



Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment

Pickers Palmers Farm, Capps Lane, Heywood, Westbury BA13 4NE

For Acorn Architectural and on behalf of Vardent Developments Ltd

March 2026

DOCUMENT CONTROL SHEET

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Preliminary Ecological Appraisal and Biodiveristy Net Gain Assessment

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The evidence which Herdwick Ecology has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional opinions.

1.0 Introduction

1.1 Herdwick Ecology Ltd has been commissioned by Acorn Architectural and on behalf of Vardent Developments Ltd to undertake an Ecological Appraisal and Biodiversity Net Gain assessment at Pickers Palmers Farm, Capps Lane, Heywood, Westbury BA13 4NE (Central Reference ST) to inform proposals for changes to the approved scheme under Class Q (ref: PL/2023/06122) and the residential conversion of a Barn 2 to Unit 6, together with other minor alterations to the design and surrounds. The planning application was submitted to Wiltshire Council and validated in November 2025 (ref: PL/2025/09355). Subsequent comments have been received from Wiltshire Council stating that a Biodiversity Net Gain assessment is required to inform the proposals.

1.2 This report has been prepared by Ceri Griffiths, Director at Herdwick Ecology, who is a Full Member of the Chartered Institute of Ecology and Environmental Management (CIEEM). Reference is made to CIEEM Guidelines for Preliminary Ecological Appraisal¹ and BS 42020:2013 Biodiversity - Code of practice for planning and development². The Statutory Biodiversity Metric has been used, with habitat data collated during the survey to assess the baseline units.

2.0 Aims and objectives

2.1 This report support the full planning application to Wiltshire Council and aims to:

- Review the relevant biological records and assess their significance;
- Identify any protected species issues or potential issues that may exist;
- Assess possible ecological constraints to development and make recommendations to avoid, minimise and mitigate for any potential impacts during the development; and
- Set out opportunities for net gain and ecological enhancements in line with relevant planning policy, legislation and other published guidance to inform a detailed application.

2.2 With regards to the Biodiversity Net Gain assessment, this report will also:

- Present the baseline habitat value of the development site;
- Present the habitat value of the proposed landscaping incorporated into the post-development design; and
- Present the overall net habitat value change in both habitat units and a percent change.

¹ CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal* (2nd. Ed.) CIEEM

² BSI (British Standards Institute) BS4202:2013 *Biodiversity – A code of practice for planning and development*. BSI, London.

3.0 Legislation and Planning Policies

3.1 In carrying out this assessment relevant legislation, planning policies, and best practice guidelines were consulted and include:

- Conservation of Habitats and Species Regulations 2017 (as amended);
- Wildlife and Countryside Act 1981 (as amended);
- Countryside and Rights of Way (CRoW) Act 2000;
- Natural Environment and Rural Communities (NERC) Act 2006;
- National Planning Policy Framework 2024 (NPPF);
- Local Planning Policies and supplementary planning documents/technical guidance.

National Planning Policy Framework (NPPF) 2024

3.2 National planning policy on biodiversity and conservation is set out in the National Planning Policy Framework (NPPF). This emphasises that the planning system should seek to minimise impacts on biodiversity and provide net gains in biodiversity wherever possible as part of the Government's commitment to halting declines in biodiversity and establishing coherent and resilient ecological networks. Chapter 15: Conserving and Enhancing the Natural Environment, is of particular relevance to this report as it relates to ecology and biodiversity. Relevant policies are set out below:

3.3 Paragraph 185: *"To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity..."*

3.4 Paragraph 186 states: "When determining planning applications, local planning authorities should apply the following principles:

- a) *'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused'*
- b) Relates to developments affecting SSSI
- c) Relates to developments affecting irreplaceable habitats, such as ancient woodland
- d) *'Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity'.*

- 3.5 The Government Circular 06/2005, which is referred to by the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.
- 3.6 The above approach encapsulates the 'mitigation hierarchy' described in British Standard BS 42020:2013, which involves the following step-wise process:
- Avoidance – avoiding adverse effects through good design;
 - Mitigation – where it is unavoidable, mitigation measures should be employed to minimise adverse effects;
 - Compensation – where residual effects remain after mitigation it may be necessary to provide compensation to offset any harm; and
 - Enhancement – planning decisions often present the opportunity to deliver benefits for biodiversity, which can also be explored alongside the above measures to resolve potential adverse effects.
- 3.7 The measures for avoidance, mitigation, compensation, and enhancement should be '*proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development*'
- Conservation of Habitats and Species Regulations 2017 (as amended)*
- 3.8 In summary these regulations, also referred to as the Habitat Regulations, cover the designation and protection of European sites and the protection of European protected species (EPS).
- Environment Bill and Biodiversity Net Gain*
- 3.9 The Environment Bill received Royal Assent on 9th November 2021, becoming the Environment Act; this includes the provision of biodiversity gain for developments in England, which will be mandated through an amendment to the Town and Country Planning Act 1990. The two-year transition period that follows Royal Assent means that mandatory Biodiversity Net Gain (BNG) became law on 12th February 2024, with small sites being mandatory on the 2nd April 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)
- Local Plan*
- 3.10 The Wiltshire Core Strategy Development Plan Document ('the plan') was formally adopted on 20 January 2015. The plan provides a positive and flexible overarching planning policy framework for Wiltshire for the period up to 2026. Policy 50 'Biodiversity and Geodiversity' states that: '*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.... All development proposals shall incorporate appropriate measures to avoid and reduce*

disturbance of sensitive wildlife species and habitats throughout the lifetime of the development. The policy goes on to state that all developments should seek opportunities to enhance biodiversity.

Bath and Bradford on Avon Special Area of Conservation (SAC) Planning Guidance for Wiltshire

- 3.11 The site sits within the 'core zone' of the Bath and Bradford on Avon Bat Special Area of Conservation (SAC). This SAC comprises a number of individual sites across the wider landscape that support a larger population of greater and lesser horseshoe bats and Bechstein's bats. The *Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire* sets out specific information on the survey and mitigation requirements for developments within the core zones.

Trowbridge Bat Mitigation Strategy SPD

- 3.12 The Trowbridge Bat Mitigation Strategy (TBMS) SPD is aimed at developers, consultants and planners involved in assessing development proposals in the landscapes in and surrounding Trowbridge. The overall aim is to provide a clear and detailed approach to considering impacts of development in the Trowbridge. The woodlands to the east and south east of Trowbridge are known to support a large and internationally significant breeding meta-population of Bechstein's bat that is linked to the Bath and Bradford on Avon Bats SAC, including significant maternity colonies in Biss Wood, Green Lane Wood and Clanger and Picket Woods. Significant potential effects to the SAC associated with development therefore include impacts to the foraging areas and commuting routes in the surrounding landscape used by the bats. The SPD sets out Bat Sensitivity Zones where development could have an effect on the SAC. The site sits within the grey zone for recreational pressure. The site may also sit within the yellow habitat zone, although there is some discrepancy with the available mapping.

Species Protection

- 3.13 A number of species, including all bats and great crested newts, are afforded protection under The Wildlife and Countryside Act 1981 (as amended).
- 3.14 Under this legislation, a person is guilty of an offence if a person intentionally or recklessly:
- disturbs any animal while it is occupying a structure or place which it uses for shelter or protection;
 - obstructs access to any structure or place which any animal uses for shelter or protection.
- 3.15 In addition the protection afforded through UK legislation, further protection is provided to a small group of species, commonly referred to as 'European Protected Species' under the Conservation of Habitats and Species 2017 (as amended) (also known as the Habitats Regulations), including bats and great crested newts.
- 3.16 With regards to European Protected Species listed under Schedule 2 of the Act, it is an offence to:

- Intentionally or deliberately capture or kill, or intentionally injure the animal;
- Deliberately disturb the animal or intentionally or recklessly disturb them in a place used for shelter or protection;
- Damage or destroy a breeding site or resting place;
- Intentionally or recklessly damage, destroy or obstruct access to a place used for shelter or protection.

3.17 The Habitats Directive provides for the derogation from these above prohibitions for specified reasons and providing certain conditions are met. Those derogations are transposed into the Regulations by way of a licensing regime that allows what would otherwise be an unlawful act to be carried out lawfully. Among the reasons why a licence may be granted and the reason relied upon by developers when seeking a licence to carry out operations for the purposes of development, is that there are imperative reasons of overriding public interest why the operation should be carried out.

3.18 Whilst Natural England is the licensing body, the LPA must have due regard for the Habitat Regulations during the planning process and that the following three derogation tests will be met:

- Test 1: *Regulation 53(2)(e) states: a licence can be granted for the purposes of “preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment”.*
- Test 2: *Regulation 53(9)(a) states: the appropriate authority shall not grant a licence unless they are satisfied “that there is no satisfactory alternative”.*
- Test 3: *Regulation 53(9)(b) states: the appropriate authority shall not grant a licence unless they are satisfied “that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range*

3.19 The NERC Act also listed species of principle importance under Section 41 of the Act. This places further duties on the LPA to have due regard for the conservation of these species, such as hedgehog or certain bird species, which may be present on-site.

4.0 Methodology

Data Search

4.1 Online sources were reviewed, such as MAGIC³, to search for designated sites, priority habitats and records of local European Protected Species (EPS) licence. In addition, the Wiltshire Council planning portal was searched for nearby applications.

³ <https://magic.defra.gov.uk/>

- 4.2 Given the small scale of the development and habitats within the locality, a full data search was not considered necessary.

Preliminary Ecological Appraisal

- 4.3 The site was surveyed on the 6th March 2025 by Ceri Griffiths, Director of Herdwick Ecology, with full membership of Chartered Institute of Ecology and Environmental Management (CIEEM) and a Natural England bat and great crested newt licence holder. Weather conditions were dry with a temperature of 6°C.

Biodiversity Net Gain Assessment

- 4.4 The Statutory Biodiversity Metric is designed to provide a quantitative approach to assessing the changes in biodiversity value brought about by development or changes in land management. It is a habitat-based approach and uses the attributes of a habitat to provide a biodiversity value based on components such as distinctiveness, condition and strategic significance of the existing habitat as well as time to establish and difficulty of creation for proposed habitats.
- 4.5 The baseline BNG calculations, as outlined below, provides a numerical habitat value which indicates the existing value of the habitats present on the site based on the identified habitat types and their condition score.

Pre-development habitat baseline approach

- 4.6 The habitat baseline used to support the biodiversity net gain assessment has been taken from an habitat survey undertaken by Herdwick Ecology in March 2025. Whilst not the optimum time of year, given the habitats onsite, sufficient information could be obtained to inform the assessment. The Baseline Habitat data is illustrated in Figure 1 below.
- 4.7 The Statutory Biodiversity Metric habitat types are based on a set of habitats as defined by the UK Habitat Classification System (UK Habitat Classification Working Group, 2018), although there are some discrepancies between how some habitats are defined, as not all UK Habitat Classification System primary habitat types are included within the selection of habitats included within the metric.

5.0 Baseline Conditions

- 5.1 The Application Site is located in a rural location to the south of Capps Lane, approximately 1.5km east of Westbury. The Westbury Cement Works site lies within 500m to the south, with a large waterbody associated with the clay pit 55m from the Application Boundary. The main line railway lies 650m south, beyond the cement works. The wider landscape comprises a mix of equestrian and agricultural fields

under a mix of pasture and arable/silage with small parcels of woodland and well maintained hedgerows.

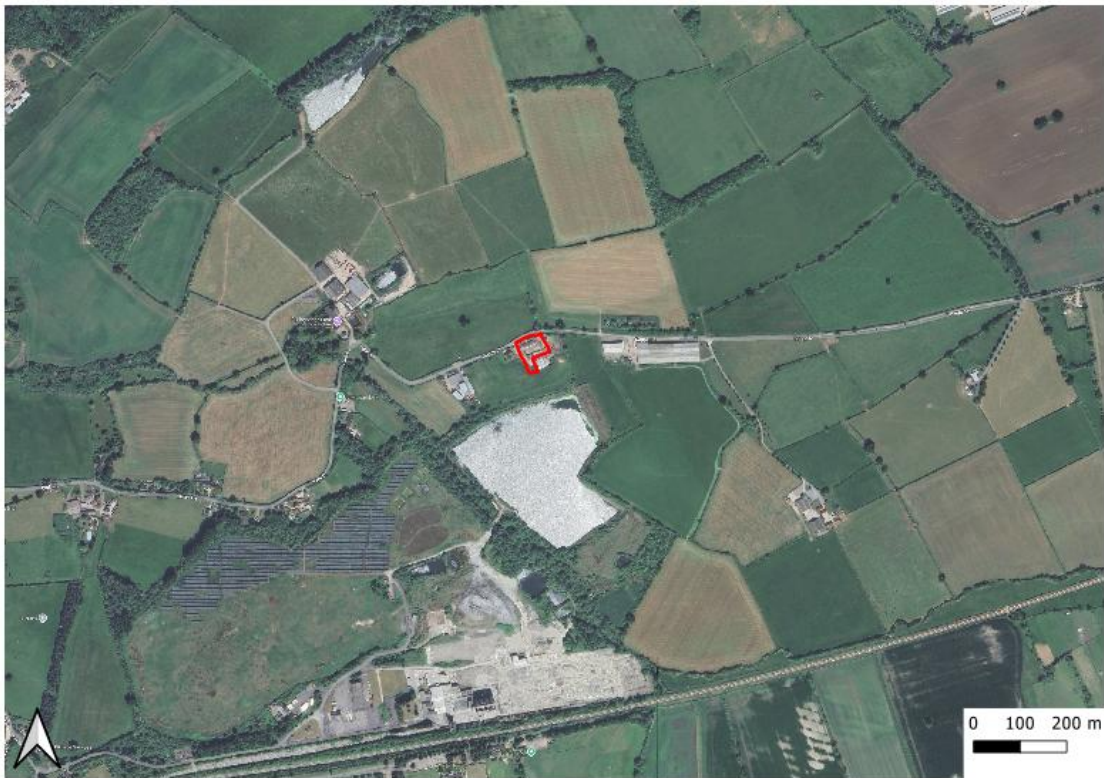


Plate 1: Site Location

Data Search

Statutory and Non-Statutory Designated Sites

Bath and Bradford on Avon Special Area of Conservation (SAC) & Trowbridge Bat Mitigation Strategy SPD

- 5.2 As stated within Section 2 above the site sits within the core zone of the Bath and Bradford on Avon SAC and within the yellow zone for the habitat impacts and grey recreational zone. Picket and Clanger Wood Site of Special Scientific Interest (SSSI) known to support species associated with the SAC lies 1km to the northwest of the Application Site.
- 5.3 The Salisbury Plain Special Protection Area (SPA) and Special Area of Conservation (SAC) lies 2.69km to the south. These internationally designated sites are selected for their orchid-rich calcareous grassland and juniper habitat as well as the population of marsh fritillary butterfly. The SPA is selected for its important breeding populations of stone curlew, quail and hobby, together with the overwintering population of hen harrier. The site sits within the 6.4km recreational pressure buffer zone for the SPA and proposals that will result in a net increase in overnight accommodation, can have the potential for additional recreational pressure on the Salisbury Plain SPA. Therefore, the competent authority (Wiltshire Council) will be required to complete an Appropriate Assessment and a financial contribution required.

- 5.4 In addition to Picket and Clanger Wood SSSI, the Bratton Downs SSSI lies 1.65km to the south. This site is notified for both its geomorphological and biological features. It provides an exceptional range of landform features associated with periglacial conditions. Biologically the site is diverse, comprising species-rich calcareous grassland and ancient broadleaved woodland.

Habitats

- 5.5 There are three parcels of deciduous woodland, a priority habitat within 500m of the Application Site. Two lies to the southern and western boundary of the old clay pit waterbody, with a further parcel 380m to the west.
- 5.6 In addition to the substantial waterbody created by the old clay pit, a further two/three waterbodies are present on the OS mapping within 250m of the site. They are present to the north of Capps Lane in an area of scrub. There are numerous waterbodies within 500m of the site.

Species

- 5.7 There are numerous European Protected Species (EPS) licences within 4km of the site boundary, with the following within 2km:
- Common & soprano pipistrelle and lesser horseshoe bat resting place (dated 2016-2026) – 460m southwest (associated with the cement works);
 - Great crested newt licence associated with the railway – 1.4km west
- 5.8 The EPS between 2km and 4km predominately relate to common and soprano pipistrelle roosts within Westbury town centre.

Preliminary Ecological Appraisal

- 5.9 The Application Site is 3313m² in area and currently comprises predominantly hardstanding (concrete) with Barn 1 under conversion (Unit 1 – 5), and a derelict barns offsite to the south, with Barn 2 (Approved Class Q) and Barn 4 siting adjacent o the Application Boundary.



Plate 2: Existing site boundary (aerial 2025)

- 5.10 Historically, the Application Site was a working farm comprising more modern style barn i.e. block and asbestos sheeting roofing. A derelict row of pigsty's and a larger agricultural barn still present. Class Q consent was approved in 2023 for the conversion of Barn 1 to five residential units and works have commenced under this consent.
- 5.11 In accordance with the BNG regulations, the baseline should be backdated if site clearance has occurred in advance of the habitat assessment. A review of historic aerial imagery shows that there has been a varying amount of vegetation cover on the site over the years, and it is understood that there has always been a substantial area of hardstanding surrounding the barns and across the wider site Furthermore, the site was cleared prior to the purchase of the site by the applicant and to implement the Class Q approval in 2023 or 2024.
- 5.12 It may be that the vegetation visible, from historic mapping, is ruderal and/or scrub encroaching from the edges and becoming progressively more established when the site was vacated, with scrub growth through the roof of the derelict barns but with the underlying substrate as hardstanding, albeit in a poor condition having been penetrated by the vegetation.
- 5.13 There has been some site clearance to enable the conversion works to commence, primarily from Capps Lane to allow for construction vehicles and storage, this has resulted in the advance loss of an area of grassland. As this area was illustrated on the existing site plans from 2025, following the purchase of the site by the applicant and so these are reflected within the baseline BNG assessment.

- 5.14 An area of grassland is present to the southwestern corner of the Application Site. This area has recently been used for storage, with some vehicle movements so the grassland is in a poor condition. The offsite grassland was therefore used to further inform and supplement the baseline BNG assessment on the assumption that this is more likely to be true condition of the grassland. This has been unmanaged with frequent rye-grass *Lolium perenne* but with tussocks of false oat grass *Arrhenatherum elatius*, Yorkshire fog *Holcus lanatus* and ruderal vegetation with scentless mayweed *Tripleurospermum inodorum*, nettle *Urtica dioica*, dog violet *Viola riviniana*, prickly sow-thistle *Sonchus asper*, common hedge mustard *Sisymbrium officinale*, greater plantain *Plantago major*, hard rush *Juncus inflexus*, rough chervil *Chaerophyllum temulum*, ground ivy *Glechoma hederacea*, creeping thistle *Cirsium arvense*, cow parsley *Anthriscus sylvestris*, white clover *Trifolium repens*, dandelion *Taraxacum officinale* agg. broad leaved dock *Rumex obtusifolius*, *Arum maculatum* spear thistle, field bindweed *Convolvulus arvensis* and creeping buttercup *Ranunculus repens*.. Given the historic agricultural use and grassland within the wider area, it is classified as g4 as still species poor (i.e. forbs less than 8/m²) but with diversity increasing due to the lack of management and more recent disturbance increasing more common ruderal/ephemeral species that quickly inhibit bare ground – g4 with ruderal and scattered rush 81 & 14.
- 5.15 The area of grassland that has been removed to facilitate site access has been classified as the same habitat and condition for the purpose of the BNG assessment.



Plate 3: View across grassland in SW corner looking NE, with Barn 4 on the left side

- 5.16 There are areas of ephemeral vegetation dominated by common chickweed *Stellaria media* with shepherd's purse *Capsella bursa-pastoris*, cleavers *Galium aparine*, Annual meadow-grass *Poa annua*, together with scattered bramble around the base of Barn 2 & Barn 4. The habitat has been assessed as urban u1b6 (SVL in BNG metric) with ruderal/ephemeral (secondary code 81).
- 5.17 A hedgerow h2a5 sits just to the north of the northern boundary, This comprises a mix of blackthorn, hawthorn, elder, ash saplings, oak and dead/dying elm with a dense bramble understorey. The elm has recently been removed.
- 5.18 The UK Habitat Classification and Biodiversity Metric equivalents are provided in Table 1 below, along with justification for the habitat choice, where relevant.

Table 1: Baseline Habitats

UK Habitat equivalent	BNG Metric & Condition	Justification
u1b5	Urban – Developed Land	n/a
u1b	Urban – Developed Land	n/a
U1f 81	Urban – ruderal / ephemeral Poor	Small areas of ephemeral vegetation around the edges of buildings Passes criteria C
Grassland Modified g4	Modified grassland - moderate	<8 sp/m2. Passes four criterion (A, C, F, G)

**Plate 4: Baseline Habitats and Condition**

Table 2: Baseline Habitat Values

Habitat type	Area (ha)	Strategic significance	Habitat units
Urban – Developed Land	0.295	Identified in TBMS	0.00
Urban - Ruderal / Ephemeral	0.001	Identified in TBMS	0.00
Grassland - Modified	0.039	Identified in TBMS	0.18
Total habitat area	0.33		0.18

Species

Bats – Foraging/Commuting Habitats

- 5.19 Whilst Barn 2 has Class Q approval, legislation and species protection are still applicable and the barn was surveyed for bats and/or evidence of bats, together with Barn 4 and the adjoining larger offsite agricultural barn. Barn is a single skin block and metal/timber construction, with an asbestos and corrugated metal sheet roof. There are large doors on the western elevation. The barn is open and light with no PRF noted externally or internally. Therefore, **Barn 2 has negligible potential** for roosting bats. Barn 4 is of a similar construction but with a shallow sloping corrugated metal sheet roof. Again, the building is light and open and **has negligible potential** for roosting bats. Whilst the remaining buildings onsite are not within the red line boundary, given their proximity and potential disturbance to any roosts that may be present, the barns were surveyed. In summary, as with Barn 2 and 4, they were light and open, with no PRF recorded – as such are also considered to have negligible potential for roosting bats.



Plate 5: Barn 2 looking northeast

- 5.20 The Application Site offers little foraging habitats, given the extent of hardstanding. However, surrounding habitats are likely to offer good foraging and commuting habitat for bats, including those associated with the Bath and Bradford on Avon SAC. However, due to the small scale of the development and size of Application Site, the loss of a small area of species poor grassland will not have a detrimental impact to the local bat population. No further survey or assessment is required but avoidance, minimisation and enhancement measures have been set out in Section 6.

Badgers

- 5.21 During the PEA survey, no evidence of badgers was identified within the ownership boundary. The wider area will offer suitable opportunities for badgers but the Application Site itself does not provide suitable sett building habitat. Precautionary construction measures have been set out in Section 6.

Breeding Birds

- 5.22 The site offers limited opportunities for nesting birds, given the lack of dense vegetation and trees. No evidence of nesting birds, current or historic were noted during the building inspection and no further survey or assessment is required. Best practice avoidance, minimisation and enhancement measures have been set out in Section 6.

Amphibians - Great crested newts (GCN)

- 5.23 The Application Site lacks vegetation that would offer shelter for great crested newts. Whilst there are waterbodies within 250m of the site, given this lack of suitable terrestrial habitat, it is considered highly unlikely that great crested newts will be impacted on by the proposals.
- 5.24 As such, whilst no further survey or assessment is required, a precautionary site clearance approach should still be adopted, as set out in Section 6 below.

Reptiles

- 5.25 As with the amphibians, the site is considered to offer negligible potential for reptiles. No further surveys or assessment is required and standard practice site clearance and construction measures are recommended.

Other protected/notable species

- 5.26 There is no suitable habitat for dormice. Other species that could be present within the locality are hedgehogs. Again, standard best practice site construction methods should be adopted, where necessary, as detailed in Section 5.

6.0 Avoidance, Mitigation and Enhancement Measures

Mitigation and Enhancement Measures

- 6.1 In line with National and Local planning policies, developments should seek to ensure the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species populations. Therefore the following section sets out avoidance and mitigation measures that should be implemented, together with enhancement opportunities, with the aim of delivering a net gain in biodiversity, in line with the mitigation hierarchy.

Development Description

- 6.2 No further surveys are required to inform the application but appropriate measures to be implemented during construction are set out below.

Development Description and Biodiversity Net Gain

- 6.3 The proposals will involve changes to the approved scheme under Class Q (ref: PL/2023/06122) and the residential conversion of a Barn 2 to Unit 6, together with other minor alterations to the design and surrounds. This will result in the loss of the areas of modified grassland, which will be incorporated into the garden for Unit 6. A proportion of the hardstanding will be converted to vegetated garden.

Table 5: Habitats Created

Habitat type	Area (ha)	Condition	Habitat units
Urban – vegetated garden	0.123	n/a	0.27
Total area (ex trees)	0.123		

Table 7: Change in Biodiversity Units

Post-Development Biodiversity Units (created & enhanced plus retained)		Pre-Development Baseline Biodiversity Units		Change in Biodiversity Units
0.27		0.18		+ 0.09 (51.98%)

- 6.4 In conclusion, the proposals results in a habitat biodiversity net gain of **51.98%** and the trading rules have been met.

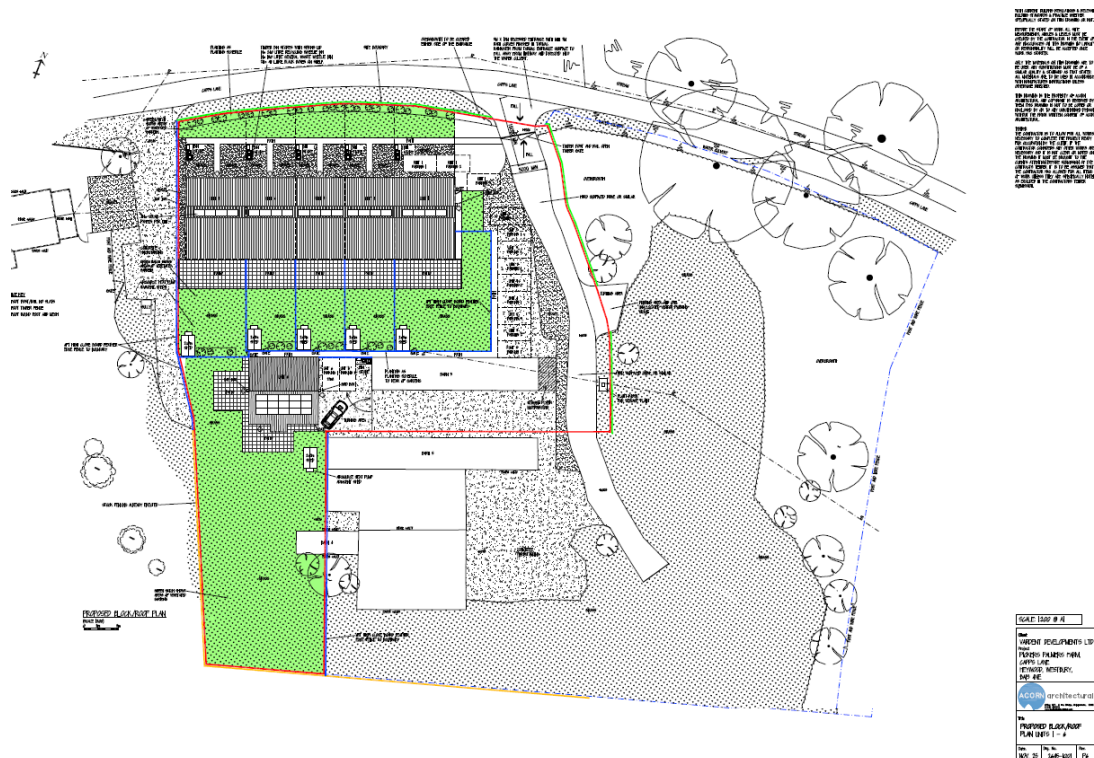


Plate 6: Proposed Landscape Plan showing areas of Vegetated Garden

- 6.5 The newly created grassland areas (within the BNG enhancement area) will be seeded with a more diverse mix, such as EL1 Flowering lawn mix⁴.
- 6.6 Given that no significant enhancement measures have been incorporated into the design, a Habitat Management and Monitoring Plan (HMMP) and monitoring is not considered necessary to implemented the above, given that it is for a small habitat area and within residential curtilage.

Mitigation Measures

- 6.7 Given the low ecological value of the site, there are minimal mitigation requirements but following measures should be implemented:
- Any new lighting will need to be sensitively designed to avoid light spill along the boundaries. This is of particular importance as the Application Site lies within the consultation zone of the Bath and Bradford on Avon SAC/TBMS . Any new lighting should be designed and adhere to the principles set out in the ILP Guidance Note 08/18 Bats and artificial lighting in the UK to avoid excessive light spill.
 - Foundation trenches and all excavations must either be covered overnight or must have scaffolding boards, or similar, placed within them to ensure that any animals that fall in are able to escape.

⁴ [EL1 Flowering Lawn Mixture - Emorsgate Seeds](#)

- Raise stored materials (that might act as temporary resting places for species such as amphibians and reptiles) off the ground, e.g. on pallets.
- Should any fencing be installed, occasional gaps must be left at the base (130 x 130mm) to allow movement of hedgehogs.

Species Enhancements

- 6.8 Habitat boxes or log piles for invertebrates, hedgehogs and reptiles can be placed along the eastern, western and northern boundaries to provide opportunities for species. During the conversion of Barn 2, two integral bat boxes should be installed on the southern gable (i.e. [1FE Schwegler Bat Access Panel | NHBS Practical Conservation Equipment](#) or [Vivara Pro Build-in WoodStone® Bat Box | NHBS Practical Conservation Equipment](#))
- 6.9 The hedgerow that sits to the north of the Application Boundary would be infilled with additional species, including the following mix:
- Hazel *Corylus avellana*
 - Field maple *Acer campestre*
 - Bird cherry *Prunus padus*
 - Blackthorn *Prunus spinosa*
 - Rowan *Sorbus aucuparia*
- 6.10 In conclusion, the Application Site comprises minimal habitats of low value and has negligible potential to support protected/notable species. A 10% net gain in biodiversity can be delivered and the proposals are in line with National and Local Planning Policy.