

Fairwood Lakes Holiday Park,
Dilton Marsh, Wiltshire

Ecological Impact Assessment
2026



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Client Hygge Estates
Project Title Fairwood Lakes, Dilton Marsh, Wiltshire
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Executive Summary

Development Details

The client is proposing leisure development of Fairwood Lakes Holiday Park, Dilton Marsh, Wiltshire, hereafter referred to as the 'site'. The site benefits from planning permission for a leisure development and the client wishes to apply for a change to the layout, via a s73 application.

This report describes the ecological features of the site and its surroundings and assesses the potential impacts of the development on the ecological interest. Recommendations are provided so that the development is compliant with biodiversity policy and legislation.

Ecological Interest

The site supports intensively managed ornamental lakes, plantation woodland, ornamental shrub beds, buildings, car parks and other developed land, as well as grasslands and hedgerows. Overall, parts of the site have a moderate level of ecological interest and other areas have a low/negligible level of ecological interest. Ecological features of interest include mature plantation woodland and species-rich hedgerows. Bats are present on site and the site lies within the Core Area for a Core Roost of Greater Horseshoe bat at Westbury Leigh, part of the Bath and Bradford on Avon Bats SAC.

Outcomes

With recommended mitigation, and the species-rich landscaping proposed, residual ecological impacts are considered to be beneficial. The site will retain functionality to the SAC.

The mitigation and enhancement described within this report would enable the proposed development to be delivered in conformity with national and local planning policy and achieve ecological gain.



1. Introduction

1.1 Project Brief

- 1.1.1 Rachel Hacking Ecology Limited was commissioned in 2025 by Hygge Estates to carry out an Ecological Impact Assessment (EclA) at Fairwood Lakes, off Fairwood Road, Dilton Marsh, Wiltshire, hereafter referred to as the 'site' (central O.S. grid reference: ST 84542 51402 – see Figure 1).

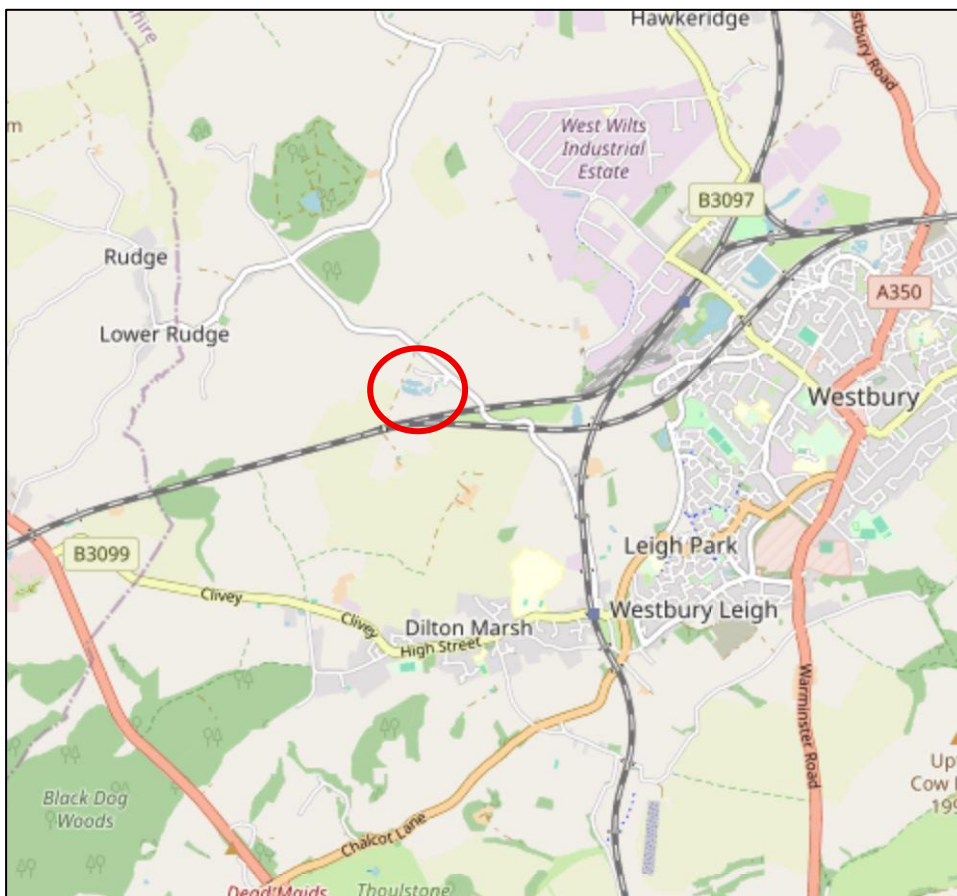


Figure 1. Map showing the location of the site courtesy of OpenStreetMap

- 1.1.2 The site measures approximately 7 hectares and currently supports holiday lodges, facilities buildings, ornamental lakes, woodlands, grasslands, ornamental planting and hardstanding.

Description of Development

- 1.1.3 The site is the subject of a Section 73 application with Wiltshire Council, which seeks to gain approval for changes to the site layout, lighting, ecological enhancement and lodge details (planning reference: PL/2025/07258). The changes are minimal and include the following; re-orientation/re-siting of the units approved by the 2022 consent, two additional units, changes to the layout and the material of the

'estate road' to the south from tarmac to raised walkways/boardwalks and the relocation of the railway carriage.

- 1.1.4 The site benefits from planning permission, received in December 2022 from Wiltshire Council, for the provision of a managers house with shop/office with living accommodation over, the replacement of the cafe with a clubhouse, the provision of a spa building, the re-planning of approved lodge area and extension to provide an additional 22no. lodges including the replacement of touring pitches, the relocation of a train carriage and retrospective planning for mini golf, play park, splash tunnel and sun canopy. Some of this work has been implemented.
- 1.1.5 As part of the 2022 application, a number of ecological surveys were undertaken by Malford Environmental Consulting Limited. These are listed below with the date they were carried out:
- Water Vole survey – 2018.
 - Phase 1 Habitat Survey – 2020, updated into Ecological Appraisal 2022.
 - Bat Activity Survey (using static detectors) – April to June 2022.

1.2 Scope of Work

- 1.2.1 The Client commissioned Rachel Hacking Ecology to carry out the following works:
- Desk-based study to obtain details of designated sites, protected and notable species within a specified search area.
 - Record the extent and type of habitats across the whole of Fairwood Lakes and immediately adjacent.
 - Search for signs of protected species and undertake an assessment of the potential of habitats and features to support protected and notable species.
 - Undertake an updated Preliminary (bat) Roost Appraisal.
 - Undertake an updated Water Vole survey.
- 1.2.2 Section 73 applications are exempt from mandatory Biodiversity Net Gain (BNG) if the application to which the s73 applies was granted before 12th February 2024. Therefore, BNG does not apply to this application.



2. Methods

2.1 Scope

- 2.1.1 The Zone of Influence (Zol) is the area over which the proposed development may affect important ecological features. In this case, it is considered that the Zol of the Proposed Development is limited to the application boundary.
- 2.1.2 The study area extends beyond the application boundary to include:
- Statutory designated sites of international importance such as Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar Sites within 10km.
 - Statutory designated sites of national importance such as Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs) within 5km.
 - Non-statutory designations such as Local Wildlife Sites (LWS) within 1km.
- 2.1.3 Ecological features considered within the scope of the assessment comprise:
- Designated sites for nature conservation as listed above.
 - Species protected by legislation (see Appendix 1) and habitat and species of principal importance for the conservation of biodiversity, as identified under the S41 of the NERC Act 2006.

2.2 Desk Study

- 2.2.1 The Magic website (Multi-Agency Geographical Information for the Countryside) was interrogated for the presence of Statutory Designated Sites within 5km radius of the site.
- 2.2.2 The Impact Risk Zones for any SSSI within 2km of the site was checked to determine whether the Local Planning Authority will need to consult with Natural England.
- 2.2.3 The Environmental Records Centre for Wiltshire (WSBRC) was contacted to provide details of non-statutory designated sites and records of protected and notable species within a 1km radius of the site. Due to the sensitivity of the bat consultation zones a bat survey data of 4km was requested.

2.3 Field Surveys

Habitat Survey

- 2.3.1 In accordance with JNCC guidelines¹ the site was walked. The habitats and features of ecological interest were mapped and described. Habitats and features of particular interest were target noted.
- 2.3.2 During the walkover habitats and features were assessed for their suitability to support protected and notable species in accordance with CIEEM guidelines². Field signs of protected and/or notable species (such as Badger, reptiles, birds, Otter and Dormouse) and invasive non-native species (such as Japanese Knotweed and Giant Hogweed), if encountered, were mapped, and described.
- 2.3.3 The Zone of Influence for the habitat and protected species assessment was the site.
- 2.3.4 Dr Rachel Hacking and Andy Harmer (Principal Ecologists) undertook the habitat survey on 25th July 2025. The weather was warm, bright and calm. Rachel and Andy both have over 20 years of experience in habitat, botanical and protected species assessments. Andy holds a Natural England Class 2 Survey Licence for bats (Ref. 2016-24701-CLS-CLS).

Bats

- 2.3.5 The exteriors of any buildings were inspected using binoculars and a high-powered torch. Features offering potential access to roosting bats were recorded. Such features may include suitable gaps in roof coverings, gaps behind external cladding/facia and gaps in masonry.
- 2.3.6 Evidence indicating the presence of roosting bats was also searched for. This may include bat droppings on walls, windows or on the ground below roost entrances or staining from fur oil around roost entry points.
- 2.3.7 The interiors of the buildings was surveyed to identify any evidence indicating use by roosting bats. Such evidence may include bat droppings, feeding remains, urine splashes, live or dead bats and staining from fur oil on timbers.
- 2.3.8 Any trees on the site that are to be affected by the proposals were given a ground-level assessment, searching for Potential Roosting Features (PRF's), such as flaking bark, woodpecker holes, knot holes and limb splits.
- 2.3.9 The daytime bat survey of the buildings and any affected trees was undertaken by Dr Rachel Hacking, Andy Harmer, Rebekah Burgess and Nazia Qamar (Junior Ecologists) on 25th July 2025 and 30th July 2025.

¹ JNCC (2010). *Handbook for Phase 1 Habitat Survey: A Technique for Environmental Audit*. Joint Nature Conservation Committee, Peterborough

² CIEEM (2017). *Guidelines for Preliminary Ecological Appraisal*. Chartered Institute of Ecology and Environmental Management, Winchester.



Otter & Water Vole

- 2.3.10 The watercourses on site were walked and signs indicating use of Otter, which include spraint (faeces), runs/slides, prints and prey remains, were searched for, along with suitable adjacent habitats. In addition, three camera traps were deployed along the stream.
- 2.3.11 Andy Harmer undertook the Otter and Water Vole survey. Andy has over twenty years of experience in mammal surveys and specialises in aquatic habitats.

2.4 Assessment

- 2.4.1 The assessment was undertaken to:
- Identify potentially significant ecological impacts likely to result from the Proposed Development.
 - Identify appropriate mitigation measures to avoid, minimise or compensate for ecological impacts.
 - Identify residual ecological impacts (after mitigation measures).
 - Assess the legal and policy implications of residual ecological impacts.
- 2.4.2 Ecological features were evaluated using professional judgement, in accordance with published guidance⁵. Designated sites, habitats and species within the study area were assigned a geographical level of importance as follows:
- International
 - National (UK)
 - Regional (South-west)
 - County (Wiltshire)
 - Local (Dilton Marsh)
 - Site (within the context of the Site)
 - Negligible
- 2.4.3 Ecological impacts can be direct (e.g. habitat loss or mortality of animals) or indirect (e.g. habitat fragmentation or a reduction in population numbers). Impacts may be positive as well as negative. Impact assessment considers the permanence or reversibility of impacts and the extent over which they have an effect.
- 2.4.4 Ecological impacts were assessed as being significant if they are likely to result in any changes to the integrity of designated sites or priority habitats, any changes to the conservation status of protected or priority habitats or species, or if they are likely to contravene legislation or planning policy.

2.4.5 This report has been produced with reference to current EclA guidelines³ and BS 42020:2013⁴ which involves the evaluation of the ecological receptors and potential adverse effects upon them.

2.5 Mitigation Hierarchy

2.5.1 Mitigation measures should be embedded within the masterplan design and planning application process. This process from proposal to implementation needs to consider the 'mitigation hierarchy' of avoid, reduce, compensate, and enhance:

- Aim to avoid negative effects through the design process.
- Mitigate if negative effects cannot be avoided.
- Use compensation measures to offset residual impacts.
- Identify and implement opportunities to enhance biodiversity.

³ CIEEM (2018) *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine* version 1.2. Chartered Institute of Ecology and Environmental Management, Winchester

⁴ BSI (2013) *BS42020:2013 Biodiversity: Code of Practice for Planning and Development*. London: BSI



3. Results

3.1 Survey Constraints

- 3.1.1 Field survey results are valid for a limited duration and no investigation can provide a complete description and characterisation of a site. The composition of habitats and species can change depending on environmental variables and the mobility of species, so the results of a study become less reliable over time. In some cases, surveys that are 3 years old may be acceptable for a project assuming that habitats have not significantly changed in the intervening period, but for protected species it is likely that survey data will need to be no more than 18 months old.
- 3.1.2 The survey visits were carried out at an appropriate time of year and all areas were accessible. No survey constraints exist.

3.2 Designated Sites

- 3.2.1 The desk study provided information on the statutory designated sites and non-statutory designated sites. These are listed below in Table 1.

Table 1. Designated Sites			
Name	Status	Location/distance	Interest
Bath and Bradford on-Avon Bats	Special Area of Conservation (SAC)	Nearest location is 10.6km to north-west (Winsley Mine Site of Special Scientific Interest).	Greater Horseshoe Bat, Bechstein's Bat, Lesser Horseshoe Bat winter hibernation site
Salisbury Plain	SAC, Special Protected Area (SPA) and Site of Special Scientific Interest (SSSI).	4.18km to south-east	Juniper, calcareous grassland, Marsh Fritillary Butterfly, breeding Stone Curlew and Hen Harrier.
Upton Cow Downs	SSSI	3.3km to south-east	Chalk grassland, butterfly assemblage
Picket and Clanger Wood	SSSI	4.3km to north-east	Species-rich ancient woodland
Bratton Downs	SSSI	4.8km to east	Chalk grassland, butterfly assemblage

Fairwood House Marsh	Local Wildlife Site (LWS)	Immediately adjacent to western boundary of site	Marshy grassland
Round Wood	LWS	500 metres to north	Ancient woodland
Fairwood Road Railway Line	LWS	600 metres to east	Calcareous grassland

- 3.2.2 The desk study identified that the site was located within the Impact Risk Zone of Salisbury Plain Special Area of Conservation SAC, SPA and SSSI. Therefore, the Local Planning Authority may need to consult with Natural England during the planning application.
- 3.2.3 The site lies within the Core Area for a Core Roost of Greater Horseshoe bat *Rhinolophus ferrumequinum* at Westbury Leigh⁵, part of the Bath and Bradford on Avon Bats SAC. The site also lies within the Yellow Zone (medium risk) as defined by the Trowbridge and Westbury Bat Mitigation Guidelines (TWBMS)⁶. Therefore, consideration must be given to the usage of the site by Greater Horseshoe bats.
- 3.2.4 A financial contribution will be made in relation to non-residential development within the Yellow Zone of the Trowbridge & Westbury Bat Mitigation Strategy, to enhance habitat within the zone. The financial contribution will be calculated on any increase in developed area between the consented scheme and the s73 layout.
- 3.2.5 The site also lies within the Zone of Influence (Zoi) (significant impacts or severance to flightlines to be considered) for Mells Valley Special Area of Conservation (SAC) for Greater Horseshoe bat, which lies 8.9km to the south-west of the site.

3.3 Habitats

- 3.3.1 Target Notes (TNs) and photographs are contained in Appendix 3. The Habitats Plan is contained in Appendix 4.

Modified Grassland

- 3.3.2 The largest area of modified grassland lies at the southern end of the site (TN1). This comprises agricultural species-poor grassland. Species include Perennial Rye-grass *Lolium perenne*, Yorkshire Fog *Holcus lanatus*, Cock's-foot *Dactylis glomerata*, Broad-leaved Dock *Rumex obtusifolius* and Creeping Bent *Agrostis stolonifera*.
- 3.3.3 Areas of mown amenity grassland, also classed as modified grassland, occur throughout the main site, adjacent to holiday lodges and facilities buildings, as well as on the banks of some lakes (TN2).

⁵ Bat Special Areas of Conservation – Planning Guidance for Wiltshire (2015)

⁶ Trowbridge and Wiltshire Bat Mitigation Strategy (TWBMS) (July 2025)

This habitat is species-poor and comprises Annual Meadow-grass *Poa annua*, Common Daisy *Bellis perennis*, Creeping Buttercup *Ranunculus repens* and Red Fescue *Festuca rubra*.

- 3.3.4 This habitat is of low ecological value, common and widespread at all geographical levels thus, it is considered of **site importance**.

Other Woodland; Broadleaved

- 3.3.5 Broadleaved plantation woodland occurs throughout the site (TN3). The canopy layer is well-defined but the scrub and ground layers are sparse and species-poor. Canopy species include Ash *Fraxinus excelsior*, Oak *Quercus robur*, Common Lime *Tilia x europaeus*, White Poplar *Populus alba*, Silver Birch *Betula pendula*, Whitebeam *Sorbus aria* agg. and Hornbeam *Carpinus betulus*. Where it occurs, the scrub layer includes Dogwood *Cornus sanguinea* var., Field Maple *Acer campestre*, Hawthorn *Crataegus monogyna* saplings of Ash. The ground flora includes Lords-and-Ladies *Arum maculatum*, Common Nettle *Urtica dioica*, Bramble *Rubus fruticosus* agg. and Ivy *Hedera helix*.
- 3.3.6 This habitat is of moderate ecological value and it is considered of **local importance**.

Other Neutral Grassland

- 3.3.7 An area of damp grassland with a more diverse sward occurs at the south-eastern corner of the site (TN4). Species here include Yorkshire Fog, False Oat-grass *Arrhenatherum elatius*, Meadow Vetchling *Lathyrus pratensis*, Tufted Hair-grass *Deschampsia cespitosa*, Soft-rush *Juncus effusus*, Reed Canary-grass *Phalaris arundinacea*, Common Bird's-foot Trefoil *Lotus corniculatus* and Cuckooflower *Cardamine pratensis*.
- 3.3.8 This habitat is relatively species-poor and of small size. It is of low ecological value and it is considered of **site importance**.

Mixed Scrub

- 3.3.9 A linear area of mixed scrub, associated with a hedgerow, occurs in the southern part of the site. Species include mostly Bramble with some Blackthorn *Prunus spinosa*, Hawthorn and Goat Willow *Salix caprea*.
- 3.3.10 This habitat is of moderate ecological value, common and widespread at all geographical levels thus, it is considered of **site importance**.

Tall Forbs

- 3.3.11 Linear swathes of tall, ruderal vegetation occur along the western track and on some of the lake edges (TN5). Species include Rosebay Willowherb *Chamaenerion angustifolium*, Common Hogweed *Heracleum sphondylium*, Cow Parsley *Anthriscus sylvestris* and Great Willowherb *Epilobium hirsutum*.
- 3.3.12 This habitat is of low ecological value, common and widespread at all geographical levels thus, it is considered of **site importance**.

Ruderal/Ephemeral



- 3.3.13 Patches of sparse ruderal/ephemeral vegetation occur in the south-western and north-eastern corners of the site, associated with disturbance. They are species-poor and Broad-leaved Dock, Common Ragwort *Jacobaea vulgaris* and Colt's-foot *Tussilago farfara*.
- 3.3.14 This habitat is of low ecological value, common and widespread at all geographical levels thus, it is considered of **site importance**.

Ornamental Lake

- 3.3.15 Four ornamental lakes occur on site (see Figure 2) (TN6). Lakes 1, 2 and 3 are heavily managed for amenity. They are stocked with fish and have chemical input to reduce algae (see Photograph 1). Lake 1 supports a bed of Bulrush *Typha latifolia*. It is ringed with tall forbs. Lakes 2 and 3 support small clumps of aquatic vegetation only such as Bulrush, Branched Bur-reed *Sparganium erectum*, Brooklime *Veronica beccabunga*, Water Mint *Mentha aquatica* and ornamental Waterlily *Nymphaea* var. Lake 4 is split into two area. The eastern end of Lake 4 supports open water and some Bulrush. The majority of Lake 4, at the centre and western end, supports no open water and comprises a bed of Bulrush with wet mud in places. Lake 4 is heavily shaded by plantation woodland canopy and scrub.



Figure 2 showing lake numbers (numbering follows previous ecology reporting)



Photograph 1 showing some of the ornamental lakes

- 3.3.16 The intensively managed lakes are of low ecological value. Lake 4 is more 'natural', having a moderate ecological value. Overall the lakes are considered of **site importance**.

Other Wetland (Swamp)

- 3.3.17 Where dense stands of Bulrush occur, these are mapped as swamp (TN7).
- 3.3.18 This habitat is of moderate ecological value, common and widespread at all geographical levels thus, it is considered of **site importance**.

Introduced Shrub

- 3.3.19 Shrub beds exist around the holiday accommodation, mainly in garden spaces but also within amenity areas. These are intensively managed.
- 3.3.20 This habitat is of low ecological value, common and widespread at all geographical levels thus, it is considered of **negligible importance**.

Bare Ground

- 3.3.21 Areas of bare earth exist on site, such as at the northern end. This habitat is considered of **negligible importance**.

Artificial Unvegetated; Unsealed Surface & Developed Land; Sealed Surface

- 3.3.22 Large areas of hardstanding and compacted gravel exist on site, used for access, parking and storage. Chipped bark paths occur in places. Numerous buildings exist, including cabins, lodges, sheds, facilities buildings and a large metal storage barn.
- 3.3.23 These habitats are considered of **negligible importance**.

Trees

- 3.3.24 Individual trees occur at the eastern and southern edges of Lake 3 and within the facilities/car parking area. The lake trees include Weeping Willow *Salix x sepulcralis* and Silver Birch.
- 3.3.25 The trees are of low-moderate ecological value, common and widespread at all geographical levels thus, and are considered of **site importance**.

Hedgerows

- 3.3.26 Ornamental hedgerows exist on site, within the facilities area, mostly comprising Cherry Laurel *Prunus laurocerasus*. Native and species-rich native hedgerows occur at the southern half of the site, bordering the fields (TN8). Species include Blackthorn, Field Maple, Hawthorn, Wych Elm *Ulmus glabra*, Cherry *Prunus* sp., Ash and Bramble.
- 3.3.27 The hedgerows are of low-moderate ecological value, common and widespread at all geographical levels thus, and are considered of **site importance**.

Ditches

- 3.3.28 Numerous ditches occur on site, mostly connecting the lakes and associated with the boundaries of the site. Some ditches were completely dry at the time of the survey. Others held water (TN9). No ditch supports aquatic vegetation and all are shallow.
- 3.3.29 The ditches are of low-moderate ecological value, common and widespread at all geographical levels thus, and are considered of **site importance**.

3.4 Species

Badger

- 3.4.1 The desk study returned two records of Badger *Meles meles*, from 1979 and 1981, from at least 500 metres from the site.
- 3.4.2 No Badger sett was found during the survey and no evidence of activity was found. The site supports suitable foraging habitat for Badger.
- 3.4.3 The site is considered to be of importance at **site** level for Badger.

Bats

- 3.4.4 The desk study returned records of 14 species of bat, including Bechstein *Myotis bechsteinii*, Greater Horseshoe and Lesser Horseshoe *Rhinolophus hipposideros* bats, within the surrounding area.
- 3.4.5 The following buildings, whilst unaffected as part of the current proposals, were assessed for bats.

Café

- 3.4.6 The café building is brick-built, with all brickwork intact. It has a lean-to style roof with no external recesses/gaps for crevice-dwelling bats to potentially occupy and is completely sealed preventing any

access into the building interior (see Photograph 2). The café has a loft void but this was not accessible during the survey. All windows and doors in the building are well sealed with no gaps. No evidence of roosting bats was observed. Given the well-sealed nature of the roof structure and walls, and lack of external evidence, the café is considered to offer **negligible** suitability for roosting bats.



Photograph 2 showing café building, with soft play zone and railway carriage adjacent

Shower Block

- 3.4.7 The shower block is a relatively new style Portacabin building. The pitched roof runs from north to south, containing two gable ends. The roof is in excellent condition with no visible gaps or missing tiles. The exterior of the building is externally clad in wood timber. The southern gable end displays a small, lifted piece of timber cladding (see Photograph 3) and a gap where the cladding and roof meet. The gaps do not lead anywhere and are cobwebbed. No evidence of roosting bats was observed. The shower block offers **negligible** suitability for roosting bats.



Photograph 3 showing cladding on shower block

North-western Storage Barn

- 3.4.8 A large metal barn exists in the north-western corner of the site, which is used for storage and for Christmas entertainment (see Photograph 4). Open at both ends at the front, and with numerous other openings, the barn comprises 10 makeshift 'rooms' of different sizes that offer dark corners and crevices and an ambient temperature. Part of the barn is draped with cloth. Internally the corrugated metal roof was found to be intact, supported by exposed wooden rafters and beams. Signs of bat activity were found within the barn, including scattered droppings and feeding remains (see Photograph 5). No voids were found.



Photograph 4 showing part of the barn



Photograph 5 showing droppings and feeding remains

Trees

- 3.4.9 No mature trees will be impacted by the development. All plantation trees were inspected from the ground and found to support no Potential Roosting Features (PRFs).

Foraging and Commuting Habitat

- 3.4.1 Previous bat surveys of the southern part of the site (2022) recorded low numbers of Greater Horseshoe bat and Lesser Horseshoe bat using the grassland field boundaries (i.e. the plantation woodland edges and the mature hedgerow).

- 3.4.2 The site continues to support good quality bat foraging and commuting habitat.

Otter

- 3.4.3 The data search returned no record of Otter *Lutra lutra*. No evidence of Otter, including holts, was found on site during extensive searches of the lake edges and ditches. Anecdotal evidence from site personnel suggests this species has not been seen on site. It is possible that Otter uses the site to forage.
- 3.4.4 The site is of **site** importance for Otter.

Water Vole

- 3.4.5 The desk study returned two Water Vole *Arvicola amphibius* records, from over 20 years ago and with no specific location other than Biss Brook and River Biss. Previous ecological reports mention that Water Vole activity was found at some of the lakes but it has not been possible to locate detailed information.
- 3.4.6 During the 2025 survey, no burrows, droppings, or other evidence of Water Vole activity, were found during the survey at any of the accessible lake edges or the ditches. Lakes 1, 2 and 3 were thoroughly searched as well as the southern edge of Lakes 4 and 4a. The ditches provide sub-optimal Water Vole habitat, due to the narrow and shallow channel (where wet), and shallow banks. The lakes are heavily managed, with the majority supporting minimal aquatic vegetation and offer shallow banks (see Photographs 6 and 7). Large number of waterfowl are present. Anecdotal evidence from site personnel suggests this species has not been seen on site. It is possible that Water Vole forages on site.



Photographs 6 and 7 showing some of the banks of the lakes

- 3.4.7 The site is considered of **site** importance for Water Vole.

Hazel Dormouse

- 3.4.8 The data search returned no records of Hazel Dormouse (*Muscardinus avellanarius*). Hazel Dormouse is reasonably unlikely to occur on site due to a lack of food resource and limited suitable structure and a lack of nearby records, for example, the plantation woodlands lack understorey structure. Only the

southern hedgerow links to other habitat. Given the lack of records of the Hazel Dormouse, and lack of suitable habitat, this species is not considered further in this report.

Reptiles

- 3.4.9 The desk study returned four records of reptile; one of Slow Worm *Anguis fragilis*, one of Grass Snake *Natrix helvetica* and two of Common Lizard *Zootoca vivipara*. All are from Westbury and from at least 15 years ago.
- 3.4.10 The site is considered to be sub-optimal for reptiles. Any open basking areas are heavily disturbed by vehicles and human activity. No hibernation habitat exists on site. It is possible that reptiles, such as Grass Snake, forage on site.
- 3.4.11 The site is considered of importance at **site** level only for reptiles.

Birds

- 3.4.12 The desk study provided over 290 bird record, with no records from the site and very few with specific locations.
- 3.4.13 The site supports suitable nesting bird habitat and foraging habitat, within the woodlands, hedgerows, scrub and mature shrubs.

Hedgehog

- 3.4.14 The desk study returned no records of Hedgehog *Erinaceus europaeus*.
- 3.4.15 No evidence of Hedgehog was found during the survey. The woodlands, hedgerow bases and scrub offer suitable cover and foraging opportunities for Hedgehog.
- 3.4.16 The site is considered to be of importance at **site** level for Hedgehog.

Amphibians

- 3.4.17 The desk study returned one record of Common toad *Bufo bufo* and one record of Great Crested Newt *Triturus cristatus*, both from 1978, located at a pond at Westbury Station, over 1.5km to the east.
- 3.4.18 The site does not support suitable breeding habitat for Great Crested Newt, with all lakes supporting fish and a general lack of egg-laying material. No other ponds exist within 250 metres of the site. It is reasonably unlikely that Great Crested Newt occurs on site. The site is not within a Great Crested Newt consultation zone. Deep fish ponds can support Common Toad.
- 3.4.19 The site is considered to be of importance at **site** level for common amphibians. Amphibians are not considered further in this report.

3.5 Invasive, Non-native Species

- 3.5.1 The desk study returned no records of invasive plant species, as listed on Schedule 9 of the Wildlife & Countryside Act, 1981.
- 3.5.2 Wall Cotoneaster *Cotoneaster horizontalis* was found within shrub beds on site.



4. Impact Assessment

4.1 Development Context

- 4.1.1 The following assessment assumes the development will progress as detailed in paragraph 1.1.3.
- 4.1.2 The current s73 layout has been assessed against the approved layout. It is understood that the approved layout included ecologically designed landscaped boundaries at the southern part of the site, specifically included to provide high quality bat foraging and commuting habitat (e.g. dual hedgerow, 'green lane' and nature trail). This was detailed within an Ecological Enhancement Site Plan. The s73 retains the majority of the same landscaped boundary habitat types. The amount of wildflower grassland has decreased but the amount of linear species-rich scrub habitat has increased. Moreover, two permanently wet SUDS pools are now included in the layout, as well as approximately 300 trees/shrubs. Both the pools and extra trees/shrubs provide suitable bat foraging habitat. The pools will be planted with marginal aquatic species and the trees/shrubs will be a mixture of flowering varieties.
- 4.1.3 Table 2, below, details the comparative areas and Figures 3 and 4 show the Ecological Enhancement Site Plans for the consented scheme and for the s73 scheme. Please refer also to the consented Ecological Enhancement Site Plan (Ashley Design Drawing no. 2626-20-03 and Inspired Partnerships Limited drawing no.: 523-3001-S4-Approved Masterplan-Rev 02) and the Ecological Enhancement Site Plan for the current s73 application (Inspired Partnerships Limited drawing no.: 523-3005-S4-Ecological Enhancement Site Plan-Rev 06).

Table 2. Comparison of proposed ecological landscaping			
Habitat Type	Consented Scheme Area (m ²)	Proposed s73 Scheme Area (m ²)	Difference (m ²)
Wildflower grassland	4621	3335	-1286
Landscape planting for bats (e.g. linear scrub and hedgerows)	6119	7075	+956
SUDS (permanently wet pools)	0	771	+771
Trees/shrubs (number)	0	300 (approximately)	+ 300 trees/shrubs

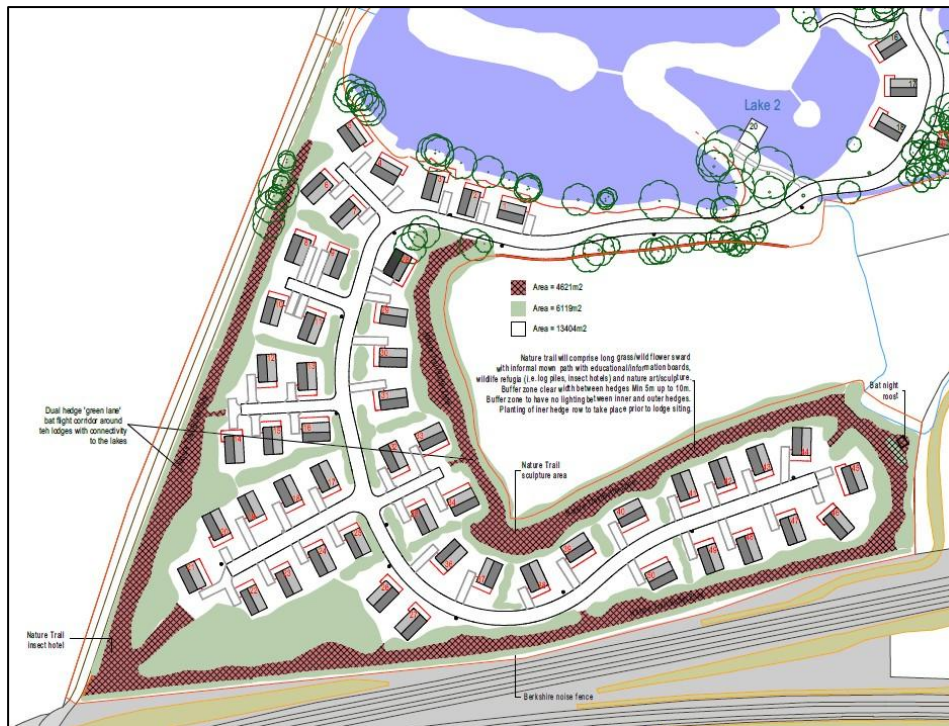


Figure 3 showing the consented Ecological Enhancement Site Plan (IP Limited)

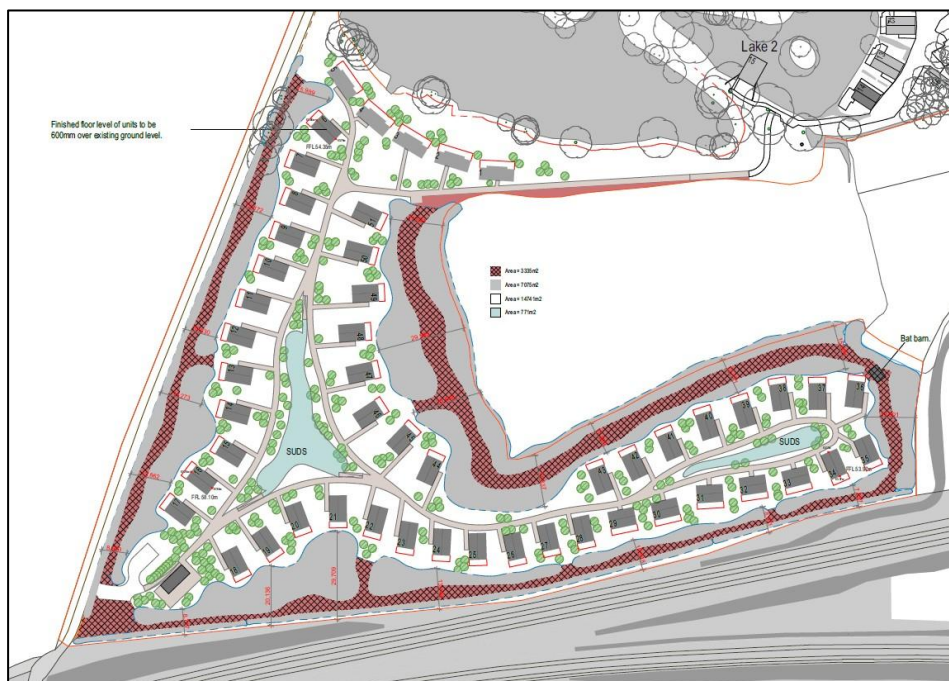


Figure 4 showing the proposed Ecological Enhancement Site Plan (IP Limited)

- 4.1.4 In terms of the widths of the proposed landscaping (bat foraging and commuting corridor), the main changes are in the south-western corner and the north-eastern boundary. The consented scheme provided widths of between 16 and 22 metres at the south-western corner (see Ashley Design Drawing no. 2626-20-03) and the s73 layout shows a reduction in some parts of the south-western corner, with widths measured at a minimum of 8 metres but increasing to 29 metres further east (see Inspired

Partnerships Limited drawing no.: 523-3005-S4-Ecological Enhancement Site Plan-Rev 06). However, the s73 layout shows an increased width of bat corridor at the north-eastern boundary, with the consented scheme showing widths of between 10-15 metres and the s73 layout showing widths of 17-29 metres. The remaining boundary widths across the two scheme layouts are very similar. Therefore, overall, whilst some areas have reduced in width (whilst still retaining the same habitat types), other areas have increased in width.

- 4.1.5 Overall, it is considered that the new s73 layout retains the valuable bat foraging corridor, with the proposed habitat types replicated, the dual hedgerow retained and retained boundary vegetation protected. Widths slightly differ in places but where the corridor is narrowed in places, its width increases in other areas. Slightly less wildflower grassland is proposed but this is mitigated for by an increase in tree/shrub planting and aquatic planting in the SUDS pools. In addition, linear species-rich scrub planting has increased, offering bats a structurally diverse foraging and commuting habitat.

4.2 Designated Sites

- 4.2.1 There is expected to be no deleterious direct impacts to any statutory protected sites, due to the distances involved and lack of impact pathways.
- 4.2.2 The inclusion of the Ecological Enhancement Site Plan for bats, as detailed above and within the bat assessment below, indicates that there is expected to be no deleterious indirect impact on the Bath and Bradford on Avon Bats SAC from the development. The s73 layout retains the functionality of the site for foraging and commuting bats. A new bat barn and the erection of multiple bat boxes, which formed part of the consented scheme, will also be implemented.
- 4.2.3 There is expected to be no deleterious direct impact on the Local Wildlife Sites. In the absence of mitigation, it is possible that indirect impacts from the construction phase could occur to the adjacent LWS and this would be adverse at local level (see Section 5).

4.3 Habitats

- 4.3.1 The habitats to be lost include modified grassland, other neutral grassland and a small area of plantation woodland, with disturbance/loss to bare ground/hardstanding and possibly shrub beds. The habitats of highest value on site are the woodlands and mixed scrub. The woodlands, however, are species-poor, homogenous and lack species-diversity and structure. The majority of these habitats are being retained. There is planning consent for the removal of part of the southern woodland blocks to facilitate the lodge development. As detailed above, the new landscaping adequately mitigates for any losses. Retained woodland will also be enhanced by understorey planting with woody species. The



landscaping and enhancement will result in a **beneficial** impact at the **site** level. This will provide betterment, particularly with the construction methods proposed as part of this s73 application changes, such as lodges on stilts rather than concrete pads.

- 4.3.2 There will be no impact to the lakes, ditches and the remainder of the site. New SUDS pools are proposed as part of the s73 changes. Indirect impacts to retained habitats will include a sensitive lighting scheme and sensitive construction practices (see Section 5).

4.4 Species

Badger

- 4.4.1 No Badger sett was found on site but it is possible that Badger uses the site to forage. Mitigation during the construction phase will be the imposition of Reasonable Avoidance Measures (RAMs). The residual impact on Badger is **negligible**.

Bats

- 4.4.2 The storage barn supports evidence of bat activity. If proposals come forward for this barn, further bat survey work would be required. No buildings will be impacted as part of the s73 application changes but overall, the remaining buildings on site offer negligible bat roosting suitability.
- 4.4.3 Whilst not required for this application, two bat transect surveys were undertaken in late summer 2025 by RHE, to obtain an updated understanding of the bat usage of the site. The results showed that a very low number of bats were foraging and commuting along the southern boundary habitats, which is in line with previous results. Only one registration of Lesser Horseshoe bat was obtained. Other species recorded included Brown Long-eared *Plecotus auritus*, Common Pipistrelle *Pipistrellus pipistrellus* and Noctule *Nyctalus noctula*.
- 4.4.4 An updated sensitive lighting scheme has been designed for the site (see Inspired Partnerships Limited drawing no.: 523-3003-S4-Lighting Plan North-Rev 05 and 523-3004-S4-Lighting Plan South-Rev 05). The lighting is bollard lighting with bulbs of 2700 Kelvin and downlit. There has been a reduction in the number of lighting bollards designed, particularly around the lake edges, the bat corridor and the new SUDS pools.
- 4.4.5 With all the appropriate mitigation and new compensatory planting, plus multiple bat roosting opportunities implemented, the residual impact on bats is expected to be **beneficial**.

Reptiles

- 4.4.6 Whilst the site is not considered to be optimal habitat for reptiles, it is recommended that careful removal of any vegetation and clearance of the site is implemented. The residual impact on reptiles is **negligible**.



Otter & Water Vole

- 4.4.7 No evidence of Otter or Water Vole was found on site but it is possible that both species use the site to forage. As part of the s73 application, there will be no impact to the lake edges. Mitigation during the construction phase will be the imposition of Reasonable Avoidance Measures (RAMs) as well as a buffer zone where no disturbance will take place to the lake edges from construction, which was agreed as part of the mitigation package for the consented scheme. A pre-commencement survey for Water Vole is also recommended. The residual impact on Otter and Water Vole is **negligible**.

Birds

- 4.4.8 In the absence of mitigation, nesting birds could be impacted by the proposals if they occur within any affected habitat. Nest surveys will be required if work takes place between March-August.
- 4.4.9 New bird nesting and foraging habitat will be created as part of the scheme, via bird boxes and new planting. The residual impact on birds is expected to be **beneficial**.

Hedgehog

- 4.4.10 In the absence of mitigation, the construction and operational phases could negatively impact on Hedgehog. Mitigation during the construction phase will be the imposition of Reasonable Avoidance Measures (RAMs).
- 4.4.11 A sensitive lighting scheme will be adopted during the construction and operational phases. The species-rich landscaping has the potential to attract Hedgehog to the site.
- 4.4.12 The residual impact on Hedgehog is **beneficial** at **site** level.

4.5 Invasive Species

- 4.5.1 In the absence of mitigation, the construction has the potential to spread the invasive, non-native species, both within the site and outside the site.
- 4.5.2 The development will include eradication or management of the invasive, non-native species. The residual impact will be **beneficial** at **site** level.



5. Recommendations

5.1 Further Surveys

- 5.1.1 For the current application, no further surveys are required.

5.2 Mitigation & Enhancement Measures

General

- 5.2.1 Protection of ecological features (protected sites, habitats and species) during the construction phase will be described in a Construction Environmental Management Plan (CEMP). A Landscape Ecological Management Plan (LEMP) will contain Operational Aims and Objectives, Rationale for management, Prescriptions and schedules detailing the timing and responsibility for delivering the greenspace within the site. A Biodiversity Enhancement Scheme (BES) will include details of biodiversity enhancements. It is anticipated that the CEMP, LEMP and BES will be provided as planning conditions in advance of the commencement of the proposed development.

Protected Sites

- 5.2.2 The Ecological Enhancement Site Plan must be implemented and maintained for the lifetime of the development, to maintain the functionality of the site to the SAC via continuing to offer bat foraging and commuting habitat.
- 5.2.3 Indirect protection of statutory and non-statutory protected sites during the construction period will be detailed in the CEMP, which will include a sensitive lighting scheme.

Habitats

- 5.2.4 The new habitats and enhanced habitats will be created and managed as described within the LEMP.

Badger & Hedgehog (General)

- 5.2.5 To ensure that any mammals are not trapped or harmed during the construction work, smaller excavations should be covered if left overnight. Larger excavations, if left overnight or for longer periods, should be ramped to enable animals to escape. Any large diameter pipes should be capped at both ends.

Bats

- 5.2.6 As above, Ecological Enhancement Site Plan must be implemented and maintained to offer bat foraging and commuting habitat.



- 5.2.7 The lighting scheme must be created as detailed in the plans. No construction lighting will be used (no night-time working).
- 5.2.8 Multiple bat boxes will be erected onto retained trees and incorporated into new buildings, where appropriate.

Reptiles

- 5.2.9 It is recommended that consideration is given to reptiles during the site clearance and removal of the vegetation. Areas of the site must be cleared north to south, to allow reptiles to disperse along the boundary vegetation. Prior to removal of vegetation, the habitat will be destructively searched by either a suitably experienced ecologist or a member of the construction personnel trained in reptile identification. If a reptile is found, it must be allowed to disperse to a safe area.

Otter & Water Vole

- 5.2.10 A minimum of a 4 metre buffer will be implemented around each lake edge. Prior to construction starting, a check for Water Vole burrows and Otter holts will take place.

Nesting Birds

- 5.2.11 In general, impacts on nesting birds should be avoided in particular, by carrying out site clearance and similar operations outside of the bird breeding season (March- August). Construction activities that might directly impact upon breeding birds should hence be limited to the September-February period. If vegetation has to be cleared during the bird breeding season checks immediately before clearance by a suitably qualified ecologist will be required. If nesting activity is detected work in that area will need to stop until the ecologist considers that nesting activity is finished.
- 5.2.12 Multiple bird boxes will be erected onto retained trees.

Invasive Species

- 5.2.13 The Wall Cotoneaster either needs to be carefully managed within the shrub beds on site and prevented from spreading, or requires eradication from the site, using a recognised methodology and disposal at a licensed landfill site.

Appendix 1: Planning Policy & Legislation

National Policy

The National Planning Policy Framework (NPPF 2024) describes the Government's planning policy for England and how it should be applied. Within this framework, the requirements in relation to biodiversity are included within several policies. The two most relevant to individual planning decisions are Paragraphs 174 and 180, shown below:

- 187. Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
 - c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; etc...
- 193. 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) 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 broader 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 and 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 improve biodiversity 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.

Legislation

The Wildlife and Countryside Act 1981 (as amended by the CROW Act 2000) includes the notification and confirmation of Sites of Special Scientific Interest (SSSIs). SSSIs can be notified for their floral, faunal, geological, or physiographical features. Protection against damaging operations and management of SSSIs is also included within the Act. Impact Risk Zones (IRZs) are zones around an SSSI account for the particular sensitivities of the features for which it is notified and identify development proposal which could have adverse impacts.

The Wildlife and Countryside Act 1981 (as amended by the CROW Act 2000) protects native animals, plants and habitats. Under the Act it is an offence to intentionally kill, injure or take any wild animal listed on Schedule 5 and it is an offence to interfere with places used for shelter or protection, or intentionally disturb animals occupying such places. The Act prohibits picking, uprooting or destroy any wild plant (or any attached seed or spore) listed in Schedule 8.

European Protected Species (EPS) such as bats, Hazel Dormouse, Otter, Natterjack Toad, Smooth Snake, Sand Lizard and Great Crested Newt are protected by the Wildlife and Countryside Act 1981 (as amended by the CROW Act 2000) and the Conservation of Habitats and Species Regulations 2017. The Acts make it an offence to:

- a) Deliberately capture, injure or kill an EPS;
- b) Deliberately impair an EPS's ability to survive, breed, reproduce, rear or nurture young; to hibernate or migrate; or significantly affect the local distribution or abundance of the EPS.
- c) Possess or control live or dead EPS or any part of, or anything derived from a EPS;
- d) Damage or destroy a breeding site or resting place of an EPS;
- e) Intentionally or recklessly obstruct access to any place that is used for shelter or protection by an EPS;
- f) Intentionally or recklessly disturb a structure or place that it uses for shelter or protection that is occupied by an EPS.

All common herptiles are protected under the Wildlife and Countryside Act 1981 (as amended by the CROW Act 2000). Grass Snake, Slow Worm, Common Lizard, Adder are protected against intentional killing or injury.



Common Frog, Common Toad, Smooth Newt, and Palmate Newt are protected against sale. In addition, all British reptiles, Common Toad, and Great Crested Newt are listed as Species of Principal Importance.

All nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended). It is an offence to intentionally kill, injure or take any wild bird or take, damage, or destroy its nest whilst in use or being built, or take or destroy its eggs. It is an offence to intentionally or recklessly disturb a species listed on Schedule 1 of the Act while they are nest building or at or near a nest with eggs or young, or to disturb the dependent young.

The Protection of Badgers Act 1992 makes it an offence to wilfully, or to attempt to kill, injure, take, possess or cruelly ill-treat a Badger, or intentionally or recklessly interfere with a sett. Interference of a sett includes disturbing badgers during occupation of a sett, or damaging or destroying a sett, or obstructing access to the sett.

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 places a duty on every public authority to have regard to conserving biodiversity. Section 41 of the same Act requires the Secretary of State to publish a list of the living organisms and types of habitats that are of 'Principal Importance' for the purpose of conserving biodiversity. The Secretary of State must take steps, as appear reasonably practicable, to further the conservation of those living organisms and habitats in any list published under this section. The list of species and habitats of principal importance currently includes 943 species and 56 habitats. These are the species and habitats found in England which are regarded as conservation priorities under the UK Post-2010 Biodiversity Framework

The Hedgerows Regulations 1997 protect 'important' hedgerows from destruction or damage. A hedgerow is 'important' if it (a) has existed for 30 years or more; and (b) satisfies at least one of the criteria listed in Part II of Schedule 1 of the Regulations. Under the Regulations, it is against the law to remove or destroy 'important' hedgerows unless permitted by the local planning authority.



Appendix 2: Desk Study

The desk study results are summarised in the report. Further details can be provided by written request to Rachel Hacking Ecology.

Appendix 3: Target Notes

Reference No.	Habitat	Photograph
1	Modified grassland (agricultural)	
2	Modified grassland (amenity)	
3	Plantation woodland (southern area)	
4	Other neutral grassland	

5	Tall Forbs		
6	Ornamental lake		
7	Other wetland		
8	Hedgerow		

9	Wet ditch	
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Appendix 4: Habitats Plan

