

PURE ECOLOGY

Great Thornham Farm, Seend

Melksham

Wiltshire

SN12 6PN

Protected Species Report



April 2026



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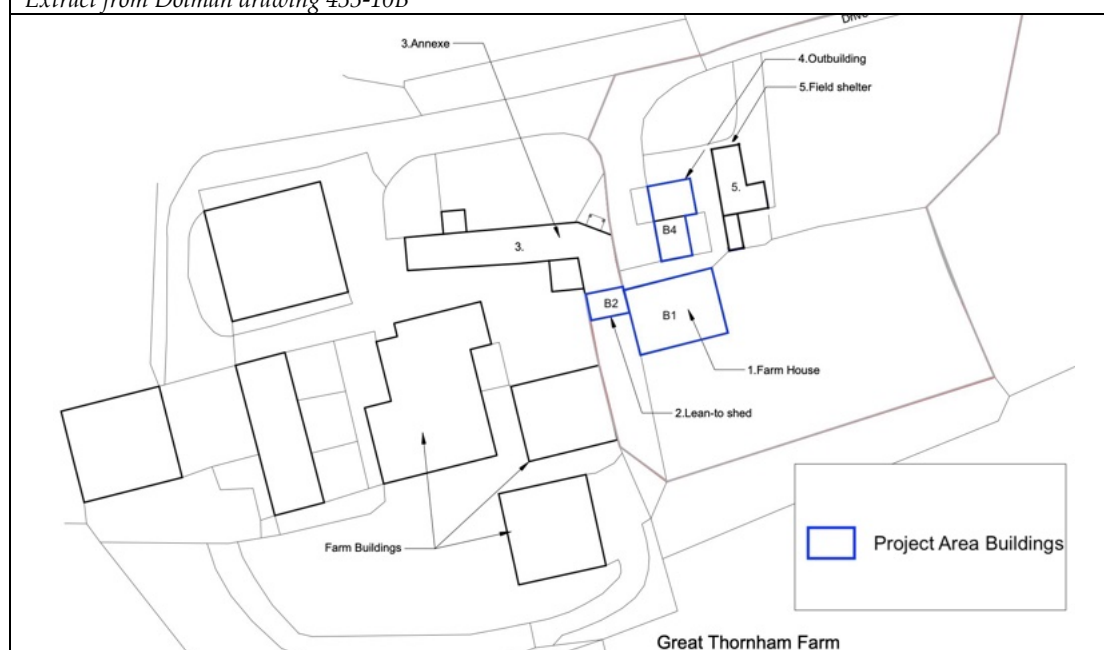
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1 Introduction

1.1 Site Description

Great Thornham Farm is situated approximately 1.8km south-west of the village of Seed and is 4km south-east of Melksham. The Project Area for this ecology assessment is shown in **Figure 1** and is located at National Grid Reference ST 93025 59620. The buildings have been referenced according to the numbering scheme shown on the existing block plan produced by Dolman Building Services (drg. Ref. 4433-10D) and the Project Area comprises the farmhouse (B1), a lean-to shed (B2) and an outbuilding (B4).

*Figure 1. Site Plan Showing the Project Area Buildings.
Extract from Dolman drawing 433-10B*



1.2 Proposed Scheme

A planning application is being prepared to remodel and refurbish the farmhouse (B1). The proposal also includes the removal of the lean-to shed (B2) and outbuilding (B4). The proposed block plan and elevations are shown in Dolman drawings 4433 -10D, a copy of which is provided in **Appendix 1**.

1.3 Scope of the Study

Pure Ecology has been commissioned to prepare a protected species survey, which includes a bat roost assessment of the farmhouse (B1) and other Project Area buildings (B2 and B4), and mitigation strategy to support a planning application for remodelling and refurbishing the farmhouse at Great Thornham Farm (described in **Section 1.2**).

The ecological assessment has been informed by existing baseline data obtained from the Wiltshire & Swindon Biological Records Centre and field surveys in 2025 that include a visual inspection and nocturnal bat surveys of the Project Area buildings.

The ecology report has been prepared by Anna Gundrey and Anton Kattan, consultant ecologists and Natural England licensed bat workers with a combined 55+ years' professional experience who are both full members of the Chartered Institute of Ecology and Environmental Management (CIEEM).

The specific aim of this study is to survey and assess the Project Area buildings for bats and other protected species that can be associated with buildings (e.g. nesting birds). This report discusses the predicted impacts of the Proposed Scheme on bats and other protected species, and establishes appropriate mitigation requirements as required. Advice is given on the legal protection for bats and licensing requirements under The Conservation of Habitats and Species Regulations 2017.

This planning application is exempt from Biodiversity Net Gain (BNG) as the proposed development does not impact a priority habitat and impacts less than 25 square metres (5m by 5m) of on-site habitat and less than 5 metres of on-site linear habitats such as hedgerows.

2 Planning Context

2.1 National

The National Planning Policy Framework (NPPF), December 2024, requires that the planning system should conserve and enhance the natural environment (Section 15) by, *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils* (para 187).

Scheme plans should 'promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species' and 'identify and pursue opportunities for securing measurable net gains for biodiversity' (para 192).

Local planning authorities should aim to protect and enhance biodiversity by applying the following principles (para 193):

- 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) Development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any border impacts on the national network of Sites of Special Scientific Interest;
- c) Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland or ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- 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 integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

2.2 Wiltshire

The Wiltshire Core Strategy (Adopted January 2015) sets out the relevant policies relevant to biodiversity, as follows:

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 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:

- Cannot reasonably be avoided
- Are reduced as far as possible
- Are outweighed by other planning considerations in the public interest and
- 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.

3 Methodology

3.1 Desk Study

Records of designated wildlife sites, protected/notable species and priority habitats from the Wiltshire and Swindon Biological Records Centre (WSBRC) within a 1km radius of the Project Area were obtained on 28th January 2025. This search area allows notable and relevant wildlife sites, habitats and species to be highlighted and taken into consideration through the ecological appraisal process.

A review of OS maps and satellite imagery was undertaken to establish the local context within which the Project Area sits and to identify whether any natural features of interest, particularly ponds, were located within 500m of the site.

A review of the following website and documentation was also completed:

- Magic website (www.magic.defra.gov.uk) for statutory designations 2km (national) and 5km (international) from Great Thornham Farm
- “*Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire*” (version 3.0 dated 10th September 2015)

Results of the desk-based study are integrated into the relevant baseline results in **Section 4**.

3.2 Field Survey

3.2.1 Bat Building Inspection

A daytime inspection of Project Area buildings B1,B2 and B4 (**Figure 1**) was undertaken on 28th July 2025 to look for evidence of bats and to assess the potential of the buildings to provide shelter for bats. “Building 5” [outside the project area] (also shown on **Figure 1**) was also inspected as part of the initial appraisal [but the building was not subsequently included in the proposed scheme]. The inspection for bats included a search for field signs such as droppings, animal carcasses or skeletal remains that could indicate previous use of the buildings by bats. The survey was carried out in accordance with good practice guidelines published by the Bat Conservation Trust (Collins, 2023). A powerful Clulite torch with a 500m spot beam, an endoscope, and binoculars were used to examine the building exteriors and interiors.

The suitability of the buildings to support roosting bats was assessed according to the following categories:

1. **Negligible potential/not a roost:** no suitable features.
2. **Low potential:** one or more suitable features that could be used by individual, or very low numbers of bats opportunistically.
3. **Moderate potential:** one or more suitable features that could be regularly used by bats, but sub-optimal conditions may limit the potential for breeding or hibernating bats.

4. **High potential:** one or more roost features that are suitable for use by a colony of bats on a regular basis and may support a maternity or hibernation site.
5. **Confirmed roost:** evidence of current/recent bat occupation.

3.2.2 *Bat Activity Surveys*

Three nocturnal bat activity surveys of buildings B1, B2 and B4 were subsequently undertaken on 5th and 28th August and 29th September 2025 in accordance with guidance for professional survey standards (Collins J (ed.), 2023). Building B5 was assessed during the initial inspection as having negligible potential to support bats and so was not included in subsequent activity surveys.

Each nocturnal survey was covered by at least four survey positions, with each position being monitored on every survey either by a surveyor equipped with a full-spectrum bat detector and IR camera or a remote camera (with accompanying bat detector), as shown in **Figure 2**. The surveyors were able to move around their positions (S1-S3) to scan for bats leaving or entering the buildings.

Surveyors were equipped with a full-spectrum bat detector and [recordable] Night Vision Aid (NVA) and were able to move around their positions to scan for bats leaving or entering the buildings. The following survey equipment was employed at the site:

- NVA – Nightfox Whisker night vision binoculars (with built in IR light) or Canon XA11 and XA40 (with IR torch).
- Static, remote IR cameras – Canon XA11 and XA40 with independent IR lamps that “illuminated” the cameras’ field of view.
- Bat detectors - Elekon Batscanner, Elekon Batlogger M, Wildlife Acoustic Echometer Touch Pro and/or Batbox Duet.

The full-spectrum bat detector could record bat calls for subsequent species identification using Wildlife Acoustic’s Kaleidoscope computer software (version 5.4).

A full-spectrum bat detector was also placed alongside the static, remote IR camera positions (C1 -C2) to record bat echolocation calls on time-stamped files that can be linked to the roost emergence time of bats recorded on the cameras. The IR camera recordings were analysed post-survey by reviewing the footage in real-time. The remote IR camera fields of view are shown in **Appendix 2**.

Table 1. Timings and Weather Conditions for Bat Activity Surveys

Date	Survey Period (hrs)	Sunset (hrs)	Weather
05/08/2025	20:05 – 22:15	20:35	0% cloud, 26-22°C, Wind BF 1, Dry.
28/08/2025	19:40 – 21:45	20:02	100% cloud, 14°C, Wind BF 3. Light rain.
29/09/25	18:30 – 20:45	19:03	0% cloud, 14-11°C, Wind BF 2, Dry
BF – Beaufort Scale			

Figure 2. Observation Points for Bat Activity Surveys and Roost Locations



3.3 Personnel

The surveys were led by Anton Kattan MCIEEM a consultant ecologist with 23 years' experience and licensed bat worker (Natural England CL18 2015-12201-CLS-CLS), with Phil Vincent MCIEEM, 22 years' experience, and holder of a Level 2 Natural England bat survey licence ref. CL18 2020-49360-CLS-CLS, and Dr. Stephen Dangerfield MCIEEM CEnv, a consultant with thirty years professional experience and licensed bat worker.

3.4 Study Constraints, Deviations and Limitations

There were no constraints to the study, all areas of the buildings were accessible for survey and weather conditions were good during the surveys.

4 Results

4.1 Designated Sites

4.1.1 Statutory Designations

There are no statutory designations covering the Project Area, or wider Great Thornham Farm.

There are no European designated nature conservation sites within 5km of the Project Area and no national nature conservation designations within 2km.

The closest Sites of Special Scientific Interest (SSSI) are Seend Cleeve Quarry SSSI and Seend Ironstone Quarry and Road Cutting SSSI, which are both designated for geological reasons, and are located approximately 1.45km and 1.48km north/northeast of the Project Area. These SSSIs will not be affected and are not relevant to this ecology study.

The Site is not within a relevant SSSI Impact Risk Zone (IRZ) as defined by Natural England). IRZ's are a tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs within define zones, which reflect the particular sensitivities of the features for which the SSSI is notified and indicate the types of development proposal which could potentially have adverse impacts.

Although there are no European designated nature conservation sites within 5km, the Project Area is located within the Bath and Bradford-on-Avon Bats SAC impact zone defined by Wiltshire Council (as shown on the WSBRC sites map in **Appendix 3**). The impact zone includes the landscape around Seend because of a significant lesser horseshoe bat (*Rhinolophus hipposideros*) maternity roost (peak roost count 150+ adults and juveniles) within the 1 sq km NGR area ST9259 (exact location withheld), placing Great Thornham Farm within 1.5km of this roost. The roost meets the criteria of a "Core Roost"¹ for lesser horseshoe bats, an Annex II species present as a qualifying feature, but not a primary reason for site selection at Bath and Bradford-on-Avon Bats SAC. Although the Project Area is not located within any of the bat SAC consultation zones defined in Wiltshire Council's *Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire* (dated 10th September 2015), the guidance is considered to apply to this more recent consultation zone.

Further details of the lesser horseshoe bat roost records are provided in **Section 4.3.1**.

¹ Criteria for Core Roost include breeding roosts for lesser horseshoe bats that support 100+ bats

4.1.2 Non Statutory Designations

There are no non-statutory designations covering the Project Area, but farmland at Great Thornham Farm is a designated Local Wildlife Sites (LWS) – see **Table 2**.

Table 2 summarises the details relating to non-statutory Local Wildlife Sites (LWS) located within 1km of the Project Area. The WSBRC designated sites plan is provided in **Appendix 3**.

Table 2: Non-statutory Local Wildlife Sites (LWS) within 1km of the Development Site

Site Name	Map Ref. (App 3)	Description	Proximity to Project Area
Great Thornham Farm	ST95.001	A series of wet pastures with swamp and reed beds adjacent to the Semington Brook	0.3km West
Woodhouse Fen	ST95.025	Wet fen on spring line and flushes dominated by lesser pond sedge, but with species-rich patches.	0.6km North-west

4.2 Habitat Context

The Project Area is within the farmyard at Great Thornham Farm. The ground is laid to hard standing to the north and west of the farmhouse (B1) and between B4 and “Building 5” (see **Photos 3 & 4** below). To the south and east of the farmhouse (B1) is a large lawned garden (**Photo 2**) and there is a small area of lawn and shrubs at the entrance to the farm. To the east, the animal shelter (Building 5) fronts onto a field of tightly grazed agriculturally improved grassland.

4.3 Bats

4.3.1 Desk Study

WSBRC provided records of five bat species, confirming common pipistrelle *Pipistrellus pipistrellus*, Natterer’s *Myotis nattereri*, serotine *Eptesicus serotinus*, brown long-eared *Plecotus auritus* and greater horseshoe *Rhinolophus ferrumequinum* are present within the 1km search area. The exact locations of roosts is not provided by WSBRC, but the data includes the following information:

- The nearest roost is a record of brown long-eared bats within 250m of the Site with a count of three bats recorded in 2023.
- There are three records of greater horseshoe bat roosts that are over 730m north-east of the Site between 1989-2017, which includes a hibernation site.

There is a confirmed lesser and greater horseshoe bat roost within 1.5km of the Site. The roost is considered to support a significant population of these Annex II species that are a qualifying feature of the Bath and Bradford-on-Avon Bats SAC, as discussed in **Section 4.1.1**. Data on the roost includes:

- Lesser horseshoe bat maternity roost records from 2020 and 2021 with a peak count of 150+ bats (29/07/2021).

- Greater horseshoe bat hibernation records from 2020 and 2021 with a peak count of 13 bats (27/11/2020).

4.3.2 Building Description

4.3.2.1 Farmhouse (B1) and lean-to shed (B2)

The core of the farmhouse (B1) is stone-built with a tiled pitched roof (**Photo 1**). There is a single-storey extension with mono-pitched roof attached to the east gable (**Photo 2**). A two-storey hipped extension (**Photos 3 & 4**) and a single-storey mono-pitch extension (**Photo 4**) extend from the north elevation.

A small lean-to shed (B2) is attached to the west elevation of the house and fronts onto the farmyard (**Photo 3**). The walls are a single skin of overlapping boards, with a corrugated metal roof. The single room within has a ceiling, creating a shallow void below the roof that could be accessible to bats via the open roof edge.



All roofs are clad with clay pantiles, which are mostly intact and tightly fitting apart from some small areas of lifting on the small hip on the east aspect (**Photo 5**), and on the north aspect, around the gabled chimney (**Photo 6**), and where the single-storey extension joins the main roof (**Photo 7**).



The majority of bat roost potential relates to the barge boarding and fascias at the eaves of the house. The barge board around the west gable is lifted (**Photo 8**), the fascias on the south elevation have gaps (**Photo 9**) and the barge board on the gabled chimney on the north aspect is open at the end (**Photo 6**).



Internally the attic of the main roof is converted into living space and well-sealed from bats (**Photo 10**). The roof void above the two-storey hipped extension (**Photo 11**) is lined with modern roofing membrane and rises to an approximate height of 2.4m at the apex. There was no evidence of bats, but light could be seen at the eaves (**Photo 12**) demonstrating that access for bats was possible.

<i>Photo 9. Gaps under the fascia (South)</i>	<i>Photo 10. Attic room under main roof</i>
	
<i>Photo 11. Attic under hipped extension</i>	<i>Photo 12. Light visible at eaves of attic</i>
	

4.3.2.2 Outbuilding (B4)

The outbuilding (B4) is a single-storey pitched building (**Photo 13**), with the eastern pitch of the roof extending to cover a lean-to (**Photo 14**). The north section is block-built with a corrugated asbestos roof and the south section is stone-built with a pantile roof. On the east aspect, a central section is open (**Photo 14**) and there is an open section at the southern end (**Photo 15**).

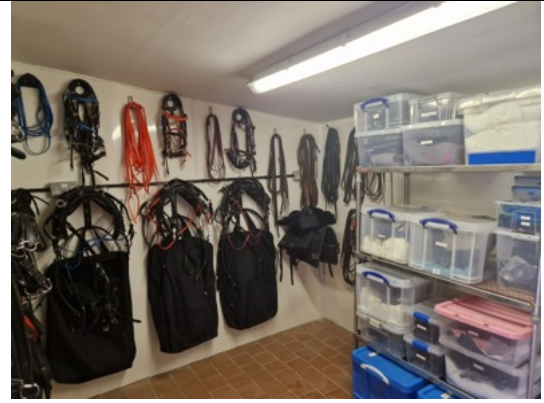
<i>Photo 13. B4 West elevation</i>	<i>Photo 14. B4 East elevation</i>
	

The southern section is a tackroom (**Photo 16**) with a lined roof void above that is a well-lit, actively used store-room (**Photo 17**). There are no opportunities for bats within this section, but gaps at the roof edges and under the tiles would allow access for bats to the space between the tiles and the wooden lining.

Photo 15. South elevation of B4



Photo 16 Interior Southern end of B4



The northern section is a single open space, with an open mezzanine. The roof is unlined (**Photo 18**). No evidence of bats was found within, but access would be possible for bats via gaps at the ridge and roof edges. The exterior does not offer any crevice roost spaces.

Photo 17. Attic room South end B4



Photo 18. Interior North end B4



Outside the Project Area, the animal shelter (Building 5) (**Photos 19 & 20**) is of a 'garden shed' type construction with walls composed of a single skin of overlapping boards, and a pitched fibreboard roof. It is open on the east aspect, where it faces onto the adjoining field. No evidence of bats was found, and it lacks any crevices or dark voids that could conceal a roosting bat.



4.3.3 Confirmed Roosts

Bats are confirmed to be roosting in both the farmhouse (B1) and the outbuilding (B4). The numbered roosts are listed below and can be cross-referenced with **Figure 3**. Images of the roost locations are provided in **Appendix 4**.

Farmhouse (B1)

5th August 2025.

20:54hrs 1 x common pipistrelle from eaves of east gable (**R1**)

28th August 2025

20:42hrs 1 x common pipistrelle from eaves of west gable (**R2**)

20:28hrs 1 x common pipistrelle from east extension roof (**R3**)

20:32hrs 1 x common pipistrelle from north end of east extension roof (**R4**)

Outbuilding (B4)

29th September 2025

19:29hrs 1 x common pipistrelle from door frame on west aspect of outbuilding (**R5**)

19:40hrs 1x Brown long-eared from south-east corner of outbuilding (**R6**)

4.3.4 Bat Activity

5th August 2026

Frequent foraging activity around the buildings by single common pipistrelle and brown long-eared bats, and less frequently also single soprano pipistrelle and lesser horseshoe bats. One brief *Myotis* sp. pass.

28th August 2026

Frequent common pipistrelle foraging activity and less frequent activity from soprano pipistrelle bats. Occasional passes by brown long-eared bats, *Myotis* sp. and noctule bats

29th September 2026

As for previous surveys - frequent foraging activity by a single common pipistrelle and occasional activity by soprano pipistrelle bats. Also, infrequent passes by brown long-eared bats, lesser horseshoe bats (single contact) and several passes from noctule.

Figure 3. Bat Roost Locations within the Project Area Buildings



4.4 Other Protected Species

4.4.1.1 Great Crested Newts

WSBRC holds one record of great crested newt *Triturus cristatus* within 1km of the Site. This is located over 350m north of the Site and was recorded in 1991.

There are no ponds shown on OS mapping within 250m of the Site, and the terrestrial habitats surrounding the buildings offer negligible cover or foraging opportunities for great crested newts.

Great crested newts are predicted to be absent from the Project Area.

4.4.1.2 Reptiles

There are no WSBRC record within the past 45 years of reptiles within the 1km search area.

There is no suitable grassland habitat within the Site for supporting reptiles. There is no shelter/ refugia within the grassland and no foraging opportunities within the Project Area.

Reptiles are predicted to be absent from the Project Area.

4.5 Birds

4.5.1 Desk Study

There are records of some notable birds within 1km of the Site, including farmland and hedge/scrub/garden species such as starling *Sturnus vulgaris*, linnet *Linaria cannabina*, house sparrow *Passer domesticus* and spotted flycatcher *Muscicapa striata*. Winter visitors include fieldfare *Turdus pilaris* and summer visitors include swift *Apus apus*. Birds of prey include red kite *Milvus milvus* and hobby *Falco subbuteo*.

No evidence of nesting birds was recorded in the Project Area buildings.

The grassland of the garden and adjacent field is unsuitable for ground nesting species having a short sward height, small area enclosed by fences/ hedges and suffering disturbance from farm activities (included regular activity within the neighbouring farmyard).

Breeding birds are not a constraint to the Proposed Scheme.

4.6 Other mammals

There are records of badger *Meles meles* within the local landscape, but no badger setts or other badger activity was recorded within the Project Area, or immediate surrounding garden and field.

There are records of hedgehog *Erinaceus europaeus* and brown hare *Lepus europaeus* within 1km. It is unlikely that hare would be present in the vicinity of the farmyard, but hedgehogs may occur at the garden and field boundaries.

None of these species are considered to be a constraint to the Proposed Scheme.

5 Ecological Impact Assessment

5.1 Legislative Context

The legal protection afforded to key habitats and species has informed the scope of the ecological studies undertaken to determine baseline conditions and guided measures that will protect and benefit valued ecological resources associated with the site. Details of relevant legislation are provided in **Appendix 5**.

5.2 Designated Sites

5.2.1 Statutory

Under the European Union (Withdrawal) Act 2018, EU-derived domestic legislation, such as existing environmental regulations that implement EU Directives, and Direct EU legislation (such as The Conservation of Habitats and Species Regulations 2017) which were in force immediately prior to the end of the transition period continue to form part of UK domestic law. Special Areas of Conservation (SAC) are designated under The Conservation of Habitats and Species Regulations 2017. The regulations provide for the designation and protection of European Sites, the protection of European protected species and the adaptation of planning and other controls for the protection of European Sites. SSSI are notified and protected under the Wildlife and Countryside Act 1981 (as amended). These sites are notified for nature conservation purposes as they support the best examples of the UK's habitats, flora and/ or fauna.

The Project Area is not covered by any European or national nature conservation designations. There are no statutory designated wildlife sites within 2km of the Project Area and the Proposed Scheme does not fall within any of the development categories defined by the Impact Risk Zone (IRZ) for SSSIs.

The proposed scheme will not result in changes to the current residential/ agricultural landuse and is also considered to be sufficiently remote from statutory designated sites that there are no predicted impact pathways between the development and these wildlife sites.

The potential effects of the Proposed Scheme will be fully contained within the Project Area, and will not alter the existing baseline conditions of the European designated sites for bats covered by the *Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire* (see **Section 4.1.1**) in terms of habitat structure and function, or pressures on the sites, and will have no impact on the known bat roosts associated with qualifying species at the European sites, such as the lesser horseshoe roost within 1.5km of the Site that is considered to be a functionally linked Core Roost to the Bath and Bradford on Avon Bat SAC (see **Section 5.4**).

There will be no significant loss of grassland and boundary habitats will remain intact and undisturbed both physically and environmentally. It can also be concluded that

Proposed Scheme will not result in any significant loss or damage to the Bath and Bradford on Avon Bat SAC, or populations of the qualifying bat species it supports.

- The Proposed Scheme will not destroy, damage or significantly disturb the population of the designated qualifying bat species (for example, breeding or hibernating lesser horseshoe bats and their roosts);
- The Proposed Scheme will not harm ecological connectivity within the wider landscape, for example, removing or significantly damaging/fragmenting a hedgerow that could help to support SAC qualifying bat species;
- The Proposed Scheme will not reduce the ability of the Bath and Bradford on Avon Bat SAC to support the designated bat species within their natural range within the county; and
- The Proposed Scheme does not restrict access to habitat resources that are important to the Bath and Bradford on Avon Bat SAC qualifying bat species.

The bat assessment provides sufficient information to predict impacts on local bat populations, including lesser and greater horseshoe bats and provides a suitable ecological baseline to allow Wiltshire Council to assess likely significant effects on the SAC as part of the [Stage 1] Habitat Regulations Assessment.

5.2.2 *Non-Statutory*

The Project Area is not covered by local designations for nature conservation. Great Thornham Farm LWS and Woodhouse Fen LWS are both buffered from the Proposed Scheme by intervening farmland. There are no ecological impact pathways between the Project Area and any designated wildlife sites within the local area.

The impact of the Proposed Scheme on these LWS is neutral, and no additional mitigation is required. This is in accordance with Wiltshire Core Policy 50. Locally designated sites are not a constraint to the Proposed Scheme and are not discussed further in this report.

5.3 **Surrounding Habitats**

Under the NERC Act 2006, certain habitats of conservation concern should be conserved and enhanced through Public Body (i.e. Local Planning Authority) decision making processes, where reasonably possible. These habitats are listed under Section 41 of the NERC Act 2006, and are known as Habitats of Principal Importance. Habitats of Principal Importance are afforded protection under National Planning Policy Framework (NPPF) and applicable Local Policies.

There are no Habitats of Principal Importance within the Project Area. The garden lawn and agriculturally improved grassland present within the Project Area is a common and widespread habitat throughout lowland Britain and is a modified habitat that is readily re-creatable. As such the grassland is of intrinsically low ecological value and has been evaluated as important with the Local (Site) context only.

The scheme will not result in the loss of change of use of any of the surrounding habitats and as such will have a negligible impact on the habitat resource at the Site.

5.4 Bats

Bats are protected under the Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000) and under The Conservation of Habitats and Species Regulations 2017. All species of bat are present on Schedule 2 of the Conservation of Habitats and Species Regulations 2017 and are subject to the provisions of Regulation 42 of those Regulations. Taken together, these protect bats from disturbance, injury or killing and make it an offence to damage, destroy or obstruct a breeding site or resting place they use.

5.4.1 Interpretation of Bat Survey Results

Buildings B1 and B4 support confirmed bat roosts with common pipistrelle and brown long-eared bats roosting within the Project Area building locations listed in **Section 4.3.3** and shown on **Figure 3**. Only low numbers of each species (maximum roost count of three bats) were observed, indicating that the roosts are non-breeding roosts described as follows:

- Single **common pipistrelle bats** have been recorded emerging from four locations on B1 and one location on B4, with different locations being utilized on each survey. The results indicate that the buildings provide an occasional day roost for small numbers of non-breeding bats.
- A single **brown long-eared bat** was recorded emerging from one location on B4 during one survey only. The result indicates that B4 provides an occasional day roost for a single non-breeding bat.

5.4.2 Evaluation of Bat Roosts

The significance of the common pipistrelle bat roosts in the house has been classified according to the definitions of roost types provided in the Bat Conservation Trust survey guidelines (Collins J (ed.), 2023) and in accordance with criteria for assessing the importance of roosts in the current Bat Mitigation Guidelines (Reason and Wray, 2023).

- **Common pipistrelle bat.** Occasional summer day roost for a low number of bats of a widespread species (not a maternity site), and therefore this roost is classed as being important in a **Local (Site)** context.
- **Brown long-eared bat.** Occasional summer day roost for a single bat of a widespread species (not a maternity site), and therefore this roost is classed as being important in a **Local (Site)** context.

Common pipistrelle bats are the most common species in Britain and are common in Gloucestershire. The Bat Mitigation Guidelines (2023) categorises day roosts of common species such common pipistrelle bat and brown long-eared bat as being of

low conservation significance. Collectively, the bat assemblage at Great Thornham Farm is classed as being important in a **Local (Site)** context.

5.4.3 *Predicted Impacts*

Without mitigation, renovation of the farmhouse (B1) and demolition of the outbuilding (B4) will result in the loss of the crevice roost features that have been identified. There is also potential for disturbance if bats are present when construction commences.

Without mitigation the following negative impacts could occur:

- Short Term Impact: Killing or injury to small number of common pipistrelle and brown long-eared bats.
- Long Term Impact: Loss of five day roosts used by common pipistrelle bats and one day roost used by brown long-eared bats.

The bat roost resource is important for individual/ small numbers of bats, but is not considered significant for the conservation of local bat populations because the development will not impair the ability for these species to breed and reproduce. Furthermore, the loss of day roosts will not affect the ability of populations of these species to maintain the current distribution within in their natural range. The proposed development is therefore not predicted to have an impact on the favourable conservation status of these species.

Whilst the proposed development is not predicted to be detrimental to the conservation status of bat species roosting in buildings B1 and B4, places of shelter used by low numbers of bats will be destroyed. It is will therefore be necessary to obtain a licence from Natural England under the provisions of The Conservation of Habitats and Species Regulations 2017.

On the basis of the evidence gathered through this study it is recommended that a licence from Natural England is obtained under the provisions of The Conservation of Habitats and Species Regulations 2017 because loss of the bat roost resource would result in an offence under Regulation 43 of the legislation. This is referred to as a 'bat mitigation licence' and advice on licensing requirements for the Proposed Scheme is provided in **Section 6.2.1**.

5.5 Other Species

There are no predicted impacts on nesting birds. There were no nesting birds within the Project Area buildings and the site is unsuitable for ground nesting birds. The garden and boundary vegetation will be retained and managed as at present. Nesting birds are not a constraint for the Proposed Scheme.

There are no predicted impacts on any other protected species, and otherwise notable species that might traverse the site boundaries will not be affected by the Proposed Scheme, as surrounding habitats will not be directly impacted.

6 Recommendations

6.1 Further Survey Work

No further ecological survey is required to support the proposed planning application. The daytime inspection and nocturnal bat surveys are considered adequate to provide a suitable level of confidence to characterize the bat roost resource within the Project Area buildings. This advice is consistent with nationally published good practice guidelines (Collins 2023), which advocates a level of survey that is proportionate to the likelihood of bats being present.

The bat survey data should be updated within 12 months of applying for a Natural England Bat Mitigation Licence. Survey standards for licensing require information from the current, or most recent bat activity season (May to August).

6.2 Bat Roost Mitigation

6.2.1 *Obtaining a Bat Mitigation Licence for this Project*

Legal Protection

Bats are sensitive to activities associated with development and the renovation of buildings. Bats are legally protected from harm and it is an offence to deliberately or intentionally kill or injure a bat. It is also prohibited to incidentally or deliberately capture, disturb or take bats, or damage or destroy a breeding site or resting place - irrespective of whether it (the roost) is occupied.

Although the law provides strict protection to bats, it also allows this protection to be set aside (derogated) under Regulation 55 of the Conservation of Habitats and Species Regulations 2017 through the issuing of licences for the purpose of preserving public health, or public safety, or other imperative reasons of overriding public interest (IROPI) including those of a social or economic nature and beneficial consequences of primary importance for the environment. Schemes with planning permission usually fulfil the requirements of IROPI. Natural England (NE) currently determine these licences in England and an application to NE can be made once the necessary planning and building consents have been obtained.

In accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 a licence can only be issued where the following requirements are satisfied:

- a) that there is no satisfactory alternative; and
- b) that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favorable conservation status in their natural range.

The Proposed Scheme at Great Thornham Farm is expected to meet these legal requirements following review against planning policy and permission has been granted by Wiltshire Council. The proposed bat roost mitigation is considered to meet requirements for maintaining the favorable conservation status of the species concerned.

A licence from Natural England can only be applied for once full planning permission has been granted, and there are no outstanding pre-commencement planning conditions relating to bats.

Natural England advise that survey data for licensing should include data from the most recent survey season. It is therefore advisable to have survey information from within the last 12 months. Survey updates may be needed if the development programme is not scheduled to start within the year planning permission is granted, and it is particularly important to consider seasonal timing constraints associated with updating the bat surveys. Therefore, if the start to development is delayed after receiving planning permission a survey update would need to be undertaken to ensure data is available for the bat breeding season (e.g. May to August) in the current or most recent season.

Capture and Exclusion of Bats

The proposed building alterations and conversion will need to take precautions to avoid disturbing roosting bats and prevent individual bats being injured or killed during the building work. Certain works, including the removal/modifications of some roofs and walls, will require the supervision of an appointed ecologist under NE licence.

The ecologist will need to check for the presence of bats to avoid animals being harmed or injured by construction activities. Prior to commencement of the scheme, a construction programme will need to be developed in consultation with the appointed ecologist and contractors. The ecologist will identify operations and building activities that present a foreseeable risk of harm or injury to bats so that they can attend site at the appropriate time for ecological supervision during the construction phase.

Further details are provided in **Section 6.2.4.**

Post-construction Review and Monitoring

The replacement / new bat roosting features included within the proposed development, including bat crevice roosting features, will be inspected and signed-off by the licenced bat worker as part of the bat mitigation licence return to Natural England. Further details are given in **Section 6.2.5**.

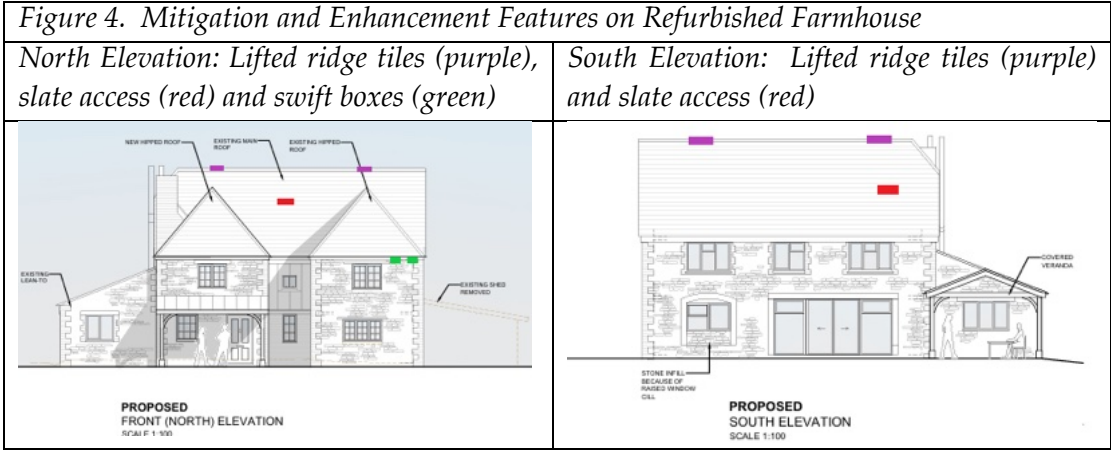
The planned work is affecting non-breeding summer roosts of two bat species that are common and widespread in England. As such there is not expected to be a requirement for post-scheme monitoring. This is in accordance with the current advice in the Bat Mitigation Guidelines.

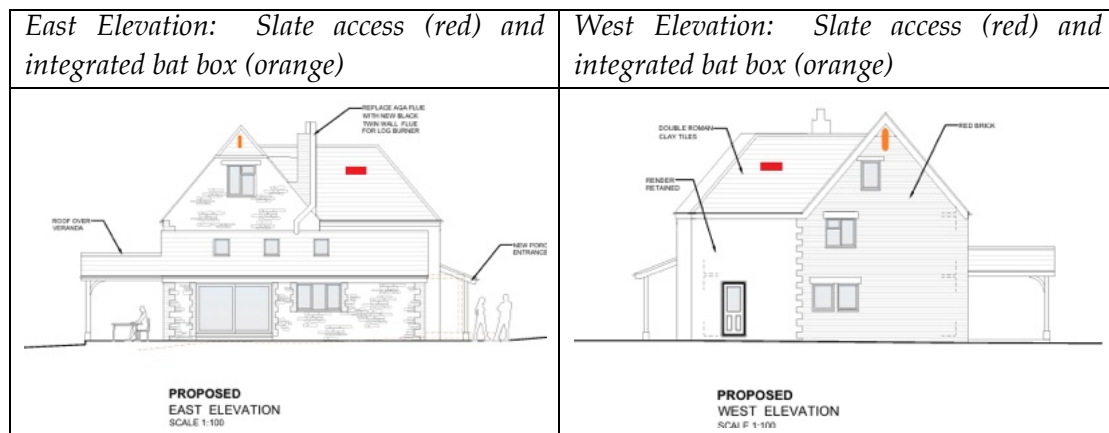
6.2.2 Bat Crevice Roost Features

To mitigate the loss of crevice roost features within the buildings (B1 and B4), a variety of crevice features (eight in total) will be provided on the newly refurbished farmhouse.

- Two integrated bat boxes (‘bat tubes’) will be installed on the east and west gable walls of the building. By integrating the bat box into the walls, the new artificial roosts will benefit from the thermal mass of the building and will therefore provide both hibernation and summer roosting opportunities.
- Four lifted tiles will be incorporated into the new roof, on the north, south, east and west pitches.
- Two lifted ridge tiles will be incorporated into the main roof.

The specifications for lifted ridge tiles and slate access designs are provided in **Appendix 6** and the proposed locations are shown in **Figure 4** (below).





6.2.3 Timing

The development work can be undertaken at any time of year as there are no seasonal timing constraints required for the bat mitigation strategy, but the building work will need to be supervised by a suitably qualified ecologist (see **Section 6.2.1** and **Section 6.2.4**)

6.2.4 Supervision

The appointed ecologist on the Natural England licence must give building contractors a 'tool box' talk regarding the bats present at the site before any alterations, demolition or construction work that impacts the walls or roof of the buildings (B1 and B4) starts. The tool box talk will include details of where the bats have been found on the buildings and where there is the potential for roosts to be present at the site. The ecologist will inspect the buildings before building works start and contractors will be advised on what bat capture and exclusion measures are needed, including what building operations require direct ecological supervision. The tool box talk will include advice on emergency procedures to rescue bats unexpectedly discovered when the ecologist is not on site.

Construction works should proceed in a careful and controlled manner, in accordance with the agreed method of working discussed with the appointed ecologist.

6.2.5 Licence Return Form

The licensee must submit a licence return to Natural England within the timescales stated on the licence. The return form includes details of the number of bats captured / excluded from roosts (at the time of the works), photographic evidence of the new bat roost features (recommended in **Section 6.2.1**) and confirmation by the appointed ecologist that the mitigation strategy complies with the licence conditions.

6.3 Careful Site Clearance (Ground Dwelling Animals)

Mitigation to ensure protection of ground dwelling animals, such as hedgehog, during construction, should adhere to the following procedure to help ensure Reasonable Avoidance Measures (RAMs) are taken to protected species:

To ensure protection of ground dwelling species, such as hedgehog and amphibians, contractors can produce a RAMs that includes the following:

- The immediate curtilage of the house should be kept closely trimmed and mown. For example, the adjacent lawn will be kept tightly mown, and no scrub or tall grass should be allowed to grow up against the building. These measures will prevent concealment opportunities for newts developing in the vicinity of the house.
- All materials and machinery will be stored on gravel/hard standing areas that surround the buildings.
- Any excavations or trenches that need to be left overnight should either be covered, or a ramp placed in the hole so that animals can safely escape.
- Any open pipework with an outside diameter of greater than 120 mm must be covered at the end of each work day to prevent animals entering/becoming trapped.
- All excavations, trenches or open pipework should be inspected first thing each morning. If an animal is found an ecologist should be consulted.

6.4 External Lighting Plan

Great Thornham Farm is a rural property and the surrounding open countryside is generally unlit around its periphery, so it will be important to ensure that there is lighting control to protect adjacent habitats and allow dark corridors for movement by bats and other nocturnal animals around the site. The lighting strategy should minimize light spill (i.e. spilling of light beyond the boundary of the proposed area to be lit) on all site boundaries.

Where lighting is required, appropriate light types (i.e. lamps with narrow spectrum and no UV output), low level lighting bollards, and hoods on lamps should be used to control light spill. The lighting proposal should be designed to illuminate only those areas where lighting is required for safety and security close to the building, but control illumination on the surrounding vegetation.

As a guide, controlling lighting within the proposed development to 0.5 lux at a position 3m from the site boundary will help prevent light spill on hedgerows.

The key principles for choosing a suitable type of lamp are:

- Avoid blue-white short wavelength lights: these have a significant negative impact on the insect prey of bats. Use alternatives such as warm-white (long wavelength) lights as this will reduce the impact on insects and therefore bats.
- Avoid lights with high UV content: (e.g. metal halide or mercury light sources), or reduce/completely remove the UV content of the light. Use UV filters or glass housings on lamps which filter out a lot of the UV content.

Selecting an appropriate lamp unit that is designed to be environmentally friendly will minimize light spill, but further controls can be imposed by installing directional

accessories such as baffles, hoods and louvres on lamps to direct light away from ecologically sensitive areas. LED (Light Emitting Diode) units are an effective way to direct the light into small target areas, and composite LEDs can be switched off to reduce/direct the light beam to specific areas.

6.5 Biodiversity Enhancement

6.5.1 *Artificial Roost Features for Bats*

The boxes proposed in **Section 6.2.2** will provide habitat enhancement with the provision of a roost resource that provides opportunities for colony bat roosts to form and therefore bats to breed at the Site. The bat boxes are suitable for both crevice and cavity dwelling bats and provide opportunities for a wide range of species, in addition to the common pipistrelle and brown long-eared bats recorded at the Site. The various orientations of the external boxes will provide diverse environmental roost conditions.

6.5.2 *Hedgehog Shelter*

It is recommended that a hedgehog box (such as Hogitat hedgehog shelter) is provided as part of the development. This should be positioned in a quiet, discreet position at the boundary of the garden, under shrubbery. Positioning the shelter under shrubs is an ideal location as it will help prevent disturbance. Covering the shelter with leaves and brushwood will camouflage it.

6.5.3 *Swift Boxes*

Two swift boxes will be installed at the eaves of the north elevation of the farmhouse (**Figure 3** above). The provision of swift boxes recognizes the fact that swifts are in decline, and swift nesting boxes are also readily used by a range of other small passerine birds, such as house sparrow (a species listed on Section 42 of the Natural Environment and Rural Communities (NERC) Act 2006), and are therefore seen as a 'universal bird box' for new development.

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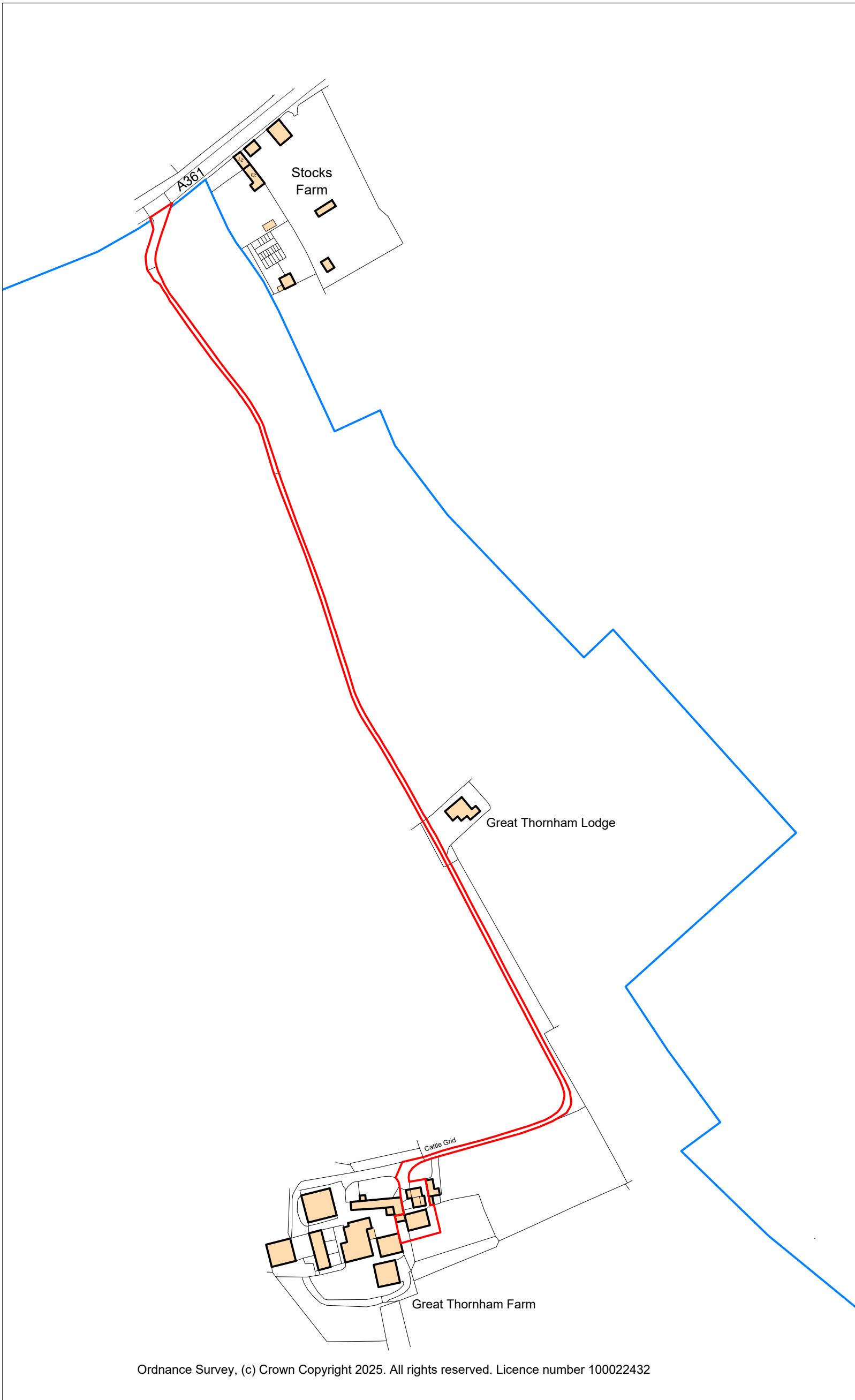
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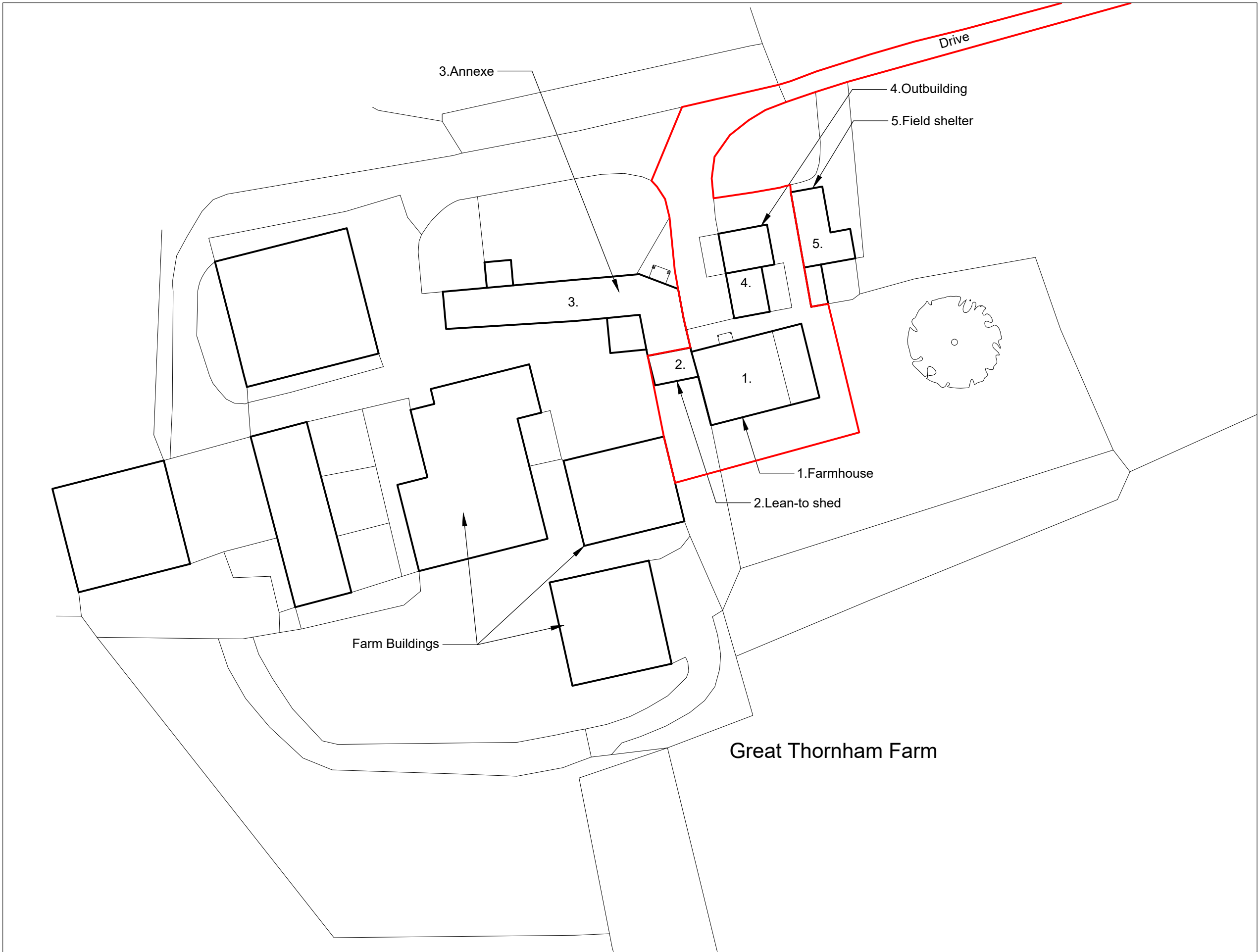
Appendix 1. Proposed Scheme



LOCATION PLAN
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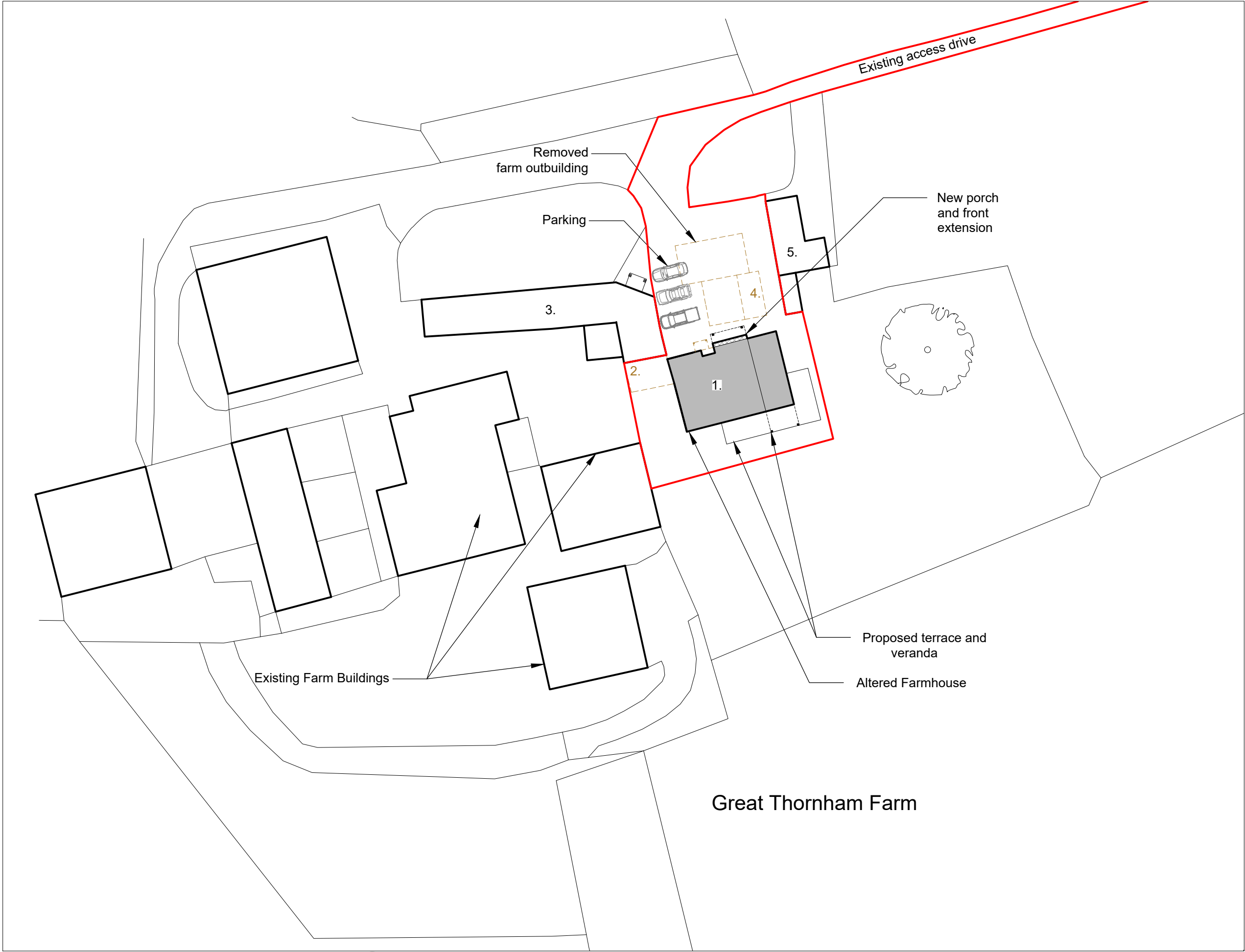
Scale bar (1:2500)



EXISTING
BLOCK PLAN
SCALE 1:500

0 10m 20m 30m

Scale bar (1:500)



PROPOSED
BLOCK PLAN
SCALE 1:500

0 10m 20m 30m

Scale bar (1:500)

THIS DRAWING IS COPYRIGHT
Contractor must take site sizes

Any discrepancies between the
drawing and site conditions
should be reported to the
Principal Designer

THIS DRAWING HAS BEEN
BASED
ON ARCHIVE INFORMATION
DIMENSIONS TO BE
CHECKED ON SITE

Rev.	Date	Init
D	30/03/26	EK
C	05/03/26	EK
B	20/02/26	EK
A	21/10/25	EK

CLIENT
Mr K. and Mrs J. Williams

PROJECT
Farmhouse Alterations
Great Thornham Farm
Seend

DRAWING
Location Plan,
Existing and Proposed Block Plans

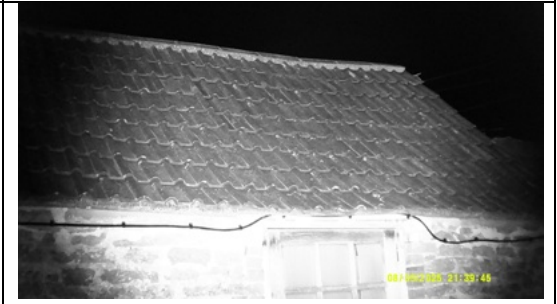
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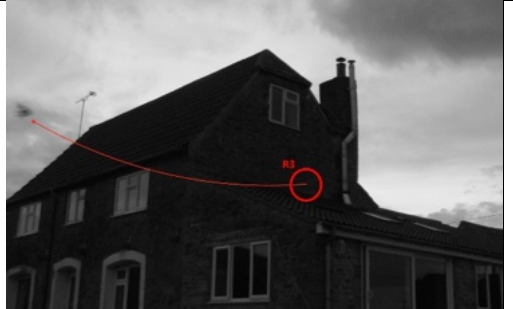
Tel: 01380 729456
Web: www.dolmansurveyors.co.uk
Email: info@dolmansurveyors.co.uk

Appendix 2. Nocturnal Bat Survey Camera Views

Surveyor Position 1	Surveyor Position 2
	
Surveyor Position 3	Camera Position 1
	
Camera Position 2	
	

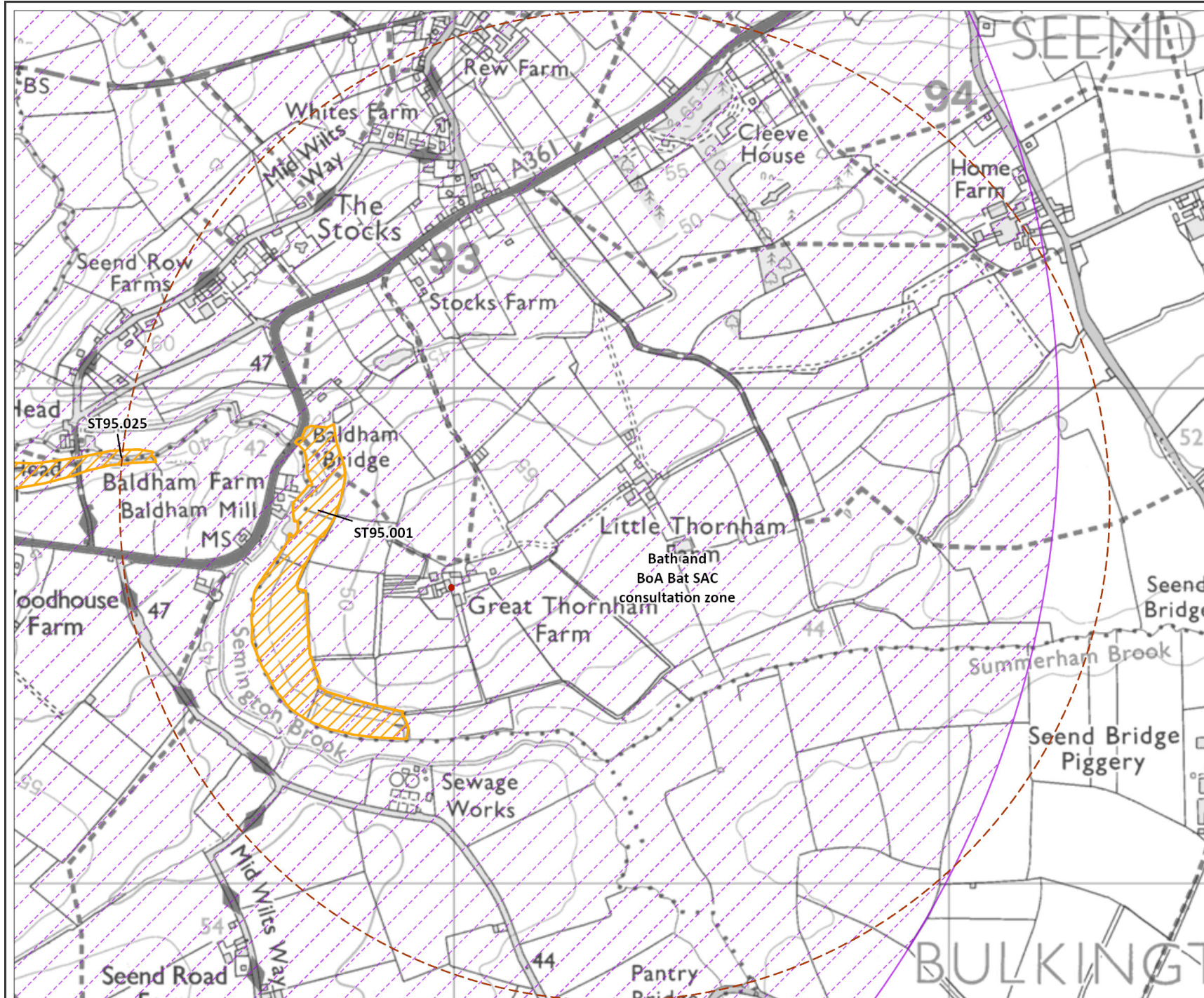
Appendix 3. WSBRC Designated Sites Map

Appendix 4. Roost Locations

Roost 1 (R1) – One common pipistrelle @ 20:54hrs	Roost 2 (R2) – One common pipistrelle @ 20:42hrs
	
Roost 3 (R3) – One common pipistrelle @ 20:28hrs	Roost 4 (R4) – One common pipistrelle @ 20:32hrs
	
Roost 5 (R5) – One common pipistrelle @ 19:29hrs	Roost 6 (R6) – One brown long-eared bat @ 19:40hrs
	

Notified Sites Within
1000 metres of
Thornham Farm:
ST9332559762

Exported: 27/01/2025



- Search Area
- WWT Reserves
- Site of Special Scientific Interest
- National Nature Reserve
- Special Area of Conservation
- Special Protection Area
- Local Nature Reserve
- Local Wildlife Sites
- Local Geological Site
- Protected Road Verge
- Woodland Trust Reserve
- Bat Consultation Zone
- County Boundary

Appendix 5. Legislative Framework

Conservation of Habitats and Species Regulations 2017

In relation to wildlife and nature conservation, two key Directives have been adopted by the European Community. These are (i) Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds ("The Birds Directive" formerly 79/409/EEC); and (ii) Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora ("The Habitats Directive"). These Directives provide for the protection of animal and plant species of European importance and the habitats which support them, particularly through the establishment of a network of protected sites.

The Habitats Directive is transposed into domestic law through the Conservation of Habitats and Species Regulations 2017. These regulations consolidate the many changes that have been made to the domestic law over the years since the predecessor regulations made in 1994. The regulations provide for the designation and protection of European Sites, the protection of European protected species and the adaptation of planning and other controls for the protection of European Sites.

Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) (WCA) consolidated and amended existing national legislation to implement the Convention of the Conservation of European Wildlife and Natural Habitats (The Bern Convention) and the Birds Directive. There have been various amendments since the original enactment.

Schedules 1 and 5 of the Act identify species of bird and other animal in relation to which the Act makes killing, injury, taking and disturbance an offence while Schedule 8 to the Act lists species of plant in relation to which the Act makes it an offence to intentionally pick, uproot or destroy.

The Natural Environment and Rural Communities Act 2006

The Natural Environmental and Rural Communities Act 2006 (NERC) introduced changes intended to benefit rural communities and the environment. Section 40 of the Act creates a duty on public bodies to have due regard for habitats and species of principal importance for biodiversity in England when exercising their duties; Section 41 requires the Secretary of State to maintain a list of such habitats and species. This is important in the context of planning decisions as the National Planning Policy Framework (paragraph 117) affords planning policy protection to the habitats of species listed by virtue of Section 41.

The Environment Act 2021

The Environment Act sets out legislation to make provision for targets, plans and policies for improving the natural environment, which includes, inter alia, nature and biodiversity. Part 6, Section 90 establishes the precedent for achieving a biodiversity gain as a condition of planning permission for major development. Schedule 14 establishes that a biodiversity gain is met if the biodiversity value attributable to the development exceeds the pre-development biodiversity value of the on-site habitat by at least 10%. Furthermore, any habitat enhancement must be maintained for at least 30 years after the development is completed. The Act came into effect for larger developments in February 2024 and for smaller developments in April 2024.

The UK Post-2010 Biodiversity Framework

The UK Post-2010 Biodiversity Framework succeeds the UK Biodiversity Action Plan (BAP) and 'Conserving Biodiversity - the UK Approach'. The Framework continues the conservation work initiated by the UK BAP following the establishment of the Convention on Biological Diversity in 1992. The purpose of the Biodiversity Framework is to set a broad enabling structure for conservation action across the UK until 2020, in summary:

- To set out a shared vision and priorities for UK-scale activities, in a framework jointly owned by the four countries, and to which their own strategies will contribute.
- To identify priority work at a UK level which will be needed to help deliver biodiversity targets and the EU Biodiversity Strategy.
- To facilitate the aggregation and collation of information on activity and outcomes across all countries of the UK, where the four countries agree this will bring benefits compared to individual country work.
- To streamline governance arrangements for UK-scale activity.

Many of the tools developed under UK BAP remain of use, for example, background information about the lists of priority habitats and species and the plans for the priority species and habitats agreed under UK BAP still form the basis of the Framework.

Appendix 5. Bat Roost Mitigation Specifications

