



Preliminary Ecological Appraisal

Home Farm, Rood Ashton, West Ashton, Trowbridge BA14 6BL

For LPC (Trull) Ltd and on behalf of Mr Sam Pike

July 2025

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DOCUMENT CONTROL SHEET

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Preliminary Ecological Appraisal

Client: Mr Sam Pike

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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 LPC (Trull) Ltd and on behalf of Mr Sam Pike to undertake a Preliminary Ecological Appraisal (PEA) at Home Farm, Rood Ashton, West Ashton, Trowbridge BA14 6BL (Central Reference ST 8886 5656) to inform proposals for the a new glamping site.

1.2 This report has been prepared to support a pre-application to North Somerset 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 4202:2013 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

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

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.

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)

Local Plan

2.10 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

2.11 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

- 2.12 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 yellow zone for impacts to habitats and within the grey zone for recreational pressure.**

Species Protection

- 2.13 A number of species, including all bats and great crested newts, are afforded protection under The Wildlife and Countryside Act 1981 (as amended)
- 2.14 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.
- 2.15 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.
- 2.16 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.
- 2.17 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. A data search can provide important contextual information to gain an understanding of the site and surrounds. In addition, the Wiltshire Council planning portal was searched for nearby applications.
- 3.2 A full data request from the records centre was not considered necessary to inform this report, given the scale of the development proposals.

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- 3.3 The site was surveyed on 10th June 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 and clear, with a temperature of 18°C.
- 3.4 Habitats and obvious features within the site were assessed following the Joint Nature Conservation Committee's Phase 1 Habitat Survey Method⁴ (JNCC, 2010) as amended in 1995 by the Institute of Environmental Assessment⁵ (IEA, 1995) and also classified under the UKHab criteria to inform the Biodiversity Net Gain calculations.

Bat Foraging Habitat Assessment

- 3.5 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 Guidelines⁶ 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.

³ <https://magic.defra.gov.uk/>

⁴ JNCC 2010. *Handbook for Phase 1 Habitat Survey*. Joint Nature Conservation Committee, Peterborough

⁵ IEA 2015 *Guidelines for Baseline Ecological Assessment* Institute of Environmental Assessment

⁶ Collins, J (ed.) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (4th Ed.) The Bat Conservation Trust, London

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 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.

Biodiversity Net Gain Assessment

- 3.6 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.
- 3.7 The baseline Biodiversity Net Gain (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.

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 north of West Ashton. The A350 lies 750m to the west. Home Farm is accessed from Sandpit Lane to the west along a farm track between fields. There are a number of parcels of woodland within the locality. A fishing lake lies to the north of the application boundary.



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. Pickets and Clangers Wood Site of Special Scientific Interest (SSSI) known to support species associated with the SAC lies 1km to the northwest of the Application Site.
- 4.3 The Salisbury Plain Special Protection Area (SPA) and Special Area of Conservation (SAC) lies 5.69km 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. 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.

Habitats

- 4.4 The broadleaved woodland immediately adjacent to the site has been identified as deciduous woodland, a Priority Habitat. Furthermore, the blocks of woodland to the north, east and south have also been recorded as Priority Habitat. There is a parcel of ancient woodland 434m to the southwest, known as 'The Brake'.

Species

- 4.5 There are no European Protected Species (EPS) licences within 2km of the site boundary. A pond that lies 1km to the southeast was recorded as supporting great crested newts in 2018 via the Natural England pond eDNA surveys. EPS licences within 2 to 4km included common pipistrelle, brown long-eared and lesser horseshoe bats all recorded in or around Trowbridge, to the west.

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- 4.6 The site covers approximately 0.56ha. A new access is to be created off Sandpit Lane to the southern corner of the Application Site. This currently comprises area of mixed scrub to the northern end of a hawthorn dominated hedgerow that runs along the lane. towards the proposed glamping area. The existing tarmac and grass track are within the application boundary.
- 4.7 A main area of the site solely comprises a single field that had recently been cut for silage. Therefore, adjacent grassland was used to aid in the species identification. Forbs were low and limited to chickweed *Stellaria media*, creeping buttercup *Ranunculus repens*, rib-wort plantain *Plantago lanceolata*, white clover *Trifolium repens*, dandelion *Taraxacum officinale* and occasional yarrow *Achillea millefolium*. Grasses are more mixed and, although rye grass *Lolium* is more dominant, other species include Yorkshire fog *Holcus lanatus*, Timothy *Phleum pratense*, fescue species and patches of cock's-foot *Dactylis glomerata* and false oat grass *Arrhenatherum elatius* offsite, but along the field edges where Sweet Vernal Grass *Anthoxanthum odoratum* was also present.
- 4.8 There is a well used grass track that comprises compacted bare soil with modified grassland in between the tyre tracks.
- 4.9 It is understood that the field had been seed previously with a herbal ley. At present, given the lack of forb diversity, the habitats meet the UKHab criteria for g4 modified grassland. The habitats within the application boundary are common and widespread and of low conservation value.

- 4.10 There are patches of broadleaved woodland (Priority Habitat) to the west of the application boundary and to the northeast. A species rich hedgerow runs offsite along the adjacent lane. A well used fishing lake is present to the north.



Plate 2: View across proposed glamping area looking southwest to broadleaved woodland beyond



Plate 3: Baseline Habitats and Condition

- 4.11 In summary, the site comprises the following primary UKHab classification habitats onsite:

Table 1: Baseline Habitats

UKHab	BNG SSM Metric	Justification
Modified grassland g4	Modified grassland – poor condition	Mix of grass species but forb poor (<9species/m2) and suboptimal species – poor condition due to the use as grass track – compaction and bare soil present.
Modified grassland g4	Modified grassland – moderate condition	Mix of grass species but forb poor (<9species/m2) and suboptimal species – moderate condition as less disturbance, bare ground
Mixed scrub h3h	Mixed scrub – moderate condition	Small area of scrub adjacent to Sandpit Lane
Rural Tree	Individual Tree - Rural	Single maple within grassland

Species

Bats – Foraging/Commuting Habitats

- 4.16 The site does not offer any roosting opportunities for bats. There is likely to be numerous trees within the adjacent woodland that will provide roost sites. The site is open with the modified grassland unlikely to offer optimum habitat – it is considered to offer moderate value for foraging and commuting due to the woodland and hedgerows to each site. The large lake and woodland will, again, provide high quality habitat for bats, and it is acknowledged that bats, including those associated with the SAC, will use these areas for commuting and foraging.
- 4.17 Given that the glamping site and car parking is only 0.44ha, comprising of modified grassland, and does not offer any habitats of high value to horseshoe or Bechstein bats, it is considered that mitigation can be put forward without the requirement for further survey. Appropriate mitigation and enhancement will be incorporated into the design, based on the assumption that the woodland and woodland edge is used by bats, including those associated with the SAC. All impacts to these habitats will be avoided. See Section 5 below for further details on the mitigation.

Badgers

- 4.18 There was no evidence of badgers within the Application Boundary. Whilst the woodland will provide habitat for badgers, as the proposals are a 'no-dig', no precautionary construction methods are applicable and badgers will not be impacted on by the Proposed Development.

Breeding Birds

- 4.19 At the time of the survey, the silage had recently been cut and hence there was no evidence of ground nesting birds. Given the hedgerow to one side and the woodland on the other, the field may be too enclosed for some species, especially given the regular use of the access track and fishing lake.

- 4.20 Again the surrounding habitat will offer excellent habitat for many species of bird. Best practice avoidance, mitigation and enhancement measures to be implemented are provided in Section 5 below.

Amphibians - Great crested newts (GCN)

- 4.21 The online data trawl recorded GCN within a pond 1km to the south east and there are additional waterbodies between 250-500m of the site. The fishing lake is unsuitable for GCN.
- 4.22 The management of the field for silage is likely to be restrictive for a proportion of the year. No refugia or potential resting sites were noted within the Application Boundary and GCN are unlikely to be impacted on by the proposals.

Reptiles

- 4.23 As with the amphibians, the management of the field for silage is likely to be restrictive for a proportion of the year. No refugia or potential resting sites were noted within the Application Boundary and reptiles are unlikely to be impacted on by the proposals.

Other protected/notable species

- 4.24 Given the availability of high quality habitats within the locality, species, such as hedgehogs, are likely to move across the site. Again, standard best practice site construction methods should be adopted, where necessary, as detailed in Section 5.

4.25

5.0 Avoidance, Mitigation and Enhancement Measures

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, in line with the mitigation hierarchy.

Development Description

- 5.2 The proposals are for four glamping pods in the northern section of the Application Boundary. The new access will be created from easement of the site from Sanpits Lane the grass track that leads to the glamping area. The pods utilise a 'no-dig' approach with the pods being essentially screwed into place.
- 5.3 The ethos of the glamping site is that it will be a 'back to nature' experience and the ecological sensitivities of the site will be promoted and managed. Whilst the habitats within the Application Boundary are common and widespread, the potential impacts from the Proposed Development relate to the anthropogenic impacts from lighting and recreational disturbance.



Plate 4: Proposed Habitat Site Plan illustrating the BNG and buffer zones for bats

Bath and Bradford on Avon Bats SAC – Trowbridge Bat Mitigation Strategy

- 5.4 The following section sets out mitigation requirements to ensure that there no impacts to the habitats that could be used by species associated with the SAC.
- 5.5 There will be minimal loss of habitat, although for the purpose of the BNG assessment, the modified grassland within the glamping area of the Application Boundary has been changed to vegetated garden to recognise its likely use as amenity. Furthermore, area beneath the pods and parking access has been illustrated as ‘other developed land/sealed surface’ although as stated it will be a no dig build. There will be the loss of the scrub from Sandpits Lane. In conclusion, the ‘loss’ of these habitats will not have an significant impacts on species, or on the integrity of the SAC.
- 5.6 However, it is acknowledged that bats, including those associated with the SAC, will use surrounding habitats i.e. woodland and woodland edge for commuting and foraging that lie adjacent to the Application Boundary. Given that the site itself is unlikely to be of great significance for horseshoe or Bechstein’s bat foraging, it is considered that mitigation can be put for forward without the requirement activity surveys. The mitigation will be in line with the measures set out in the TBMS and will focus on preventing all impacts from lighting.
- **A 10m vegetated buffer from the woodland edge on each side to ensure that the development is sufficiently offset from the sensitive habitats. This area will be planted with mixed scrub along the eastern edge and a mix of scrub and g3c grassland to the east. There**

will also be a native species rich hedgerow along the southern edge that will offer improved connectivity across the landscape to benefit the bats. Whilst this buffer is somewhat smaller than that set out in the TBMS, it is considered to be proportionate to the development impacts and will offer an overall significant improvement in availability of habitats.

- There will be a sensitive lighting strategy to demonstrate that there will be no increase in lighting, including from within the glamping pods.
- Sensitive positioning and orientation of the pods to further minimise light spill across the woodland/woodland edge.
- Lighting where needed, i.e. access to glamping area and adjacent to pods, will all be low level, cowed and directional to avoid light spill. They will be on a PIR system so that they will only be utilised when needed.
- A suitable buffer will be implemented to ‘future-proof’ the woodland and woodland edge from encroachment that will be managed appropriately to protect dark corridors.

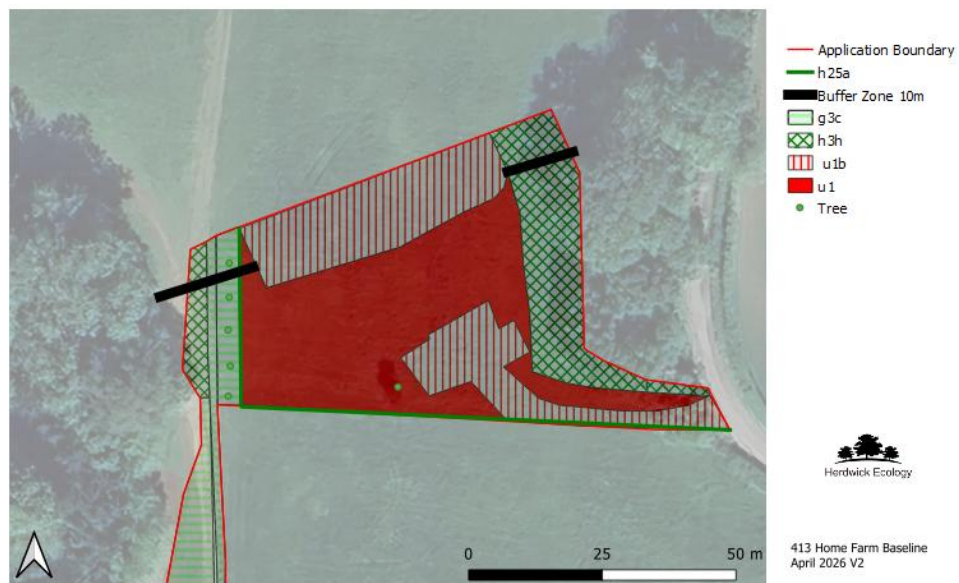


Plate 5: Illustrating bat buffer zone and vegetation type

- 5.7 Specific campsite rules will be prepared setting out the ‘code of conduct’ and to promote the sensitivities of the site and surrounding habitats. The site will be managed to ensure that these regulations are adhered to. The guests will be aware of the restrictions of the site prior to booking so that a ‘back to nature’ ethos is adopted.

Biodiversity Net Gain

- 5.8 A separate BNG report has been prepared that demonstrates a net gain in biodiversity.
- 5.9 In conclusion, the Application Boundary comprises modified grassland of low value and has negligible potential to support protected/notable species. Whilst the site is located in an ecological sensitive area,

it is considered that additional activity surveys can be avoided given the small scale of development and protection of offsite features. This will include avoidance and protection of the woodland/woodland edge through a buffer area and a sensitively designed scheme and lighting strategy that will provide the confidence that there will be no effect on the integrity of the SAC.

