

ECOLOGY & BIODIVERSITY NET GAIN ASSESSMENT (BNGA) REPORT

12th February 2025

The Bell House Hotel, Sutton Benger,
Wiltshire, SN15 4RH

Applicant: Calibre Homes SW Limited

Agent/planner: A Harlow and Sons

REPORT ISSUE SHEET:

Draft/final and Version no:	Final Ecology & BNG Assessment (V.1)
Previous report version(s) and date(s):	Ecological Assessment – The Bell House Hotel, Sutton Benger, Wiltshire, SN15 4RH Draft Version 1.0: Dated 22 nd June 2022; Ecological Assessment and bat activity report – The Bell House Hotel, Sutton Benger, Wiltshire – 4 th March 2024 Final version 1.0 and updated 29 th July 2024 (V. 2.0)
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Planning application number (if known):	n/a

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This report has been prepared to identify the presence of bats and nesting birds within the site, where this falls within the scope of the agreed works.

This report has been produced using all reasonable skill and care, and a Quality Assurance (QA) review process has been undertaken prior to issue of this report. If the reader identifies any inaccuracies or discrepancies, this should be brought to the attention of ABR Ecology immediately.

SURVEY DATA LIFESPAN AND VALIDITY:

Survey data is considered valid for 12 months from the survey date in accordance with the CIEEM Advice note (CIEEM, 2019), due to the presence of and/or potential for mobile species to be present within the site. The 12-month period is taken where the condition(s) of the site remain unchanged since the survey and the proposals for the site are unchanged. If any changes to the plans occur, this report may not be valid, and any conclusions provided may not be appropriate.

Where plans or conditions change on site, it is the responsibility of the applicant to contact ABR Ecology to determine whether an amended report or resurvey of the site is required.

In the event a Natural England mitigation licence is required, update survey data will be required to inform the European Protected Species (EPS) licence application. For example, in the event a bat roost is identified, bat activity survey data must be obtained from the then current bat survey season (May – August).

This document has been prepared in accordance with CIEEM's Guidelines for Ecological Report Writing 2nd ed (CIEEM, 2017a), Biodiversity Net Gain Report & Audit Templates (CIEEM, 2021), and the Bat Conservation Trust (BCT) Good Practice Guidelines 4th ed (Collins, 2023).

The results of the surveys and this assessment are representative at the time of the surveys taking place.

ABR Ecology Ltd cannot accept responsibility for third party data supplied within this report.

At the time of writing, standard methodologies have been used which are accepted by Natural England and other statutory bodies. No responsibility will be accepted where standard methodologies change and where Government, national bodies and industry subsequently modify standards.

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Non-technical summary

- ◆ ABR Ecology Ltd were commissioned by Calibre Homes SW Ltd to produce an Ecology & Biodiversity Net Gain Assessment (BNGA) for The Bell House Hotel, Sutton Benger, Wiltshire, SN15 4RH.
- ◆ This report was requested to inform a full application for the partial demolition of the existing building and new residential development.

Survey background:

- ◆ A Preliminary Ecological Appraisal (PEA) including a Preliminary Roost Appraisal (PRA) was originally conducted on the 22nd April 2022 by class licenced ecologist Russell Hoyle ACIEEM and assistant ecologist James Gooding. The survey was then updated by class licenced ecologist Laurence Wills and assistant ecologist Georgia Linter on the 12th June 2023 and again by class licenced ecologist Becci Smith MCIEEM and assistant ecologist Zoe Barrett on the 7th January 2025.
- ◆ A suite of three bat activity (two dusk and one dawn) surveys were conducted on the 25th May and the 12th and 27th June 2023.

Habitats and Statutory Biodiversity Metric (SBM):

- ◆ Area habitats onsite include modified grassland (g4), introduced shrub (u1-847), bramble scrub (h3d), individual urban trees (u1-32), developed land; sealed surface (u1b6) and a building (u1b5). No hedgerows or watercourses are present on-site. No priority habitats (S41 NERC Act 2006) were recorded onsite.
- ◆ The baseline for the BNG assessment is taken to be the site visit dated 7th January 2025; no former site clearance is believed to have occurred prior to the visit.
- ◆ A Statutory Biodiversity Metric was conducted, and a copy of the calculation tool accompanies this report. Based on the current proposals, a percentage net gain of +0.97% in area habitats is anticipated to occur post-development. Offsite habitat units or statutory biodiversity credits will need to be purchased to meet the minimum 10% net gain requirement and to discharge the biodiversity gain condition. Further details are provided in Section 5.

Protected sites and Ecological Networks:

- ◆ No impacts on statutory or non-statutory sites are anticipated as part of the works. No Ecological Networks exist onsite; therefore, no recommendations are made in relation to Networks.

Badgers:

- ◆ No evidence of badgers was recorded onsite; no mitigation is recommended for this species.

Barn owls and other nesting birds:

- ◆ No evidence of barn owl and no potential foraging habitats were recorded on-site. Evidence of nesting birds was identified on-site on the northwest elevation of the hotel building; and there is potential for nesting birds within the individual trees, scrub and introduced shrub on site. Mitigation for nesting birds is provided in Section 5.

Bats:

- ◆ The PRA undertaken on the 22nd April 2022 identified the building to hold 'high potential' for roosting bats in line with national survey guidelines. Bat droppings were recorded within the loft void, identified to belong to brown long-eared bats by DNA analysis.
- ◆ Three bat activity (two dusk and one dawn) surveys were conducted on the property to determine the roost types, numbers of bats, location of access points and species of bat roosting within the property.
- ◆ The activity surveys identified a maximum count of one common pipistrelle bat emerging from the property during any one survey. The building has been assessed to support a day roost for one common pipistrelle bat and an assumed day roost for brown long-eared bats based on dropping evidence.
- ◆ **The works will result in the loss of the common pipistrelle day roost and the brown long-eared roost will remain unaffected by the proposed works due to the isolated nature of the demolition. A bat European Protected Species (EPS) licence from Natural England is required following planning approval and prior to any works commencing to ensure works are lawful.** It is the responsibility of the applicant to arrange for application of the licence.
- ◆ The general site also supports commuting and foraging bats, and there is potential for artificial lighting to impede bats using the general property.
- ◆ A bat mitigation plan is provided in Section 5. This plan involves a works method statement including supervision by a class 2 licenced bat ecologist, lighting control measures and temporary and permanent replacement bat roosts.

Dormice:

- ◆ The site is not considered likely to support dormice; no mitigation is provided for this species.

Hedgehogs:

- ◆ There is potential for hedgehog onsite and there are hedgehog records nearby; mitigation is provided in Section 5.

Reptiles, common amphibians and great crested newts (GCN):

- ◆ GCN, reptiles and common amphibians are not considered to be impacted, and no mitigation is provided for these species provided the vegetation onsite is maintained short (<5cm) before and during the works.

Biodiversity enhancements:

- ◆ To ensure the proposed development is compliant with the National Planning Policy Framework (NPPF) and Core Policy 50 of the Wiltshire Core Strategy, biodiversity enhancements are required as part of the development. An enhancement strategy is provided in Section 5 of this report.

1. Introduction

- 1.1 ABR Ecology Ltd were commissioned by Calibre Homes SW Ltd to produce an Ecology & Biodiversity Net Gain Assessment (BNGA) for The Bell House Hotel, Sutton Benger, Wiltshire, SN15 4RH (central grid reference: ST 94716 78670) (herein referred to as ‘the site’ / ‘onsite’). This report was requested to inform a full application for the partial demolition of the existing building and a new residential development.
- 1.2 A Preliminary Ecological Appraisal (PEA) including a Preliminary Roost Appraisal (PRA) was originally conducted on the 22nd April 2022 by class licenced ecologist Russell Hoyle ACIEEM and assistant ecologist James Gooding. The survey was then updated by class licenced ecologist Laurence Wills and assistant ecologist Georgia Linter on the 12th June 2023 and again by class licenced ecologist Becci Smith MCIEEM and assistant ecologist Zoe Barrett on the 7th January 2025.
- 1.3 A suite of three bat activity (two dusk and one dawn) surveys were conducted on the 25th May, 12th and 27th June 2023.
- 1.4 Site plan and existing plans are provided in Appendix A and proposed plans are provided in Appendix B.

Site context

- 1.5 The application site is located in the village of Sutton Benger, Wiltshire and consists of a public house/hotel and garden with scattered trees throughout the site and in the adjacent properties. The site is immediately surrounded by residential housing in a semi-rural location. Amenity grassland is present approximately 60m from the site with arable land, grazing pasture and hedgerow networks in the wider landscape. Woodland is present approximately 390m northwest and The River Avon is located approximately 780m northeast of the site. The immediate surrounding landscape is considered to provide good opportunities for urban wildlife and the wider landscape is considered to provide excellent habitats for a variety of wildlife.

Aims and scope of the report

- 1.6 This report is based on the results of the PEA, PRA, bat activity surveys and biological records as supplied by Wiltshire & Swindon Biological Records Centre (SWBRC, 2025). The Preliminary Roost Appraisal (PRA) was principally aimed at determining if a bat roost is present within the site and/or whether the building(s)/structure(s)/tree(s) hold the ‘potential’ to support roosting bats in line with The BCT Good Practice Survey Guidelines (Collins, 2016; Collins, 2023).
- 1.7 This assessment primarily aims to determine the biodiversity value of the site and looks to identify the presence/likely absence of protected and vulnerable species onsite. This report also aims to evaluate whether there will be any potential development impacts on protected species and habitats and identifies whether mitigation and/or protected species licensing is required to ensure the development complies with legislation and national and local planning policy.

1.8 This assessment also estimates the Biodiversity Net Gain (BNG) anticipated to be generated by the current proposals for the site, as measured using the Statutory Biodiversity Metric (DEFRA, 2024a); and follows guidance set out within the Biodiversity Net Gain: Good Practice Principles for Development (Baker *et al.*, 2019) and BS 8683:2021 Process for designing and implementing Biodiversity Net Gain - Specification (BSI, 2021).

1.9 The BNGA part of this assessment aims to:

- ◆ *Classify the habitat type, distinctiveness, condition, connectivity and strategic significance of habitats present prior to and post-development.*
- ◆ *Ensure that baseline habitat conditions are classified in a consistent and robust manner, and that classification is based on the best quality data available at the time of the assessment.*
- ◆ *Clearly identify data collection methods and any survey limitations.*
- ◆ *Calculate baseline (pre-development) and proposed (post-development) habitat units, watercourse and hedgerow units for onsite and offsite land where applicable based on the current development proposals.*
- ◆ *Proposed a BNG design with the aim of maximising BNG through habitat creation and enhancement; ensuring BNG is designed to support the known protected species within the site based on the wider ecological evaluation of the site.*
- ◆ *Aim to achieve a BNG onsite, with offsite BNG pursued where this is not possible.*

Relevant planning policy and legislation

1.10 Full details of relevant planning policy and legislation are provided in Appendix C of this report; the following policy and legislation in respect of biodiversity is applicable to this application:

- ◆ The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019
- ◆ The Wildlife and Countryside Act 1981 (as amended) – Section 1 and Schedules 1 and 5
- ◆ The Environment Act 2021 – Part 6 Schedule 14
- ◆ Town and Country Planning Act 1990 – Schedule 7A (as inserted by Schedule 14 of the Environment Act 2021)
- ◆ The National Planning Policy Framework (NPPF) 2024 – Section 15
- ◆ National Planning Practice Guidance Natural Environment - para 10-35
- ◆ The Natural Environment and Rural Communities (NERC) Act 2006 – Sections 40 and 41
- ◆ Circular 06/05: Biodiversity and Geological Conservation – Statutory Obligations and Their Impact Within the Planning System
- ◆ The Wiltshire Core Strategy – Core Policy 50: Biodiversity and Geodiversity

1.11 It is the responsibility of the applicant(s) to ensure that the proposed development proceeds in full compliance with legislation, national and local policy, and in

accordance with all conditions of the obtained planning consent(s). It is also the responsibility of the applicant(s) to request a report amendment / reassessment of the site where the scale/nature of the proposed plans subsequently change.

2. Methodology

Desktop data search

- 2.1 Protected sites under the UK National Site Network including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), and Ramsars were identified within 7.5 kilometre (km) of the site; and Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs), and Local Nature Reserves (LNRs) were identified within 2km of the site using the Multi-Agency Geographical Information for the Countryside (MAGIC) website (MAGIC, 2025).
- 2.2 A search was also conducted on MAGIC (2025) to identify the potential presence of priority habitats, European Protected Species (EPS) licences and known great crested newt breeding ponds.
- 2.3 Wiltshire & Swindon Biological Records Centre (WSBRC) (2025) were contacted to provide records of protected, vulnerable and notable species, Sites of Importance for Nature Conservation (SINCs) and Ecological Networks within a 1km radius of the application site.
- 2.4 This information was used to evaluate the potential of the site for protected and vulnerable species, and to determine whether there is potential for development impacts on these species, surrounding habitats and protected sites.

Botanical survey (UKHab)

- 2.5 A botanical survey of the site was originally conducted on the 22nd April 2022 by experienced botanist Russell Hoyle ACIEEM and assistant ecologist James Gooding. The botanical survey was then updated on the 12th June 2023 by experience ecologist Laurence Wills and assistant ecologist Georgia Linter and again on the 7th January 2025 by experience botanist Becci Smith MCIEEM and assistant ecologist Zoe Barrett.
- 2.6 Habitats on site were classified and coded in accordance with the UKHab Classification System, using the UK Habitat Classification Definitions document Version 2.0 (UKHab Ltd, 2023a) and UKHab Field Key Version 2.1 (UKHab Ltd, 2023b). Other features of ecological interest were identified using ‘target notes’. Habitats were assigned both primary and secondary (essential and additional) UKHab codes, where relevant.
- 2.7 The survey involved a detailed flora survey of habitats, and each flora species was allocated an abundance in accordance with the DAFOR scale, using local (L) as a prefix where a species was restricted in distribution across the habitat:

D – Dominant
A – Abundant
F – Frequent
O – Occasional
R – Rare

Statutory Biodiversity Metric – Biodiversity Net Gain (BNG)

Pre and post-development mapping

- 2.8 A Statutory Biodiversity Metric (DEFRA, 2024a) was undertaken to determine the baseline and proposed biodiversity value for the site, this included both a percentage habitat net gain/loss and the overall change in habitat, hedgerow and watercourse units (where present) post-development.
- 2.9 The statutory biodiversity metric calculation tool (DEFRA, 2024a) was used to measure the overall net gain or net loss post-development.
- 2.10 Pre and post-development habitat maps were digitised using Coreo (2024) and the QGIS template associated with the Statutory Biodiversity Metric (DEFRA, 2024a) and in accordance with the 'Statutory Biodiversity Metric: User Guide' (DEFRA, 2024b). The proposed site plan (as shown in Appendix B) was georeferenced, and the proposed habitats were overlain using this plan.
- 2.11 Information was then entered for each habitat parcel including baseline/proposed habitat types, condition, strategic significance, parcel reference, retention and spatial risk categories using the QGIS template for both onsite and offsite land (where present).
- 2.12 Trees were entered manually using the 'Urban Tree Helper' in the Main Menu of the Metric Tool to determine their equivalent size in hectares (ha).

Strategic significance of habitats

- 2.13 To inform the BNG assessment, a desktop study was undertaken to determine the strategic significance of habitats. This comprised a review of the following:
- ◆ The Wiltshire Core Strategy – Core Policy 50: Biodiversity and Geodiversity (2015)
 - ◆ Multi-Agency Geographic Information for the Countryside (MAGIC) online database (accessed January 2025)
 - ◆ Data search response from WSBRC (January 2025)

Measurement of habitat areas

- 2.14 Baseline and proposed habitat areas were measured as distinct habitat parcels and were measured using plans and aerial photography overlain in QGIS and Coreo. Post-development habitat parcels were calculated by measuring the proposed plan as shown in Appendix B.

Competency requirements for BNG

- 2.15 Experienced ecologist Becci Smith MCIEEM and assistant ecologist Zoe Barrett undertook the baseline survey and metric calculation of the site; the ecologists have received CIEEM-certified training for the Biodiversity Metric 4.0 and UKHab Habitat Classification System.

Protected species assessment

Badgers

- 2.16 A walkover was conducted looking for potential evidence of badgers *Meles meles*. Evidence of badgers can include the presence of setts (underground burrows), 'snuffle

marks' (nose marks and scratches from badger foraging within the earth), latrines (territorial marking sites), scats, hair, footprints, and well-worn paths.

Barn owls and other nesting birds

- 2.17 A search was conducted for evidence of barn owl *Tyto alba* and other nesting birds within and around the buildings and vegetation. Evidence of nesting birds can include the physical presence of chicks and/or adult birds, nesting material, eggs and/or egg casings, feathers, white splashing (droppings), and pellets (for barn owls).

Bats – Daytime Bat Walkover (DBW)

- 2.18 A Daytime Bat Walkover (DBW) survey was conducted to record any habitats suitable for roosting bats. This included a Preliminary Roost Appraisal (PRA) of buildings and trees for bat suitability as detailed below.

Survey conditions, equipment and timings

- 2.19 Survey information for the Preliminary Roost Assessment (PRA) is provided in Table 1 below:

Table 1: Weather conditions, equipment and timings for survey

Survey date	Time of survey	Surveyors	Equipment used	Weather conditions		
22/05/2022	11:00am	Russell Hoyle ACIEEM and James Gooding	High-powered torch, mirrors, sealable bags, FFP3 face masks, gloves, extendable ladder, endoscope, binoculars	Temp:	Okta cloud cover:	Beaufort wind force:
				12°C	8/8	1/12
12/06/2023	20:00pm	Laurence Wills and Georgia Linter	High-powered torch, mirrors, sealable bags, FFP3 face masks, gloves, extendable ladder, endoscope, binoculars	Temp:	Okta cloud cover:	Beaufort wind force:
				20°C	2/8	0/12
07/01/2025	11:30am	Becci Smith MCIEEM and Zoe Barrett	High-powered torch, mirrors, sealable bags, FFP3 face masks, gloves, extendable ladder, endoscope, binoculars	Temp:	Okta cloud cover:	Beaufort wind force:
				4°C	6/8	2/12

- 2.20 The surveying ecologists have received training in Working at Heights (and in-house training in the use of ladders for PRA surveys), Manual Handling, and Emergency First Aid At Work to ensure compliance with Health and Safety legislation (The Work at Height Regulations 2005, Manual Handling Operations Regulations 1992, The Health and Safety (First-Aid) Regulations 1981).

Buildings

- 2.21 The PRA was undertaken in accordance with The Bat Conservation Trust (BCT) Good Practice Survey Guidelines (Collins, 2016; Collins, 2023). A systematic search was made of any internal building areas / loft spaces and exterior building areas. Where

present, information was compiled on the potential and actual bat entry/exit points (where possible); potential and actual bat roosting locations; and any evidence of bats found.

2.22 The external building assessment included an inspection of the ground/flooring, and where present, any windowsills, windowpanes, behind peeling paintwork/lifted render, brick/block work, chimneys, eaves, lead flashing, tiles and soffits etc.

2.23 Evidence of roosting bats in buildings can include:

- ◆ The presence of physical live/deceased bats
- ◆ Bat droppings (distinguished from rodent droppings by their crumbly texture)
- ◆ Fur-oil staining around entry/exit points
- ◆ Urine splashing
- ◆ Feeding remains, such as insect wings and casings

2.24 The building was identified as a 'confirmed' bat roost where bat evidence was recorded. If droppings were present, a sample of the bat droppings were collected and couriered to Swift Ecology Ltd for DNA analysis to confirm the species of bat present.

2.25 Most native bats in England are crevice-dwelling species, with bats roosting in remote areas, such as under roof tiles; behind cladding; in cavities; soffits; and behind lead flashing etc, and evidence of these species is often concealed and/or inaccessible. Therefore, where no evidence of roosting bats was recorded, an assessment on the availability of potential roosting areas and bat exit/entry points around the building(s) was conducted. The building(s) were then assigned a category based on a sliding scale of potential for bats, ranging from 'none' to 'high' (Collins, 2023) (Table 2 below):

Table 2: Guidelines for assessing the potential suitability of buildings for bats (Collins, 2023)

Bat roosting potential	Description
'High'	A structure with one of more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis & potentially for longer periods of time due to their size, shelter, protection, conditions (temperature, humidity, height above ground level, adverse light levels, or high levels of disturbance), and surrounding habitat. The structure has the potential to support high conservation status roosts for example maternity or classic cool/stable hibernation sites.
'Moderate'	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions (temperature, humidity, height above ground level, adverse light levels, or high levels of disturbance), and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity & hibernation and this is made irrespective of species conservation status, which is established after presence if confirmed via the PRA).
'Low'	The building features one or more potential roosting features that could be used by bats opportunistically at any time of year. However, these potential roost sites

	do not provide enough space, shelter, protection, appropriate conditions (temperature, humidity, height above ground level, adverse light levels, or high levels of disturbance) and/or suitable surrounding habitat to be used on a regular basis or by a larger number of bats.
‘Negligible’	There are no obvious habitat features likely to be used by bats, however there is a small element of uncertainty as bats can use small and apparently unsuitable features on occasion. (*negligible is defined as ‘so small or unimportant as to be not worth considering, insignificant’. This category may be used where there are places that a bat could roost or forage (due to one attribute), but it is unlikely that they would (due to another attribute).
‘None’	No habitat features on site 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).

Trees

- 2.26 A Ground-Level Tree Assessment (GTLA) was undertaken in accordance with The BCT Guidelines (Collins, 2023). A systematic search was made of any trees onsite for bats and where present, information was compiled on the potential and actual bat entry/exit points (where possible); potential and actual bat roosting locations; and any evidence of bats found.
- 2.27 The inspection was carried out systematically and consistently around all parts of each tree (from all angles and close to the trunk and further away). Potential Roosting Features (PRFs) that can be exploited by bats include the following (Table 3 below):

Table 3: Potential Roosting Features (PRFs) for bats in trees

PRFs formed by disease and decay	PRFs formed by damage	PRFs formed by association
Woodpecker holes Squirrel holes Knot holes Pruning cuts Tear outs Wounds Cankers Compression Forks Butt rots	Lightning strikes Hazard beams Subsidence cracks Shearing cracks Transverse snaps Welds Lifting bark Desiccation Fissures Frost cracks	Fluting Ivy

- 2.28 Trees were categorized in accordance the scale shown in Table 4 below:

Table 4: Categories for assigning tree potential for roosting bats

Suitability	Description
NONE	Either no PRFs in the tree or highly unlikely to be any.
FAR	Further assessment required to establish if PRFs are present in the tree.
PRF	A tree with at least one PRF present.

- 2.29 The above assessment was further refined for any trees with identified Potential Roosting Features (PRFs) which were categorized in accordance with the following scale (Table 5 below) (Collins, 2023):

Table 5: Categories for assigning tree potential for roosting bats

Suitability	Description
PRF-I	PRF is only suitable for individual bats either due to size or lack of suitable surrounding habitats.
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony.

- 2.30 The tree was identified as a ‘confirmed’ bat roost where bat evidence was recorded. If droppings were present, a sample of the bat droppings were collected and couriered to Swift Ecology Ltd for DNA analysis to confirm the species of bat present.

Bats – Bat activity (dusk and dawn) surveys

- 2.31 A total of four surveyors undertook each survey on the existing hotel building. Timings and weather conditions for each survey are provided in Table 6 below:

Table 6: Timings and weather conditions for dusk and dawn activity surveys

Survey date	Timings	Surveyors	Equipment used	Weather conditions		
25/05/2023 – Dusk emergence survey	Start: 20:53 Sunset: 21:07 End: 22:45	Russell Hoyle, Aaron Templar, Chris Payne & Lewis Collins	Echo Meter Touch 2 with tablet x 4	Temp:	Okta cloud cover:	Beaufort wind force:
				Start: 15°C End: 14°C	0/8	0/12
12/06/2023 – Dusk emergence survey	Start: 21:05 Sunset: 21:25 End: 23:00	Laurence Wills, Chris Payne, Caitlin McQuillan & Georgia Linter	Echo Meter Touch 2 with tablet x 4 & Sony AX33 with two 15 LED IR floodlights	Temp:	Okta cloud cover:	Beaufort wind force:
				Start: 19°C End: 19°C	2/8	0/12
27/06/2023 – Dawn re-entry survey	Start: 03:23 Sunrise: 04:53 End: 05:08	Zoe Barrett, Aaron Templar, Kieran Mullany & Emily Parsons	Echo Meter Touch 2 with tablet x 4	Temp:	Okta cloud cover:	Beaufort wind force:
				Start: 12°C End: 12°C	8/8	0/12

- 2.32 The surveys were conducted in accordance with the BCT Good Practice Survey Guidelines (Collins, 2016; Collins, 2023) and the Interim Guidance Note: Use of Night Vision Aids for bat emergence surveys and further comment on dawn surveys (BCT, 2022).
- 2.33 The surveys involved a direct observation of the external building to identify any bats emerging from their roosts. The ecologists used automated bat detectors and a Night Vision Aid (NVA) (one Sony AX33 with two 15 LED IR floodlights) to identify any later emerging species and to identify bats where vision was limited (for example, roofs under the cover of tree canopies). A screenshot of the ‘darkest point’ of the surveys captured using the NVA is provided in Appendix H.
- 2.34 Where present, information was compiled on the species, numbers, access points, roosting locations and flight paths. Information was also obtained on general activity on site such as foraging and commuting bats crossing the property.
- 2.35 The dusk surveys commenced 15 minutes before sunset and finished between 1.5-2hrs after sunset. The dawn survey commenced 1.5hrs before sunrise and finished 15

minutes after sunrise. The surveys were conducted when the temperature was 10°C with no strong winds or precipitation.

- 2.36 Following the dusk surveys, the footage from the NVA was reviewed by an analyst using a motion detection software. Bat calls were analysed using Kaleidoscope Pro Analysis Software.

Bat impact assessment

- 2.37 Following the CIEEM Bat Mitigation Guidelines (Reason, P.F. and Wray, S, 2023), the roost(s) onsite were classified in accordance with the following roost types:

- Day roost
- Night roost
- Maternity roost
- Satellite roost
- Hibernation roost
- Feeding perch and
- Transitional roost

- 2.38 Information on the roost type(s) and rarity of the bat species within a geographical context was used to assess the importance of the roost(s). Maternity and hibernation roosts are of higher importance than day/night or transitional roosts, which are lower in conservation value due to supporting low numbers of bats; maternity roosts support high numbers of bats and contribute more significantly to the population of the species and are therefore of higher importance.

- 2.39 Roosts are assigned a value based upon 'Guidelines for Ecological Impact Assessment (EcIA)' (CIEEM, 2018), this ranges from 'site' importance (day roosts of common species) to 'national' importance (hibernation roosts of Annex II species).

- 2.40 Once the roost(s) on site were identified and classified, the 'Minimum Expectations for Bat Mitigation Compensation, Monitoring and Management' (Natural England, 2023) document was used to design an appropriate bat mitigation, compensation and enhancement plan.

Dormice

- 2.41 An assessment was conducted to evaluate the suitability of the habitats on site for the dormouse *Muscardinus avellanarius*, a small, nocturnal mammal which occupies habitats including hedgerows, scrub, woodland and treelines. The dormouse requires good habitat connectivity and suitable food resources providing fruit, nuts, nectar and/or insects throughout the year. Where hazel *Corylus avellana* was present, a search was also made for any hazelnuts on the ground with characteristic gnaw marks.

Great crested newts

- 2.42 The habitats on site were assessed for their potential to support the great crested newt *Triturus cristatus* (GCN). GCN occupy both aquatic and terrestrial habitats, spending most of their life cycle on land and a short period of the year for breeding and egg-laying. Suitable terrestrial habitats can include grassland, woodland, hedgerows, scrub, and

tall herb communities; and suitable overwintering (hibernation) sites can include piles of materials such as rubble/logs and at the base of buildings/stone walls.

- 2.43 GCN are known to travel up to 500 metres (m) from their breeding sites; for this reason, an aerial assessment was made prior to the site visit to determine if any waterbodies were present onsite and around the site (offsite). Any accessible waterbodies were assessed under the Habitat Suitability Index (HSI) (Oldham *et al*, 2000, 2008) to determine the suitability of the waterbody to support great crested newts.

Hedgehogs

- 2.44 The habitats on site were assessed for their potential to support hedgehogs *Erinaceus europaeus* and a search was undertaken for any evidence such as hedgehog scats. Suitable habitats for hedgehog can include hedgerows, grassland, shrubbery, woodland edges and gardens.

Reptiles and common amphibians

- 2.45 An appraisal of the habitats on site was conducted to evaluate their suitability for common British reptiles, such as slow worm *Anguis fragilis*, common lizard *Zootoca vivipara*, grass snake *Natrix natrix* and adder *Vipera berus*, and common amphibians such as common frog *Rana temporaria* and common toad *Bufo bufo*.
- 2.46 Suitable habitats for reptiles and amphibians include those with a varied structure, offering a range of niches for basking and foraging. Typical habitats include rough and unmanaged grassland with shorter margins, heathland, ponds/pond margins, woodland, scrub and ruderal vegetation. Potential overwintering (hibernation) sites can include piles of materials such as rubble/logs, rockeries and at the base of buildings/stone walls.

Survey limitations and assumptions

PEA and UKHabs survey

- 2.47 The site visit provides a 'snapshot' of the site and does not take into account seasonal variation. Species may have been overlooked due to the constraints of the season and time in which the survey was undertaken. A lack of evidence of a species does not confirm its absence from site, rather there was no indication of its presence at the time of survey.
- 2.48 An aerial search for waterbodies can be constrained by the accuracy of online maps. Several websites were accessed to minimise the chances of missing waterbodies, however, garden ponds within residential properties are very rarely mapped and it is possible that waterbodies have been overlooked as part of this assessment.
- 2.49 Certain species, such as bats and nesting birds, are highly mobile and it is therefore possible for these species to occupy the site at any time in the future, particularly if any alterations/changes occur to the site. The survey only provides a 'snapshot' in time and does not account for seasonal variation. As such, it is not possible to have complete certainty that species are not present, rather, there was no indication of their presence at the time of survey.

- 2.50 Often bats leave no visible sign of their presence on the outside of buildings/trees, and even when they do, wet weather can wash evidence away.

DEFRA Statutory Biodiversity Metric (SBM)

- 2.51 The DEFRA Statutory Biodiversity Metric (SBM) relies on outputs of biodiversity unit calculations which are not absolute values or scientifically precise. Therefore, the Metric and its outputs should be informed by a qualitative assessment and the Metric's results interpreted within caution.
- 2.52 The DEFRA SBM does not change the legislation afforded to biodiversity; individual species and protected/irreplaceable habitats are outside of the scope of the Metric and are addressed separately within this assessment.
- 2.53 The accuracy of habitat area measurements is limited by the form of baseline data collection and resolution of the proposed site plan. QGIS and Coreo have been used to calculate habitat areas which have been aligned with Google Maps satellite imagery and the proposed site plan.
- 2.54 Habitat condition for newly created habitats was assigned on a precautionary approach and with consideration of biological and operational phase conditions (i.e. which may limit the degree to which 'good' condition is likely to be reached).

Reporting and survey lifespan

- 2.55 The data within this report should not be seen as comprehensive. Data obtained from the WSBRC (2025) data search is highly unlikely to be representative of the species existing within the area. It is therefore possible that species may occur that have not been recorded in the area by the local records centre.
- 2.56 This report is considered valid for 12 months from the survey date in accordance with the CIEEM Advice note (CIEEM, 2019) for planning purposes only; and is only intended for the proposed plans outlined within this report. If any material changes to the site occurs or if the nature and/or extent of the proposed development changes, an update visit to reassess the site will be required, as any conclusions provided herein may not be valid.

3. Results

Desktop data search

Statutory designated sites

- 3.1 MAGIC (2025) was used to identify SPAs and SACs as included under the UK National Site Network and Ramsars within 7.5km of the site; and nationally/locally protected sites (NNRs, LNRs, SSSIs) within 2km of the site. Results are presented in Table 7 below:

Table 7: Statutory designated sites around application site

Site name	Designation	Distance from application site (m/km)	Site description
Sutton Lane Meadows	SSSI	900m south	Sutton Lane Meadows is a botanically diverse area of unimproved neutral grassland in the Oxford Clay Vale of North Wiltshire. The site comprises two extremely herb-rich meadows which are cut for hay in late summer and then grazed in autumn. An exceptional variety of herbs occurs commonly in the sward, including lady's bedstraw, yarrow, common sorrel, common bird's-foot-trefoil and yellow-rattle. In addition, there are small numbers of meadow saffron, a plant which is known from only one other Wiltshire grassland site. The meadows are surrounded by species-rich hedges which attract birds such as yellowhammer and lesser whitethroat.

Impacts on statutory sites

- 3.2 No impacts on the above statutory sites are anticipated due to distance from the application site; no mitigation for statutory designated sites is recommended within this assessment.

Non-statutory designated sites

- 3.3 WSBRC (2025) provided records of non-statutory designated sites (SINC)s within 1km of the application site. The results are presented in Table 8 below:

Table 8: Non-statutory designated sites around application site

Site name	Designation	Distance from application site (m/km)	Site description
The Shrubbery	625m west	LWS	A small ancient, replanted woodland set in parkland with a stream running along the southern boundary.
Bristol Avon River	800m northeast	LWS	One of the main river systems draining north-west Wiltshire.
Sutton Lane Meadows	815m south	LWS	A small neutral meadow adjacent to a larger SSSI meadow.

Impacts on non-statutory designated sites

- 3.4 No impacts on the above non-statutory sites are anticipated due to distance from the application site; no mitigation for LWSs is recommended within this assessment.

Ecological Networks

- 3.5 No Ecological Networks were identified onsite; therefore, no further action is recommended in relation to Networks.

Priority habitats (S.41 NERC Act 2006)

- 3.6 From an aerial search, no priority habitats were identified onsite; the nearest area of priority habitat, deciduous woodland, is located 375m northwest of the site boundary (MAGIC, 2025). The proposed development is buffered by existing urban development and therefore no impacts on this habitat are anticipated.
- 3.7 No further mitigation is provided regarding priority habitats.

Protected and vulnerable species

- 3.8 WSBRC (2025) provided records of protected, rare and vulnerable species within 1km of the application site. The results are presented in Table 9 below:

Table 9: Protected, rare and vulnerable species within 1km of the site

Common name	Scientific name	Number of records	Most recent record	Nearest record to site
Bats				
Brown long-eared bat	<i>Plecotus auritus</i>	5	2011	Within 1km
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	4	2014	450m west
Lesser horseshoe	<i>Rhinolophus hipposideros</i>	3	2014	450m west
Myotis sp.	<i>Myotis</i> sp.	1	2014	450m west
Noctule	<i>Nyctalus noctula</i>	3	2011	620m west
Pipistrelle sp.	<i>Pipistrellus</i> sp.	1	1996	Within 1km
Serotine	<i>Eptesicus serotinus</i>	2	2014	450m west
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>	4	2014	450m west
Mammals				
Brown hare	<i>Lepus europaeus</i>	1	2016	1km south
Eurasian badger	<i>Meles meles</i>	16	2016	580m southeast
Eurasian otter	<i>Lutra lutra</i>	5	2018	50m north
Harvest mouse	<i>Micromys minutus</i>	3	1982	540m southeast
Rabbit	<i>Oryctolagus cuniculus</i>	7	2016	850m northwest
Water vole	<i>Arvicola amphibius</i>	1	1989	780m northeast
West European hedgehog	<i>Erinaceus europaeus</i>	13	2021	50m west
Birds				
Brambling	<i>Fringilla montifringilla</i>	15	2022	Within 1km
Cetti's warbler	<i>Cettia cetti</i>	7	2023	Within 1km
Fieldfare	<i>Turdus pilaris</i>	12	2021	Within 1km
Greylag goose	<i>Anser anser</i>	1	2020	Within 1km
Hobby	<i>Falco subbuteo</i>	1	2019	Within 1km
House sparrow	<i>Passer domesticus</i>	33	2022	80m southwest
Kingfisher	<i>Alcedo atthis</i>	31	2023	850m northeast
Quail	<i>Coturnix coturnix</i>	1	2019	Within 1km
Lapwing	<i>Vanellus vanellus</i>	3	2023	780m south
Lesser redpoll	<i>Acanthis cabaret</i>	2	2023	Within 1km
Little egret	<i>Egretta garzetta</i>	1	2020	Within 1km
Red kite	<i>Milvus milvus</i>	5	2021	Within 1km
Red wing	<i>Turdus iliacus</i>	26	2023	Within 1km
Reed bunting	<i>Emberiza schoeniclus</i>	21	2023	Within 1km
Skylark	<i>Alauda arvensis</i>	9	2005	465m southeast
Spotted flycatcher	<i>Muscicapa striata</i>	1	2019	Within 1km

Yellowhammer	<i>Emberiza citrinella</i>	33	2023	Within 1km
Plants				
Bluebell	<i>Hyacinthoides non-scripta</i>	7	2019	850m northwest
Butcher's-broom	<i>Ruscus aculeatus</i>	3	2018	850m northwest
Invertebrates				
Blood-vein	<i>Timandra comae</i>	1	2014	1km southwest
Cinnabar	<i>Tyria jacobaeae</i>	1	2023	1km southwest
Shaded broad-bar	<i>Scotopteryx chenopodiata</i>	1	2015	1km southwest
Small heath	<i>Coenonympha pamphilus</i>	9	2020	830m south
Reptiles and amphibians				
Common toad	<i>Bufo bufo</i>	1	2005	815m northwest
Grass snake	<i>Natrix natrix</i>	2	2014	470m southwest
Great crested newt	<i>Triturus cristatus</i>	2	2018	1km south
Slow worm	<i>Anguis fragilis</i>	2	2014	470m southwest

- 3.9 There are records for long-eared, myotis and lesser horseshoe bats within the area. There is potential for changes in artificial lighting to impede foraging and commuting bats that may be using the general site; therefore, lighting specifications are detailed in Section 5 of this report to reduce obtrusive lighting impacts on bats.
- 3.10 There are nearby records for badgers, hedgehogs, reptiles and amphibians; further discussion for these species is provided under 'Protected species' further on in Section 3.

Habitat survey – UKHabs

- 3.11 A baseline (pre-development) habitat map with floral species lists is provided in Appendix E and photos in Appendix D of this report. A summary of the habitats recorded onsite is presented in Table 10 below:

Table 10: Habitats recorded onsite as listed under the UK Habitat Classification system

Habitat	Primary UKHab code	Secondary UKHab code(s) ¹	Description	Area of the site
Buildings	u1b5	818	An existing hotel building is present to the west of the site.	West of the site.
Developed land; sealed surface	u1b6	-	Hard standing is present in the form of a car park in the centre of the site.	Centre of the site.
Modified grassland	g4	108	Modified grassland that is regularly mown (108) is present to the north, east and south of the site, comprising lawn gardens for the hotel.	North, east and south of the site.
Introduced shrub	u1	847	Introduced shrub is present throughout the site.	Throughout the site.
Bramble scrub	h3d	-	A small area of bramble scrub is present within the green area to the east of the site, surrounded by introduced shrub and individual trees.	East of the site.
Urban trees	u1	32	A number of individual urban trees are present throughout the site to the east of the hotel building.	Throughout the site.

1: See Appendix E for list of UKHabs secondary codes

Impacts of development on existing habitats

- 3.12 The proposals will result in the partial demolition of the existing hotel building, restricted to the southern and eastern extensions. The remainder of the hotel building will be retained, and new car parking will be provided to the east of the building. The car park

and modified grassland and introduced shrub in the southern garden area will be lost to facilitate the erection of three new dwellings. Three trees will also be lost to facilitate the development, with all other trees on site being fully retained.

- 3.13 A DEFRA Statutory Biodiversity Metric (SBM) was undertaken to calculate any habitat losses/gains and the results are provided in Section 4 of this report.

Protected species

Badgers

- 3.14 16 badger records exist within 1km of the site (WSBRC, 2025). Despite the presence of suitable foraging habitat, no evidence to suggest badgers are present onsite was identified during the survey.
- 3.15 Based on a lack of evidence onsite, badgers are not considered to be impacted by the proposals and are not discussed further in this assessment.

Barn owls and other nesting birds

- 3.16 No evidence of barn owl was recorded on site and there are no known barn owl records within 1km of the site (WSBRC, 2025). There are currently little to no barn owl foraging habitats present on site due to the shorter nature of vegetation and urban nature of the site. Therefore, this species is not considered to be impacted and is not discussed further in this assessment.
- 3.17 Nesting birds were recorded on the northwest elevation of the existing hotel building during a dusk survey; however, this section of the building will not be impacted as part of the planned works. Additionally, the individual trees, introduced shrub and scrub on site provides suitable nesting habitat for birds. A mitigation and compensation strategy for nesting birds is provided in Section 5 of this report.

Bats

Daytime Bat Walkover (DBW)

Buildings

- 3.18 Descriptions of the buildings surveyed for roosting bats with any identified potential bat access points and roosting areas are provided in Table 11 below (see Appendix E for building locations and Appendix D for photographs):

Table 11: Building description

Building	Description
<i>Hotel ('B1')</i>	- The two-storey hotel is constructed of brick elevations. - The roof is consists of a series of pitched, hipped and flat bituminous roofs. - Stone tiled roofs are present on the south, west and north elevations and the adjoining single-storey reception. - Concrete hip and roof tiles are present on the southern pitch of the northern building section. - A skylight is present on the northern aspect of the southern pitched roof.

- A series of internal brick chimneys are present including one on the northern section pitch, one on the southern north pitch and two on the western pitch.
- A mixture of wooden and stone doorframes and window frames are present.
- Wooden soffits and fascia are present.
- Wooden cladding is present on the upper half of the elevations in the central courtyard.
- A single-storey extension with a pitched stone tiled roof and concrete ridge is present with a porch in the east.
- Two flat roof single-storey extensions are present on the rear southern elevation.
- A flat roof single-storey extension is present to the south of the northern building section within the central courtyard.
- Internally, a series of loft voids are present, three of which were accessed in the west and one which was viewed but not entered in the north. An additional void was also present in the south and within the east extension porch which were surveyed on the 12th June 2023. Description of the voids accessed are provided below:

Void 1

- The loft is in the south of the west roof pitches and runs south to north and measures approximately; 7.5m in length, 5m in width and 2.5m in height to the apex.
- A timber ridge beam is present along the length of the loft along with purlins and collar beams.
- The roof is lined with breathable membrane and bituminous 1F felt.
- Fibreglass insulation present.
- A water tank is present.
- A chimney is present in the northern of the void and separates void 1 from void 2.

Void 2

- The loft is in the centre west roof pitches and runs south to north and measures approximately; 7m in length, 4m in width and 2.8m in height to the apex.
- A timber ridge beam is present along the length of the loft along with purlins and collar beams.
- The roof is lined with a mixture of breathable membrane and bituminous 1F felt.
- No insulation is present.

Void 3

- The loft is in the north of the west roof pitches and runs south to north and measures approximately; 7m in length, 4m in width and 2.3m in height to the apex.
- A timber ridge beam is present along the length of the loft along with purlins and collar beams.
- The roof is lined with bituminous 1F felt and has areas without any lining.
- No insulation is present.
- A chimney is present on the east side and separates void 3 from void 4.

Void 4

- The loft is in the north and runs west to east and measures approximately; 15m in length, 5m in width and 2m in height to the apex.
- The void could be viewed from Void 3 but was inaccessible.

	- A timber ridge beam is present along the length of the loft along with purlins and collar beams. - A chimney is present. - The roof has no lining. - No insulation is present.	
	Void 5 - The loft void is in the southeast and runs southwest to northeast, measuring approximately; 23m in length, 7m in width and 2m in height. - The roof is constructed from ridge beam, purlin, collar and support struts. - Bituminous 1F felt is present. - Fibreglass insulation is present with no boarding. - A water tank and water system are present. - Partially removed internal walls are present.	
	<i>Potential access points:</i>	<i>Potential roosting areas:</i>
	- Multiple gaps under the stone roof tiles throughout the roofs. - Gaps at the tiles and mortar around the chimneys. - Gaps at the verges of the stone tiled roofs. - Gaps at the tiles around the skylight. - Gaps at the hatch to the void within the porch. - Gap above a timber beam above a window on the eastern elevation.	- Roosting between the roof tiles and roof lining. - At the internal beams, stone chimney and gable tops within the loft spaces. - Between the roof tiles around the chimneys and skylight. - Between the timber beam and brickwork on the eastern elevation.
	<i>Evidence of bats recorded (refer to map in Appendix G):</i>	
	- One bat dropping recorded adjacent to the loft hatch (void 1). - Approximately 20 bat droppings under the ridge beam with possible staining on the ridge beam from bats (void 2). - Four butterfly wings (potential bat feeding remains) at the bottom of the southern chimney (void 2). - Five butterfly wings at the bottom of the chimney on the eastern side of the loft (void 3).	
	<i>DNA analysis of dropping sample (as tested by Swift Ecology Ltd):</i>	
	- Droppings confirmed to belong to brown long-eared bats.	
	<i>Roost status / potential of the building for bats:</i>	
	'Confirmed roost' for roosting bats	

3.19 Bat droppings and feeding remains were identified within loft voids 1, 2 and 3, therefore the building supports a 'confirmed' roost for brown long-eared bats (confirmed by DNA analysis of droppings).

3.20 Three bat activity (dusk and dawn) surveys were conducted upon the building in accordance with the BCT Guidelines (Collins, 2016); the results of the surveys are provided below.

Bat activity (dusk) surveys

- 3.21 The dusk surveys were undertaken upon the building and a summary of the survey results are provided in Table 12 below (full results are provided in Appendix H and a map showing the locations of bat roosts / bat exit/entry points with surveyor locations is provided in Appendix I of this report):

Table 12: Summary of results from the dusk surveys

Date of survey	Bats recorded emerging from/re-entering the building	General bat activity recorded on site
25/05/2023	One common pipistrelle bat emerged from beneath the wooden fascia of the eaves at the western end of the southern extension and commuted eastwards at 21:39.	- The following species were recorded generally commuting and foraging across the site during the survey: - Soprano pipistrelle - Serotine - Noctule - Common pipistrelle - Myotis sp.
12/06/2023	No bats were recorded emerging from the building.	- The following species were recorded generally commuting and foraging across the site during the survey: - Common pipistrelle - Soprano pipistrelle - Serotine - Myotis sp.
27/06/2023	No bats were recorded re-entering the building.	- The following species were recorded generally commuting and foraging across the site during the survey: - Soprano pipistrelle - Common pipistrelle - Long-eared bat sp. - Noctule - Serotine

Discussion and bat impact assessment

- 3.22 Bat roosts were identified within the property, the roosts have been classified in accordance with the CIEEM Bat Mitigation Guidelines (Reason, P.F. and Wray, S, 2023), as shown in Table 13 below:

Table 13: Impact assessment of the works on the onsite bat roosts

Roost reference	Species	Roost type	Maximum count of bats during any one survey	Location of access point/roost	Importance of roost	Impact
Roost 1	Brown long-eared bat	Day roost	n/a	Within loft space (roost)	Site	No impact

Roost 2	Common pipistrelle	Day roost	1	Behind fascia board of the eaves on the southern extension (roost and access point)	Site	Loss
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- 3.23 The roosts were classified as day roosts as the survey data does not indicate the presence of a maternity roost. No brown long-eared bats were recorded emerging and so it is assumed that the building supports a day roost in the absence of bats emerging.
- 3.24 The building does hold limited bat hibernation potential in external crevices between the tiles and the felt; however, it is not possible to determine if a hibernation roost is present without lifting every tile and potentially destroying roosts. In accordance with the BCT Guidelines (Collins, 2023) assessment for hibernation roosting potential, the building does not support traditional hibernation features such as underground sites/tunnels/basements and so the site is deemed to hold low potential to support hibernating bats. No further survey works are deemed to be required in relation to hibernation roosts.
- 3.25 The proposals will impact upon a day roost for common pipistrelle bats. Following the ‘Minimum Expectations for Bat Mitigation, Compensation, Monitoring and Management’ document (Natural England, 2023), the provision of at least one feature, suitable for the species concerned (e.g., bat box/tile/brick/crevice) per roost and species to be impacted is considered appropriate.
- 3.26 **As the works will impact the identified common pipistrelle bat roost, a bat European Protected Species (EPS) licence from Natural England will be required following planning approval and prior to any works commencing. An ER licence is required to ensure the works are lawful and can only be obtained following approval of all consent(s).**

Trees

- 3.27 The trees on-site were assessed for their potential to support roosting bats; all trees onsite were not considered to hold potential for roosting bats due to a lack of Potential Roost Features (PRFs) and/or smaller size. No further action is recommended in relation to roosting bats and trees; however, further information is provided in Section 5 regarding the validity of the survey.

Artificial Lighting at Night (ALAN)

- 3.28 The development is also anticipated to result in a change to Artificial Lighting At Night (ALAN) through internal light spill and external light fixtures.
- 3.29 Illuminating a bat roost can cause disturbance and this may result in the bats abandoning the roost or even becoming entombed within it (BCT & ILP, 2023). Lighting is therefore considered an obstruction under the legislation protecting bats and their roosts. ALAN is consequently a key consideration and must be controlled to minimise impacts on bats that are roosting within the buildings on site.

- 3.30 A number of commuting and foraging bats were also recorded across the general property and within the gardens. Bats are very sensitive to artificial lighting, which can impede their ability to successfully forage and can alter flightpaths (BCT & ILP, 2023). As bats are using the property during nocturnal hours, it is also essential that new lighting is designed to minimise impacts on foraging bats, particularly around areas with mature vegetation such as trees and hedges. Light spill can extend beyond the site boundary and may therefore also impact bats using neighbouring land.
- 3.31 A bat mitigation, compensation and plan and details of the BMCL/EPS bat licensing process are detailed in Section 5 of this report.

Dormice

- 3.1 No known dormouse records exist within the local area (WSBRC, 2025); the nearest European Protected Species (EPS) licence is located 12km southwest of the site (MAGIC, 2025) and the habitat on site is not considered suitable for dormice due to the site's urban location. Therefore, dormice are not considered to be affected by the proposed works and no mitigation is advised for this species.

Great crested newts

- 3.32 The site holds some potential for terrestrial great crested newts (GCN) around the fringes of the site, in the introduced shrub, scrub and roost bases of larger trees, however, the lawns are regularly maintained through a mowing regime and are at a short sward height, providing sub-optimal habitat. The site is surrounded by residential gardens and roads, and it is considered unlikely that GCN would be utilising the surrounding gardens due to fragmented habitat connectivity around the site.
- 3.33 There are no waterbodies within the site and an aerial assessment did not reveal any waterbodies within 250m of the site. The nearest record for GCN is approximately 1km south of the site (WSBRC, 2025). For these reasons, it is considered unlikely great crested newts would be impacted by the proposed development and no mitigation is advised for this species.

Hedgehogs

- 3.34 There are suitable habitats onsite for hedgehog including the modified grassland and introduced shrub which provide suitable foraging and sheltering grounds. There are 13 known records for hedgehog with the closest record approximately 50m west of the site (WSBRC, 2025).
- 3.35 Hedgehogs are a species of 'principal importance' under the NERC Act 2006 and have been in historic decline (Wembridge *et al.*, 2022); gardens and green spaces are an important refuge for urban populations of this species.
- 3.36 There is therefore potential for hedgehogs to be present onsite during the nocturnal hours and potential for an overall loss in foraging habitat and severance of commuting through installation of garden fencing. Mitigation for this species is provided in Section 5 of this report.

Reptiles and common amphibians

- 3.37 There is some suitable habitat on site for reptiles limited to the bramble scrub and introduced shrub. However, the site is surrounded by urban development on all sides, with no green corridors or connectivity to suitable habitat for these species. The lawns are maintained through a mowing regime and are at a short sward height, providing sub-optimal habitat.
- 3.38 For these reasons, reptiles and common amphibians are considered unlikely to be impacted by the proposed development provided the site is maintained as existing and these species are not considered further in this assessment.

4. Biodiversity Net Gain (BNG) – metric results

Baseline habitat assessment

- 4.1 A site baseline habitat map is provided in Appendix E of this report. Habitat Condition Assessments (HCAs) are provided in Appendix F providing the habitat condition score for each habitat type and habitat parcel recorded.
- 4.2 A full copy of the DEFRA Statutory Biodiversity Metric (SBM) calculation tool accompanies this report; this should be read in conjunction with this report.
- 4.3 Where present, three component habitat types were mapped and assessed including ‘area’ habitats (e.g. grassland, woodland) (A), hedgerows (H) (e.g. hedgerows, line of trees) and watercourses (W) (e.g. ditches, rivers).

Relevant date for baseline of the site

- 4.4 The relevant date for baseline of the site was taken to be the 7th January 2025; no site clearance is believed to have occurred prior to the site visit.

Baseline area (A) habitats

- 4.5 Table 14 below summarises the baseline ‘area’ habitat parcels present onsite; all habitats, including those without a UKHAB primary habitat code, were included within the baseline as distinct mappable habitat parcels:

Table 14: Baseline ‘Area’ (A) habitats onsite

Habitat type	Habitat parcel reference	Area of habitat (ha)	Habitat condition	Habitat units
<i>Modified grassland</i>	BA-A	0.1195	Poor	0.24
<i>Bramble scrub</i>	BA-B	0.0046	n/a	0.02
<i>Developed land; sealed surface</i>	BA-C	0.169	n/a	0.00
<i>Introduced shrub</i>	BA-D	0.0865	n/a	0.17
<i>Urban trees</i>	BA-G955	0.0041	Moderate	0.03
	BA-G955	0.0041	Moderate	0.03
	BA-G955	0.0041	Moderate	0.03
	BA-G955	0.0041	Moderate	0.03
	BA-T934	0.0163	Moderate	0.13
	BA-T936	0.0366	Good	0.44
	BA-T937	0.0163	Moderate	0.13
	BA-T938	0.0163	Good	0.20
	BA-T939	0.0366	Good	0.44
	BA-T940	0.0163	Good	0.20
	BA-T941	0.0163	Moderate	0.13
	BA-T942	0.0163	Good	0.20
	BA-T943	0.0163	Good	0.20
	BA-T944	0.0163	Good	0.20
	BA-T945	0.0163	Good	0.20
	BA-T946	0.0041	Good	0.05
	BA-T947	0.0041	Good	0.05
	BA-T948	0.0163	Moderate	0.13
	BA-T949	0.0163	Moderate	0.13
	BA-T950	0.0163	Moderate	0.13
	BA-T951	0.0041	Moderate	0.03
	BA-T952	0.0163	Good	0.20
	BA-T953	0.0041	Good	0.05
	BA-T954	0.0163	Moderate	0.13
	BA-T956	0.0163	Moderate	0.13
	BA-T957	0.0041	Moderate	0.03
	BA-T958	0.0041	Good	0.05

Habitat type	Habitat parcel reference	Area of habitat (ha)	Habitat condition	Habitat units
Total site area (excl. trees) and 'area' habitat units =		0.38ha		4.11 habitat units

Justification for strategic significance of baseline 'area' habitats

- 4.6 All habitats were assigned a low strategic significance based on the desktop assessment; these habitats have not been identified within a local strategy and are considered to be of low ecological value.

Baseline hedgerow (H) habitats

- 4.7 No 'hedgerow' habitats were recorded at baseline onsite and therefore mandatory net gain is not legally required for this component habitat type under the Environment Act 2021.

Baseline watercourse (W) habitats

- 4.8 No 'watercourse' habitats were recorded at baseline onsite and therefore mandatory net gain is not legally required for this component habitat type under the Environment Act 2021.

Baseline habitat impacts

- 4.9 The tables below summarise the impacts on baseline habitats from the proposed development and indicates where these are retained, lost or enhanced.

Impacts on baseline area (A) habitats

- 4.10 Table 15 below summarises the impacts to baseline 'area' habitat parcels:

Table 15: Baseline 'Area' (A) habitats impacts from development

Habitat type	Baseline habitat parcel ref	Areas of habitat (ha) to be retained / lost / enhanced				Habitat units retained / lost / enhanced			
		Area retained	Area enhanced and proposed condition		Enhanced area parcel ref	Baseline units retained	Baseline units enhanced	Area lost	Units lost
Modified grassland	BA-A	0.0713	0	-	-	0.14	0	0.05	0.10
Bramble scrub	BA-B	0.0046	0	-	-	0.02	0	0	0.00
Developed land; sealed surface	BA-C	0.0283	0	-	-	0.00	0	0.14	0.00
Introduced shrub	BA-D	0.0657	0	-	-	0.13	0	0.02	0.04
Individual trees	BA-G955	0.0041	0	-	-	0.03	0	0	0.00
	BA-G955	0.0041	0	-	-	0.03	0	0	0.00
	BA-G955	0.0041	0	-	-	0.03	0	0	0.00
	BA-G955	0.0041	0	-	-	0.03	0	0	0.00
	BA-T934	0.0163	0	-	-	0.13	0	0	0.00
	BA-T936	0.0366	0	-	-	0.44	0	0	0.00
	BA-T937	0.0163	0	-	-	0.13	0	0	0.00
	BA-T938	0.0163	0	-	-	0.20	0	0	0.00
	BA-T939	0.0366	0	-	-	0.44	0	0	0.00
	BA-T940	0.0163	0	-	-	0.20	0	0	0.00
	BA-T941	0.0163	0	-	-	0.13	0	0	0.00
	BA-T942	0.0163	0	-	-	0.20	0	0	0.00
	BA-T943	0.0163	0	-	-	0.20	0	0	0.00

	BA-T944	0.0163	0	-	-	0.20	0	0	0.00
	BA-T945	0.0163	0	-	-	0.20	0	0	0.00
	BA-T946	0.0041	0	-	-	0.05	0	0	0.00
	BA-T947	0.0041	0	-	-	0.05	0	0	0.00
	BA-T948	0.0163	0	-	-	0.13	0	0	0.00
	BA-T949	0.0163	0	-	-	0.13	0	0	0.00
	BA-T950	0.0163	0	-	-	0.13	0	0	0.00
	BA-T951	0.0041	0	-	-	0.03	0	0	0.00
	BA-T952	0.0163	0	-	-	0.20	0	0	0.00
	BA-T953	0.0041	0	-	-	0.05	0	0	0.00
	BA-T954	0.0163	0	-	-	0.13	0	0	0.00
	BA-T956	0.0163	0	-	-	0.13	0	0	0.00
	BA-T957	0.0041	0	-	-	0.03	0	0	0.00
	BA-T958	0.0041	0	-	-	0.05	0	0	0.00
Total site area (excl. trees) and 'area' habitat units =						3.98 units	0	0.21ha	0.14 units

Pre-development (proposed) habitats

- 4.11 A proposed habitat map is provided in Appendix E of this report.
- 4.12 Where proposed, three component habitat types were mapped including 'area' habitats (A), hedgerows (H) and watercourses (W).

Proposed area (A) habitats

- 4.13 Table 16 below summarises the proposed 'area' habitats and units to be created; all habitats, including those without a UKHAB primary habitat code, were included within the proposed pre-development map as distinct mappable habitat parcels:

Table 16: Proposed 'Area' (A) habitats

Habitat type	Habitat parcel reference	Area of habitat (ha)	Habitat condition	Habitat units
Modified grassland	PR-A	0.0387	Poor	0.07
Developed land; sealed surface	PR-B	0.1202	n/a	0
Introduced shrub	PR-C	0.0013	n/a	0
Vegetated garden	PR-D	0.0495	n/a	0.10
Individual trees	PR-T1,T2	0.0018	Poor	0.01
Total site area (excl. trees) and 'area' habitat units =		0.21ha		0.18 habitat units

Justification for strategic significance of proposed 'area' habitats

- 4.14 As all proposed habitats will form part of a residential development and are of low ecological value, all proposed habitats were therefore assigned low strategic significance as none of these habitats will contribute to local biodiversity objectives or serve a function in the wider site area.

Statutory Biodiversity Metric (SBM) assessment results

- 4.15 A full copy of the DEFRA SBM calculation tool accompanies this report; the headline results page for the calculation is presented in Figure 1 below:

Figure 1: DEFRA Statutory Biodiversity Metric headline results

FINAL RESULTS				
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	0.04		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	0.97%		
	Hedgerow units	0.00%		
	Watercourse units	0.00%		
Trading rules satisfied?		Yes ✓		
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	4.11	4.53	0.37
Hedgerow units	10.00%	0.00	0.00	0.00
Watercourse units	10.00%	0.00	0.00	0.00

Interpretation of results

- 4.16 Based upon the current proposals, there is anticipated to be an overall net gain of +0.04 habitat units post-development; this is equivalent to a net % change of +0.97% in habitat units post-development.
- 4.17 The unit shortfall summary is presented in Figure 2 below which indicates the shortfall required to achieve the mandatory 10% net gain in habitat (A1) units:

Figure 2: DEFRA Statutory Biodiversity Metric unit shortfall summary

Tier	Unit Shortfall by Tier	Unit Shortfall by Tier (SRM Included)
A1	0.37	0.74 ▲
A2	0.00	0.00
A3	0.00	0.00
A4	0.00	0.00
A5	0.00	0.00
H	0.00	0.00
W	0.00	0.00

- 4.18 No hedgerow or watercourse units are present at baseline and therefore a minimum 10% net gain is not legally required for watercourse under the Environment Act 2021.
- 4.19 The applicant owns no suitable alternative land for new habitat creation and there is no available area to accommodate additional habitats onsite due to the residential nature of the development.
- 4.20 A 10% net gain cannot be achieved onsite for habitats; therefore, offsite habitat units and/or statutory biodiversity credits will now need to be purchased by the applicant. Further information is provided in Section 5 below.

5. Compensation, mitigation and enhancement plan

Biodiversity Net Gain (BNG) – habitat gains/losses

- 5.1 Based upon the current proposals, there is anticipated to be an overall net gain of +0.04 habitat units post-development; this is equivalent to a net % change of +0.97% in habitat units post-development.
- 5.2 As the mandatory minimum 10% net gain cannot be achieved onsite for habitat units, the applicant will need to secure either offsite habitat units or statutory biodiversity credits, or a combination of both.

Requirements to discharge the biodiversity gain condition of planning permission

- 5.3 The applicant must now purchase habitat units from a local offsite provider or as a last resort purchase statutory biodiversity credits from Natural England to meet the mandatory minimum 10% net gain requirements for both habitats and watercourse units as required under the Environment Act 2021.
- 5.4 The applicant should note that the Spatial Risk Multiplier (SRM) has already been applied to the unit shortfall summary (Section 4 – Figure 2) and so this represents the number of units needed to be purchased if purchasing statutory biodiversity credits (x 2 multiplier applied).
- 5.5 Both options have been explained below:

Offsite habitat units

- 5.6 Should offsite habitat units be purchased through an offsite provider, an appropriate SRM will be applied depending on where the units are allocated (x 1 for units located within the LPA or National Character Area (NCA) boundary, therefore half of the above units; x 1.5 for units within a neighbouring LPA / NCA boundary, and x 2 if the units are not located within LPA/NCA or neighbouring LPA/NCA boundaries).
- 5.7 It should therefore be noted that purchasing offsite habitat units will always be the preferred option and the most economical option as statutory credits are priced above the local market rate.
- 5.8 A copy of the completed SBM calculation tool will need to be submitted to the offsite provider if habitat units are purchased and the offsite provider will need to complete the offsite section of the tool, with the appropriate SRM applied depending on where the purchased habitat units are located. Habitat units can be found online, examples of offsite providers include:

<https://gaiacompany.io/>

<https://environmentbank.com/>

Statutory biodiversity credits

- 5.9 Alternatively, statutory biodiversity credits may be purchased as a last resort. A copy of the calculation tool will need to be submitted to Natural England at the time of buying

statutory credits; an estimation of pricing for credits can be found online via the below link, however, a final price will be provided in a quotation once applied for:

<https://www.gov.uk/guidance/estimate-the-cost-of-statutory-biodiversity-credits>

Discharge of biodiversity gain as a condition of planning permission

- 5.10 A biodiversity gain condition is a pre-commencement condition; once planning permission has been granted, a Biodiversity Gain Plan must be submitted to the Local Planning Authority (LPA) by the applicant and approved prior to commencement of the development. The Biodiversity Gain Plan is a mechanism to ensure the post-development biodiversity value of the development's onsite habitat is accurate based on the approved plans and drawings; and any offsite biodiversity gains have been registered and allocated to the development; and/or biodiversity credits, if necessary, have been purchased.

Proposed habitat creation

Modified grassland creation

- 5.11 Modified grassland will be created across the site within the communal hotel grounds. The following sowing and maintenance regime will be implemented for new grassland areas:

- ◆ The areas of proposed modified grassland will initially be sown/turfed with a standard lawn species mixture and initial laying of the grassland must follow the manufacturer's/nursery's specifications to ensure successful establishment.
- ◆ The areas of grassland must be regularly checked for any areas of poor/limited growth and any areas of poor quality must be reseeded to ensure full coverage of the sward in the areas specified for modified grassland growth. This is not limited to completely returfing/resowing areas if growth has failed or continues to fail.
- ◆ During periods of dry/excessively hot weather during establishment, a daily/regular watering regime must be followed to ensure the sward does not become degraded.
- ◆ The grassland will be subject to a regular cutting regime to maintain the sward at a short height.

New tree planting

- 5.12 Two new trees are to be planted in the communal area of the hotel grounds. The new trees will comprise native species such as oak, birch, beech, rowan, whitebeam, or lime. The tree must be sourced from British-grown bare root stock. The tree sourced must be between 16-18cm in girth.
- 5.13 The tree roots must be soaked in water prior to planting, which will take place from September to early May only during a mild spell. The trees will be planted a minimum of 3m apart to ensure sufficient growing space; the holes must be generous and at least one third larger than the roots of the trees and will be dug-in with well-rotted manure/compost prior to planting.

- 5.14 The trees will be placed in the hole and supported with ties and a stake to ensure it is in an upright position. A plastic water channel will then be installed for each tree starting at the base of the roots to surface level to direct waters into the root system.
- 5.15 Once the stakes, ties and channels are in place, enriched compost will be backfilled over the roots and bedded in to ensure the tree is stable and upright. Immediately after planting the tree will be kept well-watered for the first month to ensure establishment.

Bats

Conclusions on roosting bats

- 5.16 The PRA and dusk surveys of The Bell House Hotel were undertaken, and the building was identified to support day roosts for an individual common pipistrelle bat and a low number of brown long-eared bats which are of 'site' importance. The proposals for a partial demolition of the existing hotel building will result in the loss of the common pipistrelle bat roost. No impact will occur to the brown long-eared day roost as its location within the building will not be affected by the proposed works.
- 5.17 As the proposals will result in impacts on the roost, a works method statement must be followed under a Bat Mitigation Class Licence (BMCL) or a bat European Protected Species (EPS) mitigation licence from Natural England. The BMCL/EPS licence can only be obtained following approval of all consent(s) and must be obtained in advance of any works commencing.

BMCL/EPS licence application

- 5.18 A BMCL/EPS licence from Natural England must be sought to allow works to proceed lawfully. The licence must pass three legal tests in order to be approved, the three tests are as follows:
1. The development is in the interests of public health and safety or is required for other imperative reasons of overriding public interest.
 2. There must be no satisfactory alternative that will cause less harm to the species.
 3. The development must not harm the long-term conservation status of the bat species.
- 5.19 As noted in the R (Vivienne Morge) V Hampshire County Council 2011 case, the three legal tests must be addressed at the planning stage. The tests have been assessed below:

Imperative reasons of overriding public interest

- 5.20 The owner of the site is proposing to demolish a section of the existing building and developing the site to accommodate additional housing for the local community. The section of the existing building is no longer required for the business currently on site as well as the adjacent land, and the land is therefore being proposed to serve the local community by providing four additional modern homes for families. The Wiltshire Council Core Strategy (Wiltshire Council, 2015) makes provision for at least 42,000 new homes in Wiltshire in the plan period from 2006 to 2026.

No satisfactory alternative

- 5.21 The owner wishes to create three new dwellings on site to create additional space for permanent living accommodation. The current building and site are not able to support this increase in living accommodation in its current state and the size of the land with the existing buildings/extensions would not be large enough to support this increase in dwellings. The demolition of a section of the current building is deemed the most financially viable option while having the least amount of impact to the overall site and local area. The demolition and rebuild of the entire building has not been considered as this would be unsustainable and have greater impacts upon the bat roosts. The 'do nothing' approach has been discounted as this would not provide housing for the future population and would not help to meet the need for housing in Wiltshire.
- 5.22 The proposed works have been judged as the most satisfactory method for improving the living accommodations on site, whilst enhancing the intrinsic character of the site and the preservation of the bat population.

Maintenance of the long-term conservation status of the bat species

- 5.23 The bat mitigation and compensation plan provided below details mitigation and compensation measures required to maintain the long-term conservation status of the onsite bat population.

Bat mitigation, compensation and enhancement plan

- 5.24 The bat mitigation, compensation and enhancement plan to be implemented under the EPS licence is provided in Table 17 overleaf; this strategy is guided by the 'Minimum Expectations for Bat Mitigation, Compensation, Monitoring and Management document (Natural England, 2023) (see Appendix J for plan).

Table 17: Bat mitigation, compensation and enhancement plan

Phase of works	Action	Description	Notes to applicant:
<i>Post-planning and before any works commence to the building</i>	1. Contact project ecologist once all planning consent(s) are obtained.	Contact project ecologist to determine whether any update surveys are required for the Bat Mitigation Class Licence (BMCL) or bat European Protected Species (EPS) bat mitigation licence application to Natural England (NE).	- An update PRA (building inspection) will be required within 3 months of the licence application. The PRA can be undertaken at any time of year. - A minimum of one update dusk survey will be required if the BMCL/EPS licence is applied for after April 30th the year following the dusk surveys (e.g. surveys conducted in May/June 2024 and licence is applied for in May 2025, therefore a minimum of one update dusk survey required in 2025 before licence application). The update dusk survey(s) can only be conducted between May and August. It is important to factor this into your project timescales.
	2. BMCL/EPS licence is submitted to Natural England for approval.	BMCL/EPS licence application submitted to Natural England for approval following any required update survey(s) by the ecologist.	- The ecologist will require time to prepare the licence application, and during busy periods this can take a number of weeks. - Following submission to NE, the BMCL/EPS licence application takes a minimum of three weeks to be obtained following submission, however, the applicant should note that this can take longer depending on how busy NE are at the time of submission. Works to the building affecting the bat roost cannot commence until the EPS licence is approved.

Phase of works	Action	Description	Notes to applicant:
	3. BMCL/EPS licence is approved from NE; contact ecologist.	BMCL/EPS licence is approved from NE. Contact ecologist to schedule works start date and supervision of works by an ecologist (see 'works method statement' below).	Ensure adequate time is allocated to schedule in contractors and class 2 licensed bat ecologist, as the ecologist will need to be onsite during works.
	4. Erection of bat boxes on trees within applicant's ownership (see Appendix J for full details and figures).	- Prior to any works commencing and following approval of the BMCL/EPS licence, one 'Improved Crevice Bat Box' must be erected on suitable mature trees within the applicant's ownership (see Appendix J). - The box must be erected at a minimum 3.5 metres (m) from ground level on a sunny aspect. Any limbs/branches must be pruned back around the entrance(s) and below the bat box(es) to ground level to ensure the entrance to the boxes are unobstructed and allows for a clear flightpath.	Bat boxes can be purchased by the applicant from https://www.nhbs.com/improved-crevice-bat-box
	Works method statement:		
<i>Works/demolition phase following approval of BMCL/EPS licence – works method statement</i>	5. Works can commence and ecologist attends site to undertake supervision of all destructive works. Works method statement to be followed by all contractors.	'Toolbox talk': Prior to any works commencing onsite, the licensed bat ecologist will provide a 'toolbox talk' to all contractors regarding the bat BMCL/EPS licence, legal protection of bats, the onsite bat roosts and potential for bats to be present in the works areas, the contractors' responsibilities, health and safety, and best working practice to avoid injuring any bats. Pre-works loft inspection: Prior to any works commencing, the ecologist will inspect the loft space. If any bats are present and where possible, the ecologist will capture any bats roosting internally by gloved hand or static net where	- A class 2 licensed bat ecologist must be present onsite during <i>all</i> works affecting the bat roost(s). If the ecologist is not present during these works, this would constitute a breach of the licence. - Temperature and weather restrictions apply for all works affecting the bat roost(s): - No works can take place during adverse conditions including heavy rain and/or strong winds. This is on welfare grounds to bats.

Phase of works	Action	Description	Notes to applicant:
		appropriate. Any bats found will be transported to a bat box already erected onsite. Destructive works: Following the internal check, the ecologist will directly supervise the 'soft' dismantling of all building areas with potential for bats. Features such as roof tiles, felt, eaves, mortar, timbers and wall tops will be carefully dismantled by hand and hand tools only. Features will be removed carefully by contractors and inspected for bats / evidence of bats. Should a bat be present, the licensed ecologist will capture and translocate the bat to the bat box. Injured/underweight bats: Any injured or underweight bats will be immediately taken into care (as directed by the Batworker's Manual, s. 7.3, pp 64 – 66; 3rd ed. 2004 and in accordance with the Bat Conservation Trust's (BCT) Bat Care Guidelines: A Guide to bat care for rehabilitators 2nd ed 2016). Continuing works: Once all features deemed suitable for bats have been carefully dismantled and inspected by the licensed ecologist, works may then continue unsupervised.	- Winter works (November to March) can only commence following four consecutive days/nights when temperatures are consecutively at 8°C or above. - In the event a bat is found during any unsupervised time, the applicant is legally obliged to stop all works immediately and contact the project ecologist for advice. - All persons other than the class 2 licensed bat ecologist are strictly forbidden from handling or interfering with bats in any way.
	6. Permanent replacement bat roosts, bat access	Replacement bat access points to be created:	

Phase of works	Action	Description	Notes to applicant:
	points and enhancement bat roosting features to be constructed (refer to Appendix J for full details and list of figures).	One 'Vivara Pro Build-in WoodStone Bat Box' will be installed in the north elevation of Plot 3 at the gable apex. The box will be installed in the masonry with no render/obstructions at the entrance. The tube is completely self-contained and maintenance-free once installed. No lighting will be erected within 5m of the tube.	- NOTE: Bituminous 1F felt must be used exclusively in all bat accessible areas/roosts. Breathable felts such as 'Tyvek' are NOT permitted for use in bat roosting areas due to entanglement risk where fibres 'fluff' up over time (Waring <i>et al.</i>, 2011). - NOTE: photographic evidence of the replacement bat roost and bat access point, must be supplied to the ecologist by the applicant for the bat licence return. The applicant is advised to speak to their contractors in advance of these works to ensure photographs can be taken in advance of roof completion; failure to supply this evidence will result in a breach of the EPS licence. - No external light fixtures must be erected within at least 5m of the replacement bat roost access points / roosting features (see 'Artificial Lighting at Night (ALAN)' below for full strategy). - The 'Vivara Pro Build-in Woodstone Bat Tube' can be purchased by the applicant from https://www.nhbs.com/ib-vl-05-vivara-pro-build-in-woodstone-batbox
	7. Installation of external light fixtures and internal light spill - Artificial Lighting at Night (ALAN)	Artificial Lighting at Night (ALAN): Bat records exist within the local area, however, the site is not located adjacent to dark unlit habitats and/or rural habitats, and so the full lighting specifications as outlined in the 'Bats and Artificial Lighting At Night' Guidance Note BN08/23 (BCT &	The applicant is advised that illuminating a bat roost can cause disturbance and this may result in the bats deserting the roost, or even becoming entombed within it. Lighting is therefore considered an obstruction under the legislation protecting bats and their

Phase of works	Action	Description	Notes to applicant:
		ILP, 2023) is not considered appropriate for the site. However, artificial lighting will be kept to a minimum as detailed below: - Preferably, no net increase in external light fixtures will be installed. If external lighting is required, this will be limited and only installed where required for safety purposes. Light fixtures will only be installed at doorways/at the site entrance etc to allow for visibility. - All luminaires installed will lack UV elements when manufactured. Metal halide, compact fluorescent sources will not be used. - LED luminaires only will be used due to their sharp cut-off, lower intensity, good colour rendition and dimming capability. - A warm white light source (2700Kelvin or lower) will be adopted to reduce blue light component. - Light sources will feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats (Stone, 2012).	roosts; lighting will also be a condition of the EPS licence. • ALAN holds potential to negatively impact foraging bats using the general property, in addition to other nocturnal wildlife. Lighting causes disturbance and impedes the ability of bats to successfully forage, with long-eared bats being among the most affected by artificial lighting. It is therefore of the utmost importance that lighting is carefully designed to ensure safety purposes only but to minimize impacts on bats.

Phase of works	Action	Description	Notes to applicant:
Post-works phase – completion of works	8. Submit photographic evidence of replacement bat roosts / roosting features for bat licence return.	Upon completion of the works, the applicant must contact the ecologist with photographic evidence of all replacement bat roosting features / bat access points for submission to Natural England.	- NOTE: photographic evidence of the replacement bat roosts and bat access points must be supplied to the ecologist by the applicant for the bat licence return. - The applicant is advised to speak to their contractors / roofers <i>in advance</i> of the works to ensure that good quality photographs of the bat access points and bat roosting features are obtained during the course of works. Failing to obtain photographs of the bat access points in the roof at the time of installation, for example, can cause issues, as it cannot then be confirmed that full access has been made for bats due to the roof (and access points) being fully tiled over. - Failure to supply this evidence will result in a breach of the EPS licence. The Local Planning Authority may also request a compliance visit post-works.

Hedgehogs

5.25 The site likely supports hedgehog due to surrounding urban garden networks and the presence of nearby records. The following measures will be followed to ensure they are protected during works and to ensure habitat connectivity is maintained:

- ◆ Any new fencing and boundaries proposed around the gardens will feature a minimum of one hedgehog highway (130mm x 130mm hole) along every boundary to ensure habitat connectivity for hedgehogs (Appendix J); this can comprise either a specialised hedgehog highway gravel board (<https://www.garden-fence-panels.co.uk/concrete-posts-bases/concrete-gravel-boards/hedgehog-friendly-concrete-base-panel-plain/>) or if timber gravel boards are used a custom-made hole.
- ◆ A hedgehog highway sign will also be installed above each highway to encourage new occupiers to keep these open for hedgehogs (can be purchased from <https://shop.britishhedgehogs.org.uk/product/hedgehog-highway-sign/>).
- ◆ During works, any trenches/pits will be boarded over at the end of each working day or alternatively a 130mm wide ramp/board will be installed in each trench/pit to allow hedgehogs to escape.
- ◆ Materials must be stored on pallets raised off the ground and away from surrounding vegetation to discourage hedgehogs from taking refuge within them.

Nesting birds

5.26 Nesting birds were recorded on the northwest elevation of the building during one of the dusk activity surveys, however, this area will be fully retained and unaffected by the proposed works. The individual trees, introduced shrub and bramble scrub provide suitable nesting habitat for birds. Therefore, the following mitigation strategy will be strictly adhered to, this will minimise impacts on potential nesting birds on site and within the vicinity:

- ◆ Any demolition works or vegetation clearance should take place between the start of September and the end of January when birds are least likely to be nesting. However, it must be noted that some species, such as wood pigeons *Columba palumbus*, nest all year round and so works should proceed with caution during this time.
- ◆ Where this is not possible and works take place between the start of February and end of August, a pre-works check for nesting birds must be undertaken by a suitably experienced ecologist. If an active nest is encountered, all works must cease immediately, and the nest must be left undisturbed. The ecologist will establish a works exclusion zone around the nest and this will be marked out with hazard tape and signage put up; a second site visit by the ecologist to check nest occupation will be required before works can continue in this area. Works may only continue when the nest is deemed to

be unoccupied/no longer active by the ecologist. A camera to monitor nesting activity may be necessary.

- ◆ **If a bird's nest is encountered at any other unsupervised time, all works in the area must cease immediately the ecologist must be contacted immediately to provide further advice.**

Biodiversity enhancements

5.27 Features will be included within the proposed development to enhance the site for biodiversity (Appendix J for plan and specifications). The new dwellings will feature the following:

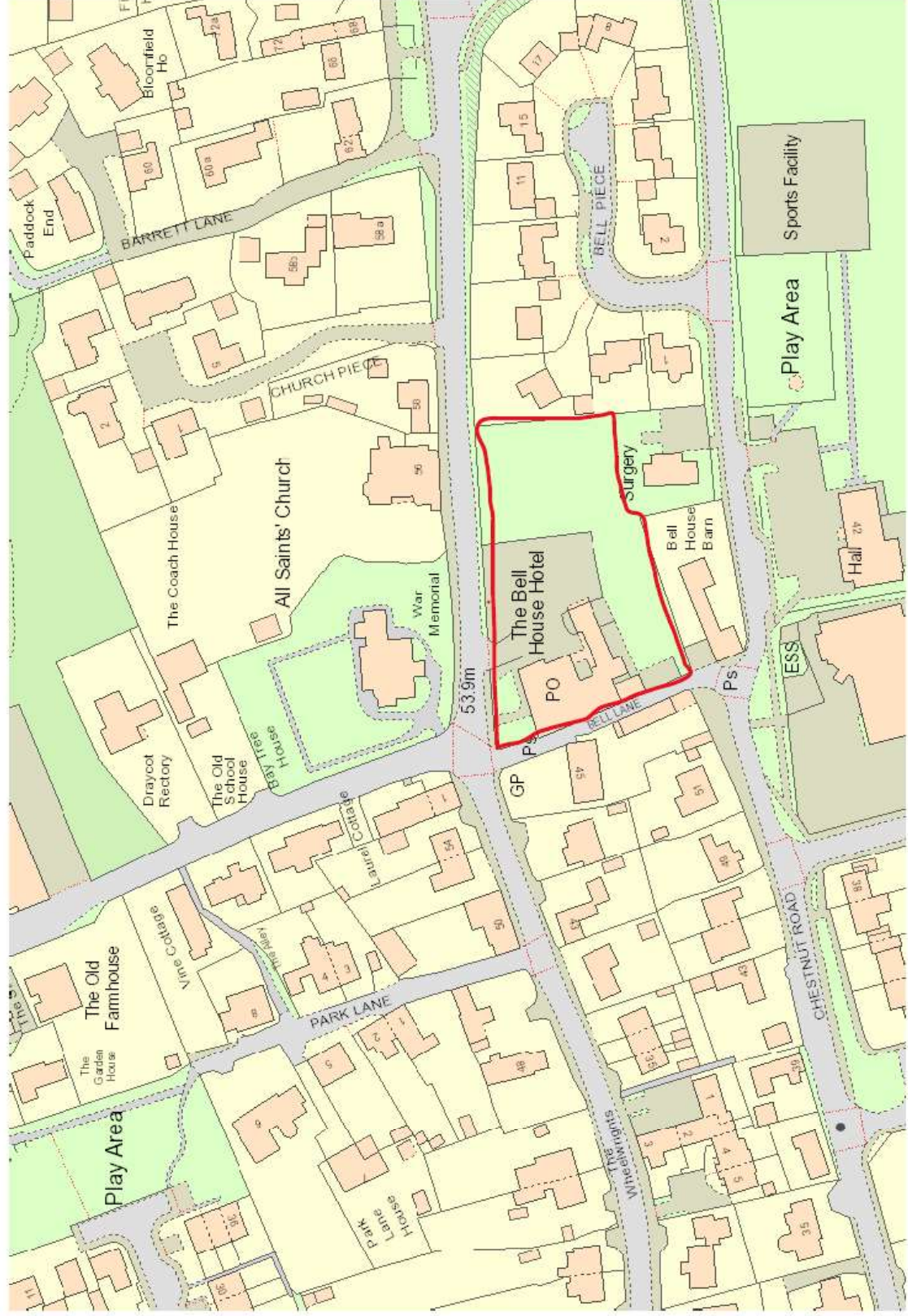
- ◆ Three 'Vivara Pro Build-in WoodStone Bat Boxes' will be installed at the gable ends of the new dwellings (one in each plot) (in addition to the box required for the replacement pipistrelle bat roost as detailed above). The boxes will be installed at eaves level away from any obstructions; no lighting will be installed within 5m of the box.
- ◆ Two 'PRO UK Rendered Build-In Swift Box' or similar approved (<https://www.nhbs.com/vivara-pro-rendered-build-in-swift-box-uk-brick-size>) units will be installed in each proposed new dwelling on site.
- ◆ Two 'Bee Bricks' or similar approved (<https://www.nhbs.com/bee-brick>) will be installed on the southern elevations of each of the new dwellings (six in total).

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Appendix A – Site and existing plans



Appendix B – Proposed plans





Appendix C - Relevant legislation and planning policy

Legislation

Protected species

In England, all bats, dormice *Muscardinus avellanarius*, otters *Lutra lutra*, white-clawed crayfish *Austropotamobius pallipes* and great crested newts *Triturus cristatus* are legally protected under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

A number of species are also listed under Annex II of the EC Habitats and Species Directive 1992 due to their rarity, including barbastelle *Barbastella barbastellus*, Bechstein's bat *Myotis bechsteinii*, greater horseshoe *Rhinolophus ferrumequinum*, lesser horseshoe *Rhinolophus hipposideros*, great crested newt, white-clawed crayfish and otter.

The above named species and adders *Vipera berus*, slow worms *Anguis fragilis*, grass snakes *Natrix natrix*, common lizards *Zootoca vivipara*, common frog *Rana temporaria*, palmate newt *Lissotriton helveticus*, smooth newt *Lissotriton vulgaris*, water voles *Arvicola amphibius* and several invertebrate species are also protected under Schedule 5 of the Wildlife and Countryside Act (WCA) 1981 (as amended).

Schedule 9 of the WCA 1981 includes non-native, invasive species including (but not limited to) Himalayan balsam *Impatiens glandulifera* and signal crayfish *Pacifastacus leniusculus*. Badgers *Meles meles* are legally protected under The Protection of Badgers Act (1992).

All birds, their nests and eggs are protected under Section 1 of The WCA 1981 (as amended) and it is thus an offence, to intentionally kill, injure or take any wild bird; intentionally take, and damage or destroy the nest of any wild bird while it is in use or being built.

Some wild bird species, such as barn owls *Tyto alba*, are afforded additional protection under Schedule 1 of the WCA 1981 (as amended). This legislation makes the disturbance of any wild bird included in Schedule 1 illegal while it is building a nest or is in, on or near a nest containing eggs or young; or disturbance of dependent young of such a bird.

Certain species are listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 as species of 'principal importance' (JNCC, 2007) such as hedgehog *Erinaceus europaeus*, due to their national decline; under Section 40, Local Planning Authorities have a duty to conserve these species.

Protected habitats and sites

A number of sites designated for nature conservation are afforded legal protection due to being of international importance. The UK National Sites Network includes Special Protection Areas (SPAs) for birds and Special Areas of Conservation (SACs) for habitats; Ramsars, designated for important wetland habitats, do not form part of the National Sites Network but are protected in the same way.

Habitats listed under Annex I of the EC Habitats and Species Directive 1992 are included due to their rarity and importance to the maintenance of protected species populations. Examples include estuaries, northern Atlantic wet heaths with *Erica tetralix*, and blanket bogs.

Other nationally protected sites include Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs) Local Nature Reserves (LNRs) and Protected Road Verges which are designated under the WCA 1981 and strengthened by the NERC Act 2006.

Several habitats are listed under Section 41 of the NERC Act 2006 including certain hedgerows, arable field margins, grassland, fen, swamp, marine habitats, woodlands and rivers.

Biodiversity Net Gain (BNG) – The Environment Act 2021

Part 6 Schedule 14 of the Environment Act 2021 ‘Biodiversity Gain as Condition of Planning Permission’ mandates a minimum 10% measurable habitat net gain for all major and minor planning applications (with certain applications being exempt). Under Sch. 14, there is a legal requirement to deliver a minimum 10% measurable habitat net gain value post-development compared to the measured pre-development value of a site, as measured using the national Metric calculation tool issued by the Secretary of State.

This legislation was enacted into law on 12th February 2024 for major applications and 2nd April 2024 for minor applications. For all applications subject to mandatory BNG, a biodiversity gain condition must be discharged through submission of a Biodiversity Gain Plan to the relevant Local Planning Authority detailing how the development has met the minimum 10% net gain objective. Offsite habitats and significant onsite habitat enhancements are subject to a minimum of 30 years maintenance under the Act.

National and local planning policy

The National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) (Department for Levelling Up, Housing & Communities, 2024) sets out the Government’s planning policies for England and how these should be applied. In the context of this report, Section 15 of NPPF is relevant and applicable, Section 15 states:

‘Planning policies and decisions should contribute to and enhance the natural environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.’

New developments and projects are supported where plans promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue measurable net gains for biodiversity.

To ensure this application is compliant with Section 15 of NPPF, enhancements for biodiversity, such as the inclusion of bat roosting and/or bird nesting boxes, are required as part of the development.

Wiltshire Core Strategy

The Wiltshire Core Strategy (Wiltshire Council, 2015) was adopted in January 2015 and includes the following relevant policy:

Core Policy 50: Biodiversity and Geodiversity

Protection

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

All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.

Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 [refer to full strategy for details] above where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would

have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.

Biodiversity enhancement

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

Local sites

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

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

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

It is the applicant's/landowner's responsibility to ensure that the proposed development proceeds in full compliance with this report and/or any update version report thereafter, that works are undertaken lawfully, in compliance with national and local policy, and in accordance with all conditions of the obtained planning consent(s).

Appendix D: Photographs

Photos taken in 2022:



Photo 1: Western elevation of the hotel.



Photo 2: Front northern elevation of the hotel.



Photo 3: Rear southern elevation of the hotel.



Photo 4: Side eastern gable end at the southern end of the hotel.



Photo 5: Porch area on the eastern elevation of the hotel.



Photo 6: Porch area on the north of the eastern end of the hotel.



Photo 7: West elevation of the rear extension



Photo 8: Chimney on the northern pitch ridge line.



Photo 9: Wooden clad upper half of the hotel within the central courtyard and boarded up window.



Photo 10: Flat roof extension south of the northern roofs.



Photo 11: The upper half of the southernmost pitched and hipped roof in the north with concrete roof tiles.



Photo 12: Rear of the hotel on the west side.



Photo 13: Gaps at the verges at the gable ends of the hotel.



Photo 14: Gaps in the tiles at the verges of the gable ends on the western pitch.



Photo 15: The southern garden.



Photo 16: Hard standing and wall in the west of the southern garden.



Photo 17: Fruit trees in the east of the southern garden.

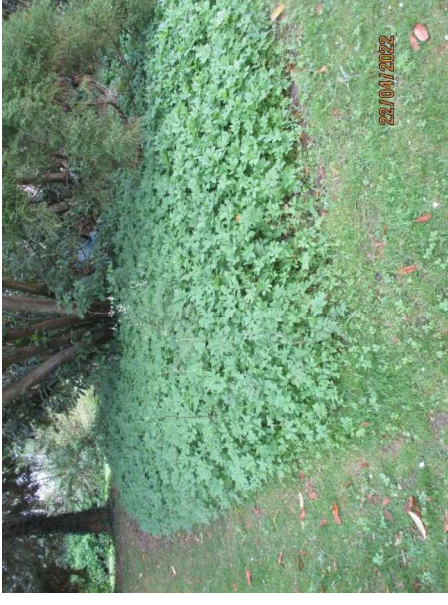


Photo 18: Large stand of ground elder dominant in the introduced shrub in the east of the southern garden.



Photo 19: Hard standing carpark in the north of the site.



Photo 20: Introduced shrub in the northwest of the eastern garden.



Photo 21: Modified grassland in the center of the eastern garden with ornamental planting borders.



Photo 22: Modified grassland and hard standing path north of the hotel.



Photo 23: Compost heap in the southwest of the eastern garden.



Photo 24: Water tank in 'Void 1' of the hotel.



Photo 25: Internal of 'Void 1'.



Photo 26: Butterfly wing feeding remains.



Photo 28: Staining at the ridge beam in 'Void 2'.



Photo 27: Internal of 'Void 2'.



Photo 30: Internal of 'Void 2'.



Photo 29: Brown long-eared bat droppings in 'Void 2'.



Photo 31: Area of the roof of 'Void 3' where the bitumen lining turns to no lining.



Photo 32: Area of no lining in 'Void 3'.



Photo 33: Butterfly wing feeding remains at the base of the chimney in 'Void 3'.



Photo 34: View of Void 4 which was inaccessible.

Photos taken in 2025:



Photo 35: Internal of void 1.



Photo 36: Internal of void 1.

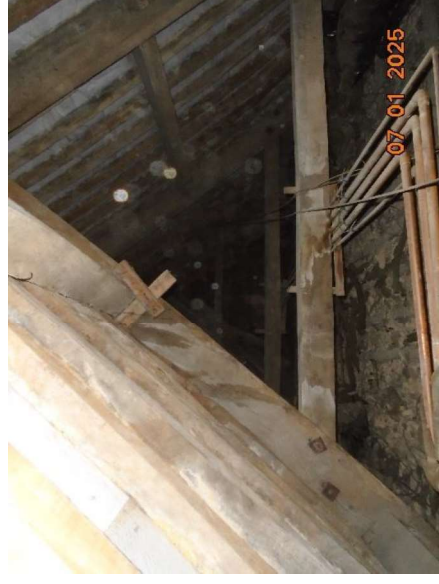


Photo 37: Internal of void 2.



Photo 38: Internal of void 5.



Photo 39: Modified grassland to the south of the hotel.



Photo 40: Modified grassland and introduced shrub to the south of the hotel.



Photo 41: Modified grassland and introduced shrub to the south of the hotel.



Photo 42: South elevation of the hotel to be demolished.



Photo 43: Introduced shrub.



Photo 45: Compost heap to the southeast.



Photo 46: Modified grassland to the east of the hotel in the green area to be retained.



Photo 47: Introduced shrub in the green area to the east to be retained.



Photo 35: Cherry trees and modified grassland to the south of the hotel.



Photo 36: Front eastern elevation of the existing hotel.



Photo 37: Existing hotel building.



Photo 38: Car park at the north of the site.



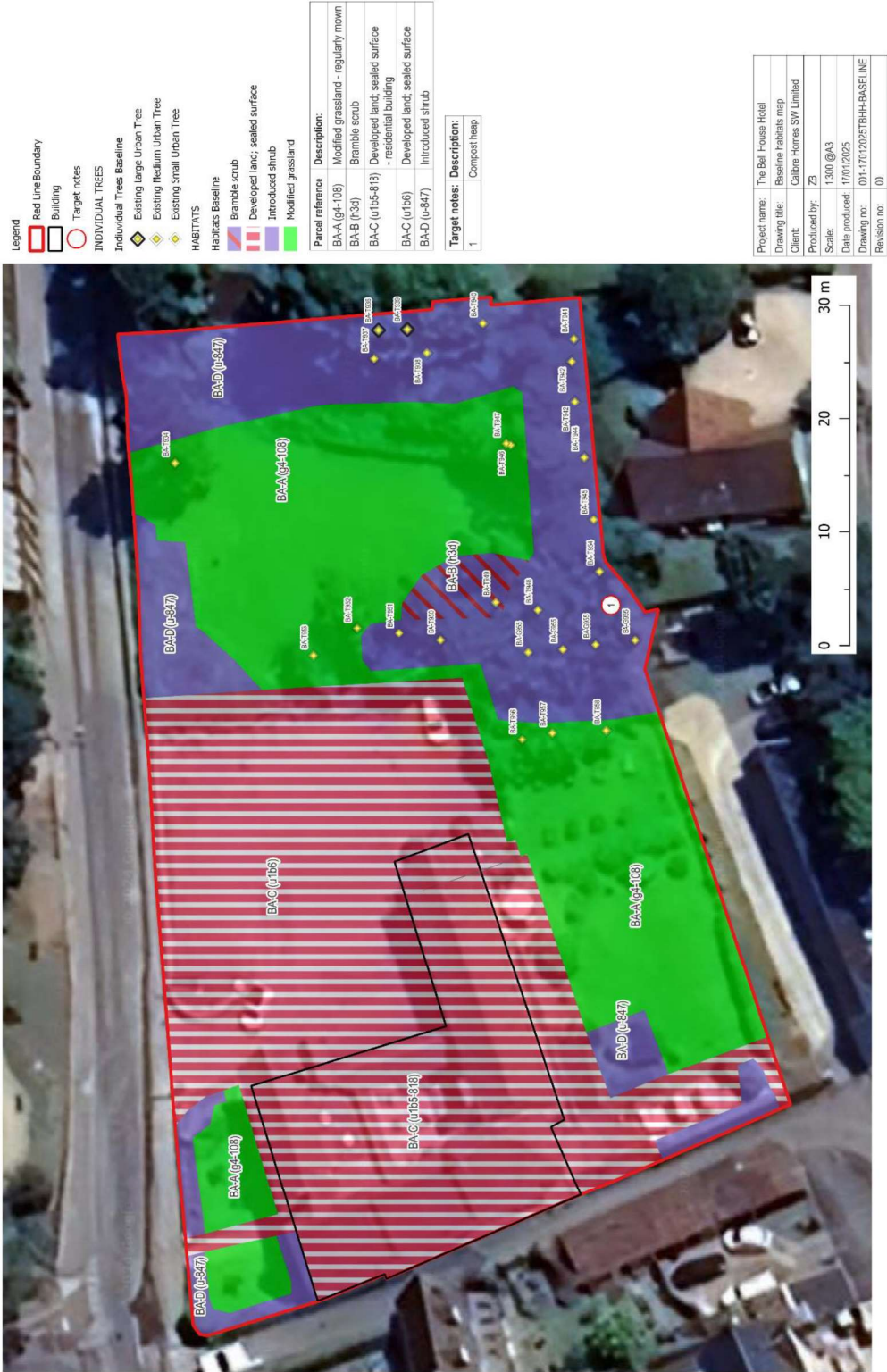
Photo 39: Modified grassland and introduced shrub at the north of the hotel building.



Photo 40: Front elevation of the existing hotel building from the road.

Appendix E – Pre and post-development habitat maps & floral species lists

Baseline habitats plan



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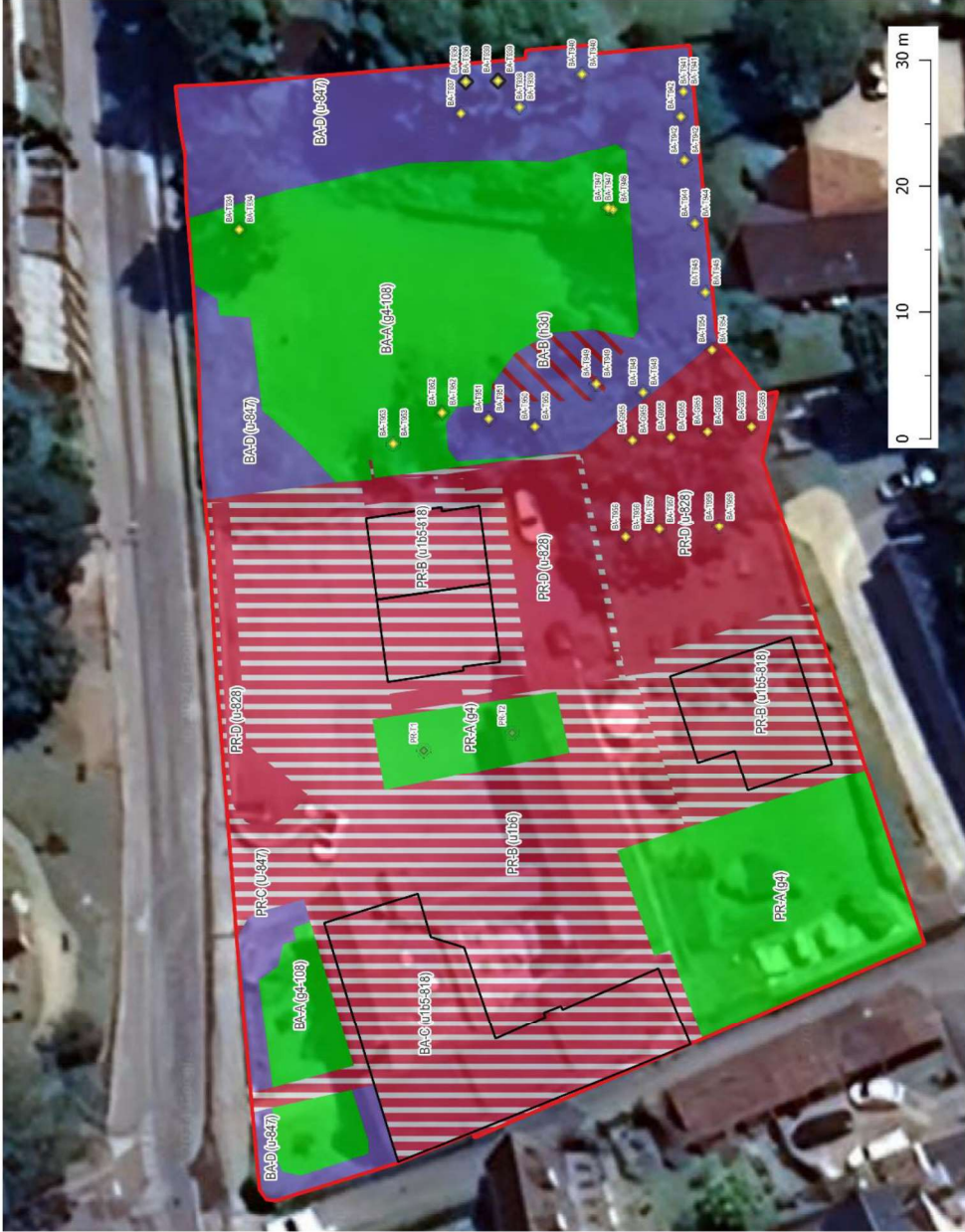
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Species lists for habitats:

Common name	Latin name	DAFOR scale abundance
Modified grassland (g4-108):		
Bluebell sp.	<i>Hyacinthoides sp.</i>	Locally abundant to rare
Cleavers	<i>Galium aparine</i>	Occasional
Clover sp.	<i>Trifolium sp.</i>	Abundant
Cock's-foot	<i>Dactylis glomerata</i>	Frequent
Common bird's-foot-trefoil	<i>Lotus corniculatus</i>	Locally occasional
Common cat's-ear	<i>Hypochaeris radicata</i>	Occasional
Common ragwort	<i>Jacobaea vulgaris</i>	Rare
Creeping buttercup	<i>Ranunculus repens</i>	Occasional
Daisy	<i>Bellis perennis</i>	Occasional
Dandelion sp.	<i>Taraxacum sp.</i>	Occasional
Dove's-foot crane's-bill	<i>Geranium molle</i>	Locally frequent
Field speedwell	<i>Veronica persica</i>	Locally frequent
Field wood-rush	<i>Luzula campestris</i>	Occasional
Greater plantain	<i>Plantago major</i>	Occasional
Green alkanet	<i>Pentaglottis sempervirens</i>	Locally occasional
Ground elder	<i>Aegopodium podagraria</i>	Locally abundant
Lesser celandine	<i>Ficaria verna</i>	Locally occasional
Lords-and-ladies	<i>Arum maculatum</i>	Locally occasional to rare
Perennial rye-grass	<i>Lolium perenne</i>	Dominant
Red dead-nettle	<i>Lamium purpureum</i>	Locally abundant
Red fescue	<i>Festuca rubra</i>	Occasional
Ribwort plantain	<i>Plantago lanceolata</i>	Occasional
Self-heal	<i>Prunella vulgaris</i>	Locally frequent to rare
Springy turf-moss	<i>Rhytiadelphus squarrosus</i>	Locally abundant to occasional
White dead-nettle	<i>Lamium album</i>	Rare
Yarrow	<i>Achillea millefolium</i>	Occasional
Bramble scrub (h3d):		
Bramble	<i>Rubus fruticosus</i>	Dominant
Introduced shrub (u1-847):		
Bluebell ornamental sp.	<i>Hyacinthoides sp.</i>	Locally abundant
Buddleia	<i>Buddleja spp.</i>	Rare
Chives	<i>Allium schoenoprasum</i>	Rare
Cow parsley	<i>Anthriscus sylvestris</i>	Locally abundant
Daffodil sp.	<i>Narcissus sp.</i>	Locally abundant
Ground elder	<i>Aegopodium podagraria</i>	Locally dominant
Ground-ivy	<i>Glechoma hederacea</i>	Locally occasional
Ivy	<i>Hedera helix</i>	Locally occasional
Lords-and-ladies	<i>Arum maculatum</i>	Rare
Stinking iris	<i>Iris foetidissima</i>	Rare
Individual trees (u1-32):		
Apple	<i>Malus sp.</i>	Locally occasional
Cherry laurel	<i>Prunus laurocerasus</i>	Locally frequent
Corsican pine	<i>Pinus nigra laricio</i>	Rare
European lime	<i>Tilia x europaea</i>	Occasional
Goat willow	<i>Salix caprea</i>	Rare
Golden king holly	<i>Ilex x altaclarensis</i>	Rare
Laurel sp.	<i>Laurus sp.</i>	Rare
Lawson cypress	<i>Chamaecyparis lawsoniana</i>	Frequent
Scot's pine	<i>Pinus sylvestris</i>	Occasional

Post-development habitat map



- Legend
- Red Line Boundary
 - INDIVIDUAL TREES
 - Proposed Small Urban Tree
 - Retained Large Urban Tree
 - Retained Medium Urban Tree
 - Retained Small Urban Tree
 - HABITATS
 - Bramble scrub
 - Developed land: sealed surface
 - Introduced shrub
 - Modified grassland
 - Vegetated garden

Parcel reference	Description:
BA-A (G4-108)	Retained modified grassland - regularly mown
BA-B (H30)	Retained bramble scrub
BA-C (U165-818)	Retained developed land: sealed surface - residential building
BA-D (U-847)	Retained introduced shrub
PR-A (G4)	New modified grassland
PR-B (U165-818)	New developed land: sealed surface - residential building
PR-C (U165)	New developed land: sealed surface
PR-D (U-847)	New introduced shrub
PR-E (U-828)	New vegetated garden

Project name:	The Bell House Hotel
Drawing title:	Proposed habitats map
Client:	Calder Homes SW Limited
Produced by:	ZB
Scale:	1:300 @A3
Date produced:	17/01/2025
Drawing no:	01-17012025 BHH-PROPOSED
Revision no:	00

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Appendix F – Habitat Condition Assessments

Condition Sheet: INDIVIDUAL TREES Habitat Type												
Habitat Type:												
Individual trees – Urban trees Individual trees – Rural trees Complete a condition sheet for each tree or block of trees.												
Please see the separate Line of trees condition sheet for a line of <u>rural</u> trees. You should only use the Line of trees condition assessment and record that habitat type in <u>rural</u> locations.												
Individual trees (description applied to the urban or rural environment): Young trees over 7.5 cm in diameter at breast height whose canopies are not touching.												
Urban Perimeter / Linear Blocks and Groups (description applied to the urban environment only): Groups or stands of trees (size requirement as defined above) within and around the perimeter of urban land. This includes those along urban streets, highways, railways and canals, and also former field boundary trees incorporated into developments. Canopies should predominantly overlap continuously. Groups of urban trees that don't match the descriptions for woodland may be assessed within this category.												
On-site or off-site / site name and location:	On-site	Survey date and surveyor name:		Becci Smith and Zoe Barrett – 07/01/2025								
		Survey reference (if relating to a wider survey):		-								
Limitations (if applicable)	-	Habitat parcel reference:										
		BA-T934	BA-T936	BA-T937	BA-T938	BA-T939	BA-T940	BA-T941	BA-T942	BA-T943	BA-T944	
		Grid reference:										
Condition assessment criteria:		See map for tree locations										Notes (such as justification):
		Criterion passed (Yes or No):										
A	The tree is a native species (or at least 70% within the block are native species).	N	Y	N	N	Y	Y	N	Y	Y	Y	
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	
C	The tree is mature (or more than 50% within the block are mature) ¹ .	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	

D	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	N	Y	Y	Y	Y	Y	Y	Y	N	N		
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	N	N	N	Y	N	N	N	N	Y	Y		
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y		
Number of criteria passed:		3	5	4	5	5	5	4	5	5	5		
Category:	Category requirements:	Metric score:	Score Achieved ×/✓										
Passes 5 or 6 criteria	Good (3)	Passes 5 or 6 criteria		✓		✓	✓	✓		✓	✓		✓
Passes 3 or 4 criteria	Moderate (2)	Passes 3 or 4 criteria	✓		✓				✓				
Passes 2 or fewer criteria	Poor (1)	Passes 2 or fewer criteria											
Note that 'Fairly Good and Fairly Poor' condition categories are not available for this broad habitat type.													
Suggested enhancement interventions to improve condition score:													
Footnotes:													
Footnote 1 - See gov.uk standing advice on ancient and veteran trees. Available from: Keepers of time: ancient and native woodland and trees policy in England (publishing.service.gov.uk) and: Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk)													

Footnote 2 - Enhancement of this habitat type is only possible by improving the habitat so that it meets all Criteria B, D and F. It is not possible or appropriate to enhance individual tree/s through meeting just one or two of those Criteria, nor by meeting Criteria A, C or E.

Condition Sheet: INDIVIDUAL TREES Habitat Type												
Habitat Type:												
Individual trees – Urban trees Individual trees – Rural trees Complete a condition sheet for each tree or block of trees.												
Please see the separate Line of trees condition sheet for a line of <u>rural</u> trees. You should only use the Line of trees condition assessment and record that habitat type in <u>rural</u> locations.												
Individual trees (description applied to the urban or rural environment): Young trees over 7.5 cm in diameter at breast height whose canopies are not touching.												
Urban Perimeter / Linear Blocks and Groups (description applied to the urban environment only): Groups or stands of trees (size requirement as defined above) within and around the perimeter of urban land. This includes those along urban streets, highways, railways and canals, and also former field boundary trees incorporated into developments. Canopies should predominantly overlap continuously. Groups of urban trees that don't match the descriptions for woodland may be assessed within this category.												
On-site or off-site / site name and location:	On-site	Survey date and surveyor name:		Becci Smith and Zoe Barrett – 07/01/2025								
		Survey reference (if relating to a wider survey):		-								
Limitations (if applicable)	-	Habitat parcel reference:										
		BA-T945	BA-T946	BA-T947	BA-T948	BA-T949	BA-T950	BA-T951	BA-T952	BA-T953	BA-T954	
		Grid reference:										
Condition assessment criteria:		See map for tree locations										Notes (such as justification):
		Criterion passed (Yes or No):										
A	The tree is a native species (or at least 70% within the block are native species).	Y	Y	Y	N	N	N	N	N	Y	N	
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	
C	The tree is mature (or more than 50% within the block are mature) ¹ .	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	

D	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	Y	N	N	N	N	N	N	Y	N	N	
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	
Number of criteria passed:		6	5	5	4	4	4	4	5	5	4	
Category:	Category requirements:	Metric score:	Score Achieved ×/✓									
Passes 5 or 6 criteria	Good (3)	Passes 5 or 6 criteria	✓	✓	✓					✓	✓	
Passes 3 or 4 criteria	Moderate (2)	Passes 3 or 4 criteria				✓	✓	✓	✓			✓
Passes 2 or fewer criteria	Poor (1)	Passes 2 or fewer criteria										
Note that 'Fairly Good and Fairly Poor' condition categories are not available for this broad habitat type.												
Suggested enhancement interventions to improve condition score:												
Footnotes:												
Footnote 1 - See gov.uk standing advice on ancient and veteran trees. Available from: Keepers of time: ancient and native woodland and trees policy in England (publishing.service.gov.uk) and: Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk)												

Footnote 2 - Enhancement of this habitat type is only possible by improving the habitat so that it meets all Criteria B, D and F. It is not possible or appropriate to enhance individual tree/s through meeting just one or two of those Criteria, nor by meeting Criteria A, C or E.

Condition Sheet: INDIVIDUAL TREES Habitat Type													
Habitat Type:													
Individual trees – Urban trees Individual trees – Rural trees Complete a condition sheet for each tree or block of trees.													
Please see the separate Line of trees condition sheet for a line of <u>rural</u> trees. You should only use the Line of trees condition assessment and record that habitat type in <u>rural</u> locations.													
Individual trees (description applied to the urban or rural environment): Young trees over 7.5 cm in diameter at breast height whose canopies are not touching.													
Urban Perimeter / Linear Blocks and Groups (description applied to the urban environment only): Groups or stands of trees (size requirement as defined above) within and around the perimeter of urban land. This includes those along urban streets, highways, railways and canals, and also former field boundary trees incorporated into developments. Canopies should predominantly overlap continuously. Groups of urban trees that don't match the descriptions for woodland may be assessed within this category.													
On-site or off-site / site name and location:	On-site	Survey date and surveyor name:				Becci Smith and Zoe Barrett – 07/01/2025							
		Survey reference (if relating to a wider survey):				-							
Limitations (if applicable)	-	Habitat parcel reference:											
		BA-G955	BA-T956	BA-T957	BA-T958								
		Grid reference:											
Condition assessment criteria:		See map for tree locations										Notes (such as justification):	
		Criterion passed (Yes or No):											
A	The tree is a native species (or at least 70% within the block are native species).	N	Y	Y	Y								
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Y	Y	Y	Y								
C	The tree is mature (or more than 50% within the block are mature) ¹ .	Y	Y	Y	Y								
D	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain	Y	N	N	Y								

	>75% of expected canopy for their age range and height.																		
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	N	N	N	N														
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Y	Y	Y	Y														
Number of criteria passed:		4	4	4	5														
Category:	Category requirements:	Metric score:	Score Achieved ×/✓																
Passes 5 or 6 criteria	Good (3)	Passes 5 or 6 criteria				✓													
Passes 3 or 4 criteria	Moderate (2)	Passes 3 or 4 criteria	✓	✓	✓														
Passes 2 or fewer criteria	Poor (1)	Passes 2 or fewer criteria																	
Note that 'Fairly Good and Fairly Poor' condition categories are not available for this broad habitat type.																			
Suggested enhancement interventions to improve condition score:																			
Footnotes:																			
Footnote 1 - See gov.uk standing advice on ancient and veteran trees. Available from: Keepers of time: ancient and native woodland and trees policy in England (publishing.service.gov.uk) and: Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk) Footnote 2 - Enhancement of this habitat type is only possible by improving the habitat so that it meets all Criteria B, D and F. It is not possible or appropriate to enhance individual tree/s through meeting just one or two of those Criteria, nor by meeting Criteria A, C or E.																			

Condition Sheet: GRASSLAND Habitat Type (low distinctiveness)			
UKHab Habitat Type:			
Grassland - Modified grassland			
UKHab – see UK Habitat Classification			
On-site or off-site, site name and location:	On-site	Survey date and surveyor name:	Becci Smith and Zoe Barrett – 07/01/2025
Central grid reference of habitat:	ST 94772 78675 ST 94731 78649 ST 94709 78688	Habitat parcel reference:	BA-A
Survey reference (if relating to a wider survey):	-	Limitations (if applicable):	n/a
Condition Assessment Criteria		Condition Achieved (Y/N)	Notes/Justification

A	There are 6-8 vascular plant species per m² present, including at least 2 forbs (these may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition. Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m² (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet.	N	4 species present per m ² .
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	N	Sward height is uniform.
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. may be present). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Y	No scrub in grassland.
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	Y	No physical damage present.
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens) ² .	Y	No bare ground present.
F	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Y	No bracken present.
G	There is an absence of invasive non-native plant species ³ (as listed on Schedule 9 of WCA ⁴).	Y	No non-native invasive species present.
Essential criterion achieved (Yes or No):			No
Number of criteria passed:			5
Condition Assessment Result (out of 7 criteria)		Condition Assessment Score	Score Achieved ×/✓
Passes 6 or 7 criteria including passing essential criterion A		Good (3)	
Passes 4 or 5 criteria including passing essential criterion A		Moderate (2)	
Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A)		Poor (1)	✓
Suggested enhancement interventions to improve condition score			
Footnotes:			

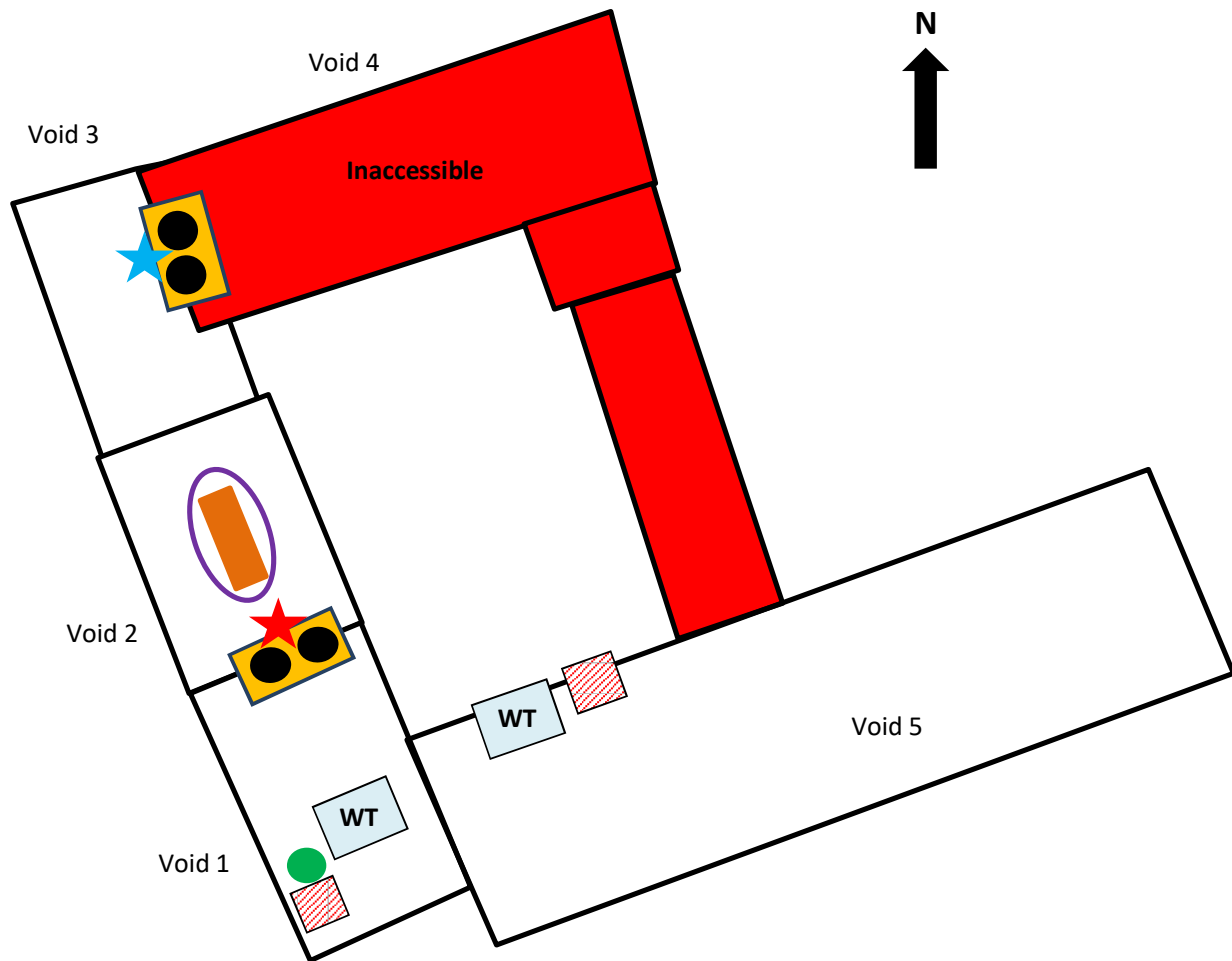
Footnote 1 – Creeping thistle *Cirsium arvense*, spear thistle *Cirsium vulgare*, curled dock *Rumex crispus*, broad-leaved dock *Rumex obtusifolius*, common nettle *Urtica dioica*, creeping buttercup *Ranunculus repens*, greater plantain *Plantago major*, white clover *Trifolium repens* and cow parsley *Anthriscus sylvestris*.

Footnote 2 – For example, this could include small, scattered areas of bare ground allowing establishment of new species, or localised patches where not exceeding 10% cover.

Footnote 3 – Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement.

Footnote 4 – Wildlife and Countryside Act 1981 (as amended).

Appendix G – Bat evidence map



Key

-  Internal chimney
-  Loft hatch
-  Water tank
-  Inaccessible loft voids
-  Staining at ridge beam
-  Single brown long-eared bat dropping
-  Scattering of approximately 20 brown long-eared bat droppings below the ridge beam.
-  Four butterfly wing feeding remains.
-  Five butterfly wing feeding remains

Appendix H: Bat activity (dusk) survey results

Table 18: Bat activity (dusk) survey results

Bat activity (dusk) survey						
Date: 25/05/2023	Sunset: 21:07	Weather conditions: Mild and dry	Precipitation: None	Site location: Bell House Hotel, Sutton Benger		
Temp: Start: 15°C End: 14°C	Beaufort wind force (Bft): 0/12	Detectors used: EchoMeter Touch 2 + tablets x 4		Oktas cloud cover: 0/8	Start Time: 20:53	End Time: 22:45
Surveyor:		Surveyor position:		NVA used? (Y/N):		NVA equipment used:
Russell Hoyle ACIEEM		Southeast		N		n/a
Aaron Templar		Northeast		N		n/a
Chris Payne		North		N		n/a
Lewis Collins		Southwest		N		n/a
Time	Sp. if ID'd	Number of bats		Comments on behaviour/activity		
21:22	Soprano pipistrelle	1		Heard not seen in the southeast and southwest.		
21:23 to 22:26	Serotine	1		Heard not seen in the northeast.		
21:20	Noctule	1		Faint call heard not seen in the southwest.		
21:24	Noctule	1		Heard not seen in the southeast.		
21:33	Soprano pipistrelle	1		Brief call heard not seen in the southwest.		
21:37 to 22:09	Common pipistrelle	1		Frequently foraged up and down the alleyway to the west of the property, travelling from north to south and north again.		
21:39	Common pipistrelle	1		Emerged from beneath the wooden fascia of the eaves at the western end of the southern extension and commuted eastwards (red circle).		
21:40	Noctule	1		Heard not seen in the southwest.		
21:43 to 22:45	Serotine	1		Commutated from the west to the east and foraged in the southeast infrequently until the end of the survey.		
21:44	Soprano pipistrelle	1		Heard not seen in the north.		
21:45	Serotine	1		Commutated from the west to the east over the alleyway to the west of the property.		
21:46	Serotine	1		Commutated from the southeast to the northeast.		
21:50	Serotine	1		Commutated from the southwest to the north.		
21:53	Soprano pipistrelle	1		Heard not seen in the southeast.		
21:55	Noctule	1		Heard not seen in the southwest.		
22:00 to 22:45	Soprano pipistrelle	1		Foraged in the north until the end of the survey.		
22:05	Serotine	1		Heard not seen in the southwest.		
22:08	Serotine	1		Commutated from the northeast to the west.		
22:08	Serotine	2		Commutated from the east to the west over the alleyway in the east of the property.		
22:08	Soprano pipistrelle	1		Heard not seen in the southwest.		
22:10	Myotis sp.	1		Heard not seen in the southeast.		
22:12	Soprano pipistrelle	1		Heard not seen in the northeast.		

22:22	Soprano pipistrelle	1	Heard not seen in the southeast.
22:23	Common pipistrelle	1	Heard not seen in the southwest.
22:27	Noctule	1	Heard not seen in the northeast.

Figure 1: Location of common pipistrelle emergence.



Table 19: Bat activity (dusk) survey results

Bat activity (dusk) survey						
Date: 12/06/2023	Sunset: 21:25	Weather conditions: Mild and dry	Precipitation: None	Site location: Bell House Hotel, Sutton Benger		
Temp: Start: 19°C End: 19°C	Beaufort wind force (Bft): 0/12	Detectors used: EchoMeter Touch 2 + tablets x 4	Oktas cloud cover: 2/8	Start Time: 21:05	End Time: 23:00	
Surveyor:	Surveyor position:		NVA used? (Y/N):	NVA equipment used:		
Laurence Wills	East		Y	Sony AX33 with two 15 LED IR floodlights		
Chris Payne	North		N	n/a		
Caitlin McQuillan	West		N	n/a		
Georgia Linter	South		N	n/a		
Time	Sp. if ID'd	Number of bats		Comments on behaviour/activity		
21:53	Common pipistrelle	1		Heard not seen in the east.		
21:55	Soprano pipistrelle	1		Heard not seen in the north.		
21:56	Serotine	1		Commuted from the west to the east over the southern garden.		
21:59	Soprano pipistrelle	1		Commuted from the north to the east in the north.		
21:59	Serotine	1		Commuted around the trees to the east.		
21:59	Serotine	1		Commuted from the west to the east over the southern garden.		

22:07	Common pipistrelle	1	Foraged in the southern garden.
22:11	Serotine	1	Heard not seen in the north.
22:17	Serotine	1	Heard not seen in the east.
22:19	Soprano pipistrelle	1	Heard not seen in the north.
22:21	Serotine	1	Heard not seen in the east, south and in the north.
22:22	Soprano pipistrelle	1	Heard not seen in the east.
22:30	Serotine	1	Heard not seen in the east.
22:31	Common pipistrelle	1	Heard not seen in the west.
22:39	Soprano pipistrelle	1	Heard not seen in the north.
22:44	Common pipistrelle	1	Heard not seen in the north.
22:45	Myotis sp.	1	Heard not seen in the south.
22:51	Soprano pipistrelle	1	Heard not seen in the south.

Figure 4: Screenshot of the darkest point recorded during survey for NVA Sony AX33



Table 20: Bat activity (dusk) survey results

Bat activity (dusk) survey						
Date: 27/06/2023	Sunset: 04:53	Weather conditions: Mild and dry	Precipitation: None	Site location: Bell House Hotel, Sutton Benger		
Temp: Start: 12°C End: 12°C	Beaufort wind force (Bft): 0/12	Detectors used: EchoMeter Touch 2 + tablets x 4		Oktas cloud cover: 8/8	Start Time: 03:23	End Time: 05:08
Surveyor:		Surveyor position:		NVA used? (Y/N):		NVA equipment used:
Zoe Barrett		North		N		n/a
Aaron Templar		East		N		n/a
Kieran Mullany		Southwest		N		n/a
Emily Parsons		South		N		n/a
Time	Sp. if ID'd	Number of bats		Comments on behaviour/activity		
03:21	Soprano pipistrelle	1		Heard but not seen in the north.		

03:23	Soprano pipistrelle	1	Foraging around the graveyard across the road, to the south of the site.
03:24-03:41	Soprano pipistrelle	1	Heard but not seen in the east.
03:24-04:06	Common pipistrelle	1	Heard but not seen in the southwest and the south.
03:31	Soprano pipistrelle	1	Commuted from northeast to southwest across the site.
03:39	Soprano pipistrelle	1	Heard but not seen in the north.
03:41	Long-eared bat sp.	1	Heard but not seen in the east.
03:41-03:44	Noctule	1	Heard but not seen in the north and the east.
03:45-04:05	Noctule	1	Heard but not seen in the south and the north.
03:43	Serotine	1	Commuted from southwest to east across the site.
03:59-04:08	Common pipistrelle	1	Foraging in the south of the site.
04:03	Soprano pipistrelle	1	Commuted from west to southeast across the site.
04:04	Noctule	1	Commuted from northeast to east over the trees to the east of the site.
04:07	Serotine	1	Commuted from east to west across the graveyard to the south of the site.
04:11-04:35	Noctule	1	Heard but not seen in the north and the south.
04:19	Soprano pipistrelle	1	Heard but not seen in the north.
04:28	Common pipistrelle	1	Heard but not seen in the east.
04:29	Noctule	1	Commuted from south to north across the site.
04:34	Noctule	1	Commuted from south to north across the site.

Appendix I: Locations of bat roosts, bat exit/entry points & surveyor locations

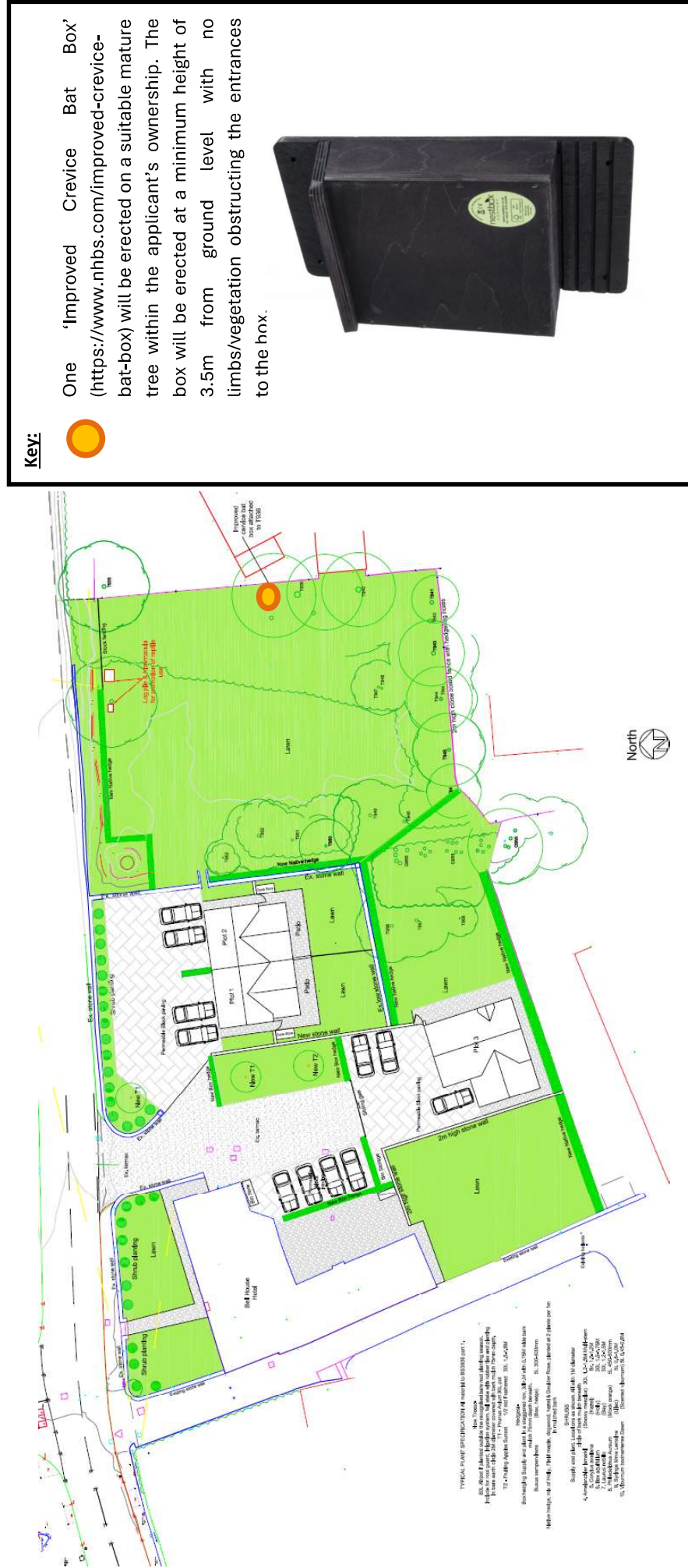


* Maximum count of one bat exiting from/entering access point during any one survey

LEGEND:	
Key:	Description:
	Surveyor position
	Building subject to dusk surveys
Bat roosts and bat access point location:	
	Brown long-eared day roost within internal building area to remain unaffected by proposed works
	Common pipistrelle access point & day roost (x 1 bat)* to be lost through demolition



Appendix J – Biodiversity mitigation, compensation and enhancement plan



Vivara Pro Build-in WoodStone Bat Box:



PRO UK Rendered Build-In Swift Box:



Bee brick:



Hedgehog fence access:

