key impacts and mitigation	The development layout has been designed to retain, protect and enhance the most valuable ecological features, namely the woodland boundary habitat. Mitigation measures are described to ensure compliance with protected species legislation for hedgehog, badger, bats and birds, details of which will be provided within a CEMP. Sensitive lighting has been recommended to avoid impact on bats.
Conclusion	Assuming the implementation of effective mitigation measures, as set out in this report, no significant adverse ecological effects are predicted. The proposed development is therefore in accordance with relevant national and local planning policies in relation to nature conservation and relevant wildlife legislation.

1 INTRODUCTION

- 1.1 This Ecological Impact Assessment (EclA) report has been prepared by Ethos Environmental Planning (Ethos) on behalf of Padel people Ltd. The EclA was written by Assistant Ecologist Amelia Ball and co-authored and reviewed by Senior Ecologist Ellie Shearn (BSc) Hons MCEEM. The final report has been approved by Stephanie Green MSc BSc (Hons), MCIEEM. The details and experience of the authors and field survey team are provided in Appendix 2.
- 1.2 The report provides the results of an EclA in relation to the proposed development of Leaffield Industrial Estate (Central Grid Reference ST 86188 69075), hereafter referred to as 'the site' and shown in Figure 1. The site is located in the south of Corsham, east of Westwells.
- 1.3 The site comprises 0.37 hectares and includes other neutral grassland, a hedgerow, developed sealed surface and woodland edges.



Figure 1 location of the site.

- 1.4 The site is proposed for development of three new external padel courts.
- 1.5 The aims of this EclA report are to:

- provide an assessment of the likely effects of the proposed development on ecological features on site;
- provide an assessment of the likely effects of the proposed development on the Bath and Bradford-on-Avon bat Special Area of Conservation (SAC).
- identify the measures required to mitigate impacts on site biodiversity;
- identify opportunities to deliver ecological enhancements and measurable gains for biodiversity as part of the development proposals; and
- to enable the Local Planning Authority to assess whether the proposals comply with relevant planning policy or legislation.

1.6 This report has been produced following the approach set out in CIEEM's 'Guidelines for Ecological Report Writing' (CIEEM, 2017).

2 POLICY AND LEGISLATION

2.1 National Policy

- 2.1.1 The **National Planning Policy Framework (NPPF)** (published Dec 2024) sets out national planning policy, including policies of relevance to conserving and enhancing the natural environment. Policies of relevance to the proposed development (parts of paragraphs 187, 192, 193 and 198) are provided in Appendix 1.

2.2 Local Policy

- 2.2.1 The Wiltshire local plan, Corsham neighbourhood plan and the Corsham batscape strategy. Relevant policies from both plans are listed below and provided in detail within Appendix 1:

- Core Policy 50: Biodiversity and geodiversity
- CNP ED1: Ecology and design

2.3 Relevant Legislation

- 2.3.1 The following pieces of legislation have been considered within this assessment with an explanation of their relevance provided in Table 1.

Table 1 Relevant legislation

Legislation	Relevance
The Habitats Directive (together with the Birds Directive) forms the cornerstone of Europe's nature conservation policy. It is built around two pillars: the Natura 2000 network of protected sites and the strict system of species protection. All in all, the Directive protects over 1,000 animals and plant species and over 200 "habitat types" (e.g. special types of forests, meadows, wetlands, etc.), which are of European importance. The Habitats Directive and parts of the Birds Directive are transposed into legislation by The Conservation of Species and Habitat Regulations 2017 (as amended) .	Potential presence of bats on site.
Wildlife and Countryside Act 1981 (as amended, including by the Countryside and Rights of Way Act 2000), which provides legislative protection for certain species. The Act also prohibits the spread of invasive plant species, as well as providing the mechanism for the designation and protection of Sites of Special Scientific Interest.	Potential presence of nesting birds and amphibians on site.
The Natural Environment and Rural Communities Act 2006 (the NERC Act) places a duty on all public authorities, including local planning authorities, to consider biodiversity in their work. Local planning authorities are to ensure that there is no net loss of biodiversity on a site, no net loss in habitat connectivity and aims to enhance biodiversity.	Potential presence of hedgehog on site. Enhancements for biodiversity.

3 METHODOLOGY

3.1 Scope of Assessment

3.1.1 This assessment has been undertaken following the approach set out in the '*Guidelines for Ecological Impact Assessment in the UK and Ireland, 1.3*' (CIEEM, 2018). The assessment has considered 'Important Ecological Features' that are present within the 'Zone of Influence' of the project. Important Ecological Features for this project comprise¹:

- Designated nature conservation sites;
- Habitats and Species of Principal Importance for the Conservation of Biodiversity in England;
- Legally protected species; and
- Red Listed or rare species (based on Red Data Book lists, Birds of Conservation Concern and species considered to be nationally rare / scarce).

3.1.2 The Zone of Influence (Zoi) is the area over which the project could have an influence on ecological features. The Zoi is likely to vary for different features. However, in general terms the Zoi for this development proposal is considered to comprise the land within the red line boundary as well as immediate adjacent habitat features.

3.1.3 The scope of the assessment was informed by an 'ecological walkover and desktop assessment' undertaken in September 2025. The purpose of this was to identify the habitats on site, their potential for protected species and to establish the scope of surveys that would be required to inform a future planning application at the site.

3.1.4 The overall assessment has been informed by guidelines provided in CIEEM (2017) Guidelines for Ecological Report Writing.

3.2 Background Data Search

3.2.1 A background data search was received from Wiltshire and Swindon Biological Records Centre in September 2025. The search area included records of non-statutory designated sites and protected and notable species within 1km of the proposed development site.

3.2.2 An additional search for statutory designated sites within 1km of the development site and granted European Protected Species (EPS) licences within 1km of the site boundary was undertaken using publicly available information (DEFRA Magic map).

3.3 UK Habitat Classification Survey

¹ Box 14 in CIEEM's ECiA Guidelines (2018)

3.3.1 A UKHab survey was undertaken on 23rd September 2025. The survey incorporated detailed assessment of the land within the development boundary, including a description and mapping of all key features and habitat types. The survey was carried out to identify the range of habitats within the site and the predominant and notable species of flora. This survey was informed by the UKHab classification Version 2 (UKHab Ltd., 2023).

3.3.2 Further details of UK habitat quadrat methodology are provided in Appendix 2.

3.4 NERC S. 41 Mammals

3.4.1 The survey included an assessment of the habitats on site for their potential to support NERC Section 41 species such as hedgehog (*Erinaceus europaeus*), polecat (*Mustela putorius*), harvest mouse (*Micromys minutus*) and brown hare (*Lepus europaeus*). This included a search for nests, runs, latrines, paw prints, and live specimens.

3.5 Badger

3.5.1 The survey for badger (*Meles meles*) included a search of the development site and surrounding habitats for any evidence including setts, foraging signs (snuffle holes), runs and latrines.

3.6 Hazel Dormouse

3.6.1 The survey included an assessment of the potential of the site for hazel dormouse (*Muscardinus avellanarius*), focusing on the connectivity and suitability of the habitat on site.

3.7 Riparian Mammals

3.7.1 The survey included an assessment of the site to support riparian mammals such as otter (*Lutra lutra*) and water vole (*Arvicola amphibius*). This included an assessment of the riparian habitats on site or within the wider environment to support these species.

3.8 Bats

3.8.1 The methodology for the bat survey has been informed by the *Bat Surveys for Professional Ecologists Good Practice Guidelines 4th Edition* (Collins, 2023).

3.8.2 Targeted surveys for bats were undertaken as set out in Table 2, with further details of survey methodology provided in Appendix 2.

Table 2 Surveys undertaken for bats

Survey	Description	Date Undertaken
Assessment of habitat suitability	Habitats on site were assessed for their suitability to support foraging and commuting bats.	23 rd September 2026
Ground Level Tree Assessment (GLTA)	Potential roosting features on trees were identified and classified in line with guidance (BCT, 2023).	23 rd September 2026

3.9 Birds

3.9.1 The bird survey included an assessment of the habitats on site for their potential to support protected and notable species of bird as well as their potential to support breeding birds.

3.10 Reptiles

3.10.1 The potential presence of reptiles on site was assessed considering the habitats present (availability of refugia and basking areas) and suitability of surrounding environment. The assessment of habitats was informed by the *Herpetofauna Workers Manual* (Gent and Gibson, 2003).

3.11 Amphibians

3.11.1 Surveys for GCN were informed by the *Great Crested Newt Conservation Handbook*, Froglife 2001.

3.11.2 The site was examined for suitable waterbodies and for breeding terrestrial habitat. Terrestrial habitats providing sufficiently structured vegetation in which amphibians may forage or hibernate over winter were also surveyed for.

3.11.3 In addition to the on-site assessment, *Great Crested Newt Mitigation Guidelines* (English Nature, 2001) recommend that a desktop analysis of ponds within 500m of the site be undertaken, to identify any potential breeding ponds which may require further survey. Ponds within 500m of the site were mapped on GIS with an OS OpenData base map at 1:10,000 resolution.

3.12 Limitations

3.12.1 The site was fully accessible for the survey, and all surveys were undertaken in line with best practice. Therefore, there are considered to be no significant limitations to the assessment.

3.13 Evaluation of Ecological Features

3.13.1 In line with CIEEMs guidelines on EcIA, this assessment has focused on relevant Important Ecological Features. The scale of importance of these features has been

determined based on available contextual information, which for this project are considered only to include:

- **International** – of international importance and protected through international legislation;
- **National** – of importance in England and protected through national legislation;
- **County** – of importance to the county (Wiltshire) but not sufficiently important to warrant 'National' scale of importance; and
- **Local** – of importance to the local area (Corsham), but not sufficiently important to warrant County scale of importance.

3.13.2 Potential impacts on Important Ecological Features are identified and assessed; likely significant effects are those likely to result in a change to the conservation status of a habitat or species population or undermine/support nature conservation policy. Mitigation measures have been devised following the mitigation hierarchy; appropriate mechanisms for securing mitigation measures have been identified.

3.14 Personnel

3.14.1 The surveyors on site have been detailed in Appendix 2.

4 BASELINE ECOLOGICAL CONDITIONS

4.1 Designated Sites

Statutory designated sites

- 4.1.1 The site is within 1km of the Corsham Railway Cutting Site of Special Scientific Interest (SSSI). This site is designated for its geology with sections of Jurassic limestone and a layer of clay containing brachiopod fossils. Given the small scale of proposed development, the qualifying features for the SSSI and the distance from the site, it has been determined that there will be no significant impacts on the SSSI from the proposed development, therefore it will not be discussed further in this assessment.
- 4.1.2 The site lies within the 2km lesser horseshoe (*Rhinolophus hipposideros*) and 4km greater horseshoe (*Rhinolophus ferrumequinum*) buffer zones for the Bath and Bradford on Avon (BoA) bat SAC consultation area. This designated site protects a significant underground network of sites, including extensive networks of caves, mines and man-made tunnels with some of the key sites including Box Mine, Winsley Mines, Combe Down and Bathampton Down Mines and Browns Folly. This network of sites is used for bats for hibernating, breeding and mating, with the surrounding habitats of grassland, watercourses and woodland being used for foraging and commuting. Species using these sites include three annex II species, greater horseshoe bats (*Rhinolophus ferrumequinum*), lesser horseshoe bats and Bechstein's bats (*Myotis bechsteinii*).
- 4.1.3 The Bath and Bradford-on-Avon Bat SAC is assessed to be of **International importance** for nature conservation, in line with its designation. Due to the presence of the site within the SAC consultation zone, impacts on the SAC are considered further in this assessment.

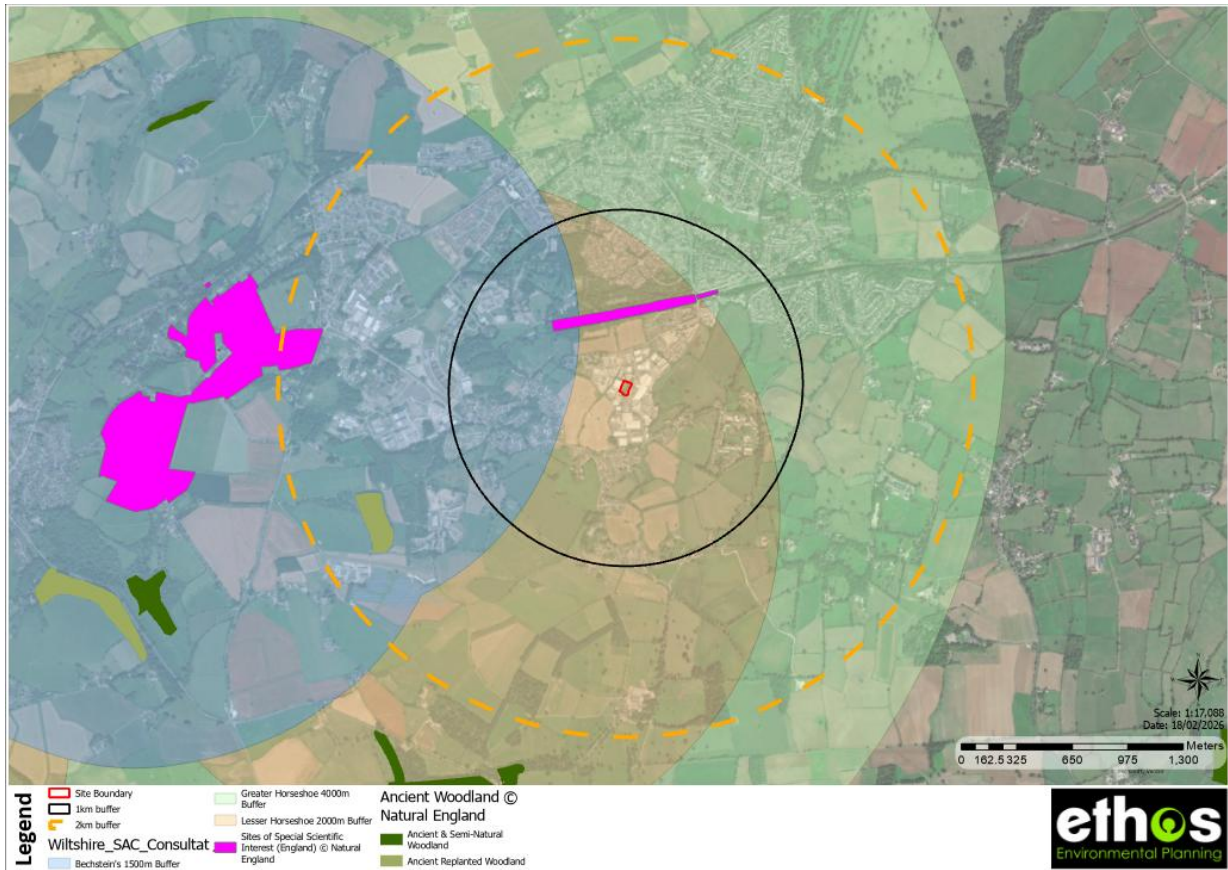


Figure 1 Statutory designated sites within 2km

Non-statutory designated sites

4.1.4 There were no non-statutory designated sites identified during the data search.

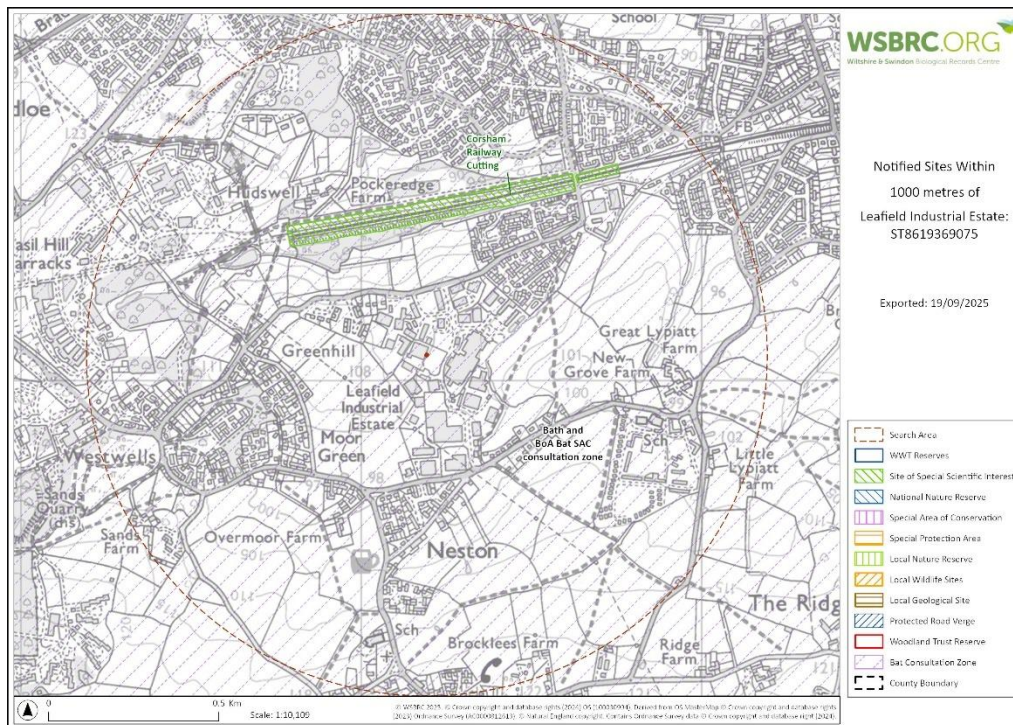


Figure 2 Non-statutory and statutory designated sites within 1km of the site

Priority habitats

- 4.1.5 Within 1km of the site, there were parcels of priority habitat deciduous woodland, traditional orchard and no main habitat but additional habitats present. The deciduous woodland is abundant in the local area, particularly north of the site around the Corsham Railway Cutting SSSI. Traditional orchard is less abundant with a small area above the SSSI and a small area southeast of the site.
- 4.1.6 No priority habitat parcels are adjacent to the site by the industrial estate and farmland. Due to this disconnect between the site and these habitats, priority habitats are not considered further in this assessment.



Figure 3 Priority habitat parcels with 1km buffer from the site

4.2 Habitats

General site description

- 4.2.1 The habitats on site include developed land sealed surface, modified grassland, bramble scrub and other woodland; mixed.
- 4.2.2 The northeast and northwest of the site is bordered by a woodland strip separating the site from the wider industrial estate. The southwest edge of the site is continuous sealed surface, and the southeast of the site is against Leafield Way road.
- 4.2.3 Though the site itself is situated within an industrial estate, the area is surrounded by farmland, and the woodland border of the site links to hedgerows that lead out into this network of fields.

UKHab survey

- 4.2.4 Figure 4 shows the key habitats using the UK habitat classifications. The key features described within this section are:
 - Modified grassland (A1);
 - Developed land; sealed surface (A4);

- Other woodland; broadleaved (A2);
- Bramble scrub (A3); and
- Hedgerows (H1).



Figure 4 UKHab map

Modified grassland

- 4.2.5 The habitat was comprised of: perennial rye grass (*Lolium perenne*), creeping bent (*Agrostis stolonifera*), Yorkshire fog (*Holcus lanatus*), creeping cinquefoil (*Potentilla reptans*), common daisy (*Bellis perennis*), red fescue (*Festuca rubra*), geranium spp, white clover (*Trifolium repens*), red clover (*Trifolium pratense*), dandelion spp (*Taxacrum spp*), creeping thistle (*Cirsium arvense*), ragwort spp (*Senecio spp*), clover spp (*Trifolium spp*), and dock spp (*Rumex spp*). The habitat was of short-sward and well managed at the time of survey.
- 4.2.6 Such habitat is relatively widespread and common and readily recreated in relatively short periods of time. The grassland is not considered to be of any particular botanical value or notability and therefore is not of significant value to nature conservation and will only be considered further in this assessment in relation to biodiversity enhancement.



Photo 1 Modified grassland



Photo 2 Modified grassland

Developed land; sealed surface

- 4.2.7 The parcel was comprised of developed land; sealed surface adjacent to a commercial structure, which has negligible value for nature conservation and will not be considered further in this assessment.



Photo 3 Developed land, sealed surface



Photo 4 Developed land, sealed surface

Other woodland; mixed

- 4.2.8 The site is bordered by a strip of other woodland; mixed that was comprised of laurel (*Laurus spp*), cypress *spp*, dog rose (*Rosa canina*), goat willow (*Salix caprea*), birch (*Betula spp*), apple (*Malus x domestica*), oak *spp* (*Quercus spp*), hawthorn (*Crataegus monogyna*), blackthorn (*Prunus spinosa*), field maple (*Acer campestre*), privet *spp* (*Ligustrum spp*), buddleia (*Buddleija davidii*), sycamore (*Acer pseudoplatanus*), bramble (*Rubus fruticosus*), elder (*Sambucus nigra*), cotoneaster *spp* (*Cotoneaster spp*), cherry *spp* (*Prunus spp*), poplar *spp* (*populus spp*), with an understorey of travellers joy (*Clematis vitalba*), common ivy (*Hedera helix*) and St. John's wort (*Hypericum perforatum*).
- 4.2.9 The woodland area has clearly outgrown with a continuous section of cypress trees (see Photo 6) and lower canopy species outgrowing from scrub previously; this is not a

good representation of a woodland habitat and has been neglected from management given the lack of understory. This woodland is not a habitat of principal importance, however, does have value for nature conservation and will be considered further in this report.



Photo 5 Inside woodland parcel



Photo 6 Woodland (north and north-east corner)

Bramble scrub

- 4.2.10 A section of bramble scrub has grown out via lack of management along the northern site boundary behind the existing hedgerow; this habitat is dense and overgrown, with no clear diversity or structure.
- 4.2.11 The habitat is not of significant value for nature conservation and will only be considered further in relation to protected species carrying capacity.



Photo 7 Bramble scrub adjacent to H1



Photo 8 Bramble scrub adjacent to H1

Hedgerows

- 4.2.12 One species rich, native hedgerow with trees associated with a bank or ditch is present along the northern boundary of the site, and is located adjacent to the mature, grown out bramble scrub located along the built-up bank, and continues off-site. The hedgerow includes hazel (*Corylus avellana*), wild privet (*Ligustrum vulgare*), goat willow, dogwood (*Cornus sanguinea*) and ash (*Fraxinus excelsior*).

- 4.2.13 This is a priority habitat and therefore is of **Local importance** for nature conservation and will be considered further in this assessment.



Photo 9 H1

4.3 NERC S. 41 Mammals

- 4.3.1 The data search identified four NERC S.41 mammal species within 1km of the site: hedgehog (*Erinaceus europaeus*), brown hare (*Lepus europaeus*), polecat (*Mustela putorius*) and a historical record of harvest mouse (*Micromys minutus*). There were 69 hedgehog records from 2000 onwards, widely distributed across the 1km zone, with the closest records 0.42km northeast (2022) and 0.57km south (2021).
- 4.3.2 The site lies on the edge of an industrial estate but connects to the wider landscape via woodland boundaries and adjacent hedgerows, providing suitable, but disturbed foraging and commuting habitat. While the site is not of significant importance for hedgehogs, their presence is considered possible and they will be addressed on a precautionary basis further in this report.
- 4.3.3 Two brown hare records were recorded approximately 1km south of the site in 2005 and 2009. Although present in the wider landscape, the industrial surroundings and on-site habitats (grassland and woodland boundaries) are unsuitable for this species. Brown hare are therefore considered absent and scoped out of further assessment.
- 4.3.4 A single polecat record was recorded around 1km south of the site in 2006, and there is also a historical record of harvest mouse. Despite the presence of a woodland edge, the surrounding industrial landscape and modified grassland limit habitat suitability for polecat, and no suitable habitat is present for harvest mouse. These species are therefore considered absent and not considered further in this assessment.

4.4 Badger

- 4.4.1 The data search returned 1 record of badger (*Meles meles*), located approximately 1km south of the site in Neston in 2019.

- 4.4.2 Although there is a lack of data search results, this does not mean badger are absent, and the surrounding farmland and rural/residential areas are suitable for badger. The grassland is of low value for foraging badgers, but the woodland boundaries of the site are more suitable and connected to the farmland through further hedgerows and woodland patches, however limited and disturbed. However, fencing was identified around the site so permeability from the surrounding area may be limited. Badger are only considered further on a precautionary basis during construction.

4.5 Hazel Dormouse

- 4.5.1 The data search did not identify any records of hazel dormice or granted EPS licences within 1km of the site.
- 4.5.2 Although there are woodland boundaries which are suitable habitats for hazel dormice (*Muscardinus avellanarius*), it is disconnected from other suitable woodland patches and disturbed with litter and industrial movement. It is assessed that dormice are likely absent from the site and they are not considered further in this assessment.

4.6 Riparian mammals

- 4.6.1 The data search did not return any records of riparian mammals.
- 4.6.2 There are no waterbodies or other suitable riparian habitat to support otter (*Lutra lutra*) or water vole (*Arvicola amphibius*) on site; the northern site boundary contains a depression along the bottom of the banked area, acting as a drainage ditch for the existing development. See photos below of these areas.



Photo 10 Northern boundary bank

- 4.6.3 The closest body of water is a small unidentified stream/wet ditch 0.16km east of the site that joins a pond. This is likely unsuitable habitat for otter and is separated from the site by an industrial estate.
- 4.6.4 The aforementioned ditches have been deemed unsuitable for riparian mammals as they are seasonally wet for drainage purposes, not seemingly connected to wider waterways and are ecologically severed from suitable waterways and riparian habitat.

- 4.6.5 Riparian mammals are therefore assessed as unlikely to be present on site and are not considered further in this assessment.

4.7 Bats

Data search

- 4.7.1 The data search identified over 4000 records of bat within 1km of the site from 2008 to 2024. Species include barbastelle (*Barbastelle barbastellus*), serotine (*Eptesicus serotinus*), alcaholic bat (*Myotis alcathoe*), Bechstein's bat (*Myotis bechsteinii*), Brandt's bat (*Myotis brandtii*), Daubenton's bat (*Myotis daubentonii*), Whiskered bat (*Myotis mystacinus*), Natterer's bat (*Myotis nattereri*), Leisler's bat (*Nyctalus leisleri*), noctule (*Nyctalus noctula*), common pipistrelle (*Pipistrellus pipistrellus*), Soprano pipistrelle (*Pipistrellus pygmaeus*), Nathusius's pipistrelle (*Pipistrellus nathusii*), brown long-eared bat (*Plecotus auritus*), greater horseshoe bat (*Rhinolophus ferrumequinum*) and lesser horseshoe bat (*Rhinolophus hipposideros*).
- 4.7.2 Over 2450 of these records were roosts, maternity roosts or hibernaculum, including for all four Annex II species.
- 4.7.3 The data search identified one granted EPS licence within 1km of the site for greater horseshoe bat, lesser horseshoe bat and common pipistrelle, located approximately 0.66km south-west of the site in Westwells.

Habitats

- 4.7.4 The grassland is of low foraging value to bats, and the developed land sealed surface is of negligible foraging value to bats.
- 4.7.5 The woodland and hedgerow boundaries on site provide limited connectivity through the industrial estate, linking to the wider farmland through hedgerows and to the area of woodland around Pockeridge lake which is a suitable foraging area for bats.
- 4.7.6 The Corsham batscape strategy highlights the north-west boundary of the site as a connective feature for bats throughout the Corsham area. It also identified the grassland on site as grass cropping and pasture, a foraging habitat for bats, however this is highly unlikely given the small scale, industrial location and modified nature of the habitat.
- 4.7.7 The boundary features identified are the key suitable habitats for foraging and commuting bats on site. It is noted that the existing structures include external lighting, as seen in the DfL Lighting Technical Report (January 2026).

Structure inspection

- 4.7.8 The structures present on the blue line land within wider ownership of the Client are active padel courts and an office, of which are not going to be impacted by the planning application; no structures were surveyed internally, as it was not deemed necessary given no impact is to be incurred, therefore there is no limitation.
- 4.7.9 The warehouse structure is a modern, corrugated metal-clad structure with security lights present, as seen in Photo 11. The structure is tight, well-sealed and in good condition, with no potential roost features (PRF's) noted, and not comprised of thermally stable materials suitable for bat roosting opportunities.
- 4.7.10 An adjoining, single-storey, brick structure with a flat roof is also located within the blue line area, also deemed to be tight, well-sealed and in good condition, with no PRF's noted.
- 4.7.11 The structures within the blue line area have been determined to have negligible potential for bats and are located away from the impacted red line area, therefore will not be considered further in this assessment.



Photo 11 Existing padel court structure off-site



Photo 12 Existing structure off-site

Ground Level Tree Assessment

- 4.7.12 One tree was assessed as having potential roosting features for bats, an extra large English oak (*Quercus robur*) located along the northern boundary. No obvious roosting features were identified, as seen in photo 13. Several small, superficial, sealed over previous wounds were recorded, however no significant PRF's were recorded.

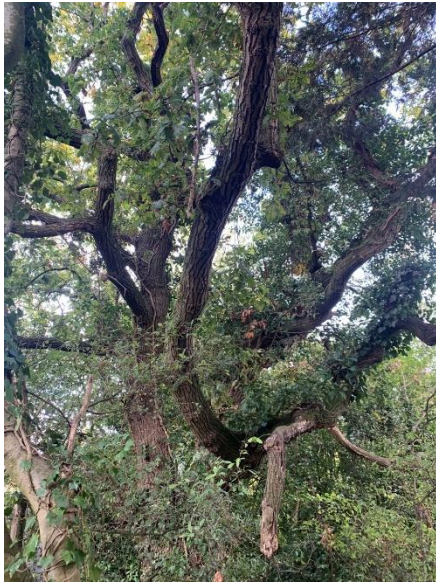


Photo 13 Oak tree on northern boundary

Summary of importance for nature conservation

- 4.7.13 Given the results from the above, it has been assessed that with the combination of the suitable wider landscape, and the heavily industrialised nature of the immediate vicinity of the site, there is some possibility for bat activity across the site, notably along the hedgerow and woodland boundary features of the site.
- 4.7.14 As bats are somewhat likely to be using the site and wider area in a commuting or foraging capacity, they are considered to be of **Local importance** for nature conservation and will be considered further in this assessment.

4.8 Birds

- 4.8.1 The data search returned over 400 bird records within 1km of the site. There are species associated with farmland and urban habitats including house sparrow (*Passer domesticus*), woodpigeon (*Columba palumbus*), starling (*Sturnus vulgaris*) and wren (*Troglodytes troglodytes*).
- 4.8.2 The woodland boundary on site is suitable for foraging and nesting birds. The grassland is suitable for foraging but not for ground nesting birds as the short sward height offers little protection from predation and is often disturbed.
- 4.8.3 Overall, the site is assessed as likely to support a common and widespread assemblage of bird species only and that the site is not an important assemblage of birds. Therefore, birds are only considered further on a precautionary basis during vegetation clearance, where required.

4.9 Reptiles

- 4.9.1 The data search identified 12 records of reptile from 2000 within 1km of the site. These were of slow worm (*Anguis fragilis*), grass snake (*Natrix helvetica*) and common lizard (*Zootoca vivipara*). The closest record was of slow worm located in the farmland 0.4km east of the site in 2020.
- 4.9.2 The grassland on site is of low suitability for reptiles. The woodland boundary is a somewhat suitable habitat, offering limited refugia given the lack of dense understorey, and foraging opportunities, but does not have a marginal boundary and results in harsher, poorly connected habitat boundaries that are less favoured by reptiles.
- 4.9.3 Although there are some suitable habitats for reptiles, construction is limited to the central area of grassland and therefore avoids potential habitat for reptiles. Reptiles therefore have not been considered further in this assessment.

4.10 Amphibians

Data search

- 4.10.1 The data search identified 3 records of amphibian within 1km of the site. These were of common toad (*Bufo bufo*) and common frog (*Rana temporaria*). One great crested newt (*Triturus cristatus*) (GCN) class survey licence return was also identified, approximately 1km from the site.
- 4.10.2 The site is located with the jurisdiction of NatureSpace and falls within an amber zone for GCN impact risk zone. This means in this area there is suitable habitat for GCN and that they are likely to be present in the area.

Habitats

- 4.10.3 There are no ponds on site, therefore there is a lack of suitable habitat for breeding. The woodland border of the site is suitable terrestrial habitat for GCN providing limited refugia. The northern boundary of the site is located along a banked area, with a small ephemeral drainage ditch present along the bottom; this was dry at the time of survey in September and flowing with low water levels upon review in January; this has been deemed unsuitable GCN habitat as it is ephemeral, flowing and only wet in periods of heavy rain.
- 4.10.4 The grassland on site is unsuitable for GCN as it is short sward and non-tussocky, providing limited shelter for GCN and only has limited potential for commuting.
- 4.10.5 The surrounding industrial landscape is unsuitable for GCN and there is limited connectivity to the wider rural landscape through fragmented hedgerows throughout the estate.

Ponds within 500m of the site

- 4.10.6 There are three ponds within 500m of the site, with locations shown below in Figure 5. Two of the ponds are located over 200m northeast of the site, which are ecologically fragmented from the site via the existing industrial estate and Leaffield Way road. The third pond is located over 450m north of the site on the other side of the railway line, being ecologically fragmented from the site with no clear connectivity present.
- 4.10.7 Although there is potential terrestrial habitat for GCN on site, there is limited connectivity between the ponds or between the ponds and the site. Hedgerows and woodland patches are present but fragmented by roads and the industrial estate. It is considered unlikely that GCN are present on site and precautionary measures would likely not be proportional to the potential for GCN to be using the site. Therefore, GCN are not considered further in this assessment.

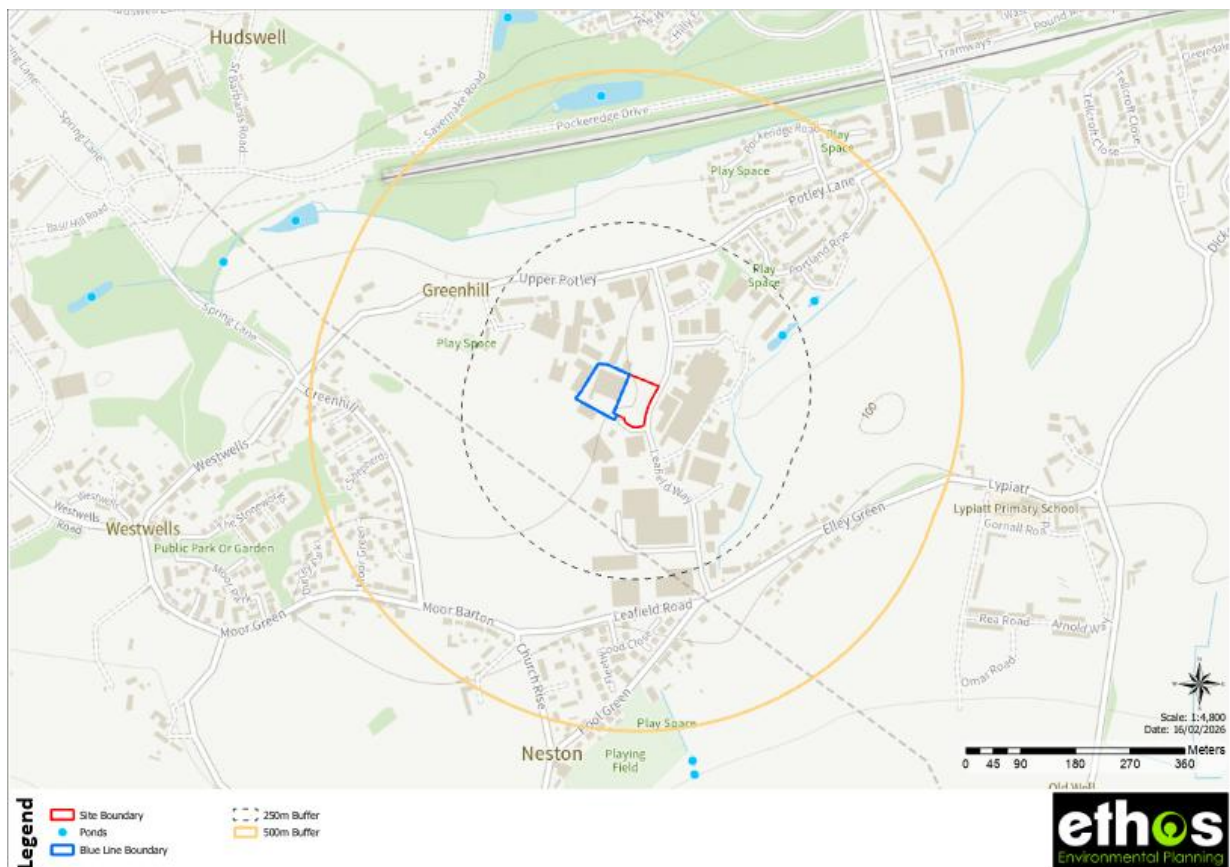


Figure 5 Ponds within 250m and 500m of the site

4.11 Invertebrates

- 4.11.1 The data search recovered 56 records of insects within 1km of the site. There were 29 species recorded, including red listed species and species listed under S.41 of the Wildlife and Countryside Act. This includes buff ermine (*Spilosoma lutea*), common darter (*Sympetrum striolatum*) and small heath (*Coenonympha pamphilus*).

4.11.2 The habitats on site are common and widespread and likely support invertebrate populations that reflect this. The woodland edges are suitable habitat to support a large assemblage of invertebrates. The development proposals are located on the grassland and therefore it is unlikely that they will have any significant impact on the woodland invertebrate assemblage.

4.12 Invasive Species

4.12.1 The data search did not identify any records of invasive species and no Schedule 9 invasive species were identified on site.

4.13 Summary

4.13.1 A summary of the important ecological features on site and their scale of importance for nature conservation is shown in Table 3.

Table 3 Important ecological features on site

Important Ecological Features	Scale of Importance
Bath and Bradford on Avon bat SAC	International
Woodland and hedgerow boundaries	Local
Hedgehog	N/a – precautionary only
Badger	N/a – precautionary only
Bats	Local
Birds	N/a – precautionary only

6 ASSESSMENT OF IMPACTS AND MITIGATION MEASURES

6.1 Bats and the Bath and Bradford on Avon bat SAC

Construction impacts

- 6.1.1 Sensitive lighting during construction will comprise directional lighting away from the woodland boundaries and hedgerows, such as no additional lighting to be utilised within hours of darkness; further details of which will be provided within a Construction Ecological Management Plan (CEMP).

Operational impacts

- 6.1.2 The proposed development will have a sensitive lighting plan to minimise light spill into boundary habitats where possible and proportional as per DfL Lighting Technical Report (January 2026). Additionally, the location of the padel courts means that the key commuting pathway identified as the north-west hedgerow by the Corsham batscape strategy, will be buffered from any changes in lighting by the existing building on site and will not be significantly impacted.
- 6.1.3 Therefore, with the above mitigation measures, no significant impacts on the Bath and Bradford on Avon bat SAC from the proposed development.

6.2 Woodland and hedgerow boundaries

Construction impacts

- 6.2.1 In the absence of mitigation, potential impacts could include damage to retained hedgerow and woodland during construction and impacts of construction pollution. To avoid impacts on hedgerows, tree protection fencing will be installed, sensitive lighting and pollution prevention controls implemented during the construction period. These measures will be set out within a CEMP, which can be secured by planning condition.

Operational impacts

- 6.2.2 Given the extent of the proposals and function of the proposed development, it has been determined that there are likely no direct impacts on the woodland and hedgerow. Indirect impacts in relation to protected species are to be discussed below.

6.3 Hedgehog

Construction impacts

- 6.1 The site has the potential to support hedgehog and in the absence of mitigation, injury or mortality could occur to foraging or commuting hedgehog during site clearance and construction. Good practice measure to avoid impacts on hedgehog include

appropriate storage of materials to avoid creating refugia, the inclusion of shallow ramps in any exposed trenches to prevent animals from becoming trapped overnight, and a sensitive lighting plan, as per DfL Lighting Technical Report (January 2026). These measures will be set out within the CEMP which can be secured by planning condition.

Operational impacts

- 6.3.1 No significant operational impacts have been predicted on hedgehog from the proposed development.

6.4 Badger

Construction impacts

- 6.1 Potential impacts on badgers include disruption to foraging or commuting badgers through insensitive construction lighting, or harm to individuals through construction activities. Mitigation to avoid impacts on badgers will include a sensitive construction lighting plan, as per above, the inclusion of gentle gradients at the ends of exposed trenches to provide an escape route for individuals and appropriate storage of materials and harmful chemicals. These details will be provided within a CEMP which can be secured by planning condition.

Operational impacts

- 6.4.1 No significant operational impacts have been predicted on badger from the proposed development.

6.5 Bats

Construction impacts

- 6.5.1 Potential impacts on commuting bats could occur as a result of insensitive construction lighting, which could disturb commuting or foraging bats. Sensitive construction lighting will be required during construction, which can be set out within the CEMP.
- 6.5.2 Protection of hedgerows (detailed in Section 6.2) will be required to ensure these important commuting habitats are retained and protected during the construction period, again this will be set out within the CEMP.

Operational impacts

- 6.5.3 As the key commuting and foraging habitats are to be retained, there are not direct impacts on bats from the operation of the proposed development.
- 6.5.4 Indirectly, insensitive lighting may disrupt commuting and foraging bats across the site; with the combination of the existing artificial light levels across the site as per DfL Lighting Technical Report (January 2026) and the proposed sensitive lighting plan and

schedule of 'switching is to be used to turn the luminaires off after curfew between 10:30pm through to 6am which will also reduce the hours of light spill' it has been assessed that any increase of lighting is unlikely to create a significant impact on bats in the area.

- 6.5.5 Overall, it has been assessed that no significant impacts will be incurred from the proposed development.

6.6 Birds

Construction impacts

- 6.6.1 The woodland on site was assessed as suitable nesting and foraging habitat for birds. The proposals do not include any need for removal of woodland, however if any trimming or management of the woodland edges is required to facilitate the construction then mitigation will be required.
- 6.6.2 Nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended) so it is necessary to avoid damage, destruction or disturbance of nests. Impacts on nesting birds can be mitigated by removing suitable habitat, namely hedgerow, scrub and trees outside of the breeding bird season (March to August inclusive). If works occur inside of the breeding bird season, a pre-works check would be required by a Suitably Qualified Ecologist (SQE). The method statement for ensuring the protection of nesting birds will be detailed within the CEMP, to be secured by a planning condition.

Operational impacts

- 6.6.3 As key bird habitat is being retained on site, it has been assessed that no significant impacts will be incurred from the proposed development.

6.7 Summary

- 6.7.1 A summary of the predicted significance of any effects, as well as the proposed mitigation measures and how these may be secured are outlined in Table 3.

Table 3 Summary of significance of effects and mitigation

Ecological Feature	Mitigation	Mechanism for securing delivery	Residual Effects
Bats and Bath and BoA bat SAC	Sensitive construction lighting Sensitive lighting plan	CEMP Lighting strategy	None
Woodland and hedgerow boundaries	Sensitive construction lighting and good practice working measures including tree protection fencing	CEMP	None
Hedgehog	Good practice working measures	CEMP	None

Ecological Feature	Mitigation	Mechanism for securing delivery	Residual Effects
	Sensitive construction lighting		
Badger	Good practice working measures Sensitive construction lighting	CEMP	None
Bats	Sensitive construction lighting Sensitive lighting plan	CEMP Lighting strategy	None
Birds	Timing of works or pre-works check	CEMP	N/a

6.8 Compensation

6.8.1 No compensation will be required.

7 ENHANCEMENTS

7.1 Habitats

- 7.1.1 The key features of the site to enhance will be the grassland, woodland and hedgerow boundaries, where possible.
- 7.1.2 The woodland was assessed to be of poor to moderate condition. This could be improved by removal of litter and the removal of non-native Leylandii trees.
- 7.1.3 The boundaries of the site also have Leylandii trees that could be supplemented with or replaced by planting of a species rich native hedgerow mix to widen these boundaries and increase diversity as well as improve soil health.
- 7.1.4 The retained grassland could be improved by re-seeding the remaining grassland around where the development footprint is with an grassland mix to promote diversity and decreasing the management regime to promote tussocky grassland to improve the condition. The grassland mix could be Emorsgate EM1, EM2, or an equivalent mix.
- 7.1.5 The measures set out above can be secured through the requirement for a Landscape and Ecology Management Plan (LEMP) or Ecological Management Strategy (EMS), which can be secured by planning condition.

7.2 Protected Species

- 7.2.1 Bat and bird boxes could be installed on some of the larger trees in the woodland area to provide new roosting and nesting opportunities.
- 7.2.2 The measures set out above can be secured through the requirement for an Ecological Enhancement Plan (EEP), which can be secured by planning condition.

8 CONCLUSIONS

- 8.1 Although the site does contain habitat of ecological value, the woodland and hedgerow borders, its location within the industrial estate reduces the value of these habitats and ecologically fragments them from the wider landscape.
- 8.2 The area of the site being developed (the grassland) is unlikely to support any protected species. The woodland and hedgerow may support commuting species such as bats, hedgehog or badger are not being impacted and will be buffered from lighting impacts during construction and operation. The woodland also is likely to support foraging and nesting birds so as well as being buffered by lighting, will also require mitigation if any removal is required. Overall, no significant impacts on biodiversity are predicted.
- 8.3 The site is located with the lesser horseshoe bat and greater horseshoe bat buffer zones within the Bath and Bradford on Avon bat SAC, but no impacts are predicted on the SAC due to the sites location within an industrial area and there will be no loss of connecting features or key habitat for bats. The site is also located within the amber zone for NatureSpace's GCN risk map but has limited connectivity to ponds or suitable habitat in the surrounding area with fragmented hedgerows through and industrial estate, ecologically disconnected by roads and sealed surface.
- 8.4 This development is therefore in accordance with core policy 50: Biodiversity and geodiversity and CNP ED1 ecology and design, and mitigation measures can be secured through an appropriate planning condition which ensures compliance with the measures set out within this EclA.
- 8.5 Suitable enhancements for habitats and protected species (bats and birds) have been provided. These measures support core policy 50: Biodiversity and geodiversity which relate to providing biodiversity gains proportionate to the development proposals.

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APPENDIX 1 POLICY

National Policy - NPPF

The **National Planning Policy Framework (NPPF)** (published Dec 2024) sets out national planning policy, including policies of relevance to conserving and enhancing the natural environment. Policies of relevance to the proposed development (parts of paragraphs 187, 192, 193 and 198) have been summarised below:

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

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

Para 192: To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*

Para 193: When determining planning applications, local planning authorities should apply the following principles, notably:

- 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;*
- 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*

Para 198: c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

Local Policy

Wiltshire core strategy - Core policy 50: Biodiversity and geodiversity

Protection

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

Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 above where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.

Biodiversity enhancement

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

Local sites

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

- I. cannot reasonably be avoided*
- II. are reduced as far as possible*
- III. are outweighed by other planning considerations in the public interest*
- 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.

Corsham neighbourhood plan – CNP ED1: Ecology and design

Proposals for development should take into account the Corsham Design Guide and Corsham Batscape Strategy. Applicants must demonstrate how their proposals will:

- I. take account of the principles and guidance in the Corsham Batscape Strategy to help ensure that their development preserves and, where possible, enhances landscape permeability and connective habitats within the Corsham area (including details of measures to preserve and, where possible, enhance wildlife corridors, especially with regard to foraging areas, priority flight lines and maternity roosts);
- II. be of high-quality design, reflecting the distinctive character and features of the local area (design, scale, materials, colours and proportion respect the prevailing historic context) identified in the Corsham Design Guide and, where possible, result in improvements to existing features that are considered to be detractors.

APPENDIX 2 SURVEY METHODOLOGY

Quadrat Methodology

Grasslands were surveyed using professional judgement using 1x1m² quadrats sample. A minimum of three quadrats were undertaken of each grassland section. The DAFOR scale was used to assess the coverage of each species.

Information collected within each quadrat included aspect, slope, average ground cover, sward variation, species, and their percentage cover.

Where the grassland differed to a certain extent or was divided by field boundary such as hedgerows it was considered that the grassland was a different habitat parcel, and another assessment was undertaken.

Bats

Habitat assessment

The habitats on site were assessed for their suitability to support foraging and commuting bats. This assessment was also contextualized through examination of suitable habitat and features in the wider landscape and possible flight-lines across the proposed site following natural linear features such as hedgerows.

Preliminary roost inspection

Physical external and internal inspection of the buildings were undertaken on 23rd September 2025 using the equipment described below to assist the inspection. Approximately 1 hour of search effort were expended.

The physical search includes a search for live animals and a search for other signs that give an indication of past or present occupancy as outlined below. In the case of bats, typical indicators include droppings (which are characteristic and can often be speciated or at least be indicative of species type), signs of staining, urine splashing, characteristic odours, and accumulations of discarded prey remains.

Ground level Tree Assessment (GLTA)

The methodology draws upon guidance within Collins (2023) and the Bat Tree Habitat Key (2018). The surveys were undertaken using binoculars and a high-powered torch to view features from the ground. Details on the potential roosting features were recorded as well as information to identify the specific trees.

Potential roosting features on trees were identified as any feature within a tree that could provide shelter for a roosting bat. These features result from the following three mechanisms:

- Disease and decay;
- Damage; and,
- Associations.

Tree with no potential roost features were assessed as having ‘negligible’ potential for roosting bats and no further surveys were carried out. Potential features have been categorised following the guidelines set out in table 6.2 (extract below):

Table 6.2. Guidelines for categorising the potential suitability of PRFs on a proposed development site for bats, to be applied using professional judgement.

Suitability	Description
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.
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony.

Trees with features suitable for roosting bats were assessed as having ‘PRF-I’ or ‘PRF-M’ suitability for bats. Trees with ‘PRF-I’ potential for roosting bats were not subject to additional survey, in line with BCT survey guidelines. Justification is provided, in the form of a detailed description and photographic evidence, to demonstrate how the classification of ‘PRF-I potential’ had been made. Recommendations will be made as necessary if any trees with low potential are to be impacted.

Trees assessed as containing PRF-M and considered likely to be impacted by the development (e.g., directly through removal or indirectly from light spill) were subject to further Potential Roost Features (PRF) inspections or Aerial Inspection Surveys as detailed below.

Surveyors on Site

Table 4 Site surveyors

Ecologist	Position	Qualifications/ Licences	Experience	Role
Steph Green	Head of Ecology	MSc BSc (Hons), MCIEEM Class 1 GCN Licence Class 1 Hazel Dormouse Licence	Steph has over eleven years’ experience in ecological field survey and consultancy. Steph is responsible for leading and undertaking comprehensive ecological impact assessments, protected species surveys and is a licensed GCN and dormouse worker, as well as a Full Member of CIEEM.	Report checker
Ellie Shearn	Senior Ecologist	BSc (Hons), MCIEEM Class 1 Bat Licence (NE) (2025-13062-CL17-BAT)	Ellie is an ecologist at Ethos with five years’ experience in ecological consultancy. Ellie leads a range of habitat assessments and protected	Report author and checker

Ecologist	Position	Qualifications/ Licences	Experience	Role
		Class 1 GCN Licence (NE) 2025-80144-SCI-CL08	species surveys including bat surveys and assessments. Ellie is proficient at authoring a range of reports and managing projects. Ellie manages that bat data analysis for Ethos.	
Becky Morris	Senior Ecologist	PhD, DIC, MSc, BSc, MCIEEM Class 1 GCN Licence	Becky has sixteen years' experience working as an Ecological Consultant, specialising in botanical surveys. She holds a great crested newt survey licence.	Site surveyor
Sarah Roberts	Ecologist	MSc, BA (Hons) Class 1 Barn Owl Licence (NE) Class 1 GCN Licence (NE) Class 1 Bat Licence (NE)	Sarah has over six years' of ecological consultancy experience and an additional four years in environmental communications. Sarah undertakes habitats and protected species surveys, as well as producing associated reports. She specialises in ornithology, ecological provisions and habitat design.	Site surveyor
Amelia Ball	Assistant Ecologist	BSc (Hons)	Amelia has experience assisting with a variety of protected species surveys. She also assists in habitat assessments, data analysis and report writing.	Report author

