



Preliminary Ecological Appraisal

Barn at Lifely Farm, West Ashton, Trowbridge, BA14 6AU

For Mark Doodes Planning and on behalf of Mr Jason Strickland

February 2026

DOCUMENT CONTROL SHEET

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Preliminary Ecological Appraisal

Client: Mr Jason Strickland

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1.0 Introduction

1.1 Herdwick Ecology Ltd has been commissioned by Mark Doodes Planning and on behalf of Mr Jason Strickland to undertake a Preliminary Ecological Appraisal (PEA) at Barn at Lively Farm, West Ashton, Trowbridge, BA14 6AU (Central Reference ST 8886 5656) to inform proposals for conversion of the existing barn to two detached self-build dwellings. The barn was granted Class Q approval by Wiltshire Council in January 2026.

1.2 This report has been prepared to support a full planning application to Wiltshire Council and aims to:

- Describe and evaluate the habitats present within the study area;
- Collate relevant biological records and assess their significance;
- Identify any protected species issues or potential issues that may exist; and
- Assess possible ecological constraints to development and make recommendations to avoid, minimise and mitigate for any potential impacts during the development of a detailed application; 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.

1.3 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.

2.0 Legislation and Planning Policies

2.1 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

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.

- 2.2 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:
- 2.3 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..."*
- 2.4 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'.*
- 2.5 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.
- 2.6 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.

2.7 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)

2.8 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

2.9 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).

2.10 The BNG Regulations also include ‘The Biodiversity Gain Requirements (Exemptions) Regulations 2024’ which prescribe exemptions for categories of development to which biodiversity net gain does not apply. One exemption is:

- Self-build and custom build applications
 - You must meet all of the following conditions to qualify for an exemption as a self-build or custom build. The development must:
 - consist of no more than 9 dwellings
 - be on a site that has an area no larger than 0.5 hectares
 - consist exclusively of dwellings that are self-build or custom housebuilding as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015

Local Plan

2.11 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

- 2.12 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

- 2.13 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 yellow zone for impacts to habitats and within the grey zone for recreational pressure and a financial contribution will be required, as detailed in the TBMS.**

Species Protection

- 2.14 A number of species, including all bats and great crested newts, are afforded protection under The Wildlife and Countryside Act 1981 (as amended).
- 2.15 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.
- 2.16 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.

- 2.17 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.
- 2.18 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.
- 2.19 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”.*
- 2.20 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.

3.0 Methodology

Data Search

- 3.1 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

³ <https://magic.defra.gov.uk/>

portal was searched for nearby applications. Given the small scale and nature of the development, a data request from the records centre was not considered necessary to support this application.

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- 3.2 The site was surveyed on 6th February 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 wet and overcast, with a temperature of 7°C. There had been heavy rain in the preceding days. Habitats and obvious features were classified under the UKHab criteria.

Bat Foraging Habitat Assessment

- 3.3 Given that the site sits within the 'yellow zone' of the TBMS, the habitats onsite were considered further for their value to commuting and foraging bats, as set out in the Survey Guidelines⁴ and provided in the Table below.

Table 1: Habitat Suitability Assessment

Potential Suitability	Description
None	No habitat features on site likely to be used by any commuting or foraging bats at any time of year
Negligible	No obvious habitat features onsite likely to be used by bats as flight-paths or foraging bats; small element of uncertainty remains in order to account for non-standard behaviour.
Low	Habitat that could be used by small numbers of bats as flight paths such as gappy hedgerows or unvegetated stream, but isolated and not well connected to the surrounding habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree or patch of scrub.
Moderate	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub, linked back gardens Habitat that is connected to the wider landscape that could be used by foraging bats such as trees, scrub, grassland or water.
High	Continuous, high quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight paths such

⁴ Collins, J (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Ed.) The Bat Conservation Trust, London

	as river valleys, streams, hedgers, lines of trees and woodland edge. High quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and well connected to known roosts.
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4.0 Baseline Conditions

- 4.1 The site is located at Home Farm in a rural location to the south east of Trowbridge and to the south of West Ashton. The Application Site is access off the A350 that lies 110m to the west. There are a number of parcels of woodland within the locality, with good connectivity to Clanger Woods



Plate 1: Site Location

Data Search

Statutory Designated Sites

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

4.2 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 Clangers Wood Site of Special Scientific Interest (SSSI) lies 1.4km to the south/south west.

4.3 The Salisbury Plain Special Protection Area (SPA) and Special Area of Conservation (SAC) lies 4.5km 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. As the site sits within the 6.4km recreational pressure buffer zone for the SPA and as the proposals will result in a net increase in overnight accommodation, there is 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 is likely to be required.

Non-statutory Sites

4.4 East Flowers Wood ancient woodland/Woodside Wood County Wildlife Site (CWS) and is located approximately 60m to the south/south west of the Application Site. Bechstein bats are known to be present within this woodland.

Habitats

4.5 The broadleaved woodland immediately adjacent to the SW corner of the Application Site has been identified as deciduous woodland, a Priority Habitat. However, during the survey, whilst this area was not accessible, it was noted that the habitats were more likely to be grassland with scattered scrub and trees. The Wiltshire Planning Portal was subsequently reviewed and this was confirmed via a detailed planning application (Ref: PL/2021/09453) that mapped the area as improved grassland.

4.6 The blocks of woodland to the north, east and south have also been recorded as Priority Habitat.

Species

4.7 There is a single European Protected Species (EPS) licence for bats within 2km of the site:

- Common pipistrelle bat resting place (dated 2015-2020) 1.36km southwest

4.8 A single great crested newt licence is also present 1.35km southwest. A waterbody that lies approximately 698m to the south returned a negative eDNA result in 2018.

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4.9 The Application Site is accessed via an existing gravel track off the A350 Yarnbrook Road. It comprises the agricultural barn, with the red line application boundary predominately following the footprint of the building, extending a small distance from each gable. These areas consist of hardstanding and loose

hardcore (UKHab u1b) with some ruderal vegetation developing around the edges of the building (g3c 10 81). There are small areas of more established grassland to the southeast and northeast corners of the Application Site which comprises a mix of unmanaged grassland (g3c), with tussocks of false oat grass *Arrhenatherum elatius* with rye grass *Lolium*, and Yorkshire fog *Holcus lanatus* and cock's foot *Dactylis glomerata* within the wider areas of grassland. Forbs were limited at the time of the survey with cleavers *Galium aparine*, creeping buttercup *Ranunculus repens*, broad leaved dock *Rumex obtusifolius*, rib-wort plantain *Plantago lanceolata*, white clover *Trifolium repens*, dandelion *Taraxacum officinale* and chickweed *Stellaria media*, with denser areas bramble *Rubus fruticosus* at the base of the building, with nettle *Urtica dioica* and ash *Fraxinus excelsior* saplings.



Plate 2: Application Boundary and Baseline Habtiats

- 4.16 The barn is of a modern construction comprising a steel frame and single skin breeze block walls. It has pitched corrugated sheet roof with the sheeting extending to the wall plate on the gables. There is a gap along the roof line and wall plate along the elevations, allowing direct access into the barn. There are five 'windows' on each elevation, which have timber shutters that were sealed. There are large steel doors on each gable.
- 4.17 Internally the barn is light and open with skylights and light ingress via the gap along the wall plate and over the doors. The barn is divided into smaller stalls for livestock but is currently used for agricultural storage. There is an small sealed section on the western elevation, with the rest of the barn open to the roof line. No bats or evidence of bats were noted and the barn is considered to offer **negligible potential**

for roosting bats being light, open and with fluctuating conditions. In addition, whilst the surrounding habitats will offer good foraging opportunities for bats, the Application Site itself provides **negligible potential for foraging/commuting bats**. Therefore, no further bat surveys are required to inform the planning application.

- 4.18 No evidence of historic bird nesting was noted within the barn and the disturbance levels may be too high to provide suitable opportunities. However, common species of bird may still utilise the barn, therefore precautionary works practices are set out below.

Other Protected/Notable Species

- 4.19 Whilst the habitats surrounding the Application Site offer habitats for numerous species, given the small red line boundary/scale of the works and the minimal habitats that will be directly impacted, no further species surveys are recommended.
- 4.20 Precautionary and best practice construction methods have been set out below, together with recommendations for enhancements for species.

5.0 Avoidance, Mitigation and Enhancement Measures

- 5.1 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.

Development Proposals

- 5.2 The proposed development will result in the demolition of the barn to allow for the construction of two detached self-build dwellings.

Biodiversity Net Gain Assessment

- 5.3 As set out in Section 2, applications for self-build are BNG exempt and therefore a full assessment is not required. There is still the expectation that there will be no net loss and developments should seek to provide ecological enhancements in line with local planning policies.

Designated sites

- 5.4 The site lies within the recreational pressure buffer of Salisbury Plain SPA and, as the proposals will result in an increase in overnight accommodation, the competent authority will be required to carry out an HRA, which is likely to lead to the requirement of a financial contribution.

- 5.5 Furthermore, as set out above, the site sits within the yellow zone for impacts to bat habitat and within the grey zone for recreational pressure. As such, a financial contribution will be required, as detailed in the TBMS that is associated with the number of new residential units. Whilst there is no direct loss to or impacts on features that could be used by bats, degradation of the habitats could still occur through insensitive lighting. Appropriate mitigation measures are set out below to ensure that there will be no adverse effect on the integrity of the SAC.

Mitigation Measures – Lighting

- 5.6 Any new lighting will need to be sensitively designed to avoid all impacts to the adjacent vegetation, in particular to the scrub/tree line along the north/west to ensure a dark continuous corridor is maintained. This is of particular importance given the proximity of the designated sites. An appropriately worded condition can be attached to the planning consent with regards to any new lighting, which should adhere to the principles set out in the ILP Guidance Note 08/23 Bats and artificial lighting in the UK⁵.

Other Mitigation Measures

- 5.7 The following mitigation measures will be implemented and can be also be secured within a planning condition:
- 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.
 - It is not anticipated that there will be any significant vegetation removal. Any vegetation removal must avoid the breeding bird season, which generally runs from March to August and a building check should also be carried out. If works are to be undertaken during this time then a check for breeding birds should be undertaken by an experienced ecologist prior to works starting. If an active nest is found then works will need to wait until the chicks have fledged, or an appropriate buffer zone implemented to ensure no disturbance to the active nest.
 - Raise stored materials (that might act as temporary resting places for species such as amphibians and reptiles) off the ground, e.g. on pallets.
 - Any close board fencing should have occasional gaps along the base of at least 13cm x 13cm to allow movement of species such as hedgehog.

Species Enhancements

- 5.8 It is recommended that three in built bat boxes are installed on each new unit. They should be positioned as high as possible on the south/southeast elevation and away from windows, door or any

⁵ <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

light sources. Three universal swift boxes should also be installed on each new unit. These bird boxes should be positioned at least 6-7m in height on the north/northwestern elevation, again, away from any window and light sources.

- 5.9 There are minimal opportunities to incorporate habitat enhancements due to the spatial restrictions of the red line, but where feasible/applicable, wildlife friendly garden plant species could be used, together with a more diverse lawn mixture
- 5.14 Taking the above into account, whilst the Application Site lies within an ecological sensitive area primarily for bats, providing the mitigation measures stated above are implemented, it is considered the proposed development does not contravene the local planning policies (Policy 50 & TBMS) and will seek to deliver a net gain in biodiversity in line NPPF.

