

Hazelbury Manor, Box
Ecological Impact Assessment

March 2026

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1 Summary

Report purpose	This report sets out the methods and results of ecological surveys at Hazelbury Manor. An ecological assessment of the Site was conducted, based on a desk study, extended habitat survey, and various surveys for protected species. This report describes likely impacts of the proposals on ecological features and recommendations for appropriate ecological mitigation and enhancement measures.
Date and methods of survey	An extended habitat survey was conducted by BSG Ecology 26 June 2025 and 30-31 July 2025. A Preliminary Roost Assessment for bats of buildings was undertaken on the 26 June 2025. An eDNA survey for great crested newt was undertaken on the 26 June 2025.
Key findings	Designated sites The desk study identified two statutory designated wildlife sites within 2 km of the Site, one SSSI and one SAC (no additional international designations are present within 5 km). Both are located onsite. The data search also highlighted seven non-statutory designated wildlife sites in the search area including five Local Wildlife Sites (LWS) and two designated verges. Habitats The Site is dominated by built-up areas and formal gardens with an other neutral grassland field in the south. Lowland calcareous grassland is also present on the verges of the southern driveway which is bordered by a hedgerow to the north. Scattered trees are present throughout. Bats Multiple bat roosting opportunities are located throughout roofs and roof voids onsite, including within Hazelbury Manor house, the Granary and the Dower house. DNA analysis of droppings collected during the Preliminary Roost Assessment in 2025 confirm the presence of serotine and common pipistrelle bats within roof voids. No further nocturnal (emergence) surveys were undertaken as impacts to bats can be avoided through implementation of mitigation; however, it is likely that multiple roosts are present throughout buildings onsite. Great crested newt There are six ponds onsite, within 250 m or sufficiently close to be considered within a metapopulation. eDNA surveys conducted by BSG Ecology in 2025 confirmed GCN absence from all ponds surveyed. No further measures are required. Reptiles Grassland, tall forbs and less managed areas of garden onsite have potential to support low numbers of reptiles.

	Birds Nesting bird opportunities are present throughout the Site, including within buildings, trees, hedgerows and ground nesting opportunities within grassland.
Potential impacts	Designated sites No direct impacts to designated wildlife sites will occur from the Proposed Development. Potential indirect impacts include increased footfall due to elevated visitor numbers and impacts during the construction phase (for example dust and light pollution). Habitats The Proposed Development will result in the loss of a limited extent of other neutral grassland and tall forbs to accommodate the carpark. Without protection measures during construction there is potential for accidental physical damage to branches or roots of retained trees, grassland and hedgerows by vehicles (compaction, ground works etc.), or through material storage or movements. Furthermore, without appropriate management during occupation, there is potential for damage by inappropriate management (e.g. felling or heavy trimming). Without protection measures during construction there is potential for physical damage or pollution. Bats All proposed renovation works will be internal below the ceiling level, with no impacts to the roof, therefore direct impacts to roosting bats are avoided. Increased artificial lighting from during construction and operation, has potential to disturb roosting, foraging and commuting bats Reptiles Potential for harm to individual reptiles during the vegetation clearance. Birds Potential for destruction of nests during the vegetation clearance.
Recommendations	Designated sites Use of signage and designated footpaths throughout the Site to create clear walkways and prevent damage to habitats within the designated sites with instructions to keep to the existing paths and for dogs to be kept on leads within sensitive areas A Construction Environmental Management Plan (CEMP) to include protective measures, such as pollution protection measures, root protection zones, temporary protective fencing, dust control and lighting measures. Habitats Incorporate protection measures within the CEMP to avoid accidental encroachment to, or damage of, retained habitats within the Site through protective fencing, root protection zones and standard noise and dust control measures (within standard working hours).

Protected species

Reasonable avoidance measures are required to protect transient animals moving thorough the Site during the enabling and construction phases of the development.

A pre-construction walkover should be undertaken by an ecologist within three months prior to works commencing to check for any new mammal signs (notably badger) prior to the commencement of construction.

Bats

All proposed renovation works will be internal and below the ceiling level, with no impacts to the roof, therefore direct impacts to roosting bats are avoided.

Increased artificial lighting from during construction and operation, has potential to disturb roosting, foraging and commuting bats. The CEMP will include lighting measures throughout construction, and a sensitive operational lighting strategy is required.

Should any trees require felling and/or pruning within the Site boundary an ecologist should be notified and further assessment is required.

Reptiles

Vegetation clearance should follow reasonable avoidance measures under the supervision of an ecologist, as a precautionary measure to protect individuals and allow them time to move away from vehicles and machinery.

Birds

The grassland to be cleared onsite is sub-optimal for ground nesting birds due to the proximity of hedge lines and trees. However, as a precaution, if vegetation clearance is undertaken in the nesting bird season (March-September inclusive) the grassland should be checked for breeding activity and/or nests prior to clearance by an experienced ecologist.

2 Introduction

Background to commission

- 2.1 BSG Ecology were first commissioned by Hazelbury Manor Limited in June 2025 to carry out a Preliminary Ecological Appraisal (PEA) involving a desk study, an extended habitat survey, an eDNA survey of ponds for great crested newt *Triturus cristatus* and a Preliminary Roost Assessment (PRA) for bats of many of the buildings onsite at Hazelbury Manor, Box, Wadswick, Corsham SN13 8HX (the 'Site'). National Grid Reference ST 83533 68326.
- 2.2 Subsequently, in February 2026, BSG Ecology were commissioned to compile this Ecological Impact Assessment (EclA) based on the desk study and surveys undertaken throughout 2025.

Site description

- 2.3 Hazelbury Manor is located within a broader 72.7 ha ownership area which includes in part a Grade II listed Park and Garden (Listing no. 1000520), woodland, ponds, traditional orchards, hedgerows with trees, grassland, scrub, and arable fields. The large village of Box is to the west, and Corsham to the northeast.
- 2.4 The property has been farmed for around two centuries. It underwent significant restoration and extension in the 1920's, later becoming a girls' school between 1943 and 1971, after which it came under private ownership once more. Hazelbury Manor house is a Grade I (listing no. 1363618) building constructed predominantly in the 15th to 17th Centuries. The Granary is a Grade II (listing no. 1363619) building constructed in late 17th Century, and later converted to garages, cottages and workshop in the 1920's. The Stables is a Grade II (listing no. 1022779) building constructed in the late 17th Century. There are further traditional and modern agricultural buildings onsite around the farm.

Description of project

- 2.5 The proposals comprise a full planning application, allowing the change of Use (CoU) of the Manor house and adjoining Dower House to be utilised as a hotel and the Granary converted into suites. All works will be undertaken below the roof ceiling level of the three buildings included as part of the CoU, with no roof works proposed. In addition, a new carpark is also proposed to the south of the Manor House, accessed by existing farm tracks. Please refer to Wiltshire Council PL/2026/00168.

Scope of study

- 2.6 This study identifies potential ecological impacts of the Proposed Development and sets out measures to avoid, reduce, mitigate or compensate for these impacts, as appropriate in line with the mitigation hierarchy.

Aims of study

- 2.7 This report sets out:
- The methods employed during the ecology desk study and surveys.
 - The findings of the extended habitat survey.
 - Likely impacts of the proposals on ecological features.
 - Recommendations for appropriate ecological mitigation and enhancement measures.

3 Methods

Desk study

- 3.1 Information on the presence of designated sites¹ and records of protected and notable² species in the vicinity of the Site was provided by Wiltshire and Swindon Biological records Centre (WSBRC) on 19 June 2025. The search area extended 1 km from Hazelbury Manor house, extending to 2 km for bat records.
- 3.2 The desk study made use of publicly available online maps and aerial photography resources to assess the landscape and ecological context of the Site, and to identify any designated sites of nature conservation interest including:
- The Multi-Agency Geographic Information for the Countryside (MAGIC) database (<http://www.magic.gov.uk/>). This was used to identify any additional nearby statutorily designated sites (including Sites of Special Scientific Interest (SSSIs) and Special Area of Conservation (SAC)) with particular consideration for the Core Sustainance Zone (CSZ) of greater horseshoe *Rhinolophus ferrumequinum* (CSZ = 3 km), lesser horseshoe *Rhinolophus hipposideros* (CSZ = 2 km), and Bechstein's *Myotis bechsteinii* (CSZ = 1 km). A CSZ refers to the area surrounding a communal bat roost within which habitat availability and quality will have a significant influence on the resilience and conservation status of the colony using the roost (Collins, 2023).
 - In addition, any granted European Protected Species Mitigation licence (EPSM) applications³, Defra eDNA survey results of ponds 2017-2019, and great crested newt survey licence returns within 2 km of the Site.
 - Google earth – current and historical aerial photographs.
 - Base maps and aerial images from the MAGIC website were used to identify waterbodies up to 500 m from the Site to help inform an assessment of the potential for great crested newt to be present on Site.

Field survey

Extended Habitat Survey

- 3.3 A brief walkover of the Site was undertaken on the 26 June 2025 by Anna Muckle MCIEEM and Emily Dickins MCIEEM, Principal Ecologists at BSG Ecology. A habitat survey of the Site (boundary mapped in Figure 1) was undertaken by Dr. Tom Flynn MCIEEM CEcol, Technical Director at BSG Ecology on 30 and 31 July 2025. A summary of the team's experience is available at <https://www.bsg-ecology.com/people>.
- 3.4 The surveyors identified the broad habitat type and their extent within the Site, and immediately adjacent where access was possible, classifying habitats according to the UK Habitats Classification (UKHab, 2023). The minimum mapping unit (MMU) used for the survey was 25 m² (5 m x 5 m). All features smaller than this threshold were not mapped as independent habitats parcels; they were considered to form part of the wider surrounding/adjacent habitat parcel. Representative photographs were taken of habitats and ecological features observed.
- 3.5 Tom Flynn carried out habitat condition assessments of the habitats following the statutory biodiversity metric condition assessment guidance from Defra (2024). Relative abundance of plant species was estimated by the surveyor using the DAFOR⁴ scale, and representative quadrats taken to provide information on the number of species per meter squared for the condition assessment. The detailed habitat condition assessments will inform a separate biodiversity net gain assessment

¹ Statutory Sites: European Sites (SAC/SPA/Ramsar Sites), SSSIs, NNRs and LNRs; Non-statutory Sites: Local Wildlife Sites / County Wildlife Sites (and equivalent designations) and Ancient Woodland sites.

² Notable Species - Species of Principal Importance (SPI) in England and species with other conservation significance (e.g. red or amber listed birds or species listed in relevant red data lists).

³ This data was most recently updated 13 January 2022, but provides contextual information.

⁴ The DAFOR scale is frequently used to estimate plant abundance during habitat surveys, the categories are: D: dominant; A: abundant; F: frequent; O: occasional; and R: rare.

(BSG Ecology, 2026) to support the planning application, and therefore the detailed results are not presented within this report.

- 3.6 The survey was 'extended' to include an assessment of the potential for the Site to support protected species and/or otherwise notable species⁵. Any invasive non-native plant species, listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended), apparent at the time of survey were identified.
- 3.7 Weather conditions during the survey visits were overcast (6/8 oktas) and averaged 19°C with light precipitation and moderate breeze (4/12 wind, Beaufort scale).

Limitations to methods

- 3.8 The habitat survey was undertaken within the recommended period for habitat surveys (JNCC, 2016). No limitations were noted.

Bat Preliminary Roost Assessment

- 3.9 A Preliminary Roost Assessment (PRA) for bats of the buildings within the Site extent were undertaken on the 26 June 2025 with reference to the Bat Conservation Trust (BCT) Good Practice Guidelines (Collins, 2023). The survey was carried out by Anna Muckle (bat survey Class Licence holder level 2: 2015-11522-CLS-CLS) and Emily Dickins (bat survey Class Licence holder level 3 & 4: 2016-27135-CLS-CLS/ 2016-27136-CLS-CLS). This combined both an external and internal assessment where safe access allowed for all buildings onsite (see Figure 4a and 4b).
- 3.10 The Manor house, Dower House and the Granary, and farm complex buildings were systematically searched internally and externally from the ground (where safe access allowed) for evidence indicating the presence of bats (live and dead bats, staining at potential roost entry points, feeding remains, droppings and urine marks) and assessed for suitability to support bat roosts through the identification of potential roosting features (PRFs) and potential bat roost access points. The suitability of the buildings for bats was assessed as either high, moderate, low or negligible using the criteria set out in Table 1.

⁵ Protected species: those that are protected under the Wildlife and Countryside Act 1981 (WCA) or the Conservation of Habitats and Species Regulations 2017; badger is also subject to specific legal protection.

Table 1: Criteria for assessing bat roosting suitability of buildings (adapted from Collins, 2023).

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

- 3.11 The survey was undertaken with high-powered torches, an endoscope, and digital camera, and sample tubes for collecting dropping samples for subsequent DNA analysis where required.

Limitations to methods

- 3.12 The assessment was undertaken in optimal conditions on a bright, sunny day and there had been no significant rainfall in the days preceding the survey. All roof voids were accessed except for a single void in the Granary building which was not accessible due to a blocked roof hatch and part of Hazelbury Manor. As no works are proposed above ceiling height in these locations, this is not considered to be a significant limitation.

Great crested newt eDNA survey

- 3.13 An environmental DNA (eDNA) survey for great crested newt *Triturus cristatus* was carried for all waterbodies located within the survey boundary by Emily Dickins (survey and education licence: 2025-70507-SCI-SCI) and Anna Muckle (survey class licence level 1: 2015-19279-CLS-CLS) on the 26 June 2025. Five ponds were originally identified to be on Site and were therefore tested (Ponds 1-5). A sixth pond (Pond 6) which was not evident on aerial images or OS plans was subsequently located, though only after the eDNA survey window closed. See Figure 3 for pond locations.
- 3.8 Environmental DNA is DNA that is released into aquatic environments through shed skin cells, urine, faeces and saliva. It can persist in water for several weeks. A laboratory test has been developed for detecting the eDNA of great crested newt via water samples, which can be an effective way to determine the presence or likely absence of this species in ponds.
- 3.9 Water samples were collected within the specified survey window for eDNA analysis (15 April to 30 June), and in accordance with the instructions of the test kit supplier, Sure Screen Scientifics Ltd, and the industry standard sampling method (Biggs et al., 2014). Following sampling, the water samples were refrigerated prior to dispatch to the laboratory for analysis.

- 3.10 Laboratory analysis of the collected water samples was undertaken by Sure Screen Scientifics Ltd on 18 July 2025. See Appendix 1 for the great crested newt eDNA report.

Limitations to methods

- 3.14 No limitations noted for the surveys of ponds 1-5. No eDNA survey was undertaken at pond 6 as it was not located until after the 2025 survey window closed.

Ecological Impact Assessment

EclA Assessment Process

- 3.15 The evaluation and assessment within this report have been undertaken with reference to the current Guidelines for Ecological Impact Assessment (EclA) in the United Kingdom developed by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2018). Although this is recognised as the industry standard for ecological assessment, the guidance is not prescriptive; rather, it promotes proportionality and aims to “provide guidance to practitioners for refining their own methodologies”.
- 3.16 The extent of the study area reflects the anticipated Zone of Influence of the development, which varies depending upon the ecological feature (species, habitat or designated site) that is being considered.

Important Ecological Features

- 3.17 A first step in EclA is determination of which ecological features (habitats, species, ecosystems and their functions/processes) are important. Important features should then be subject to detailed assessment if they are likely to be affected by a development. It is not necessary to carry out detailed assessment of features that are sufficiently widespread, unthreatened and resilient to effects of the development, such that there is no risk to their viability.
- 3.18 Ecological features can be important for a variety of reasons and the rationale used to identify these is explained below. Importance may relate, for example, to the quality or extent of designated sites or habitats, to habitat/species rarity, to the extent to which a habitat/species is threatened throughout its range, or to its rate of decline.

Evaluation: Determining Importance

- 3.19 The importance of an ecological feature is considered within a defined geographical context. The following frame of reference has been used in this case:
- International and European
 - National (UK)
 - National (England)
 - Regional (Southwest of England)
 - County (Wiltshire)
 - Local (Box and surrounding villages)
 - the Site (application boundary and immediate surrounds)
- 3.20 In certain circumstances, receptors may be valued below the Site level. In these instances, they are described as being of negligible importance.

Zone of Influence

- 3.21 The zone of influence (Zol) considered in this EclA was taken to be as follows based on consideration of the type and scale of the development:

- Internationally designated sites 5 km buffer from the Site
- Nationally designated sites 2 km buffer from the Site
- Non-statutory designated sites 1 km buffer from the Site
- Protected species 1 km buffer from the Site (extended to 2 km for bats)
- Priority habitats – directly adjacent to Site and the Site
- Other habitats – the Site

Assessment of Significance

- 3.22 The assessment of significance process involves:
- identifying and characterising significant effects.
 - incorporating measures to avoid and mitigate (reduce) these significant effects.
 - assessing the significance of any residual effects after mitigation.
 - identifying appropriate compensation measures to offset significant residual effects.
 - identifying opportunities for ecological enhancement.
- 3.23 The CIEEM guidance sets out information in paragraphs 5.25 through to 5.29 about the concept of ecological significance and how it relates to the ability to deliver biodiversity conservation objectives for a given feature.
- 3.24 Significant effects are qualified with reference to an appropriate geographic scale, and the scale of significance of an effect may or may not be the same as the geographic context in which the feature is considered important.
- 3.25 The assessment only needs to describe those characteristics of effects that are relevant to understanding the ecological effect and determining the significance. It should consider, as appropriate: direct, indirect, secondary and cumulative effects and whether these are short, medium, long-term, permanent, temporary, reversible and / or irreversible. In this EcIA, positive effects are referred to as beneficial, negative effects as adverse. The assessment of significant effects then takes into account the baseline conditions to describe:
- how the baseline conditions will change as a result of the project and associated activities.
 - cumulative effects of the proposal and those arising from other developments.

Achieving a net gain in biodiversity value

- 3.26 The above method, based on that set out for EcIA in CIEEM (2018), aims to assess significant effects on important ecological features. The effect on more commonplace and widespread habitats (together with more important habitats) has been considered through the use of a metric-based calculation of loss and gain in “biodiversity units”. This reflects current Government policy in relation to securing a measurable net biodiversity gain. The Biodiversity Net Gain Assessment is detailed in a standalone report (BSG Ecology, 2026).

4 Results and Evaluation

Desk study

Designated sites

- 4.1 Designated sites within 1 km of the Site are listed in Table 2 below and presented on Figure 2. No additional national designations are located within 2 km of the Site and no further internationally designated sites are present within 5 km of the Site.
- 4.2 Notably, Bath & Bradford on Avon Bats SAC and Box Mine SSSI overlap with the northern boundary of the Site. Both sites share the same boundary and are designated in relation to bats, further detail is provided in Table 2.
- 4.3 Hazelbury Common LWS also overlaps with the Sites southern driveway by 0.008 ha, this is an existing driveway and no additional works are proposed in this area. Similarly, Wadswick Common Verge and Chapel Plaister Verge are located directly adjacent to existing Site access tracks and no additional works are proposed in this area.
- 4.4 Privett's Wood LWS, Hazelbury Fields LWS and White Wood LWS are all located within 0.4 km of the Site with connectivity via public footpaths. Box Hill Common LWS to the north also has connectivity to the Site through the public footpath network. Due to the potential for additional footfall as a result of the Proposed Development, these designated Sites are scoped into this assessment.

Table 2: Designated Sites

Site Name	Distance from Site	Interest features	Scale of Importance of Feature
Bath & Bradford on Avon Bats SAC	Onsite (northern boundary)	Primary features are: Greater horseshoe bat ⁶ <i>Rhinolophus ferrumequinum</i> and Bechstein's bat ⁷ <i>Myotis bechsteinii</i> , Secondary features are: Lesser horseshoe bat <i>Rhinolophus hipposideros</i> . An area of 0.086 ha overlaps with the northern extent of the Site.	International
Box Mine SSSI	Onsite (northern boundary)	Box Mine is an extensive network of man-made tunnels which is used by bats for hibernation, mating and as a staging post prior to dispersal. Small numbers of bats use the system throughout the year, but the site is particularly important for bats as a hibernaculum between October and May and as a dispersal site in July and August. The site boundary has been drawn to include all the known subterranean workings believed to be of significance to bats. Most of the land surface is intensively farmed and is not known to be of scientific interest, but the woodland is important as a feeding area for bats ⁸ . The extent of the SSSI matches that of Bath & Bradford on Avon Bats SAC. An area of 0.086 ha overlaps with the northern extent of the Site.	National
Hazelbury Common LWS	Onsite (southern access)	A small common, consisting of a slightly sloping area of limestone grassland surrounded by hedgerows. Minimal overlap (0.008 ha) with the southern extent of the southern Site access track.	Local
Wadswick Common Verge	Directly South	Protected road verge. Located directly southeast of the southern access track,	Local
Chapel Plaister Verge.	Directly South	Protected road verge. Located 137 m west of the Site. Located directly south of the eastern access track,	Local
Privett's Wood LWS	0.1 km southwest	Ancient semi-natural woodland on hillside.	Local
Hazelbury Fields LWS	0.3 km southwest	Unimproved calcareous grassland in a narrow field between two woodlands.	Local
White Wood LWS	0.4 km southwest	Ancient woodland overlooking A361 and tributary of By Brook. It is located in the south of the site on the other side of Devizes Road (B365).	Local

⁶ This site in southern England includes the hibernation sites associated with 15% of the UK greater horseshoe bat population and is selected on the basis of the importance of this exceptionally large overwintering population (SAC designation, <https://sac.jncc.gov.uk/site/UK0012584>)

⁷ Small numbers of Bechstein's bats have been recorded hibernating in abandoned mines in this area, though maternity sites remain unknown (SAC designation, <https://sac.jncc.gov.uk/site/UK0012584>)

⁸ Box Mine SSSI Citation (<https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1005600.pdf>)

Site Name	Distance from Site	Interest features	Scale of Importance of Feature
Box Hill Common LWS	0.6 km north	Common land consisting of limestone grassland, scrub and woodland. It is located north of the SSSI/SAC, past quarry hill road.	Local

Field surveys

Habitats

- 4.5 The habitats recorded within the Site are shown on Figure 1 and are described in Table 3 below. Full details quadrats for grassland habitats can be found in Appendix 2.

Table 3: Habitats present at the Site (Figure 1).

Habitat	Description	Importance of feature
Other neutral grassland	Full species lists and quadrats are provided in Appendix 2. The field is dominated by grass species, with few forbs present, grasses include false oat-grass <i>Arrhenatherum elatius</i> , Yorkshire fog <i>Holcus lanatus</i> , red fescue <i>Festuca rubra</i> , creeping bent <i>Agrostis stolonifera</i> , cock's foot <i>Dactylis glomerata</i> and common bent <i>Agrostis capillaris</i> . A moss layer is present in places, including <i>Brachythecium</i> sp. and <i>Rhytidiadelphus squarrosus</i> . Discounting bryophytes (as per UKhab guidance), the field has an average species richness of 6.66 per m ² . The field was unmanaged at time of survey with a homogenous long sward. Despite the low species richness the field is classified as other neutral grassland due to the sward being dominated by grasses not generally sown for agricultural production and presence of indicator species.	Site
Lowland calcareous grassland	Grass verges on the main drive comprise lowland calcareous grassland. Full species lists and quadrats are provided in Appendix 2. Grassland species include false oat-grass, Yorkshire fog, red fescue, creeping bent, cock's foot, sweet vernal grass <i>Anthoxanthum odoratum</i> , upright brome <i>Bromus erectus</i> and smaller cats tail <i>Phleum bertolonii</i> . Forbs are limited to common bird's-foot trefoil <i>Lotus corniculatus</i> , salad burnet <i>Sanguisorba minor</i> , common knapweed <i>Centaurea nigra</i> , field scabious <i>Knautia arvensis</i> and ribwort plantain. Blackthorn <i>Prunus spinosa</i> saplings are also present. The verge has an average species richness of 8.66 per m ² therefore species richness thresholds for the lowland calcareous grassland definition are not met, however, all remaining criteria are achieved: >30% broadleaved herbs and sedges, <10% cover of rye grasses and white clover <i>Trifolium repens</i> and three indicator species are present (occasional salad burnet, frequent common knapweed, occasional field scabious and rare burnet saxifrage <i>Pimpinella saxifraga</i>).	Local
Tall forbs	Species poor unmanaged mound dominated by common nettle <i>Urtica dioica</i> and broadleaved dock <i>Rumex obtusifolius</i> .	Site
Vegetated garden	A majority of the Site comprises the formal gardens surrounding the Manor house and associated buildings. The gardens consist of manicured lawns of a short, frequently mown sward and managed ornamental planting.	Negligible
Ornamental lake or pond	Ornamental pond, P2 is located onsite south of the Manor house. The pond is enclosed by a stone wall with concrete banks and significantly shaded by a large willow tree. No emergent vegetation is present, and the surface of the pond is covered by duck weed <i>Lemna minor</i> .	Negligible
Developed land, sealed surface	Areas of hardstanding within the Site including access tracks, pathways and parking areas. These will be retained by the Proposed Development.	Negligible

Developed land, sealed surface (buildings).	Buildings onsite include the manor house, dower house, granary, swimming pool loggia and other scattered farm buildings. All will be retained by the Proposed Development, with some subject to internal modifications below the ceiling level.	Negligible
Individual trees	Semi-mature and mature trees are scattered throughout the Site (see Figure 1). Native species include oak sp. <i>Quercus</i> sp., willow sp <i>Salix</i> sp., hazel <i>Corylus avellana</i> , yew <i>Taxus baccata</i> , ash <i>Fraxinus excelsior</i> , holly <i>Ilex aquifolium</i> , hawthorn <i>Crataegus monogyna</i> and beech <i>Fagus sylvatica</i> . Non-native species are primarily located within the formal garden areas and surrounding the manor, species include bay <i>Laurus nobilis</i> , acer sp. <i>Acer</i> sp., horse chestnut <i>Aesculus hippocastanum</i> , magnolia sp. <i>Magnolia</i> sp., mulberry <i>Morus</i> sp., walnut <i>Juglans regia</i> , holm oak <i>Quercus ilex</i> , cedar <i>cedrus</i> sp., false acacia <i>Robinia pseudoacacia</i> , flowering cherry <i>Prunus serrulate</i> , foxglove tree <i>Paulownia tomentosa</i> and paper birch <i>Betula utilis</i> . The trees are generally well managed with little to no evidence of adverse health.	Site
Native species rich hedgerow with trees	H1, mature species rich hedgerow with trees running north-south along the Site access track. Hedgerow species comprise hawthorn, blackthorn, field maple <i>Acer campestre</i> and ash. Trees within the hedgerow are all ash.	Site

Protected and notable species

- 4.6 Full details of protected species and their legislation can be found in Appendix 3.

Badgers

- 4.7 WSBRC returned a single badger record dated within the last decade, relating to a sighting in Box approximately 1 km north of the Site. Sett records were returned by WSBRC; however none pertain to recordings made in the last decade.
- 4.8 No signs of badger were recorded by BSG Ecology during the extended habitat survey both onsite and within the broader survey area. Most of the Site is developed with formal gardens, and of limited use to badger. Individuals present in the broader area may utilise the grassland and tall forbs in the south of the site for commuting and/or foraging in conjunction with the broader landscape.
- 4.9 The site is considered to be of site level value for badger.

Bats

- 4.10 WSBRC returned records for 16 bat species, including: barbastelle *Barbastella barbastellus*, serotine *Eptesicus serotinus*, Alcathe *Myotis alcathoe*, Bechstein's, Brandt's *Myotis brandtii*, Daubenton's *Myotis daubentonii*, whiskered *Myotis mystacinus*, Natterer's *Myotis nattereri*, Leisler's *Nyctalus leisleri*, noctule *Nyctalus noctula*, Nathusius's pipistrelle *Pipistrellus nathusii*, common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, brown long-eared *Plecotus auritus*, greater horseshoe and lesser horseshoe.
- 4.11 Of the above records, 502 pertain to confirmed roosts, accurate location data for which is not provided.
- 4.12 1665 hibernation records were returned for dates between 1964 and 2024. A large proportion of these relate to the following designated sites (which overlap the northern Site boundary, see **Figure 2**):
- Bath & Bradford on Avon Bats SAC, listed for its large population of overwintering greater horseshoe, Bechstein's and lesser horseshoe bats.
 - Box Mine SSSI listed for the extensive hibernaculum used by overwintering bats.
- 4.13 Six European Protected Species Licences (EPSL) returns within 2 km of the survey boundary were returned on the MAGIC map layer. See Table 4 below.

Table 4: EPSL's within 2 km of the survey boundary

Reference	Distance from survey boundary	Species covered by the licence ⁹	From	To	Destruction of breeding site	Destruction of resting site
EPSM2013-6255	0.2 km	Lesser horseshoe	29/11/2013	30/09/2014	N	Y
EPSM2011-3457	0.9 km	Lesser horseshoe, greater horseshoe, whiskered	Null	Null	N	Y
EPSM2010-2384	0.9 km	Common pipistrelle, lesser horseshoe, greater horseshoe, brown long-eared, Natterer's	01/03/2011	30/09/2012	N	Y
EPSM2011-2839	1.2 km	Common pipistrelle, lesser horseshoe, greater horseshoe, brown long-eared, Natterer's	10/08/2011	31/12/2015	Y	Y
EPSM2010-1942	1.5 km	Lesser horseshoe, Natterer's	03/02/2011	31/12/2013	Y	Y
EPSA2012-5222	1.9 km	Common pipistrelle, lesser horseshoe, greater horseshoe	04/04/2013	01/03/2016	N	Y

Landscape assessment results

- 4.14 **Foraging bats:** A significant extent of habitats within the broader landscape are highly suitable for foraging, commuting, and roosting bats. The lowland deciduous woodland, species-rich grassland, riparian corridors and ponds in particular, have the potential to supporting a diversity of invertebrates (e.g. saproxylic invertebrates, pollinators, aquatic invertebrates, etc.) and are therefore of high value for foraging bats. The grazing regime within certain fields offers sources of food for dung beetles, and in turn for bats, particularly horseshoe species. However, the Site itself is predominantly comprised of built-up areas and formal gardens, suboptimal for foraging bats in comparison to the surrounding landscape. Grassland within the southern extent of the Site does present foraging opportunities, notably due to its proximity to offsite woodland and hedgerows.
- 4.15 **Commuting bats:** The structure of habitats surrounding the Site offers good connectivity and is therefore suitable for commuting bats, with woodland edges, hedgerows, and lines of trees connecting to the southern ancient woodlands and to the northern SSSI and SAC. Horseshoe bats using the hibernaculum within the SAC and SSSI north of the Site rely heavily on woodland edges and hedgerows and are therefore likely to commute towards foraging grounds located within the wider landscape. Whilst commuting features within the Site itself are limited, it is likely to be utilised by commuting bats in conjunction with features in the wider landscape. Connectivity between the Site and nearby documented roosts is good, notably at the northern boundary.
- 4.16 **Roosting bats:** Many mature trees are present within the Site and offer potential roosting opportunities for bats. Proximity to other known roosts (noting many of these species such as barbastelle and Bechstein's are tree roosting specialist species) increases the likelihood of bats using trees on Site. The buildings onsite also provide suitable roosting opportunities for bats (see Preliminary Roost Assessment (PRA) results).

Preliminary Roost Assessment results

- 4.17 Table 5 and Figure 4a and 4b set out the results of the PRA survey. Dropping DNA reports are available in Appendix 4. Photographs are available in Section 8 of this report.

⁹ NB: Not all species listed will be subject to the impacts described.

Table 5: Preliminary roost assessment results

Buildings	Roosting potential	Potential roosting features	Photograph reference
Hazelbury Manor	High	Hazelbury manor is a two-storey building with a central courtyard. The roof is clad in stone offering potential bat access / roosting points across the entire roof as this roof covering provides ample natural crevices and gaps. The stonework on the elevations of the building is in good condition. There are several contiguous roof voids, many of which are likely to have gaps and connecting features allowing bats to crawl or pass between them. Most roost voids are lined with bitumen roofing membrane with simple roof trusses, except for the roof voids where S7a and S7b were taken, next to the great hall. These are the oldest parts of the building, where timbers are more significant in size. The Great Hall does not have a roof void; this is open to the ridge. There are several chimneys and dormer windows across Hazelbury manor house. Areas of flat roof sections are bitumen covered. Of the roof voids that could be accessed, evidence of bat roosting was identified in all of them, except for the small eaves' cupboards. Most of the bat droppings were consistent in size and shape with those of serotine bats. Where found, serotine droppings were numerous, and fresh indicating significant roost sizes in current use. The DNA analysis of S6 (void 1) and S7b also confirmed serotine (void 2). Void 3 (S9) was also consistent with serotine, though the dropping results came back as inconclusive. A large part of this roof void could not be accessed, and therefore any further evidence of bats in this void has not yet been determined. It is understood the high concentrations of bat urine could result in inconclusive results being obtained from the droppings. DNA analysis of S8 (void 3) confirmed a common pipistrelle roost as well with a wide scattering of droppings present. There are no basements under the main house, although a floor hatch leading to a small underground area in the Great Hall previously led to a tunnel underneath the track heading south away from the house. However, this is now sealed off and used for plant. The western roof void of Hazelbury manor house was not accessible during the PRA. Given that the renovations of this building are internal (below the ceiling level), this does not pose a significant constraint.	10-16
Loggia	Moderate	An open sided mono-pitch roof structure with opportunities for bats underneath the clay pan tiles. Individual bat droppings were noted on walls underneath the loggia roof structure. It was not possible to determine whether the droppings had occurred from roosting or foraging bats.	-
Loggia (flat roof)	Low	Assumed flat roof, surrounded with a parapet obscuring the view of the roof exterior.	-
Swimming pool	Low	A relatively modern swimming pool building. The interior has simple hipped roof (roof covering unknown) and no roof void up to the ridge. There are small voids / 'boxes' evident in the interior of the building for electrics/ lighting. There are no obvious features / access points for bats into these, and they are unlikely to support bats given their continual heating from the pool below. Given the building's construction design, and in combination with the voids being subject	17-18

		to continual heating from the pool below, the building was categorised as having low suitability for roosting bats overall.	
Dower House	Moderate	The Dower House is directly adjoined to Hazelbury manor house and architecturally mirrors the construction and style; it is two storeys and clad in the same stone. It has a single roof void that extends the entirety of the roof. It is a very undisturbed space; many dense spiderwebs were noted throughout. There was no evidence of roosting bats within the roof voids, but bats roosting under the roof stones remains a possibility.	19-20
B14	Moderate	Located on the edge of the gardens, B14 is a log store constructed from stone with a mono-pitch roof and clay pan tiles. No internal access was possible (full of stored logs). No evidence of bats was detected on external elevations. Potential bat access features include a hole in one of the elevations through the stonework, an open aperture, and the pan clay tiles of the roof.	21
The Granary	Moderate	Construction and architecture mirror Hazelbury manor house and the Dower House. All the elevations are in good condition. Of the roof voids present, only one was inaccessible (stuck hatch), if renovations do not affect the roof void or roof construction, this should not pose a significant constraint. However, should proposals involve structural changes to this part of the building, or roof repairs, as a minimum access should be sought to carry out an internal inspection of this roof void. There is no roof void above the studio. The attic space has no evidence of bat use. It is an undisturbed space used for storage with a window allowing natural light into the area (a potential bat access point). The garage appears to have been renovated and is open allowing bat access into the area.	22-24
B13 (Stables)	Moderate	B13 is a two-storey stone building with stone clad roof. The ground floor is disused horse stalls. There are small accumulations of old bat droppings under the lintels of two windows. No dropping sample was taken as it is very unlikely that DNA sequencing would have been viable due to their age and condition. It's likely the dropping arose from a small or medium sized species of bat, or combination thereof. The first floor is divided into an office space and a storage space. Lime torching is present under one of the pitches, and bitumen felt on the other. Significant dense accumulation of cobwebs is present throughout. No evidence of bats was seen on the first floor. There are two hayloft doors with gaps between the doors and frames. Externally, there are two small open kennels with old bird nests.	25-28
B12 (Coach House)	Moderate	The coach house is a stone building with a clay pan tiled roof. It is currently in use by gardeners for storage and workshop. It has a mezzanine floor, bitumen roof lining, and infra-red lamps (presumably a form of heating the internal space in colder months). No evidence of roosting bats was seen.	29-30
B11	Moderate	B11 is a covered seating area, which is open on one side. The majority of the underside of the roof has wire mesh to prevent birds nesting in the rafters. There are exposed timbers. There is a confirmed bat access point where the building adjoins to the Tythe Barn (B10) with a dense accumulation under the access point. The droppings (S3) are consistent with serotine bat.	31-34
B10 (Tythe Barn)	Moderate	The Tythe Barn has stone elevations, a low-pitched roof clad in corrugated sheet material, and two projections. There is a second breeze block skin within the external stone walls and a suspended ceiling. The void(s) in between the internal and external structures of the building were not accessible but are very likely to provide roosting opportunities for bats. The internal building is used for storage and is mechanically ventilated.	34-38

		Both scattered and dense accumulations of bat droppings was noted within the internal structure of the building (S1 and S2) consistent with serotine. Bats may be accessing the internal building through a gap in boarding of the northeastern projection, connected to the bat access point noted under B11. The internal area of the southwestern projection could not be accessed. This was taken into consideration in the assessment of the suitability of this building for roosting bats.	
B9	Low	B9 has a shallow pitched clay tile roof, small roof void (with no access), and stone elevations in good condition. No evidence of bats found.	39
B8	Negligible	Two small timber livestock shed not in use.	40
B7	Moderate	B7 is a livestock shed with a roof understructure comprised of laths. Its western end is open, with no evidence of roosting bats in this area. The pan clay roof tiles offer suitability for roosting bats. The single stable to the east as been converted into a storage area, and has been lined with plasterboard, with significant amounts of mould. This portion of the building has a small roof void under the ridge line which is not accessible. This was taken into consideration in the assessment of the suitability of this building for roosting bats.	41-43
B6	Negligible	An open log store with corrugated metal roof.	44
B5 (Squash Court)	Low	B5 is a disused squash court with metal sheet covered roof, currently used for storage. The top-level windows of the building are all ajar, allowing bat access to the interior, although the temperature fluctuations are likely to provide unsuitable conditions for roosting bats. Potential roosting features include underground voids either side of the entrance (particularly in the winter months), stored stacked clay pan tiles, and pan clay tiles of the open-sided lean to that adjoins the squash court.	45-48
B4	Negligible	Pair of greenhouses in continued use.	49
B1, B2, and B3	Negligible	Modern style agricultural buildings.	50-52

- 4.18 Based on the scope of works associated with the Proposed Development, additional nocturnal survey and licencing is unlikely to be required as impacts to bats and their roosts have been avoided. As a consequence, roost categorisation is unknown. Based on information obtained during the PRA, which includes a basic understanding of the species of bat using the buildings together with consideration for connectivity between the buildings and designated sites and habitats present within the Site boundary, the Site is considered to be of up to Regional importance for bats (it is possible that should further survey be undertaken this status may be amended after review).

Amphibians

- 4.19 No amphibian records were returned by WSBRC for locations within 1 km of the Site in the last decade. However, two great crested newt EPSLs were recorded within 2 km of the Site:
- EPSM2011-2784 (2011-2020), 1.2 km northeast - destruction of resting and breeding site.
 - EPSM2009-893 (2011), 1.8 km northeast – not a breeding site.
- 4.20 One pond was recorded onsite (P2) with an additional four ponds located offsite within 250 m (P1, P3-4 and P6). P5 was also included in the survey effort, as despite being over 250 m from the Site it is within 75 m of P6 and therefore has potential to form a metapopulation should great crested newt be present at either location. Photographs of the ponds are provided in Section 8 and their locations are presented in Figure 3.
- 4.21 Ponds P1-P5 were subject to eDNA survey in 2025, all returned negative results. Additional detail is presented in Table 6 with full results reports are provided in Appendix 1.
- 4.22 Pond P6 was identified as being present after the eDNA survey window closed, therefore no assessment was undertaken. However, this is not considered to be a significant limitation as negative eDNA results were recorded in P5 (75m south east of P6) and P4 (75 m northeast of P6). It is therefore considered unlikely that P6 would support a great crested newt population that do not also frequent other suitable ponds within their immediate locality (Cresswell and Whitworth 2004).

Table 6: 2025 eDNA survey results

Pond number	eDNA result	Distance to the Site
1	Negative	25 m east
2	Negative	Onsite
3	Negative	115 m southwest
4	Negative	170 m southwest
5	Negative	290 m southwest
6	No eDNA survey undertaken	195 m southwest

- 4.23 The terrestrial habitats within the Site have some opportunities for resting, sheltering and hibernating amphibians, notably the gardens and hedgerow understories. This is considered sub-optimal in relation to habitats available in the broader landscape, however, the presence of common amphibian species cannot be ruled out.
- 4.24 The site is considered to be of site level value for common amphibians.

Reptiles

- 4.25 WSBRC returned one reptile record for locations within 1 km of the Site within the last decade a common lizard *Zootoca vivipara* record from 2018, located within a field 50 m west of where the southern access track adjoins the B3109. Historically, slow worm *Anguis fragilis* have also been recorded in the locality.
- 4.26 The grassland field and tall forb within the south of the Site provides suitable habitat for sheltering, commuting and foraging reptiles, whilst the less managed areas of garden may provide opportunities for hibernation.

- 4.27 Due to proposed works being largely limited to the buildings and a limited extent of grassland, significant impacts on these species from the Proposed Development are unlikely as long as works are carried out under Reasonable Avoidance Measures (RAMs). For this reason, a reptile survey was not considered necessary to inform this assessment.
- 4.28 Reptile populations are considered unlikely to be present onsite, with the exception of occasional transitory individuals moving through the broader landscape. Reasonable Avoidance Measures during the enabling and construction phase should take into consideration the risk of transient reptiles across the Site, as discussed in Section 5 of this report.
- 4.29 The Site is considered to be important at the Site level for reptiles.

Birds

- 4.30 WSBRC returned records for forty bird species within 1 km of the Site within the last decade. Of these, 31 records are of species listed on Schedule 1 of the Wildlife and Countryside Act (1981) as amended: red kite *Milvus milvus* (eight records), kingfisher *Alcedo atthis* (17 records), hobby *Falco subbuteo* (two records), brambling *Fringilla montifringilla* (one record) and redwing *Turdus iliacus* (three records). Accurate location data was not provided for these species.
- 4.31 An additional 15 records of SPI bird species were returned within the last decade, relating to: skylark *Alauda arvensis*, tree pipit *Anthus trivialis*, yellowhammer *Emberiza citrinella*, spotted flycatcher *Muscicapa striata* and house sparrow *Passer domesticus*.
- 4.32 The trees, tall forbs and buildings onsite provide nesting habitat for a variety of bird species. Whilst grassland in the south of the Site may have potential to support ground nesting species, such as skylark, this is largely negated due to the proximity of hedge lines and trees, likely to attract predators and deter ground nesting.
- 4.33 The Site is considered to be of importance at the Site level for birds.

Hazel Dormouse

- 4.34 Whilst the Site is within the known range for hazel dormouse *Muscardinus avellanarius*, WSBRC returned no records.
- 4.35 The species rich native hedgerow with trees along the southern access track does provide suitable nesting habitat and structure; however, the lack of connectivity to other hedgerows offsite means this species is unlikely to be present within this feature.
- 4.36 Whilst other suitable habitat is present in the wider area, none is present onsite, it is therefore considered highly unlikely that the species would occur on or adjacent to the Site and the Site is considered to be of negligible value to this species.

Water vole

- 4.37 WSBRC returned no water vole *Arvicola amphibius* records for locations within 1 km of the Site within the last decade. However, one record was returned relating to a sighting in 2015 650 m west of the Site at Hazelbury Hill.
- 4.38 The Site provides no habitat suitable for water vole. No ditches are present onsite, the onsite pond is ornamental and unsuitable for burrowing water vole due to their concrete banks. Additionally there is no riparian connection from the Site to suitable watercourses located offsite, such as those flowing through Thorn Wood and Privett's Wood.
- 4.39 The Site is considered to be of negligible value to water vole.

Otter

- 4.40 WSBRC returned no otter *Lutra lutra* records for locations within 1 km of the Site within the last decade. However, they are historically known to be present on By Brook north of Box.
- 4.41 No riparian habitat onsite is suitable for otter, P2 is ornamental and provides no foraging resource. Terrestrial habitats onsite are largely managed and formal, with no suitability for holt building or breeding otter. Due to the proximity of the Site to By Brook and connected watercourses to the east, it is possible that individuals may infrequently occur onsite whilst commuting throughout the wider landscape.
- 4.42 Overall, the Site is considered to be of Site level value to otter.

Other SPI mammals

- 4.43 WSBRC returned seven hedgehog *Erinaceus europaeus* records for locations within 1 km of the Site in the last decade. Historic records of polecat *Mustela putorius* and water shrew *Neomys fodiens* were also returned. No SPI mammal records were located within the Site.
- 4.44 The Site provides suitable foraging habitat for hedgehogs, although it is limited in extent with higher quality habitat, including woodland and hedgerows networks in the immediate locality
- 4.45 The Site is considered to be of Site level importance for hedgehog.

Plants

- 4.46 WSBRC returned 15 records of flowering plants for nine species within the last decade for locations within 1 km of the Site. Five of the records relate to bluebell *Hyacinthoides non-scripta*, listed on Schedule 8 of the Wildlife and Countryside Act (1981) as amended.
- 4.47 Full species lists are provided in the habitats section of this report, however, the botanical interest at the Site is limited to relatively widespread species.
- 4.48 The Site is considered to be of importance at the Site level for plants.

Invertebrates

- 4.49 WSBRC returned 638 records for 44 species of invertebrates within the 2km search area in the last decade; 36 of these species are SPIs and include four species of butterfly (small heath butterfly *Coenonympha pamphilus*, dingy skipper *Erynnis tages*, marsh fritillary *Euphydryas Aurinia*, grizzled skipper *Pyrgus malvae*) and 32 moth species.
- 4.50 The Site is of generally low value to invertebrates due to being predominantly built-up land, however, floral planting within the garden and the grassland within the south of the Site do present some floristic and structural diversity suitable for invertebrates. However, no notable invertebrate species (including moths and butterflies) were recorded during the habitat surveys.
- 4.51 The Site is considered to be of Site level importance for invertebrates.

Other notable species

- 4.52 The Site is unlikely to support any other protected or notable species.

Invasive non-native species

- 4.53 WSBRC returned no records of invasive species within 1 km of the Site. Whilst no invasive species were recorded onsite during the extended habitat survey, Himalayan balsam *Impatiens glandulifera* was recorded in the wider area along footpaths and watercourses in Privett's Wood.

Features to be scoped in or out from further assessment

- 4.54 Ecological features to be excluded from further assessment and those to be taken forward within the assessment are summarised in Table 7 below, with a rationale for exclusion given where appropriate.

Table 7: Features taken forward for assessment. HPI = Habitats of Principal Importance. SPI = Species of Principal Importance.

Feature	Importance	Action	Notes/rationale for exclusion
Designated sites			
Bath & Bradford on Avon Bats SAC	International	Taken forward	Taken forward for further discussion.
Box Mine SSSI	National	Taken forward	Taken forward for further discussion.
Local Wildlife Sites	Local	Taken forward	Taken forward for further discussion.
Habitats			
Other neutral grassland	Site	Scoped out	Not HPI. Common and widespread in the locality. Its contribution to biodiversity is appropriately captured in the Biodiversity Gain Assessment and potential value to species is captured under other receptors.
Lowland calcareous grassland	Local	Taken forward	HPI habitat, taken forward to inform planning policy and legal compliance.
Tall forbs	Site	Scoped out	Not HPI. Common and widespread. Its contribution to biodiversity is appropriately captured in the Biodiversity Gain Assessment and potential value to species is captured under other receptors.
Vegetated garden	Negligible	Scoped out	
Ornamental lake or pond	Negligible	Scoped out	
Developed land, sealed surface	Negligible	Scoped out	Not HPI. Built up land of negligible habitat value.
Developed land, sealed surface (buildings).	Negligible	Scoped out	Not HPI. Built up land of negligible habitat value. Value in relation to bats is discussed within protected species sections.
Individual trees	Site	Scoped out	Not HPI. Its contribution to biodiversity is appropriately captured in the Biodiversity Gain Assessment, potential value to species is captured under other receptors.

Native species rich hedgerow with trees	Site	Taken forward	HPI habitat, taken forward to inform planning policy and legal compliance.
Species			
Badger	Site	Taken forward	Protected species, taken forward to inform legal compliance
Bats	Regional	Taken forward	Surveys indicate the presence of multiple roosts within buildings onsite. Taken forward to inform planning policy and legal compliance
Great Crested Newt	Negligible	Scoped out	Surveys indicate likely absence onsite and within 250 m.
Other amphibians	Site	Scoped out	Minimal suitable terrestrial habitat on site. No relevant planning policy or legal compliance to inform.
Reptiles	Site	Taken forward	Limited habitat suitability for protected species, taken forward to inform planning policy and legal compliance
Birds	Site	Taken forward	Protected species, suitable nesting habitat, taken forward to inform planning policy and legal compliance
Hazel dormouse	Negligible	Scoped out	Minimal habitat suitability and connectivity, likely absent.
Water vole	Negligible	Scoped out	Minimal habitat suitability and connectivity, likely absent.
Otter	Site	Taken forward	Minimal habitat suitability, likely absent. Taken forward in relation to legal compliance as individuals may infrequently commute across Site.
Plants	Site	Scoped out	Rare and/ or protected species recorded in broader area not present onsite.
Invertebrates	Site	Scoped out	Minimal high suitability invertebrate habitat, notable species or communities likely absent
Other SPI mammals (hedgehogs)	Site	Taken forward	Protected species taken forward to inform planning policy and legal compliance

5 Potential Impacts and Recommendations

Designated Sites

- 5.1 Impacts to Bath & Bradford on Avon Bats SAC and Box Mine SSSI in relation to bats are discussed separately within the 'Bats' section of this report, below.
- 5.2 Despite the overlap in land take of the Site and Bath & Bradford on Avon Bats SAC and Box Mine SSSI, no works are proposed in this area and therefore no direct impacts are anticipated. There is also overlap between the southern access drive and Hazelbury Common LWS; this is an existing road which will continue to be used in conjunction with the Proposed Development, no additional land take or direct impacts to the LWS are anticipated.
- 5.3 All other designated Sites are considered sufficiently distant, with no impact pathways, that direct impacts are considered to be negligible.
- 5.4 Potential indirect impacts to designated sites as a result of the development include impacts from increased visitor pressure during operation, light pollution (during both construction and operation) and water/ air pollution during construction.
- 5.5 The Wiltshire core strategy 50 on Biodiversity and Geodiversity states: *"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."*

Impacts from increased visitor pressure

- 5.6 All scoped-in designated sites are well connected to the Site via a network of public footpaths. The change of use of the Site to a hotel is likely to increase footfall within these areas.
 - Bath & Bradford on Avon Bats SAC and Box Mine SSSI overlap with the Site, a public right of way (PRoW) directly off the eastern access track (which itself is also a designated footpath) provides direct access to the SAC and SSSI.
 - Privett's Wood LWS, Hazelbury Fields LWS and White Wood LWS are all located within a walk of approximately 500 m from the Site with direct connectivity via Public Right of Ways (PRoWs) which lead out of the Site itself to the south and west.
 - Box Hill Common LWS 0.6 km to the north also has connectivity to the Site through the PRoW and road network, this is a slightly longer walk and due to the need to cross roads is likely to be less favoured in comparison to other options.
- 5.7 The Proposed Development is being designed to attract visitors and will have amenities onsite for guests staying at the hotel with footpaths and marked trails throughout the wider land holding (several of these paths are already designated as PRoWs). It is anticipated that many guests will remain on footpaths within the Hazelbury Manor landholding.
- 5.8 The Proposed Development comprises the creation of 23 suites (each of which has one parking space). Each suite has an average occupancy of two people. An additional 46 people utilising existing PRoWs within the designated sites is not considered to be a significant increase in recreational use.
- 5.9 Given that the purpose of the LWS's are to provide access to nature and that visitor access at these sites is actively managed for this through PRoWs, additional amenities proposed within the Site that

are designed to attract visitors, the low number of residential units proposed and maximum visitor numbers, there is not considered to be any significant adverse direct or indirect impacts to designated sites within 1 km of the Proposed Development in relation to ecology that would likely significantly increase the recreational use of these sites.

Mitigation

- 5.10 It is recommended that the above risks are managed through the use of signage across the areas of public/ visitor access within the land holding to inform users of the ecologically sensitivities associated with Hazelbury Manor. Signage should include maps of accessible areas, and those where access is not permitted (possibly during certain times of the year), and instructions to keep to the existing paths and for dogs to be kept on leads within sensitive areas. Brochures with this information could be given to guests visiting the hotel (at reception or within rooms), and on the hotel website.

Construction Impacts

- 5.11 Possible impacts during pollution include water pollution through spill events, air pollution (through unmanaged dust, impacts to habitats through vehicle tracking.

Mitigation

- 5.12 A Construction Environmental Management Plan (CEMP) will be collated to include measures to minimise ecological impacts throughout construction. This will entail standard measures including:
- Pollution prevention: adoption of good practice measures to reduce the risk of pollution will ensure that the potential for important ecological features to be impacted is minimised¹⁰. This includes pollution run-off to the watercourses offsite.
 - Root protection zones: all trees onsite will be retained within the development. Retained trees that lie within or adjoin the Site would be physically safeguarded using tree protection fencing and guards to avoid harm to those trees. During the construction phase of the development the retained trees and hedgerows will be protected by adopting appropriate measures as set out in BS 5837:2012 'Trees in relation to design, demolition and construction'.
 - Temporary Protective Fencing: During the construction phase, retained habitats (grassland field to the south) will be surrounded with fencing to prevent incursion and/or direct damage to these areas by site personnel or vehicles.
 - Dust control: Industry guidance (Holman et al., 2014) advises that construction related dust impacts are only likely within 50m of the site boundary. Watercourses and wetland habitats within 50 m of the Site boundary may be sensitive to dust deposition. It is assumed that good practice measures in relation to dust management will be adopted as part of the Proposed Development. With appropriate mitigation in place, the impacts of dust generated during the construction phase would be negligible.
 - Lighting: construction activity should be limited to daylight hours to limit the requirement for construction lighting. Should lighting be required, for example security lighting, this should be motion activated or on a timer and designed with input from a professional ecologist to minimise any displacement effects, notably to bats (see guidance in BCT & ILP, 2023). Light spill onto surrounding habitat is to be avoided through appropriate placement of lighting rigs, and if necessary, by the use of cowls, backplates and/or hoods.

Habitats

- 5.13 The majority of onsite habitats will be retained within the Proposed Development. Habitat losses are limited to poor condition other neutral grassland and tall forbs in the south of the Site to accommodate a carpark. This reflects a change from the original design which originally required the loss of a small area of calcareous grassland along the driveway. To avoid and retain this habitat the carpark access was redesigned to use existing tracks and habitat loss is now solely other neutral grassland and tall forbs.

¹⁰ <https://www.gov.uk/guidance/pollution-prevention-for-businesses>

- 5.14 To mitigate for the grassland loss, the wider grassland field to the south will be enhanced in condition through additional seeding and appropriate management, tree planting will also be undertaken in this area (see Figure 5).
- 5.15 Without protection measures during construction there is potential for accidental physical damage to branches or roots of retained trees, and hedgerows by vehicles (compaction, ground works etc.), or through material storage or movements. Furthermore, without appropriate management during occupation, there is potential for damage by inappropriate management (e.g. felling or heavy trimming).
- 5.16 It will be necessary to incorporate measures to avoid accidental encroachment or damage of retained habitats within the Site during the construction phase. Such measures will be set out in a CEMP, as detailed in paragraph 5.12

Protected species

Reasonable Avoidance Measures

- 5.17 The following RAMs refer to transient animals moving thorough the Site during the enabling and construction phases of the development and should be included within the CEMP:
- Any excavations that are left open overnight will either be covered or include a means of escape for any animals that may fall in;
 - Inspect excavations daily for the presence of animals before recommencing work on them;
 - Where possible, works to be limited to the hours from dawn to one hour before sunset;
 - Temporary lighting during construction will be designed in line with good practice to ensure onsite habitats and those adjacent, can continue to be used by animals without disturbance;
 - The creation of large stockpiles of earth will be avoided as these may be attractive for badgers and other animals;
 - Store building materials above ground on pallets and/ or existing hardstanding;
 - Should any evidence of protected mammal species be identified during the pre-construction check the need for specific measures will be assessed and if required, such measures will be put in place. If a Natural England licence is required, then this will be secured and the licence method statement will be enacted; and,
 - Should any evidence of protected mammal species be identified during subsequent works, works in the area will stop and the ecologist will be contacted for advice.
 - Tall stands of vegetation are to be removed through a two-stage cut. The first cut will reduce the height of the vegetation down to 150mm using hand tools (brush cutters for example). This is to be left for a 24 hour period before undertaking a second cut to take vegetation down to 50mm. Vegetation is to be maintained at this height until impactful work are completed.

Badgers

- 5.18 No active badger setts have been recorded within the Site boundary or 30 m buffer (where accessible). However, badger are a mobile species and can construct new setts in a short space of time. Therefore, to ensure the likelihood of harm to badgers is minimised it is recommended that appropriate precautionary measures prior to and during construction are undertaken. Works should follow the RAMs as detailed in Section 5.17 of this report to reduce residual risk to transient animals.
- 5.19 It is recommended that a repeat walkover survey of the Site for badgers is undertaken by an ecologist within three months prior to works commencing and that this is secured by planning condition.
- 5.20 The Proposed Development will lead to the loss of a small area of other neutral grassland and tall forbs, which has potential to be utilised by foraging and commuting badger. Proposals include the enhancement of grassland to the south to mitigate this and inclusion of additional tree and hedgerow

planting (see Figure 5). Proposed habitats have a greater structural diversity than grassland in its current condition and present an enhancement on the baseline condition for badger.

- 5.21 There is also a significant extent of rural landscape in the immediate surrounding area that will continue to provide suitable foraging, movement and sett building opportunities for badgers. Overall, there is not considered to be any adverse effect on the local conservation status of badger and the Proposed Development is likely to be beneficial with regards to badger at the Site level.

Bats

Commuting and foraging bats

- 5.22 Bat activity surveys were not undertaken in relation to this development as there are limited opportunities for foraging and commuting, owing to the limited extent of the Site and primarily developed nature. Features suitable for commuting and foraging bats, including the hedgerow along the southern driveway and scattered trees will be retained by the development.
- 5.23 A small area of grassland and tall forb will be lost to accommodate the carparking area. Currently, this is likely to support only limited invertebrate communities and therefore subsequent poor foraging resource for bats. Grassland to the south of the retained carpark will be enhanced in line with the development, introducing a greater species richness and sward height variation beneficial to invertebrates, in addition to proposed tree and hedgerow planting in this area, the habitat enhancements are likely to be beneficial to both commuting and foraging bats in the wider area (see Figure 5).
- 5.24 Since the Proposed Development is predominantly impacting areas of poor condition grassland and there are opportunities to create habitats of higher ecological value on Site, overall, no significant impacts on foraging or commuting bats from habitat loss are anticipated.

Bath & Bradford on Avon Bats SAC and Box Mine SSSI

- 5.25 Without mitigation, the Proposed Development, could compromise the conservation status of bats within the nearby SAC and SSSI sites.
- 5.26 Increased footfall due to the hotel guests is anticipated, without mitigation this has potential to cause the loss or degradation of foraging habitats and fragmentation of commuting routes. As discussed in Section 5.8, the proposed change of use to a hotel comprises 23 suites, with mitigation, additional footfall from residents is considered unlikely to significantly impact habitat degradation and therefore commuting/ foraging bats. Signage should be incorporated throughout public areas to carefully mark footpaths and inform users of the ecologically sensitivities associated with Hazelbury Manor. By keeping the public to designated paths and trails, the risk of habitat degradation through footfall is reduced.
- 5.27 Increased artificial lighting from hotel facilities, gardens, pathways, has potential to disturb foraging and commuting bats. As such, a lighting strategy is required. This must align with aligned to guidelines to reduce impacts of artificial lighting on bats (BCT and ILP, 2023) and may incorporate the following:
- Avoidance of light spill to key habitats, including grassland, trees, hedgerows and known roost sites (including the rooflines of buildings).
 - Lower levels of lighting during quiet periods of the night and motion sensors to be used where appropriate.
 - Light with no UV elements or metal halide compact fluorescent sources. Use of LED luminaires where possible with a warm light of 2700 Kelvin or lower.
 - Internal luminaires to be recessed where possible, as opposed to pendant light fittings which if installed near windows have potential to cause glare.
 - Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt.

- The use of bollard or low-level downward-directional luminaires is strongly discouraged, they can cause glare, unacceptable upward light output and increased upward light scatter.
- As a last resort, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed.

Roosting bats

- 5.28 The PRA recorded evidence of roosting bats in buildings throughout the Site and DNA surveys confirmed the presence of serotine and common pipistrelle bats roosting onsite. As nocturnal surveys have not been undertaken the full species assemblage and roost characterisation is unknown, though significant use of the Site by serotines is at least expected.
- 5.29 It is understood that all proposed renovation works will be internal and below the ceiling level, with no impacts to the roof. Additionally, no changes to insulation, electrics, pipework, or the addition of air conditioning ducting or extraction are anticipated. Consequently, bat roosts are avoided and no direct impacts are likely to occur and no further survey or licencing is required as part of these proposals. However, if proposals are modified in any way to include structural changes to the roof (e.g. removal of ceilings, opening of roof voids, or extensive repairs to roof cladding), then bat roosts would likely be damaged or destroyed, or bats disturbed, resulting in an offence, and an EPSL informed by a suite of bat emergence/re-entry surveys would be required.
- 5.30 No trees will be impacted by the Proposed Development within the Site boundary; therefore, a full tree assessment has not been undertaken. Should any tree require pruning or felling an ecologist should be consulted and a ground level tree assessment undertaken. Dependant on results, additional survey/measures may be required prior to felling/ pruning.
- 5.31 Indirect impacts to roosts (buildings and trees) through additional construction and/or operational lighting must be avoided through a lighting plan, as discussed in paragraph 5.27. It is advised that this is reviewed by an ecologist to ensure that bat roost access points and important links between habitats and roost access points are not compromised.
- 5.32 Through provision of onsite habitat creation, the proposed works are likely to increase the habitat quality and food availability at the site for bats, by providing enhanced grassland areas and additional tree and hedgerow planting and thereby increasing the abundance and diversity of invertebrates and roosting opportunities (see proposed habitats in **Figure 5**). This is likely to benefit the population of bats foraging or roosting within the local area. Overall, the Proposed Development is likely to be beneficial with regards to bats at the Site level.

Reptiles

- 5.33 During the construction phase, without suitable precautions, there is limited potential to impact individual reptiles during vegetation clearance. Works should follow the RAMs as a precautionary measure, and in addition the following is to be implemented:
- Any features that can provide refuge for wildlife (e.g. logs, rubbles, and debris) are to be dismantled by hand carefully.
 - Should reptiles be encountered, they must be allowed to disperse away from the area without harm.
- 5.34 The habitat creation that forms part of the development is likely to benefit reptiles through the creation of areas of more structurally diverse grassland and tree and hedgerow planting, creating additional foraging habitats and microclimates within habitat ecotones. Overall, the Proposed Development is likely to be beneficial with regards to reptiles at the Site level.

Birds

- 5.35 Without appropriate protection measures during vegetation clearance works, there is potential for disturbance, damage or destruction of active nests and killing or injury of birds or eggs.

- 5.36 The grassland to be cleared onsite is sub-optimal for ground nesting birds due to the proximity of hedge lines and trees. However, if an active nest is identified in these areas a protection zone will be required around the area (extent to be advised by the ecologist), which must remain until any young have fully fledged and the nest becomes inactive.
- 5.37 Proposed works to buildings are internal only and all below the ceiling line. Therefore the presence of encountering nesting birds is highly unlikely.
- 5.38 Loss of low-quality foraging habitat on the grassland will occur during the construction phase to accommodate the carpark. To mitigate this, surrounding grassland will be enhanced to a greater species richness and structural diversity, resulting in improved foraging habitat on Site. Additional individual trees will also be planted in this area providing additional nesting opportunities in the long-term. This is set out in the BNG report. Overall, the Proposed Development is likely to be beneficial with regards to birds at the Site level.

Otter

- 5.39 No otter holts or signs of otter activity have been recorded onsite or within the wider Hazelbury Manor land holding. However, otter are a mobile species, known to be present within the wider area and may infrequently commute across any part of the Site. Therefore, to ensure the likelihood of harm to otter is minimised it is recommended that appropriate precautionary measures prior to and during construction are undertaken. Works should follow the RAMs as detailed in Section 5.17 of this report to reduce residual risk to transient animals.
- 5.40 Overall, there is not considered to be any adverse effect on the local conservation status of otter and the Proposed Development is likely to be beneficial with regards to otter at the Site level.

Other SPI mammals

- 5.41 It is recommended that appropriate precautionary measures prior to and during construction are undertaken. Works should follow the RAMs as detailed in Section 5.17 of this report to reduce residual risk to transient animals, notably hedgehog.
- 5.42 Hedgehogs will have free movement throughout the Site during the operational phase and the Proposed Development will not reduce habitat connectivity for this species.
- 5.43 Overall, the Proposed Development is likely to be beneficial with regards to SPI mammals at the Site level due to proposed grassland enhancement and tree and hedgerow planting (see Figure 5).

Other notable and protected species

- 5.44 No impacts on other protected or notable species are considered likely from the Proposed Development.

Summary of effects

- 5.45 Table 8 below outlines the summary of effects for each receptor and their significance and considering the scale of effects.

Table 8: Summary of effects

Receptor	Effect type (adverse/beneficial/neutral)	Effect scale	Significance
Designated Sites	Neutral	Local	Not significant
Habitats	Beneficial	Site	Not significant
Badgers	Beneficial	Site	Not significant
Bats	Beneficial	Site	Not significant
Reptiles	Beneficial	Site	Not significant
Birds	Beneficial	Site	Not significant
Otter	Beneficial	Site	Not significant
Other SPI mammals	Beneficial	Site	Not significant

Cumulative effects

- 5.46 A search was made for nearby Proposed Development projects within 1 km of the Site within the last five years. Results are summarised in Table 9 below. Refused and withdrawn applications are not included. Householder planning applications where no ecological assessment was required are also not included within this list.
- 5.47 This impact assessment concludes no adverse residual impacts. Therefore, considering information collated in Table 9, there are no active planning applications that, in conjunction with this Site, will have an adverse impact on the same ecological receptors or on the wider landscape.
- 5.48 Given that the effects of the Proposed Development on all ecological receptors will be beneficial (as detailed in Table 8 above), there is no scope for significant cumulative effects with other Proposed Development projects.

Table 9: Cumulative developments

Planning reference	Description	Status	Distance from Site	Notes
PL/2025/00957	EIA Screening Opinion for a proposed 10.6MWp solar	EIA Not required	50 m east	No ecological assessment currently available.
20/10983/FUL	Part single-storey/part two-storey extension incorporating a terrace above the ground floor extension and creation of swimming pool	Approved with conditions.	0.46 km northeast	Common pipistrelle roost present and retained through reasonable avoidance measures.
PL/2024/10965	Proposed single storey annexe extension to provide guest accommodation	Approved with conditions.	0.5 km east	No ecological assessment undertaken.
20/11035/FUL	Proposed new driveway entrance to replace existing	Approved with conditions	0.6 km northwest	No ecological assessment undertaken.

PL/2023/09195	Redevelopment of existing industrial site to facilitate restoration, renovation and creation of 2no. dwellings and 2no. self-contained holiday units.	Approved with conditions.	0.6 km northwest	Loss of common pipistrelle, soprano pipistrelle and lesser horseshoe bat roosts, mitigated for through licencing with creation of a bat loft.
20/09557/FUL	Ground floor extensions to provide enlarged garage, conversion of existing bedrooms into new lounge and office	Approved with conditions.	0.6 km southeast	No ecological assessment undertaken.
PL/2022/08552	Erection of Agricultural Buildings.	Approved with conditions.	0.6 km east	No ecological assessment undertaken.
PL/2021/08476	Conversion of existing barn and adjacent outbuildings for residential use.	Approved with conditions.	0.6 km east	Multiple roosts supporting brown long-eared bat, Natterer's bat, lesser horseshoe and greater horseshoe. Lost roosts mitigated through creation of bat loft.
PL/2024/08943	Alterations and renovations to existing house, ground floor single storey extension and change of use of barn and store buildings to form a self-contained annexe and ancillary residential use.	Approved with conditions.	0.6 km east	Multiple roosts to be lost, supporting common pipistrelle (day roosts), lesser horseshoe (night roost) and greater horseshoe (night feeding roost). Mitigated through compensatory roost provision.
PL/2022/07938	Change of use of C3 dwelling to Class E use	Approved with conditions.	0.6 km east	No ecological assessment undertaken.
PL/2022/09284	Introduction of a new car park with EV charging and widening of the entrance road to the site.	Approved with conditions.	0.6 km east	No ecological assessment undertaken
PL/2022/08662	Change of use of part of agricultural storage building for commercial (B8 Use)	Approved with conditions.	0.7 km east	No ecological assessment undertaken.
20/11525/FUL	Proposed single storey garden room extension, replacement of	Approved with conditions.	0.75 km west	No ecological assessment undertaken.

	conservatory & addition loft conversion			
PL/2021/08338	Loft conversion with rear flat roof dormer	Approved with conditions.	0.78 km west	No ecological assessment undertaken.
PL/2024/11653	Retrospective planning permission for change of use from agricultural use to gym with external alterations	Approved with conditions.	0.78 km south	EclA concludes no adverse ecological impacts.
20/11035/FUL	Proposed new driveway entrance to replace existing	Approved with conditions.	0.79 km northwest	No ecological assessment undertaken.
PL/2023/02374	Replacement of existing single storey building containing four single garages with a larger building containing four double garages.	Approved with conditions.	0.8 km northwest	No ecological assessment undertaken.
19/07339/REM	Reserved matters details for layout, scale, appearance and landscaping for 166 dwellings and B1 office buildings pursuant to outline application 14/11354/OUT	Approved	0.87 km northeast	Primary ecological impacts: demolition of buildings supporting lesser horseshoe, greater horseshoe, serotine and common pipistrelle bat roosts and removal of trees impacting foraging routes. All fully mitigated within proposals.
20/07916/MOD PO PL/2022/00776 PL/2023/10443 PL/2024/04304 PL/2025/06580	All relate to the Wadswick Green Village developmentt13/070 02/FUL (various amendments/ condition changes)	Approved with conditions.	0.9 km east	Wadswick Green Village development originally approved in 2014. No additional impacts to ecological receptors identified in last five years.
PL/2023/09569	Re-modelling of No.1 and No.2 The Lycetts, including window alterations and the creation of off-street parking	Approved with conditions.	0.9 km west	No ecological assessment undertaken.
PL/2024/02617	Conversion of engineering factory to create two dwellings	Approved with conditions.	0.9 km west	Loss of two common pipistrelle day roosts, mitigated for by creation of like-for-like roosting opportunities.
PL/2024/10579	Conversion of garage/workshop buildings to create	Approved with conditions.	0.95 km west	Loss of two common pipistrelle day roosts, mitigated for by creation of

	1no. new dwelling, demolition of store to provide 1 bed ancillary annex and conversion of garage reception building into ancillary residential curtilage for The Manor House			like-for-like roosting opportunities.
PL/2023/09068	Proposed installation of six PV Solar panels on roof of the Tractor Shed	Approved with conditions.	0.95 km west	No ecological assessment undertaken.
PL/2021/07094	Construction of a timber two loosebox stable block with adjoining utility space.	Approved with conditions.	0.99 km south west	No ecological assessment undertaken

6 References

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7 Figures

(overleaf)

Figure 1: Baseline habitat plan

Figure 2: Designated Sites

Figure 3: Pond Location Plan

Figure 4a-b: PRA Summary Plan

Figure 5: Proposed habitat plan



- Legend
- Existing Very Large Urban Tree
 - Existing Large Urban Tree
 - Existing Medium Urban Tree
 - Existing Small Urban Tree
 - Native Species Rich Hedgerow with trees (h2NE1)
 - Developed land; sealed surface
 - Developed land; sealed surface (Buildings)
 - Lowland calcareous grassland
 - Ornamental lake or pond
 - Other neutral grassland
 - Tall forbs
 - Vegetated garden
 - Site boundary

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PROJECT TITLE
HAZELBURY MANOR

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Figure 1: Baseline habitats

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- Legend
- Proposed Small Rural Tree
 - Retained Very Large Urban Tree
 - Retained Large Urban Tree
 - Retained Medium Urban Tree
 - Retained Small Urban Tree
 - Native Hedgerow (h2NE5)
 - Native Species Rich Hedgerow with trees (h2NE1)
 - Developed land; sealed surface
 - Developed land; sealed surface (Buildings)
 - Lowland calcareous grassland
 - Ornamental lake or pond
 - Other neutral grassland
 - Vegetated garden
 - Site boundary

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Figure 2: Proposed habitats

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- Legend
- Ponds and Other Water Bodies
 - 250m buffer from site boundary
 - Site boundary

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Figure 3: Pond Location Plan

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DRAWN: SL APPROVED: HS VERSION:1.0

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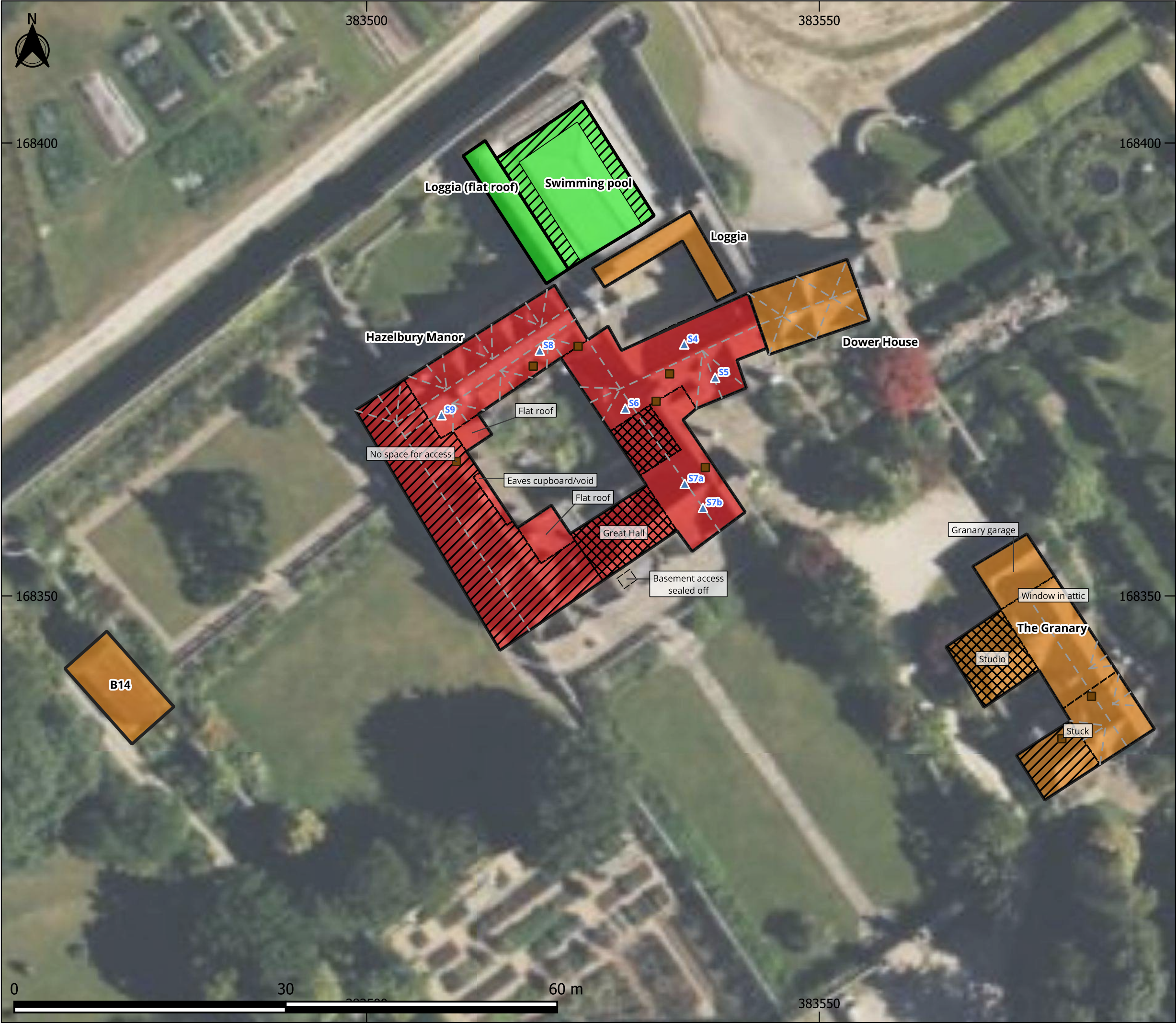
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Sources: BSG Ecology survey data



- Legend
- Site boundary
 - Bat dropping sample point
- Buildings:**
- Low roost potential
 - Moderate roost potential
 - High roost potential
 - Roof lines / dormer window outlines
- Voids:**
- No void
 - No access
 - Access hatch



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PROJECT TITLE
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Figure 4a: PRA Summary Plan - Hazelbury House and The Granary

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APPROVED: PS
SCALE: 1:400
VERSION: 1.2

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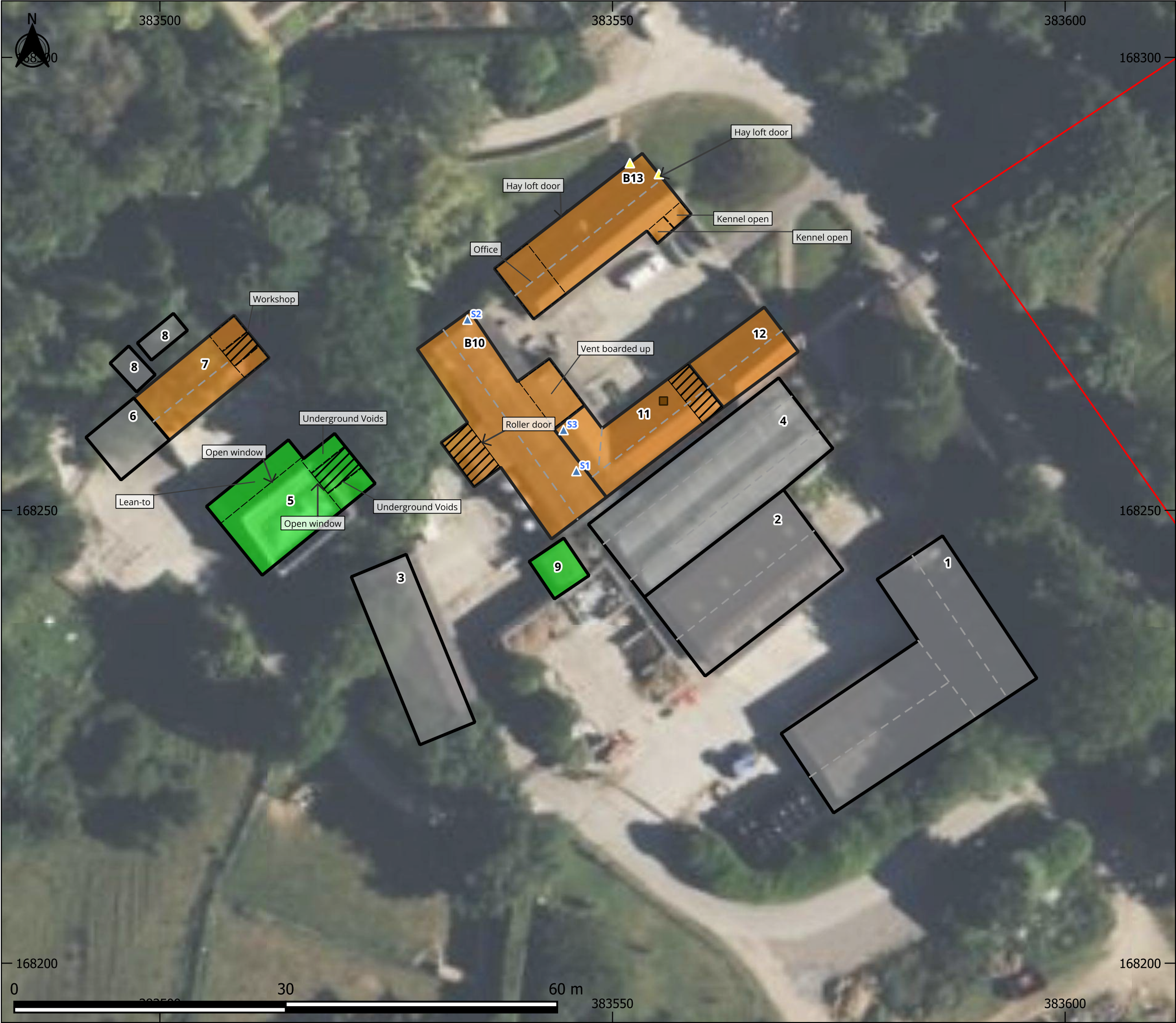
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Legend

Site boundary

Bat dropping points:

- Bat dropping sample
- Bat dropping

Buildings:

- Negligible
- Low roost potential
- Moderate roost potential
- Roof lines / dormer window outlines

Voids:

- No access
- Access hatch



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PROJECT TITLE
HAZELBURY MANOR

DRAWING TITLE
Figure 4b: PRA Summary Plan - Hazelbury Farm

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APPROVED: PS
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VERSION:1.2

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- Legend
- Proposed Small Rural Tree
 - Retained Very Large Urban Tree
 - Retained Large Urban Tree
 - Retained Medium Urban Tree
 - Retained Small Urban Tree
 - Native Hedgerow (h2NE5)
 - Native Species Rich Hedgerow with trees (h2NE1)
 - Developed land; sealed surface
 - Developed land; sealed surface (Buildings)
 - Lowland calcareous grassland
 - Ornamental lake or pond
 - Other neutral grassland
 - Vegetated garden
 - Site boundary

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Figure 5: Proposed habitats

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8 Photographs



Photograph 1. Hedgerow along main drive – Species-rich native hedgerow.



Photograph 2. Grass verges on main driveway – Lowland calcareous grassland.



Photograph 3. Vegetated Garden



Photograph 4. P1 – Ornamental Pond (offsite)



Photograph 5. P2 – Ornamental Pond (onsite)



Photograph 6. P3 – Pond (offsite)



Photograph 7. P4 – Pond (offsite)



Photograph 8. P5 – Pond (offsite)



Photograph 9. Main drive and wall



Photograph 10. Hazelbury Manor house



Photograph 11. Great Hall of Hazelbury Manor House with no roof void.



Photograph 12. Example of fireplace at Hazelbury Manor House.



Photograph 13. Eaves cupboard / void in Hazelbury Manor House



Photograph 14. Contiguous roof voids in Hazelbury Manor House (void 2).



Photograph 15. Accumulation of serotine droppings in Hazelbury Manor (sample S6).



Photograph 16. Scattered bat droppings (both serotine and common pipistrelle) in Hazelbury Manor House (void 3)



Photograph 17. Interior of swimming pool building with wooden cladding



Photograph 18. Interior of swimming pool building with 'boxes'



Photograph 19. The Dower House adjacent to Hazelbury Manor House.



Photograph 20. Stone roof covering with natural gaps offering potential access points for bats.



Photograph 21. Building 14 with clay pan roof tiles, window, and apertures in the stonework.



Photograph 22. The Granary



Photograph 23. Accessed roof void (attic) with no bat evidence of bat use in the Granary.



Photograph 24. Window in the Granary attic – Potential bat access point



Photograph 25. B13 (Stables), two-storey stone building with stone cladding roof and hayloft doors.



Photograph 26. B13, two small open kennels with old bird's nests.



Photograph 27. B13 (Coach House), lime torching under on side of the pitch and bitumen felt on the other side.



Photograph 28. B13, old bat droppings under the lintel of two windows on the ground floor of the Stables.



Photograph 29. B12 or Coach House



Photograph 30. B12 mezzanine floor and bitumen roof lining.



Photograph 31. B11, covered seating area



Photograph 32. B11, wire mesh and exposed timbers.



Photograph 33. Serotine bat access point between B11 and B10



Photograph 34. Accumulation of serotine droppings underneath the bat access point between B11 and B10



Photograph 35. B10 (Tythe Barn) with stone elevations and a corrugated sheet roof



Photograph 36. Internal structure of B10 with breeze block and suspended ceiling.



Photograph 37. Accumulation of serotine droppings in B10.



Photograph 38. Likely access point to internal structure of B10 through boarding for serotine.



Photograph 39. B9 with a shallow pitched roof.



Photograph 40. B8 – two small timber livestock sheds.



Photograph 41. B7, open section of the livestock shed.



Photograph 42. B7, section converted into a storage area with a small roof void.



Photograph 43. B7, internal view of the converted stable into a storage area with a small roof void.



Photograph 44. B6, open log store with corrugated metal roof.



Photograph 45. B5, squash courts with open-sided lean to with pan clay tiles.



Photograph 46. B5, squash courts with top level windows ajar



Photograph 47. B5, squash courts with stacks of clay tiles



Photograph 48. B5, squash courts with underground voids



Photograph 49. B4, pair of greenhouses



Photograph 50. Agricultural buildings



Photograph 51. Agricultural buildings



Photograph 52. Agricultural buildings

Appendix 1: GCN eDNA Report

Folio No: 3671-2025
Purchase Order: P25-359/3
Contact: BSG Ecology Ltd
Issue Date: 18.07.2025
Received Date: 04.07.2025

GCN Report

Technical Report



SureScreen Scientifics

Folio No: 3671-2025
Purchase Order: P25-359/3
Contact: BSG Ecology Ltd
Issue Date: 18.07.2025
Received Date: 04.07.2025

GCN eDNA Analysis

Summary

When great crested newts (GCN), *Triturus cristatus*, inhabit a pond, they continuously release small amounts of their DNA into the environment. By collecting and analyzing water samples, we can detect these small traces of environmental DNA (eDNA) to confirm GCN habitation or establish GCN absence.

Results

Lab ID	Site Name	OS Reference	Degradation Check	Inhibition Check	Result	Positive Replicates
R25 0155	Hazelbury Manor - P4	ST 83400 68083	Pass	Pass	Negative	0/12
GCN25 2263	Hazelbury Manor - P5	ST 83239 67952	Pass	Pass	Negative	0/12
GCN25 2267	Hazelbury Manor - P2	ST 83520 68278	Pass	Pass	Negative	0/12
GCN25 9120	Hazelbury Manor - P1	ST 83582 68395	Pass	Pass	Negative	0/12

Matters affecting result: none

Reported by: Amy Bermudez

Approved by: Jennifer Higginbottom

Methodology

The samples detailed above have been analyzed for the presence of GCN eDNA following the protocol stated in DEFRA WC1067 'Analytical and methodological development for improved surveillance of the Great Crested Newt, Appendix 5.' (Biggs et al. 2014). Each of the 6 sub-sample tubes are first centrifuged and pooled together into a single sample tube which then undergoes DNA extraction. The extracted sample is then analyzed using real-time PCR (qPCR), which uses species-specific molecular markers to amplify GCN DNA within a sample. These markers are unique to GCN DNA, meaning that there should be no detection of closely related species.

If GCN DNA is present, the DNA is amplified up to a detectable level, resulting in positive species detection. If GCN DNA is not present then amplification does not occur, and a negative result is recorded. Analysis of eDNA requires attention to detail to prevent the risk of contamination. True positive controls, negative controls, and spiked synthetic DNA are included in every analysis and these have to be correct before any result is declared and reported. Stages of the DNA analysis are also conducted in different buildings at our premises for added analytical security.

SureScreen Scientifics Ltd is ISO9001 accredited and participates in Natural England's proficiency testing scheme for GCN eDNA testing.

Interpretation of Results

Sample Integrity Check:

When samples are received in the laboratory, they are inspected for any tube leakage, suitability of sample (not too much mud or weed etc.) and absence of any factors that could potentially lead to inconclusive results. Any samples which fail this test are rejected and eliminated before analysis.

Degradation Check:

Pass/Fail. Analysis of the spiked DNA marker to see if there has been degradation of the kit or sample between the date it was made to the date of analysis. Degradation of the spiked DNA marker may lead indicate a risk of false negative results.

Inhibition Check:

Pass/Fail. The presence of inhibitors within a sample is assessed using a DNA marker. If inhibition is detected, samples are purified and re-analyzed. Inhibitors cannot always be removed, if the inhibition check fails, the sample should be re-collected.

Result:

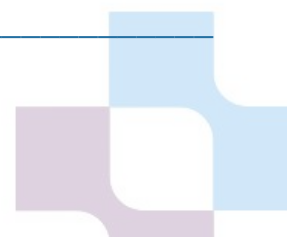
Presence of GCN eDNA (Positive/Negative/Inconclusive)

Positive: GCN DNA was identified within the sample, indicative of GCN presence within the sampling location at the time the sample was taken or within the recent past at the sampling location.

Positive Replicates: Number of positive qPCR replicates out of a series of 12. If one or more of these are found to be positive the pond is declared positive for GCN presence. It may be assumed that small fractions of positive analyses suggest low level presence, but this cannot currently be used for population studies. In accordance with the WC1067 Natural England protocol, even a score of 1/12 is declared positive. 0/12 indicates negative GCN presence.

Negative: GCN eDNA was not detected or is below the threshold detection level and the test result should be considered as evidence of GCN absence, however, does not exclude the potential for GCN presence below the limit of detection.

Inconclusive: Controls indicate inhibition or degradation of the sample, resulting in the inability to provide conclusive evidence for GCN presence or absence.



Appendix 2: Quadrat data

Other neutral grassland					
Species	Latin Name	DAFOR	ST 83631 68108	ST 83701 68033	ST 83617 67979
False oat-grass	<i>Arrhenatherum elatius</i>	A		✓	✓
Yorkshire fog	<i>Holcus lanatus</i>	A	✓	✓	✓
Red fescue	<i>Festuca rubra</i>	A	✓	✓	✓
Creeping bent	<i>Agrostis stolonifera</i>	A	✓	✓	✓
Cock's foot	<i>Dactylis glomerata</i>	F		✓	✓
Red clover	<i>Trifolium pratense</i>	O		✓	
Ribwort plantain	<i>Plantago lanceolata</i>	O	✓		✓
Common bent	<i>Agrostis capillaris</i>	O		✓	
Common Dandelion	<i>Taraxacum officinale</i>	F	✓	✓	✓
Brachythecium moss	<i>Brachythecium sp.</i>	A		✓	✓
Rhytidiadelphus squarrosus	<i>Rhytidiadelphus squarrosus</i>	O	✓		
Total species			6	9	8
Total species excluding bryophytes			5	8	7
Average species (excluding bryophytes)			6.66		

Lowland calcareous grassland					
Species	Latin Name	DAFOR	ST 83859 67897	ST 83781 67994	ST 83731 68067
False oat-grass	<i>Arrhenatherum elatius</i>	A	✓	✓	✓
Yorkshire fog	<i>Holcus lanatus</i>	F	✓		
Red fescue	<i>Festuca rubra</i>	F		✓	✓
Creeping bent	<i>Agrostis stolonifera</i>	F	✓	✓	✓
Cock's foot	<i>Dactylis glomerata</i>	O	✓	✓	✓
Common bird's-foot trefoil	<i>Lotus corniculatus</i>	O		✓	
Sweet vernal grass	<i>Anthoxanthum odoratum</i>	O		✓	
Ribwort plantain	<i>Plantago lanceolata</i>	O			✓
Smaller cats tail	<i>Phleum bertolonii</i>	F	✓	✓	
Blackthorn	<i>Prunus spinosa</i>	F	✓		
Common knapweed	<i>Centaurea nigra</i>	F	✓		✓
Salad burnet	<i>Sanguisorba minor</i>	O	✓		
Upright brome	<i>Bromus erectus</i>	R	✓	✓	
Field scabious	<i>Knautia arvensis</i>	O	✓	✓	✓

Total species	10	9	7
Average species	8.66		

Appendix 3: Summaries of Relevant Policy, Legislation and Other Instruments

This section briefly summarises the legislation, policy and related issues that are relevant to the main text of the report. The following text does not constitute legal or planning advice.

National Planning Policy Framework (England)

The Government issued the National Planning Policy Framework (NPPF) in December 2023. Text excerpts from the NPPF are shown where they may be relevant to planning applications and biodiversity including protected sites, habitats and species.

The Government sets out the three objectives for sustainable development (economy, social and environmental) at paragraphs 8-10 to be delivered through the plan preparation and implementation level and 'are not criteria against which every decision can or should be judged' (paragraph 9). The planning system's environmental objective is 'to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity...' (paragraph 8c).

In conserving and enhancing the natural environment, the NPPF (Paragraph 180) states that 'planning policies and decisions should contribute to and enhance the natural and local environment' by:

- Protecting and enhancing...sites of biodiversity value... '(in a manner commensurate with their statutory status or identified quality in the development plan)'.
- Recognising the wider benefits from natural capital and ecosystem services... including... trees and woodland.
- Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- Preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.

In respect of protected sites, at paragraph 181, the NPPF requires local planning authorities to distinguish, at the plan level, '...between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value...take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.' A footnote to paragraph 181 refers to the preferred use of agricultural land of poorer quality if significant development of agricultural land is to take place.

Paragraph 185 refers to how plans should aim 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 [a footnote refers to ODPM Circular 06/2005 for further guidance in respect of statutory obligations for biodiversity in the planning system], wildlife corridors and stepping stones that connect them and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation;' and to 'promote the conservation, restoration and re-creation 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.'

Paragraph 186 advises that, when determining planning applications, '...local planning authorities should apply the following principles:

- 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;
- development on land within or outside a Site of Special Scientific Interest, 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 Sites of Special Scientific Interest;

- 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; and
- 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.'

In paragraph 187, the following should be given the same protection as habitats sites:

- potential Special Protection Areas and possible Special Areas of Conservation;
- listed or proposed Ramsar sites; and
- sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.'

In paragraph 188 the NPPF refers back to sustainable development in relation to appropriate assessment and states: 'the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site'.

In paragraph 189, the NPPF refers to planning policies and decisions taking account of ground conditions and risks arising from land instability and contamination at sites. In relation to risks associated with land remediation account is to be taken of 'potential impacts on the natural environment' that arise from land remediation.

In paragraph 191 the NPPF states that planning policies and decisions should ensure that development is appropriate to the location and take into account likely effects (including cumulative) on the natural environment and, in doing so, they 'should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation' (paragraph 191c).

Government Circular ODPM 06/2005 Biodiversity and Geological Conservation (England only)

Paragraph 98 of Government Circular 06/2005 advises that "the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Local authorities should consult Natural England before granting planning permission. They should consider attaching appropriate planning conditions or entering into planning obligations under which the developer would take steps to secure the long-term protection of the species. They should also advise developers that they must comply with any statutory species' protection provisions affecting the site concerned..."

Paragraph 99 of Government Circular 06/2005¹¹ advises that "it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the Proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted".

Standing Advice (GOV.UK - England only)

The GOV.UK website provides information regarding protected species and sites in relation to development proposals: 'Local planning authorities should take advice from Natural England or the Environment Agency about planning applications for developments that may affect protected species.' GOV.UK advises that 'some

¹¹ ODPM Circular 06/2005. *Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their Impacts within the Planning System* (2005). HMSO Norwich.

species have standing advice which you can use to help with planning decisions. For others you should contact Natural England or the Environment Agency for an individual response.'

The standing advice (originally from Natural England and now held and updated on GOV.UK¹²) provides advice to planners on deciding if there is a 'reasonable likelihood' of protected species being present. It also provides advice on survey and mitigation requirements.

When determining an application for development that is covered by standing advice, in accordance with guidance in Government Circular 06/2005, Local planning authorities are required to take the standing advice into account. In paragraph 82 of the aforementioned Circular, it is stated that: 'The standing advice will be a material consideration in the determination of the planning application in the same way as any advice received from a statutory consultee...it is up to the planning authority to decide the weight to be attached to the standing advice, in the same way as it would decide the weight to be attached to a response from a statutory consultee.'

The Environment Act 2021

The Environment Act includes the requirement for mandatory biodiversity gain for all qualifying developments in England through an amendment to the Town and Country Planning Act 1990 which came into force on 12 February 2024. For all qualifying developments in England, The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024 (SI44) at Regulation 3 advises in relation to planning applications that '*the biodiversity gain planning condition does not apply in relation to a planning permission within the scope of regulation 2 (2) of these Regulations, where the application for planning permission was made before 12th February 2024*'. From 12 February 2024, the Act and associated secondary Regulations (SI2024 No's 44- 50) insert amendments into the Town and Country Planning Act 1990 which in summary require the following for all qualifying developments in England:

- The provision of a required percentage of biodiversity gain, currently set nationally to be at 10%, as a general condition of planning permission,
- The use of the statutory Biodiversity Metric to calculate the biodiversity gain,
- Submission to and approval by the planning authority, of a Biodiversity Gain Plan (BGP) for the development before the development may be begun; the BGP is to be prepared using a template prepared by Defra to demonstrate how biodiversity gain will be delivered on and / or off-site and how the biodiversity gain hierarchy has been applied so that the local planning authority can take account of the approach taken when deciding whether to approve the BGP,
- Significant on-site biodiversity gain and all offsite biodiversity gain to be secured for a fixed period, currently nationally set at 30 years,
- Alternative arrangements to be made for the purpose of minimising the adverse effect of development to habitats deemed to be irreplaceable habitat (see NPPF),
- Demonstration of how the biodiversity gain will be secured, typically through planning obligations in a section 106 agreement,
- Registration of offsite biodiversity gain and allocation of relevant biodiversity units to a given development in a national register for which Natural England is the Register Operator,
- Use of statutory biodiversity credits through the Secretary of State, which is considered to be a last resort, if onsite and/or offsite biodiversity gains cannot achieve the required percentage.

Natural Environment and Rural Communities (NERC) Act 2006 – Habitats and species of principal importance (England)

The Natural Environment and Rural Communities (NERC) Act came into force on 1st October 2006. Section 41 (S41) of the Act require the Secretary of State to publish a list of habitats and species which are of principal importance for the conservation of biodiversity in England. The list has been drawn up in consultation with

¹² <https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications#standing-advice-for-protected-species>

Natural England as required by the Act. In accordance with the Act the Secretary of State keeps this list under review and will publish a revised list if necessary, in consultation with Natural England.

The S41 list is used to guide decision-makers such as public bodies, including local authorities and utilities companies, in implementing their duty under Section 40 of the NERC Act 2006, to have regard to the conservation of biodiversity in England, when carrying out their normal functions, including development control and planning. This is commonly referred to as the 'Biodiversity Duty.'

Guidance for public authorities on implementing the Biodiversity Duty¹³ has been published by Defra. One of the key messages in this document is that 'conserving biodiversity includes restoring and enhancing species populations and habitats, as well as protecting them.' In England the administration of the planning system and licensing schemes are highlighted as having a 'profound influence on biodiversity conservation.' Local authorities are required to take measures to "promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species. The guidance states that 'the duty aims to raise the profile and visibility of biodiversity, clarify existing commitments with regard to biodiversity, and to make it a natural and integral part of policy and decision making.'

In 2007, the UK Biodiversity Action Plan (BAP) Partnership published an updated list of priority UK species and habitats covering terrestrial, freshwater and marine biodiversity to focus conservation action for rarer species and habitats in the UK. The UK Post-2010 Biodiversity Framework¹⁴, which covers the period from 2011 to 2020, now succeeds the UK BAP. The UK priority list contained 1150 species and 65 habitats requiring special protection and has been used as a reference to draw up the lists of species and habitats of principal importance in England.

In England, there are 56 Habitats of Principal Importance and 943 Species of Principal Importance on the S41 list. These are all the habitats and species found in England that were identified as requiring action in the UK BAP and which continue to be regarded as conservation priorities in the subsequent UK Post-2010 Biodiversity Framework.

European protected species (Animals)

The Conservation of Habitats and Species Regulations 2017 (as amended) consolidates various amendments that have been made to the original (1994) Regulations which transposed the EC Habitats Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (Council Directive 92/43/EEC) into national law.

"European protected species" (EPS) of animal are those which are shown on Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended). They are subject to the provisions of Regulation 43 of those Regulations. All EPS are also protected under the Wildlife and Countryside Act 1981 (as amended). Taken together, these pieces of legislation make it an offence to:

- a. Intentionally or deliberately capture, injure or kill any wild animal included amongst these species
- b. Possess or control any live or dead specimens or any part of, or anything derived from a these species
- c. deliberately or recklessly disturb wild animals of any such species
- d. deliberately take or destroy the eggs of such an animal, or
- e. intentionally, deliberately or recklessly damage or destroy a breeding site or resting place of such an animal, or obstruct access to such a place

For the purposes of paragraph (c), disturbance of animals includes in particular any disturbance which is likely—

- a. to impair their ability—
 - i. to survive, to breed or reproduce, or to rear or nurture their young, or

¹³ Defra, 2007. *Guidance for Public Authorities on Implementing The Biodiversity Duty*. (<http://www.defra.gov.uk/publications/files/pb12585-pa-guid-english-070516.pdf>)

¹⁴ JNCC and Defra (on behalf of the Four Countries' Biodiversity Group). 2012. *UK Post-2010 Biodiversity Framework*. July 2012. (<http://jncc.defra.gov.uk/page-6189>)

- ii. in the case of animals of a hibernating or migratory species, to hibernate or migrate; or
- b. to affect significantly the local distribution or abundance of the species to which they belong.

Although the law provides strict protection to these species, it also allows this protection to be set aside (derogated) through the issuing of licences. The licences in England are currently determined by Natural England (NE) for development works and by Natural Resources Wales in Wales. In accordance with the requirements of the Regulations (2017, as amended), a licence can only be issued where the following requirements are satisfied:

- a. The proposal is necessary 'to preserve public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment'
- b. 'There is no satisfactory alternative'
- c. The proposals 'will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.'

Definition of breeding sites and resting places

Guidance for all European Protected Species of animal, including bats and great crested newt, regarding the definition of breeding and of breeding and resting places is provided by The European Council (EC) which has prepared specific guidance in respect of the interpretation of various Articles of the EC Habitats Directive.¹⁵ Section II.3.4.b) provides definitions and examples of both breeding and resting places at paragraphs 57 and 59 respectively. This guidance states that 'The provision in Article 12(1)(d) [of the EC Habitats Directive] should therefore be understood as aiming to safeguard the ecological functionality of breeding sites and resting places.' Further the guidance states: 'It thus follows from Article 12(1)(d) that such breeding sites and resting places also need to be protected when they are not being used, but where there is a reasonably high probability that the species concerned will return to these sites and places. If for example a certain cave is used every year by a number of bats for hibernation (because the species has the habit of returning to the same winter roost every year), the functionality of this cave as a hibernating site should be protected in summer as well so that the bats can re-use it in winter. On the other hand, if a certain cave is used only occasionally for breeding or resting purposes, it is very likely that the site does not qualify as a breeding site or resting place.'

European protected species (Plants)

The Conservation of Habitats and Species Regulations 2017 (as amended) consolidates various amendments that have been made to the original (1994) Regulations which transposed the EC Habitats Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (Council Directive 92/43/EEC) into national law.

"European protected species" (EPS) of plant are those which are present on Schedule 5 of the Conservation of Habitats and Species Regulations 2017 (as amended). They are subject to the provisions of Regulation 46 of those Regulations.

Regulation 47 makes it an offence to deliberately pick, collect, cut, uproot or destroy a wild plant of an EPS. It also makes it an offence to have in possession or control any live or dead plant or part of plant which has been taken in the wild and which is an EPS (or listed in Annex II(b) or IV(b) of the Habitats Directive).

Competent authorities

Under Regulation 7 of the Conservation of Habitats and Species Regulations 2017 (as amended) a "competent authority" includes "any Minister of the Crown..., government department, statutory undertaker, public body of any description or person holding a public office."

In accordance with Regulation 9, "a competent authority must exercise their functions which are relevant to nature conservation, including marine conservation, so as to secure compliance with the requirements of the [Habitats and Birds] Directives. This means for instance that when considering development proposals a competent authority should consider whether EPS or European Protected Sites are to be affected by those

¹⁵ Guidance document on the strict protection of animal species of Community interest under the Habitats Directive 92/43/EEC. (February 2007), EC.

works and, if so, must show that they have given consideration as to whether derogation requirements can be met.

Birds

All nesting birds are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended) which makes it an offence to intentionally kill, injure or take any wild bird or take, damage or destroy its nest whilst in use or being built, or take or destroy its eggs. In addition to this, for some rarer species (listed on Schedule 1 of the Act), it is an offence to disturb them whilst they are nest building or at or near a nest with eggs or young, or to disturb the dependent young of such a bird.

The Conservation of Habitats and Species Regulations 2017 (as amended) places duties on competent authorities (including Local Authorities and National Park Authorities) in relation to wild bird habitat. These provisions relate back to Articles 1, 2 and 3 of the EC Directive on the conservation of wild birds (2009/147/EC, 'Birds Directive'¹⁶) (Regulation 10 (3)) requires that the objective is the 'preservation, maintenance and re-establishment of a sufficient diversity and area of habitat for wild birds in the United Kingdom, including by means of the upkeep, management and creation of such habitat, as appropriate, having regard to the requirements of Article 2 of the new Wild Birds Directive...' Regulation 10 (7) states: 'In considering which measures may be appropriate for the purpose of security or contributing to the objective in [Regulation 10 (3)] Paragraph 3, appropriate account must be taken of economic and recreational requirements'.

In relation to the duties placed on competent authorities under the 2017 Regulations, Regulation 10 (8) states: 'So far as lies within their powers, a competent authority in exercising any function [including in relation to town and country planning] in or in relation to the United Kingdom must use all reasonable endeavours to avoid any pollution or deterioration of habitats of wild birds (except habitats beyond the outer limits of the area to which the new Wild Birds Directive applies).'

Badger

Badger is protected under the Protection of Badgers Act 1992. It is not permitted to wilfully kill, injure, take, possess or cruelly ill-treat a badger, or to attempt to do so; or to intentionally or recklessly interfere with a sett. Sett interference includes disturbing badgers whilst they are occupying a sett, as well as damaging or destroying a sett or obstructing access to it. A badger sett is defined in the legislation as "a structure or place, which displays signs indicating current use by a badger".

ODPM Circular 06/2005¹⁷ provides further guidance on statutory obligations towards badger within the planning system. Of particular note is paragraph 124, which states that "The likelihood of disturbing a badger sett, or adversely affecting badgers' foraging territory, or links between them, or significantly increasing the likelihood of road or rail casualties amongst badger populations, are capable of being material considerations in planning decisions."

Natural England provides Standing Advice¹⁸, which is capable of being a material consideration in planning decisions. Natural England recommends mitigation to avoid impacts on badger setts, which includes maintaining or creating new foraging areas and maintaining or creating access (commuting routes) between setts and foraging/watering areas.

Reptiles

All native reptile species receive legal protection in Great Britain under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). Viviparous lizard, slow-worm, grass snake and adder are protected against killing, injuring and unlicensed trade only. Sand lizard and smooth snake receive additional protection as "European Protected species" under the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended) and are fully protected under the Wildlife and Countryside Act 1981 (as amended).

All six native species of reptile are included as 'species of principal importance' for the purpose of conserving biodiversity under Section 41 (England) of the NERC Act 2006 and Section 7 of the Environment (Wales) Act 2016.

¹⁶ 2009/147/EC Birds Directive (30 November 2009. European Parliament and the Council of the European Union.

¹⁷ ODPM Circular 06/2005. *Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their Impacts within the Planning System* (2005). HMSO Norwich.

¹⁸ <http://www.naturalengland.org.uk/ourwork/planningdevelopment/spatialplanning/standingadvice/specieslinks.aspx>

Current Natural England Guidelines for Developers¹⁹ states that 'where it is predictable that reptiles are likely to be killed or injured by activities such as site clearance, this could legally constitute intentional killing or injuring.' Further the guidance states: 'Normally prohibited activities may not be illegal if 'the act was the incidental result of a lawful operation and could not reasonably have been avoided'. Natural England 'would expect reasonable avoidance to include measures such as altering development layouts to avoid key areas, as well as capture and exclusion of reptiles.'

The Natural England Guidelines for Developers state that 'planning must incorporate two aims where reptiles are present:

- To protect reptiles from any harm that might arise during development work;
- To ensure that sufficient quality, quantity and connectivity of habitat is provided to accommodate the reptile population, either on-site or at an alternative site, with no net loss of local reptile conservation status.'

Wild mammals in general

The Wild Mammals (Protection) Act 1996 (as amended) makes provision for the protection of wild mammals from certain cruel acts, making it an offence for any person to intentionally cause suffering to any wild mammal. In the context of development sites, for example, this may apply to rabbits in their burrows.

Invasive non-native species

An invasive non-native species is any non-native animal or plant that has the ability to spread causing damage to the environment.

Under the Wildlife and Countryside Act 1981 (as amended) it is an offence to release, or to allow to escape into the wild, any animal which is not ordinarily resident in and is not a regular visitor to Great Britain in a wild state or is listed under Schedule 9 of the Act.

It is an offence to plant or otherwise cause to grow in the wild invasive non-native plants listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

Hedgerows

Article 10 of the Habitats Directive²⁰ requires that 'Member States shall endeavour...to encourage the management of features of the landscape which are of major importance for wild fauna and flora. Such features are those which, by virtue of their linear and continuous structure...or their function as stepping stones...are essential for the migration, dispersal and genetic exchange of wild species'. Examples given in the Directive include traditional field boundary systems (such as hedgerows).

The aim of the Hedgerow Regulations 1997²¹, according to guidance produced by the Department of the Environment²², is "to protect important hedgerows in the countryside by controlling their removal through a system of notification. In summary, the guidance states that the system is concerned with the removal of hedgerows, either in whole or in part, and covers any act which results in the destruction of a hedgerow. The procedure in the Regulations is triggered only when land managers or utility operators want to remove a hedgerow. The system is in favour of protecting and retaining 'important' hedgerows.

The Hedgerow Regulations set out criteria that must be used by the local planning authority in determining which hedgerows are 'important'. The criteria relate to the value of hedgerows from an archaeological, historical, wildlife and landscape perspective.

¹⁹ English Nature, 2004. *Reptiles: guidelines for developers*. English Nature, Peterborough. <https://webarchive.nationalarchives.gov.uk/20150303064706/http://publications.naturalengland.org.uk/publication/76006>

²⁰ Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

²¹ Statutory Instrument 1997 No. 1160 – The Hedgerow Regulations 1997. HMSO: London

²² The Hedgerow Regulations 1997: a guide to the law and good practice, HMSO: London

Appendix 4: Bat DNA Reports

Folio No: 3306-2025
Purchase Order: P25-359 (6)
Contact: BSG Ecology Ltd
Issue Date: 23.07.2025
Received Date: 01.07.2025

Biological Report

Technical Report



SureScreen Scientifics

Biological Sample Analysis

Summary

Most biological materials (tissue, feces, hair, blood, etc.) contain small amounts of DNA from the organism of which it originated. Using molecular methods such as PCR (polymerase chain reaction) and DNA sequencing, SureScreen Scientifics are able to analyze an unknown sample to determine which species the sample originates from our methods are optimized for the detection of species including bats (over 92% of bat species worldwide can be identified including all 18 UK bat species), mammals; bees, wasps & hornets; birds; fish; plants (from roots, leaves, stem and even dried wood) and many more species.

Results

Lab ID	Site Name	OS Reference	Sample Type	Species Name	Match(%)
B5021	Hazelbury Manor - S2 (B10 - green)		Bat Dropping	Serotine (Eptesicus serotinus)	100.00
Genetic Sequence TTTGCTATTATAATTGGGGGCTTTGGAATTGATTAGGTGCCTTTAATAATCGGAGCTCCTGATATAGCATTCCCACG AATGAACAATATAAGCTTCTGACTCCTTCCTCCCTCTTTCCTACTTCTTCTAGCATCATCTATGGTAGAGGCCGGGG CTGGCACTGGTTGGACAGTCTACCCCCCTTTGGCAGGAAACCTAGCA					
B5022	Hazelbury Manor - S3 (B10 - blue)		Dropping	Inconclusive	-
Genetic Sequence -					
B5023	Hazelbury Manor - S6 (pink)		Bat Dropping	Serotine (Eptesicus serotinus)	99.50
Genetic Sequence GTTGCTATATAATTGGGGGTTTGGGAATTGATTAGTGCCTTTAATAATCGGAGCTCCTGATATAGCATTCCCACGAAT GAACAATATAAGCTTCTGACTCCTTCCTCCCTCTTTCCTACTTCTTCTAGCATCATCTATGGTAGAGGCCGGGGCTG GCACTGGTTGGACAGTCTACCCCCCTTTGGCAGGAAACCTAGCACCACGCAGGAGAGA					
B5024	Hazelbury Manor - S7a (purple)		Dropping	Inconclusive	-
Genetic Sequence -					
B5025	Hazelbury Manor - S8 (clear)		Bat Dropping	Common pipistrelle (Pipistrellus pipistrellus)	100.00
Genetic Sequence TATGCTATTATAATTGGAGGATTGGAAACTGACTAGTTCCTACTAATAATTGGAGCCCCTGACATGGCATTTCCTCG TATAAATAATATAAGTTTCTGACTCCTACCTCCTTCTTCTACTACTACTAGCCTCGTCTATAGTAGAAGCGGGGAGC GGGTACAGGCTGAACAGTCTA					



Folio No: 3306-2025
Purchase Order: P25-359 (6)
Contact: BSG Ecology Ltd
Issue Date: 23.07.2025
Received Date: 01.07.2025



B5026	Hazelbury Manor - S9 (clear)	Dropping	Inconclusive	-
Genetic Sequence				
-				

Matters affecting result: none
Reported by: Consuela Sopronyi

Approved by: Lauryn Jewkes

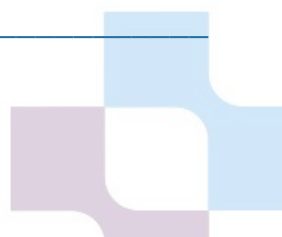


Methodology

Once samples have arrived in the laboratory, the DNA is isolated using a commercial DNA extraction kit. Using PCR, DNA (if present within the sample) is amplified using universal molecular markers designed to amplify a short fragment of the DNA of the target species group (i.e. mammal, fish, arthropod, reptile, plant etc.). If amplification is successful, the resulting DNA sequence is revealed using a process known as Sanger Sequencing in order to obtain the genetic sequence of the mitochondrial gene within the sample. The sequence results are aligned against a library of known reference sequences using bioinformatics software, which enables us to determine which species the DNA sequence from the sample matches with, informing the species identity and sequence similarity (match %). If the initial analysis is unsuccessful, the entire process is repeated up to two additional times with a fresh reserve sample (if available) in order to obtain a species identification. If no DNA is detected after three attempts, then we can be confident that any further analysis of the sample will likely also fail to result in species identification.

Interpretation of Results

- Sample Type:** The sample you send to us can come from a variety of sources. Fecal, dropping, urine, hair, blood, carcass (skin, flesh, bone), gamete, plant matter or unknown biological material all contain DNA that we can test for in order to identify the species of origin.
- Genetic Sequence:** The unique DNA sequence obtained from the sample.
- Match (%):** How closely matched the DNA sequence from your sample is to the sequences within our reference database. This can be interpreted as a score of result accuracy, with the maximum score of 100% indicating an exact match of the sample to the indicated species' reference sequence. Lower scores (80-99%) indicate some variation between the sample and reference sequence, likely due to natural variation between individual genetic sequences and/or systematic variations generated through the sequencing process. Scores below 80% similarity should be interpreted with care and can indicate part degraded or part contaminated samples.
- Inconclusive Result:**
- Degraded sample:**
DNA is degraded and we are unable to determine species identification due to degradation of sample DNA. This can happen either before sample collection (old samples, exposure to UV etc.) or after sample collection if stored for long periods before analysis or not handled correctly.
- Inhibited/contaminated sample:**
We are unable to determine species identity due to contamination or the suspected presence of large quantities of PCR inhibitors. Contamination sources can originate from other species which could have come into contact with the samples, or human contamination during sample collection.
- Alternative Result:** Sometimes, for targets such as bat dropping analysis, other mammalian species such as rodents are detected. We find this to be a common occurrence as some bat droppings can be similar in appearance to rodent droppings. Although sometimes unexpected, repeat analyses in these cases would likely return the same results.



Folio No: 3919-2025
Purchase Order: Follow-up Analysis
Contact: BSG Ecology Ltd
Issue Date: 11.08.2025
Received Date: 05.08.2025

Biological Report

Technical Report



SureScreen Scientifics

Biological Sample Analysis

Summary

Most biological materials (tissue, feces, hair, blood, etc.) contain small amounts of DNA from the organism of which it originated. Using molecular methods such as PCR (polymerase chain reaction) and DNA sequencing, SureScreen Scientifics are able to analyze an unknown sample to determine which species the sample originates from our methods are optimized for the detection of species including bats (over 92% of bat species worldwide can be identified including all 18 UK bat species), mammals; bees, wasps & hornets; birds; fish; plants (from roots, leaves, stem and even dried wood) and many more species.

Results

Lab ID	Site Name	OS Reference	Sample Type	Species Name	Match(%)
B5240	Hazelbury Manor - S7b		Bat Dropping	Serotine (Eptesicus serotinus)	100.00
Genetic Sequence GATTGGGGGGCTTTGGAATTGATTAGTGCCTTTAATAATCGGAGCTCCTGATATAGCATTCCCACGAATGAACAAT ATAAGCTTCTGACTCCTTCCTCCCTCTTTCTACTTCTTCTAGCATCATCTATGGTAGAGGCCGGGGCTGGCACTGG TTGGACAGTCTACCCCCCTTTGGCAGGAAACCTAGCA					

Matters affecting result: none
Reported by: Lauryn Jewkes

Approved by: Lauryn Jewkes

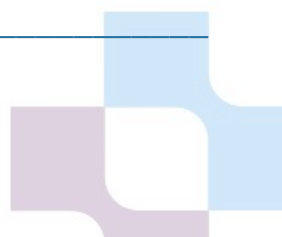


Methodology

Once samples have arrived in the laboratory, the DNA is isolated using a commercial DNA extraction kit. Using PCR, DNA (if present within the sample) is amplified using universal molecular markers designed to amplify a short fragment of the DNA of the target species group (i.e. mammal, fish, arthropod, reptile, plant etc.). If amplification is successful, the resulting DNA sequence is revealed using a process known as Sanger Sequencing in order to obtain the genetic sequence of the mitochondrial gene within the sample. The sequence results are aligned against a library of known reference sequences using bioinformatics software, which enables us to determine which species the DNA sequence from the sample matches with, informing the species identity and sequence similarity (match %). If the initial analysis is unsuccessful, the entire process is repeated up to two additional times with a fresh reserve sample (if available) in order to obtain a species identification. If no DNA is detected after three attempts, then we can be confident that any further analysis of the sample will likely also fail to result in species identification.

Interpretation of Results

- Sample Type:** The sample you send to us can come from a variety of sources. Fecal, dropping, urine, hair, blood, carcass (skin, flesh, bone), gamete, plant matter or unknown biological material all contain DNA that we can test for in order to identify the species of origin.
- Genetic Sequence:** The unique DNA sequence obtained from the sample.
- Match (%):** How closely matched the DNA sequence from your sample is to the sequences within our reference database. This can be interpreted as a score of result accuracy, with the maximum score of 100% indicating an exact match of the sample to the indicated species' reference sequence. Lower scores (80-99%) indicate some variation between the sample and reference sequence, likely due to natural variation between individual genetic sequences and/or systematic variations generated through the sequencing process. Scores below 80% similarity should be interpreted with care and can indicate part degraded or part contaminated samples.
- Inconclusive Result:**
- Degraded sample:**
DNA is degraded and we are unable to determine species identification due to degradation of sample DNA. This can happen either before sample collection (old samples, exposure to UV etc.) or after sample collection if stored for long periods before analysis or not handled correctly.
- Inhibited/contaminated sample:**
We are unable to determine species identity due to contamination or the suspected presence of large quantities of PCR inhibitors. Contamination sources can originate from other species which could have come into contact with the samples, or human contamination during sample collection.
- Alternative Result:** Sometimes, for targets such as bat dropping analysis, other mammalian species such as rodents are detected. We find this to be a common occurrence as some bat droppings can be similar in appearance to rodent droppings. Although sometimes unexpected, repeat analyses in these cases would likely return the same results.

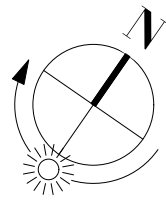


Appendix 5: Proposed Site Layout



General Notes:

1. This drawing is to be read in conjunction with other consultants drawings.
2. Site conditions must be checked prior to the commencement of work.
3. Discrepancies must be reported directly to the Architect.
4. Do not scale off drawing. Use figured dimensions only unless for planning purposes.
5. This drawing may be issued in colour, and may be a non-standard paper size.
6. Copyright Yiangou Architects Ltd.



1. The Manor (12 Suites)
2. Dower House (3 Suites)
3. The Granary (8 Suites)
4. Car Park (23 Spaces)

KEY:



H	08/01/2026	Updated Layouts	AG
G	15/12/2025	Updated Layouts	AG
F	05/12/2025	Updated Layouts	AG
E	18/11/2025	Updated Layouts	AG
D	18/11/2025	Updated Layouts	AG
C	18/11/2025	Updated Layouts	AG
B	11/11/2025	Updated Layouts	AG
A	31/10/2025	Pre-Application Issue	AG
Rev	Date	Notes	Drawn

Scale	0 10 20 30m
1 : 500 @ A1	0 50 100ft

QA Serial Number

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Project Address	Hazelbury Manor, Wiltshire, SN13 8HX		
Project Description	Proposed Alterations		
Drawing Title	Proposed Site Plan		
Drawing No.	2956-055	Rev.	H