

Preliminary Ecological Appraisal & Preliminary Roost Assessment

Survey site:

Blackberries Camping, Monkton Farleigh, Wiltshire, BA15 2QP

Client:

Stuart Anderson

Report date:

17/04/2026

Project:

This report has been produced to support a planning application with Wiltshire Council. The proposal is described as: '*Erection of replacement clubhouse, replacement of reception building and erection of sauna after demolition of toilet/shower/pot wash building*'.

PEA Survey methodology and legislation can be found in the Arbtech Supplement: [PEA Methodology and Legislation - 2024](#).

PRA survey methodology and legislation can be found in the Arbtech Supplement: [PRA Methodology and Legislation - 2024](#).

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The field survey was undertaken by Laurence Wills ACIEEM, BSc (Hons), Senior Ecologist. Laurence has 4 years' experience completing Preliminary Ecological Appraisal and Preliminary Roost Assessments and holds a Natural England Class 2 bat licence (licence number available on request).					
Date of survey	Temperature (°C)	Humidity (%)	Cloud Cover (%)	Wind (km/h)	Rain
01/04/2026	14	76	70	1.57	None
This report is considered valid for a period of 18 months in accordance with CIEEM guidance in the lifespan of Ecological Reports and Surveys.					
Limitations					
It should be noted that whilst every effort has been made to describe the baseline conditions within the survey area, and evaluate these features, this report does not provide a complete characterisation of the site. This assessment provides a preliminary view of the likelihood of protected species being present. This is based on suitability of the habitats on the site and in the wider landscape, the ecology and biology of species as currently understood and the known distribution of species as recovered during the searches of historical biological records. A biological records data search has not been undertaken. However, given the impacts to the site as part of the current proposed scheme, it is not anticipated that the purchase of biological records data will add any significant weight or alter the conclusions and recommendations outlined in this report. The two toilet blocks and clubhouse were not present onsite during the site survey and therefore a Preliminary Roost Assessment (PRA) of these buildings was not undertaken.					
Executive Summary					
Further Surveys / Advice required to inform the planning application					
Designated Sites	Habitat Regulations Assessment (HRA) for local SAC site				
Recommended Mitigation/Compensation Requirements					
Surrounding Landscape	Construction Environmental Management Plan (CEMP) to protect onsite and local habitats.				
Invasive Species	Invasive plant species removal.				
Bats	Precautionary Working Methods to be applied during site preparation and construction and enhancement proposed.				
Birds	Precautionary Working Methods to be applied during site preparation and construction and enhancement proposed.				
Badgers	Preconstruction walk over survey, precautionary Working Methods to be applied during site preparation and construction				
Reptiles	Precautionary Working Methods to be applied during site preparation and construction.				
Dormice	Precautionary Working Methods to be applied during site preparation and construction.				
Hedgehogs	Precautionary Working Methods to be applied during site preparation and construction, ecological enhancement proposed.				

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Ecological Survey Factor Conclusion, Impact or Recommendations	Detailed using desk study and site survey. Any specific limitations noted within relevant section. This table may include further work you will need to commission (if any) to obtain planning permission or comply with legislation for other consent. All clients are expected to read and understand this section, or to contact the Project Ecologist for advice. A site location plan in Appendix A, a site habitat plan in Appendix B, and site photographs in Appendix C. Botanical species are described with reference to the DAFOR scale (D = Dominant; A = Abundant, F = Frequent, O = Occasional, R = Rare).
Site context	
	The site is located to the north of Monkton Farleigh, near Bradford on Avon, Wiltshire (national grid reference: ST 80133 66109). The site comprises a temporarily closed camping site supporting areas of modified grassland, bramble scrub, scattered trees, and woodland. A large block of woodland is located directly offsite to the northwest, with open grassland present to the south and southeast. A network of hedgerows and scattered mature trees connects the site to the wider landscape to the east. The site and surrounding environment are considered to provide high potential for supporting a range of wildlife. The site supports areas previously classified as of UK Priority Habitat: Deciduous Woodland which, based on its characteristics and classification, meets the criteria for a Habitat of Principal Importance listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006), specifically 'Lowland' Mixed Deciduous Woodland'. Other habitats within the site have low ecological value. Notable habitats are present within 2km.
Habitats and flora	
Survey Results	Habitats recorded on site include: • w1g – Other broadleaved woodland • h3h – Mixed scrub • g4 (32, 108), – Modified grassland (scattered tree, frequently mown) • h3d – Bramble scrub

- **u1b5** – Buildings
- **u1c** – Artificial unvegetated, unsealed surface

A description of each habitat type is provided below with photos shown in **Appendix C** and locations of the habitats illustrated on the site plan in **Appendix B**:

w1g – Other broadleaved woodland

A woodland is present onsite located within the southern western section, and adjacent the boundaries. The tree species recorded within the canopy layer of the woodland include beech *Fagus sylvatica* (A), sycamore *Acer pseudoplatanus* (A), ash *Fraxinus excelsior* (O), hawthorn *Crataegus monogyna* (O), and willow spp. *Salix* spp. (R). The field layer comprises common nettle *Urtica dioica* (F), ivy *Hedera helix* (F), lesser celandine *Ficaria verna* (F), small-leaved dock *Rumex acetosella* (F), cleavers *Galium aparine* (F), dog's mercury *Mercurialis perennis* (F), bramble *Rubus fruticosus* (F), variegated yellow archangel *Lamiastrum galeobdolon* subsp. *argentatum* (O), hogweed *Heracleum sphondylium* (O), lords-and-ladies *Arum maculatum* (O), cock's foot *Dactylis glomerata* (O), Indian clusterberry *Leycesteria formosa* (O), herb Robert *Geranium robertianum* (O), cherry laurel *Prunus laurocerasus* (O), Italian lords-and-ladies *Arum italicum* (R), wild garlic *Allium ursinum* (R), primrose *Primula vulgaris* (R), and hart's-tongue fern *Asplenium scolopendrium* (R).

The woodland supports a two-storey structure throughout, with two distinct age classes of trees present, however, no seedlings or young tree regeneration were recorded, indicating limited ongoing natural recruitment. Five native tree species are present within the canopy, and over 80% of the ground flora and shrub layer is composed of native species. Browsing pressure is evident but limited, affecting less than 40% of the woodland. No notable veteran trees are present, and no trees were noted to be in particularly poor health. Deadwood is scarce, with less than 25% of the woodland supporting standing or fallen deadwood features. Approximately 40% of the woodland contains open space, contributing to structural heterogeneity. Variegated yellow archangel *Lamiastrum galeobdolon* subsp. *argentatum* and Italian lords-and-ladies *Arum italicum*, invasive non-native species,

	are present within the woodland, indicating past planting or garden influence with the cherry laurel <i>Prunus laurocerasus</i>. Around 20% of the woodland floor shows evidence of ground damage likely associated with previous site use. No clearly identifiable National Vegetation Classification (NVC) ground-layer community was apparent, reflecting a disturbed and transitional woodland understorey rather than a well-defined semi-natural assemblage. The woodland has previously been identified as UK Priority Habitat Deciduous Woodland, which indicates that it may retain underlying semi-natural woodland characteristics. The current survey recorded a number of woodland-associated species, including dog's mercury, wild garlic, primrose and hart's-tongue fern, supporting this interpretation. However, the canopy is dominated by beech and sycamore, and the presence of non-native species such as cherry laurel, Indian clusterberry and Italian lords-and-ladies, together with frequent nutrient-enrichment indicators such as nettle, cleavers, bramble and hogweed, confirms that the woodland is modified and represents a degraded example of the habitat. <u><i>h3h – Mixed scrub</i></u> Small patches of mixed scrub are present within the central and northeast sections of the site. The areas of scrub, although connected to the woodland, display a clear change in structure and species composition, indicating likely introduction of select species or additional screening through previous site use. A mix of shrub ages are present, including saplings, young shrubs and maturer shrubs, and no non-native invasive species (Schedule 9) were recorded. The edges of the scrub are not well defined due to the previous maintenance around the site and adjacent tracks/grassland. Despite the adjacent tracks and grassland, no traditional 'clearings' or 'rides' are directly associated with the habitat, and therefore do not create additional enhanced areas of habitat. Species within this habitat include hawthorn <i>Crataegus monogyna</i> (A), wild privet <i>Ligustrum vulgare</i> (F), dogwood <i>Cornus sanguinea</i> (F), hazel <i>Corylus avellana</i> (F), common nettle <i>Urtica dioica</i> (F), bramble <i>Rubus fruticosus</i> (F), small-leaved dock <i>Rumex acetosella</i> (O), ground ivy <i>Glechoma hederacea</i> (O), cleavers <i>Galium aparine</i> (O), wild garlic <i>Allium ursinum</i> (O), lords-and-ladies
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	<i>Arum maculatum</i> (O), buddleia <i>Buddleja davidii</i> (O), green alkanet <i>Pentaglottis sempervirens</i> (O), hogweed <i>Heracleum sphondylium</i> (O), and hart's-tongue fern <i>Asplenium scolopendrium</i> (O). <u>g4 (32. 108). – Modified grassland (scattered tree, frequently mown)</u> An area of grassland is located within the central areas of the site, and within clearings within the southern woodland section, mainly all for amenity purposes. Due to consistent maintenance, the sward height is not varied and is maintained at a consistent low height. There are no occasions of scrub within the grassland, as well as no evidence of Wildlife and Countryside Act. (1981) Schedule 9 species, nor bracken (<i>Pteridium aquilinum</i>). Due to site use and likely frequent use of vehicles within the grassland, areas of physical damage are present within the habitat, making up approximately 10% of the overall habitat. Species recorded within this habitat include perennial ryegrass <i>Lolium perenne</i> (A), Yorkshire fog <i>Holcus lanatus</i> (F), red fescue <i>Festuca rubra</i> (F), creeping buttercup <i>Ranunculus repens</i> (F), white clover <i>Trifolium repens</i> (O), daisy <i>Bellis perennis</i> (O), dove's-foot crane's-bill <i>Geranium molle</i> (O), dandelion <i>Taraxacum</i> spp. (O), and ragwort <i>Jacobaea vulgaris</i> (O). The following scattered trees are present within the habitat: • T1 Beech – identified as 'large' with a continuous full canopy with no adverse impacts to health. No specific ecological niches recorded, although vegetation is present below the canopy. • T2, T3, T4 & T5 Hawthorn – Five 'medium' trees with continuous canopies with no adverse impacts to health or specific ecological niches. Vegetation is present below with both trees. • G6 Hazel, Ash and Beech – A group of six 'medium' trees with predominantly full canopies. The pruned nature displays adverse impacts on general tree health. Open stands create invertebrate niches, and vegetation fully covers below the canopies.
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	<u><i>h3d – Bramble scrub</i></u> Pockets of large bramble scrub are present within the central area of the site, adjacent the grassland and small areas of mixed scrub. These areas are dominated by bramble <i>Rubus fruticosus</i>. No other species of interest are present within these areas. <u><i>u1b5 – Buildings</i></u> A former WWII pillbox (B1) is located within the centre of the site, immediately covered by mixed scrub on all elevations. No species of interest were directly associated with this building. A small timber reception/information point (B2) is also located within the northeast of the site with sections of mixed scrub surrounding to the north. No species are directly associated with the building. Full descriptions of the buildings are present within the 'Bats' section below. <u><i>u1c – Artificial unvegetated, unsealed surface</i></u> Areas of gravel/stone track are present throughout the grassland and woodland sections, including gravel foundation areas where buildings onsite were previously present. No species of interest were recorded within these areas. <i>The Surrounding Landscape</i> A review of the Multi Agency Geographic Information for the Countryside (MAGIC) database was completed to determine the presence of protected and/ or notable habitats within 2km of the site. Protected and/ or notable habitats recorded within 2km and their nearest distance from the site are detailed below. • UK Priority Habitat: Deciduous Woodland – <u>Onsite (southern and western section)</u> • National Forest Inventory: Woodland – <u>Onsite (southern and western section)</u> • Ancient Woodland – ~315m north. • UK Priority Habitat: Lowland Meadows – ~495m north. • UK Priority Habitat: Lowland Calcareous Grassland – ~495m north.
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	• UK Priority Habitat: Traditional Orchards – ~1.3km north.
<i>Foreseen Impacts</i>	The Site The woodland is registered as a UK Priority Habitat: Deciduous Woodland despite the assessment onsite suggesting a modified habitat with a potentially declined condition. As part of the proposed plans, the woodland onsite will not be impacted by the development, and habitats/areas will be fully retained as part of this application. The buildings proposed will be occurring within the footprint of the previously positioned buildings onsite, and therefore a decrease in habitats is highly unlikely from the previously established site 'baseline'. However, temporary indirect effects during the construction period may occur due to the presence of machinery and groundwork taking place, that may create dust/particulate damage and/or noise impacts. The grassland, scattered trees, and areas of scrub on site are considered common and widespread both locally and nationally. The proposed development will also not result in any loss to these habitats, as the buildings will be located within the original footprint of the previous buildings. Temporary indirect effects during the construction period may occur due to the presence of machinery and groundwork taking place, that may create dust/particulate damage and/or noise impacts onto the adjacent areas. Statutory Biodiversity Net Gain (BNG) The current proposals onsite are not considered to require a Statutory Biodiversity Net Gain (BNG) assessment due to the lack of habitat impact (di minimis 25m²) and also lack of impacts/no likely decline to the UK Priority Habitat: Deciduous Woodland onsite. If the plans change to include the removal of any priority habitat, or an area of any habitat larger than 25m² a BNG assessment must be undertaken.
<i>Recommendations</i>	Mitigation and compensation The trees onsite and woodland within the site should be protected in line with the measures outlined in the British Standard "Trees in Relation to Design, Demolition and Construction to Construction - Recommendations" (BS 5837) (2012).

	A Construction Environmental Management Plan (CEMP) will be required to mitigate any adverse effects created by the development and construction of the proposed plans on site to the adjacent habitats and habitats onsite. Enhancements To enhance the site for biodiversity in line with the National Planning Policy Framework (NPPF), native species of local importance should be selected for landscaping within the development. These should be located in proximity to the woodland within the south of the site and/or mature scattered trees to enhance these existing habitats in an aim to increase the current condition.
Designated Sites	
<i>Survey Results</i>	Statutory designated sites A 2km radius data search for the presence of national statutory designations, and a 10km search for international designated sites has been undertaken using the MAGIC database. The data search indicates that the site is not subject to any statutory or non-statutory designations. However, the below designated sites are located within 2km/10km: • National Landscape (Cotswolds) – <u>On site</u> • Brown's Folly SSSI – ~290m northwest • Bath & Bradford On Avon Bats SAC – ~290m northwest The site is also situated within the Brown's Folly SSSI impact zone.

	<i>Non-statutory designated sites</i> The presence of non-statutory designated sites within 2km of the site cannot be established without data from the local records centre. However, due to the limited impacts of the current proposed development on site and surrounding habitats, a local search is not deemed necessary.
<i>Foreseen Impacts</i>	<i>Statutory designated sites</i> The site is situated within proximity to the Bath & Bradford On Avon Bats SAC, and the application is within the suggested consultation zone for the statutory site. The SAC is primarily designated for greater horseshoe, lesser horseshoe and Bechstein's bats, which will utilise the surrounding landscape for commuting and foraging purposes. All vegetation/habitats onsite will be retained, however, impacts to commuting and foraging bats could occur due to the installation of any artificial lighting as part of the proposed plans, if unmitigated. The proposed development type is not listed as a possible high risk for the Brown's Folly SSSI impact zone and therefore no impacts are anticipated.
<i>Recommendations</i>	<i>Bath & Bradford On Avon Bats SAC</i> Due to the proximity to internationally designated sites and the site being located within the core area/consultation zone, a Habitat Regulations Assessment (HRA) will be required for the local authority to assess the impacts of the development on these protected sites, specifically in relation to lighting due to the increase of artificial lights as part of the application.

Invasive / non-native species	
<i>Survey results</i>	<i>Invasive Species</i> Variegated yellow archangel <i>Lamium galeobdolon</i> subsp. <i>Argentatum</i>, cherry laurel <i>Prunus laurocerasus</i> and Italian lords-and-ladies <i>Arum italicum</i> were recorded within the woodland onsite, and buddleia <i>Buddleja davidii</i> recorded within the mixed scrub. Buddleia, cherry laurel and Italian lords-and-ladies are not recorded in Schedule 9 of the Wildlife and Countryside Act. (1981) (as amended), however, they are generally regarded as a species of concern for native flora due to their highly competitive. Buddleia is acknowledged by the Department for Environment, Food & Rural Affairs (Defra) as a non-native species with invasive tendencies. Variegated yellow archangel is recorded in Schedule 9 of the Wildlife and Countryside Act. (1981) (as amended) and therefore must not be allowed to spread into the wild. No other invasive/non-native species were recorded within the site.
<i>Foreseen impacts</i>	If these species are to be removed from the site, there is the possibility that cuttings could spread into the wild or adjacent habitats. This could lead to the development of additional plants and native flora being outcompeted and decrease native diversity across the area, with potential detrimental impacts to nectar sources for invertebrates.
<i>Recommendations</i>	During habitat removal prior to development, the invasive foliage will be cut and either chipped on site or removed immediately and disposed of at an appropriate facility. The roots will then be pulled and either chipped or immediately removed to a disposal unit. The areas where the plants were located will then be monitored to ensure that no new growth appears. If new growth is recorded, the steps taken previously will be undertaken again and repeated until complete eradication of the plant from the site.

Invertebrates	
<i>Survey Findings</i>	The habitats present on-site, including grassland and woodland, provide invertebrates with opportunities to forage and shelter, due to the presence of leaf litter and dead wood, although, it is noted that the grassland habitats onsite provide negligible habitat value for a range of invertebrates due to the current usage and short maintained sward. The site contains no further notable habitats which may provide niches for specialised or protected invertebrates.
<i>Foreseen Impacts</i>	No woodland or grassland removal will take place as a result of the proposed development. The woodland and grassland habitats will be retained on site, including the mature woodland, and will continue to support the local invertebrate population. As such, opportunities for the onsite and local invertebrate population will be maintained.
<i>Recommendations</i>	Further Surveys None required. Biodiversity enhancements The incorporation of bee bricks (e.g. Ibstock BeeHabitat or similar alternative brand) into the fabric of suitable new buildings would provide sheltering opportunities for pollinators and reintroduce habitats for invertebrates to prevent an onsite loss. These should be installed 0.5m above ground level on a south-facing elevation with nearby flowering plants. The site could be further enhanced via the provision of additional native wildflowers or wildflower turf, which would provide foraging opportunities for invertebrates.
Bats	
<i>Survey Findings</i>	Desk Study A search of the magic.gov.uk database for granted EPSLs within a 2km radius of the site has been completed. Displaced bats from licensed sites <2km away from the survey site will find alternative habitat either within the mitigation measures implemented as

part of the licence or will relocate to other known roosts sites in proximity to the licensed site. The results of the search are provided in the table below:

Bat species	Year licence obtained	Licence Activity	Distance from site
Common pipistrelle (<i>Pipistrellus pipistrellus</i>)	2014	Roost destruction	770m southeast
Common pipistrelle, lesser horseshoe (<i>Rhinolophus hipposideros</i>)	2015	Roost destruction	1.8km west
Lesser horseshoe	2020	Roost destruction	1.8km northwest

A search for SAC sites specifically designated for bat species records Bath and Bradford on Avon Bats SAC within 10km of the site boundary (see above 'Statutory Sites' mitigation section for continued discussion).

Foraging and commuting habitat

Habitats recorded onsite include a small section of woodland and open area of central grassland with scrubland. The woodland around the site has the potential to provide commuting bats with linear features, as well as the grassland providing open areas for foraging. It is therefore possible that commuting and foraging bats will utilise the site. However, the small scale of the open grassland and limited edges around the woodland are a limiting factor. But as the habitats are present, it cannot be discounted that bats may commute along this habitat and over the development site.

The site is also located within the Bath and Bradford on Avon Bats SAC consultation framework and should be treated, on a precautionary basis, as lying within or very close to a core area/likely Band A consultation zone, such that impacts on commuting and foraging habitat, including functionally linked land, should be considered.

Roosting bats – Buildings/Structures**Building – B1 (WWII Pillbox)**

A WWII pillbox is present within the central area of the site amongst an area of dense scrub. A table is provided below with internal and external descriptions (photos provided in **Appendix C**):

External	Internal
• The structure is fully constructed from concrete, with a flat roof. • The building is set 1m below the surface, with a small portion of the top building exposed. • A small concrete staircase is present on the northeast elevation leading down to a small doorway entrance on the north elevation. • Three thin horizontal window cut outs in the concrete are present on the north, east and south elevations, however, these are mostly covered with dense vegetation.	• Two internal spaces are present within the building • First chamber: ○ An open ground level chamber is present with concrete internal roof and elevations. ○ Open window access is present on three elevations, with the doorway uncovered and open. ○ Small cracks within the concrete inner ceiling are present. ○ The first chamber measures approximately; 3m in width, 3m in length and 2.5m in height. • Second chamber: ○ A below ground second chamber is located on the west elevation. ○ A staircase and open access doorway are present within the north. ○ No windows are present within the chamber, with the only access through the main doorway. ○ The chamber comprises a concrete ceiling and elevations. ○ The void measures approximately; 3m in length, 1.5m in width and 2.25m in height.

B1 - Bat Evidence

A thorough search for bat evidence was undertaken on the internal and external features of the building with the following recorded:

	- Approximately 100 scattered bat droppings on the floor within the first chamber, predominantly within the northeast corner of the room above cracks within the concrete ceiling. Historical evidence in previous ecological reports (Chalkhill Environmental Consultants, 2013) is consistent with this finding, which suggested that the droppings belonged to lesser horseshoe bats (<i>Rhinolophus hipposideros</i>), although no formal DNA analysis was undertaken. The bat droppings recorded as part of this survey (2026) suggest similarities between lesser horseshoe bat droppings also, however, no DNA analysis has been undertaken at this time. <u>B1 - Access Points / Roosting Provisions</u> <u>Open doorway and windows</u> – Open access within the concrete structure at the doorway on the north and windows on the north, east and south elevations allow access into the first chamber for bat species. It is noted that the windows on the east and south elevation are heavily vegetated. The second chamber has an open access doorway on the north elevation providing direct access into the void. <u>Cracks on inner ceiling of the first chamber</u> – Cracks and chipping within the ceiling of the first chamber provide adequate grip to provide a roosting provision, specifically for horseshoe spp. (<i>Rhinolophus spp.</i>). The feature is consistent with the bat droppings recorded below directly below the feature. <u>B1 - Conclusion</u> The building has been assessed in line with the Bat Conservation Trust (BCT) guidelines and is confirmed to support roosting bats due to the presence of bat droppings within the building. The access points on the external features and surrounding landscape are also considered to hold 'high' potential for bats. <u>Building – B2 (Reception)</u> A reception building is present within the eastern section of the site. A table is provided below with internal and external descriptions (photos provided in Appendix C):
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	<table border="1"> <thead> <tr> <th data-bbox="488 215 1182 260">External</th><th data-bbox="1182 215 1881 260">Internal</th></tr> </thead> <tbody> <tr> <td data-bbox="488 260 1182 470"> • The structure is single storey and constructed from single skin timber cladding elevations with a pitched roof. • A Bituminous felt roof is present with timber fascias at the eaves. • A wooden doorway and small porch is present on the southwest elevation. </td><td data-bbox="1182 260 1881 470"> • No internal loft void is present. </td></tr> </tbody> </table> <u>B2 - Bat Evidence</u> A thorough search for bat evidence was undertaken on the external features of the building and no evidence was recorded. <u>B2 - Access Points / Roosting Provisions</u> • No suitable roosting provisions or access points were recorded within the building. Roosting bats – trees The mature trees located directly around the proposed area of works associated with the development onsite were surveyed and no Potential Roost Features (PRF) were recorded. It is noted that the mature trees within the woodland were not fully or individually assessed for PRF's, however, the woodland will be fully retained as part of the proposed plans.	External	Internal	• The structure is single storey and constructed from single skin timber cladding elevations with a pitched roof. • A Bituminous felt roof is present with timber fascias at the eaves. • A wooden doorway and small porch is present on the southwest elevation.	• No internal loft void is present.
External	Internal				
• The structure is single storey and constructed from single skin timber cladding elevations with a pitched roof. • A Bituminous felt roof is present with timber fascias at the eaves. • A wooden doorway and small porch is present on the southwest elevation.	• No internal loft void is present.				
<i>Foreseen Impacts</i>	Roosting bats - buildings The two toilet blocks and clubhouse were not present onsite during the site survey and therefore an assessment for roosting bats has not been made as part of this report. The WWII pillbox (B1) will be fully retained as part of the proposed plans. The additional lighting proposed around the development (The Solar Centre Warm White Aldenham Solar Path Down Light), which is described as low-level floor lighting of maximum 21cm				

	in height, will be approximately 20m distance from the confirmed roost and likely access point within the building and will therefore not be within proximity. As no direct impacts to the building will be experienced and the lighting is not considered to provide a disturbance to the accessibility of the roost, no impacts are anticipated. Roosting bats – trees No PRF's were recorded on the mature trees within proximity of the proposed new building locations, and therefore no impacts to roosting bats in trees are anticipated as a result of the development. Foraging and commuting bats – Bath & Bradford on Avon SAC The addition of artificial lighting as a result of the development is unlikely to provide impacts on commuting bats due to low level lighting selected ('The Solar Centre Warm White Aldenham Solar Path Down Light') and limited use throughout the site (Appendix D). However, the site is also located within the Bath and Bradford on Avon Bats SAC consultation framework and should be treated, on a precautionary basis, as lying within or very close to a core area/likely Band A consultation zone, such that impacts on commuting and foraging habitat, including functionally linked land, should be considered. A Habitats Regulation Assessment (HRA) will be required to fully assess the impacts to the designated site.
<i>Recommendations</i>	Roosting bats – Building 1 (WWII Pillbox) External lighting is proposed around the site and the lighting installed must be within the proposed areas (Appendix D) and will adhere to the 'Bats and Artificial Lighting At Night' Guidance Note BN08/23 (BCT & ILP, 2023). These specifications include (but are not limited to): • External lighting will be positioned to ensure that no light spills onto nearby vegetation, including mature trees. • All lighting fixtures will be free of ultraviolet (UV) components. Metal halide and compact fluorescent lamps will not be utilised.

	- LED lighting will be exclusively employed, offering sharp cut-off, lower intensity, excellent colour rendering, and dimming capabilities. - A warm white light source with a colour temperature of 2700 Kelvin or lower will be used to minimise the blue light component. Biodiversity Enhancements To comply with the National Planning Policy Framework (NPPF) and local plan, three bat boxes will be installed as part of the development within the site ownership on mature trees. The boxes will be installed at approximately 3m in height and should be southeast facing. The entrance area must be free to access and not compromised by branches or other buildings. An appropriate box that can be installed include: 2F Schwegler Bat Box (General Purpose).
Birds	
<i>Survey Findings</i>	Buildings The buildings were surveyed for nesting birds and no evidence was recorded. It is highly unlikely that the buildings will be utilised for protected/notable bird species. Habitats The woodland and individual trees on site provide optimal habitats for nesting birds, however, no nesting birds/birds nests were recorded around the area of the proposed development within these habitats during the survey and the habitats will be fully retrained.
<i>Foreseen Impacts</i>	Buildings None foreseen.

	Habitats The habitats onsite will be fully retained as part of the proposed current development. No nesting birds were recorded during the time of the survey, however, the scrub and the mature trees are within proximity to the areas of the proposed work. If nesting birds are present within these areas during future development, there is the potential for impacts to occur.
<i>Recommendations</i>	Mitigation The demolition of the buildings and construction should be undertaken outside of the nesting bird season (March-August). If this period cannot be avoided, an inspection for nesting birds within the adjacent vegetation will be undertaken by a suitably qualified ecologist. If nesting activity is recorded, a 3-5m radius buffer will be installed and this area will be left untouched and undisturbed until the chicks have fledged. Enhancements To comply with the National Planning Policy Framework (NPPF) and local plan, three bird boxes will be installed as part of the development within the site ownership on mature trees. The boxes will be installed at approximately 3m in height and should be southeast facing. The entrance area must be free to access and not compromised by branches or other buildings. An appropriate box that can be installed include: • Vivara Pro Barcelona WoodStone Open Nest Box.
Reptiles	
<i>Survey Findings</i>	Desk Study A search of the Magic.gov.uk database indicates that there have been no granted EPSL pertaining to reptiles within 2km of the site.

	<i>On site Habitats</i> The woodland onsite provides an area that has the potential to be used by reptiles, however, it is noted that the understorey of the woodland lacks the appropriate assemblage to provide adequate refuge. The areas of scrub also provide vegetation with suitable fringe habitat that provides basking opportunities. The remaining suitable habitats on site comprise an area of grassland within the central area of the site, however, the grassland is maintained at a short height due to regular maintenance and is therefore considered sub optimal. As some suitable habitats are present onsite, albeit limited, reptile species cannot be fully ruled out from being present entirely from the site.
<i>Foreseen Impacts</i>	The habitats onsite will be retained as part of the current proposed development. Although the extent of suitable reptile habitat is limited, there is the low possibility for death or injury to occur during the construction phase of the works. This could occur due to the presence of machinery onsite resulting in individuals being crushed or injured, if present.
Recommendations	<i>Precautionary Working Method</i> Due to the small scale/local impacts and low probability of reptile presence, a full suite of reptile surveys is considered disproportionate for the proposed development. A precautionary working method will be implemented for widespread reptiles during construction, including the following measures: • Vegetation will be maintained at a short sward (5cm) to discourage reptiles. • Any areas of developed vegetation within 5m of the proposed buildings will be protected with heras fencing to ensure that that vehicles do not roll back onto suitable areas. • Any excavations will be covered overnight, or a ramp will be installed to enable any trapped animals to escape. • Best practice pollution prevention measures will be implemented to minimise impacts to nearby habitats.

	- Any chemicals or pollutants used or created by the development should be stored and disposed of correctly according to COSHH regulations. - In the unlikely event that a reptile is identified, works must cease and advice must be sought from a suitably qualified ecologist.																		
Amphibians																			
<i>Survey Findings</i>	Desk Study Two EPSL record for great crested newts (GCN) is recorded on the MAGIC within 2km of the site; 945m north and 1.8km north. Great crested newts exist in metapopulations and are known to utilise ponds and their connecting terrestrial habitat during their life cycle; great crested newts are typically found within terrestrial habitats up to 500m from breeding ponds (Langton et al. 2001). Aquatic habitat suitability (including ponds within 500m) There is small pond located within the central area of the site/northern section of the woodland. The pond appears to have permeance, however, at the time of survey the water was reduced significantly to a few inches with a heavy amount of leaf litter. There was no clear water mark on the surrounding banks/habitats indicating that water is not consistently present. The pond measures approximately 2m by 1.5m (3m²). Aquatic species are limited, likely due to heavy shading. A Habitat Suitability Index (HSI) assessment has been undertaken on the pond: <table border="1"> <thead> <tr> <th>SI Description</th><th>SI Value</th></tr> </thead> <tbody> <tr> <td>Geographic location</td><td>1</td></tr> <tr> <td>Pond Area</td><td>0.05</td></tr> <tr> <td>Pond Permanence</td><td>0.5</td></tr> <tr> <td>Water Quality</td><td>0.01</td></tr> <tr> <td>Shade</td><td>0.3</td></tr> <tr> <td>Waterfowl Effect</td><td>1</td></tr> <tr> <td>Fish Presence</td><td>1</td></tr> <tr> <td>Pond Density</td><td>0.45</td></tr> </tbody> </table>	SI Description	SI Value	Geographic location	1	Pond Area	0.05	Pond Permanence	0.5	Water Quality	0.01	Shade	0.3	Waterfowl Effect	1	Fish Presence	1	Pond Density	0.45
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		Terrestrial Habitat	1
		Macrophyte Cover	0.5
		HSI Score	0.33
		HSI Category	Poor
	A review of aerial imagery (MAGIC and OS Maps) indicates one identifiable pond/waterbodies within 500m; a fishing pond 480m southeast. Due to the pond being within private land, access was not possible to assess this pond further. Connectivity to the pond is considered unlikely due to the distance and agricultural fields situated between the locations. Terrestrial Habitat Suitability The woodland and scrub leaf litter and understory, albeit limited vegetation, provides optimal habitats for commuting and foraging GCN. The woodland located around the outside of the site provides the opportunity for GCN/amphibians to commute through the site to optimal areas around the site. The grassland offers limited habitat suitability due to the short sward height and regular maintenance.		
Foreseen Impacts	All habitats will be retained as part of the development, including the pond onsite. The site suffers from poor connectivity to the surrounding habitats, as well as poor connectivity to any surrounding ponds. The pond also scores 'Poor' under the HSI assessment, and which provides evidence that the pond is unsuitable for GCN. It is therefore considered unlikely that a GCN population is present onsite.		
Recommendations	None required.		

Badger	
<i>Survey Findings</i>	Optimal habitats onsite for badgers include the woodland and areas of scrub, which provides year-round food sources. The grassland areas provide optimal commuting areas for snuffling and commuting across the landscape. A badger sett has been historically recorded within the southeast section of the woodland onsite. Approximately 10 sett entrances are currently recorded across an area of approximately 0.04ha. Historical ecological surveys have confirmed the active presence of the badger sett (Chalkhill Environmental Consultants, 2013). During the updated site survey (2026), there were no clear signs of active usage of the sett; no fresh spoil heaps are present, and the sett entrances were heavily littered with woodland vegetation. No scrapes or scratch marks were evident within the area or within the wider site boundaries.
<i>Foreseen Impacts</i>	It is suggested that the badger sett onsite is likely historical due to the poor condition of the sett entrances and lack of recent evidence onsite, however, this cannot be confirmed without undertaking update Phase 2 badger activity surveys. As part of this development proposal, no heavy construction work will be undertaken within 30m of a badger sett. All habitats onsite will be retained, and therefore the sett will be retained under previous mitigation proposed as part of applications for the site. The construction activities onsite, however, construction activities could indirectly result in the death or injury of badgers, if present.
<i>Recommendations</i>	Owing to the retention of the habitats onsite and the distance to the badger sett, further badger surveys are considered to be disproportionate and a Natural England licence not required due to lack of disturbance/impacts. A Precautionary Working Method will be implemented prior and during construction to protect commuting badger species, which include the following measures: • Heras fencing will be erected around the working area to prevent encroachment into retained habitats. • Any excavations will be covered overnight, or a ramp will be installed to enable any trapped animals to escape.

	- The use of night-time lighting will be avoided, or sensitive lighting design will be implemented to avoid light spill on to retained habitats which badgers could use. - Any chemicals or pollutants used or created by the development should be stored and disposed of correctly according to COSHH regulations. In the unlikely event that additional activity or additional badger sett is identified, works must cease and advice must be sought from a suitably qualified ecologist.
Otters, Water Voles, & White-Clawed Crayfish	
<i>Survey Findings</i>	The site contains no suitable habitat to support otters or water voles due to the lack of suitable aquatic habitats on or adjacent the site.
<i>Foreseen Impacts</i>	None required.
<i>Recommendations</i>	None required.
Hazel dormouse	
<i>Survey Findings</i>	Desk Study A search of the Magic.gov.uk database indicates that there have been no granted EPSL pertaining to dormice within 2km of the site. Habitats Habitats recorded on site could provide limited opportunities for dormouse, primarily associated with the woodland. However, the woodland habitat is heavily constrained by its very poor and open understorey structure. The woodland lacks the dense shrub layer typically required by dormice, significantly reducing the availability of nesting opportunities. In addition, important plant

	species commonly used by dormice for nesting and bedding, such as honeysuckle, are absent. This results in a structurally simple woodland that provides limited foraging opportunities and poor nesting potential. In the context of the wider landscape, more extensive and better-quality woodland and scrub habitats are present offsite, offering superior connectivity, structural diversity, and food availability for dormice. As such, while the onsite woodland may provide some marginal, transient use, it is considered suboptimal habitat for supporting a resident dormouse population when assessed within an overall landscape context. Surrounding Landscape The site is directly adjacent woodland habitat offsite to the northwest, which is considered to be optimal habitat for dormice.
<i>Foreseen Impacts</i>	Habitats The woodland on site is considered suboptimal for dormice and their presence is not considered likely. The woodland onsite and scrub habitats will also be fully retained as part of the development, and therefore no impacts are anticipated on hazel dormice.
<i>Recommendations</i>	None required.
Other species - hedgehog	
<i>Survey Findings</i>	Habitats on site comprising the woodland, scrub and grassland are likely to provide foraging, commuting, and refuge opportunities for hedgehogs. Refuge opportunities are most prevalent amongst the woodland, whereas the grassland provides foraging and commuting opportunities. No evidence indicating use of the site by hedgehogs was recorded, however, evidence is difficult to record due to the nature of the vegetation and site use.

	The potential for hedgehogs to be present onsite and continue to gain access to the site is likely due to the surrounding habitats, which include woodland to the east.
<i>Foreseen Impacts</i>	The development onsite may impact on the ability for hedgehogs to move around the local area due to the installation of artificial infrastructure and possible additional fencing. Construction activities could result in the death or injury of hedgehogs within the local area that may be commuting through the site, resulting in injury or death.
<i>Recommendations</i>	Mitigation and Enhancement Site preparation and construction works should be completed in accordance with the following precautionary working methods, which are considered suitable to reduce the potential for impacts: • Any excavations will be covered overnight, or a ramp will be installed to enable any trapped animals to escape. • Works will be completed during daylight hours only to prevent impacts of excessive artificial light spill. • Any chemicals or pollutants used or created by the development should be stored and disposed of correctly according to COSHH regulations. • Hedgehog fencing will be installed on any proposed boundary fence within the development. This comprises hedgehog pathways or hedgehog gaps (13cm x 13cm) to be installed.

Appendix A: Site Location Plan



Appendix B: UKHabs Habitat Plan



Appendix C: Site Photographs



Photo 1: Woodland onsite.



Photo 2: Woodland onsite.



Photo 3: Mixed scrub.



Photo 4: T1.



Photo 5: Modified grassland.



Photo 6: G6 mature trees.



Photo 7: Grassland and track paths.



Photo 8: Badger sett entrance



Photo 9: Mixed scrub and B1 Pillbox south elevation.



Photo 10: Mixed scrub and B1 Pillbox north elevation.



Photo 11: Internal B1 first chamber.



Photo 12: Scattered droppings within first chamber B1.



Photo 13: Second chamber B2.

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Appendix D: Lighting Plan



Appendix E: Legal and Report Version**Legal**

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