

Interim Ecological Impact Assessment

Land North of Seagry Road, Great Somerford

Ecology | Green Space | Community | GIS

Unit 1, Brassmill Lane Enterprise Centre | Bath | BA1 3JN

01225444114 | info@ethosep.co.uk

www.ethosep.co.uk



Report Produced for

Nick Davies

Written by:

Kane Burchill, Principal Ecologist

Checked by:

Stephanie Green, Head of Ecology

Approved by:

Jim Phillips, Managing Director

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SUMMARY

Purpose of the Report	This Interim Ecological Impact Assessment has been produced by Ethos Environmental Planning on behalf of Nick Davies. It provides an assessment of the likely ecological effects associated with the proposed residential development of an area of land known as 'Land North of Seagry Road, Great Somerford'.
Description of the scheme	The development proposals for the site include plans for eight self-build residential dwellings with associated access and green space.
Methodology	A desk study and UK Habitat Classification survey were undertaken for the site in May 2025 and June 2025, respectively. Detailed surveys for bats and dormice were undertaken in 2025.
Baseline Ecological Conditions	• The site comprises an area of cattle grazed grassland, bramble scrub and line of trees. • The line of trees was assessed as suitable habitat for foraging and commuting bats and birds. • The surveys identified fourteen species of bat including barbastelle, serotine, Brandt's bat, Daubenton's bat, whiskered bat, Natterer's bat, Leisler's bat, noctule, Nathusius's pipistrelle, common pipistrelle, soprano pipistrelle, brown long-eared bat, greater horseshoe bat and lesser horseshoe bat. • A desktop search identified three European Protected Species licence returns within 250 metres of the redline boundary for Great crested newts. • The eDNA survey of the pond on site (P) concluded great crested newt are absent from site. • The key habitats on the site are the hedgerow off the eastern boundary and the line of trees on the southern boundary.
Key impacts and mitigation	Mitigation including a sensitive lighting plan is recommended to ensure the continual use of the site for commuting and foraging bats. This will be provided in a Construction Environment Management Plan and landscape plan. The design scheme has incorporated a 5 metre wildlife buffer between the residential curtilage and the adjacent eastern hedgerow. This area will be protected to ensure continual use of the site for commuting and foraging bats. Ecological enhancement features have been suggested, including bird and bat boxes, bee hotels and insect loggeries.
Conclusion	Assuming the implementation of effective mitigation measures, as set out in this report, no significant adverse ecological effects are predicted in relation to; Nerc Mammals, Badgers, Otters and wolverines, Dormouse, reptiles and GCN.

Subject to implementation of the mitigation measures set out in this report, and a sensitive lighting strategy approved by a Suitably Qualified Ecologist, the proposed development is not predicted to result in significant adverse effects on bats, including Annex II species.

1 INTRODUCTION

- 1.1 This Interim Ecological Impact Assessment (EclA) report has been prepared by Ethos Environmental Planning (Ethos) on behalf of Nick Davies. The EclA was written by Kane Burchill and reviewed by Stephanie Green, Head of Ecology. The final report has been approved by Jim Phillips. The details and experience of the authors and field survey team are provided in Appendix 2.
- 1.2 The report provides the results of an interim EclA in relation to the proposed development of Land North of Seagry Road, Great Somerford (Central Grid Reference ST 96256 82528), hereafter referred to as 'the site' and shown in Figure 1. The site is located in the village of Great Somerford, Wiltshire.
- 1.3 The redline boundary comprises 0.5 hectares and includes other neutral grassland, bramble scrub and line of trees habitats. The survey area was extended to the blue line boundary below which was a total of 1.2 hectares and included other neutral grassland, broadleaved woodland and ruderal.



Figure 1 Site location

- 1.4 The site is proposed for eight self-build residential plots with associated access and green space.
- 1.5 The aims of this EcIA report are to:
- provide an assessment of the likely effects of the proposed development on ecological features on site;
 - identify the measures required to mitigate impacts on site biodiversity;
 - identify opportunities to deliver ecological enhancements and measurable gains for biodiversity as part of the development proposals; and
 - to enable the Local Planning Authority to assess whether the proposals comply with relevant planning policy or legislation.
- 1.6 This report has been produced following the approach set out in CIEEM's 'Guidelines for Ecological Report Writing' (CIEEM, 2017).

2 POLICY AND LEGISLATION

2.1 National Policy

- 2.1.1 The **National Planning Policy Framework (NPPF)** (published Dec 2024) sets out national planning policy, including policies of relevance to conserving and enhancing the natural environment. Policies of relevance to the proposed development (parts of paragraphs 187, 192, 193 and 198) are provided in Appendix 1.

2.2 Local Policy

Wiltshire Core Strategy 2015 (relevant policy)

- 2.2.1 *Wiltshire's natural environment is one of its greatest assets and includes a network of identified wildlife sites: International – Special Areas of Conservation, Special Protection Areas and Ramsar Sites, National – Sites of Special Scientific Interest and National Nature Reserves, Local – County Wildlife Sites, Protected Road Verges and Local Geological Sites.*
- 2.2.2 *The valuable natural environment includes not only identified sites, but also other features of nature conservation value including: priority species and habitats (including those listed in the national and Wiltshire Biodiversity Action Plan) areas of habitat with restoration potential (particularly those identified on the South West Nature Map or through other landscape scale projects) all waterbodies covered under the Water Framework Directive features providing an ecological function for wildlife such as foraging, resting and breeding places, particularly wildlife corridors of all scales which provide ecological connectivity allowing species to move through the landscape and support ecosystem functions. For the purposes of evaluation in ecological impact assessment, the value of undesignated habitats and species should be measured against published selection criteria where possible. However, statutory protection will only ever apply to those sites which have been formally notified by Natural England.*
- 2.2.3 *Collectively these sites and natural features make up the local ecological networks necessary to underpin and maintain a healthy natural environment. Core Policy 50 seeks to ensure protection and enhancement of these sites and features and is necessary to help halt and reverse current negative trends and meet new challenges particularly from climate change adaptation and pressures associated with the increasing population. It is vital that all stages of sustainable development are informed by relevant ecological information, from site selection and design to planning decisions and long-term management. All effects should be considered, including positive and negative, direct and indirect, cumulative, and on and offsite impacts over the lifetime of the development (including construction, operational and restoration phases), also giving consideration to disturbance effects such as noise, lighting, recreational pressures, trampling, traffic, domestic pets, vandalism etc.*

2.2.4 *All effects upon the natural environment should be addressed sequentially in accordance with the principle of the 'mitigation hierarchy' given below:*

1. *Avoid e.g. site location, buffers.*
2. *Reduce, moderate, minimise.*
3. *Rescue e.g. translocation.*
4. *Repair, reinstate, restore.*
5. *Compensate or offset.*

2.2.5 *Compensation is a last resort but will be necessary in some instances where other approaches cannot guarantee 'no net loss' of biodiversity and any unavoidable losses are outweighed by other sustainability considerations. Such measures should be delivered within the development site where possible; however, where this is not feasible, it may be more appropriate to deliver offsite measures through legal agreements and landscape scale projects. Appropriate compensatory measures should demonstrate no net loss of the relevant local biodiversity resource in the short and long-term and be delivered as close to the development site as possible to avoid the degradation of local ecological networks or 'ecosystem services. Additional guidance is available to help clarify appropriate ecological avoidance, mitigation and compensation measures to demonstrate compliance with Core Policy 50, which should be proportionate to the scale of any predicted impact.*

2.2.6 *A number of strategic plans and guidance documents are also available to ensure that the most commonly occurring effects upon international sites can be avoided as efficiently and effectively as possible.*

- 1) *The Stone Curlew Management Strategy – applicable to residential development within distances up to 15km of Salisbury Plain.*
- 2) *Wiltshire Bats SAC Planning Guidance – applicable to all development types in the areas within and surrounding Bradford on Avon, Box, Colerne, Corsham, Trowbridge, Westbury, Fonthill and Chilmark.*
- 3) *River Avon Planning Guidance – applicable to any new development in proximity to the Salisbury Avon, or major development within the wider catchment.*

2.2.7 *Sustainable development also provides opportunities to enhance the natural environment for wildlife and Wiltshire's communities, particularly through landscaping, public open space, Sustainable Urban Drainage Systems and features of the built environment e.g. bird and bat boxes. Such measures should contribute to delivery of relevant Biodiversity Action Plan (BAP) and River Basin/Catchment Management Plan objectives, but also be tailored to local landscape character. Development may also open up opportunities to bring degraded or neglected features back into favourable condition through sensitive management to encourage wildlife; such restoration will be particularly valuable where it contributes towards Nature Improvement Areas or other landscape scale projects identified by the Local Nature Partnership or objectives in relevant River Basin / Catchment Management Plans. Additional guidance will be produced to aid the design and incorporation of suitable ecological enhancement measures to demonstrate compliance with Core Policy 50, which should be proportionate to the scale of development.*

Core Policy 50

Biodiversity and Geodiversity Protection

- 2.2.8 *Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services. All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development. Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 above where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.*

Biodiversity Enhancement

- 2.2.9 *All development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services. Such enhancement measures will contribute to the objectives and targets of the Biodiversity Action Plan (BAP) or River Basin/ Catchment Management Plan, particularly through landscape scale projects, and be relevant to the local landscape character.*

2.3 Relevant Legislation

- 2.3.1 The following pieces of legislation have been considered within this assessment with an explanation of their relevance provided in Table 1.

Table 1 Relevant legislation

Legislation	Relevance
The Habitats Directive (together with the Birds Directive) forms the cornerstone of Europe's nature conservation policy. It is built around two pillars: the Natura 2000 network of protected sites and the strict system of species protection. All in all, the Directive protects over 1,000 animals and plant species and over 200 "habitat types" (e.g. special types of forests, meadows, wetlands,	Presence of foraging and commuting bats on site including Annex II greater horseshoe bats. Potential presence of GCN.

Legislation	Relevance
etc.), which are of European importance. The Habitats Directive and parts of the Birds Directive are transposed into legislation by The Conservation of Species and Habitat Regulations 2017 (as amended) .	
Wildlife and Countryside Act 1981 (as amended, including by the Countryside and Rights of Way Act 2000), which provides legislative protection for certain species. The Act also prohibits the spread of invasive plant species, as well as providing the mechanism for the designation and protection of Sites of Special Scientific Interest.	Likely presence of nesting birds on site.
The Natural Environment and Rural Communities Act 2006 (the NERC Act) places a duty on all public authorities, including local planning authorities, to consider biodiversity in their work. Local planning authorities are to ensure that there is no net loss of biodiversity on a site, no net loss in habitat connectivity and aims to enhance biodiversity.	Potential presence of hedgehog on site Enhancements for biodiversity

3 METHODOLOGY

3.1 Scope of Assessment

3.1.1 This assessment has been undertaken following the approach set out in the '*Guidelines for Ecological Impact Assessment in the UK and Ireland, 1.3*' (CIEEM, 2018). The assessment has considered 'Important Ecological Features' that are present within the 'Zone of Influence' of the project. Important Ecological Features for this project comprise¹:

- Designated nature conservation sites;
- Habitats and Species of Principal Importance for the Conservation of Biodiversity in England;
- Legally protected species; and
- Red Listed or rare species (based on Red Data Book lists, Birds of Conservation Concern and species considered to be nationally rare / scarce).

3.1.2 The Zone of Influence (Zoi) is the area over which the project could have an influence on ecological features. The Zoi is likely to vary for different features. However, in general terms the Zoi for this development proposal is considered to comprise the land within the red line boundary as well as immediate adjacent habitat features. It also includes designated nature conservation sites in the surrounding area.

3.1.3 The scope of the assessment was informed by an 'ecological walkover and desktop assessment' undertaken in June 2025. The purpose of this was to identify the habitats on site, their potential for protected species and to establish the scope of surveys that would be required to inform a future planning application at the site.

3.1.4 The overall assessment has been informed by guidelines provided in CIEEM (2017) Guidelines for Ecological Report Writing.

3.2 Background Data Search

3.2.1 A background data search was received from Wiltshire and Swindon Biological Records Centre in May 2025. The search area included records of non-statutory designated sites and protected and notable species within 1km of the proposed development site.

3.2.2 An additional search for statutory designated sites within 1km of the development site and granted European Protected Species (EPS) licences within 1km of the site boundary was undertaken using publicly available information (DEFRA Magic map).

¹ Box 14 in CIEEM's ECiA Guidelines (2018)

3.3 UK Habitat Classification Survey

- 3.3.1 A UKHab survey was undertaken on 3rd June 2025. The survey incorporated detailed assessment of the land within the development boundary, including a description and mapping of all key features and habitat types. The survey was carried out to identify the range of habitats within the site and the predominant and notable species of flora. This survey was informed by the UKHab Classification Version 2 (UKHab Ltd., 2023).

3.4 NERC S. 41 Mammals

- 3.4.1 The survey included an assessment of the habitats on site for their potential to support NERC Section 41 species such as hedgehog (*Erinaceus europaeus*), polecat (*Mustela putorius*), harvest mouse (*Micromys minutus*) and brown hare (*Lepus europaeus*). This included a search for nests, runs, latrines, paw prints, and live specimens.

3.5 Badger

- 3.5.1 The survey for badger (*Meles meles*) included a search of the development site and surrounding habitats (up to 30metres where feasible) for any evidence including setts, foraging signs (snuffle holes), runs and latrines.

3.6 Hazel Dormouse

- 3.6.1 The survey included an assessment of the potential of the site for hazel dormouse (*Muscardinus avellanarius*), focusing on the connectivity and suitability of the habitat on site.
- 3.6.2 Targeted survey methodology for dormouse is provided in Appendix 2.

3.7 Riparian Mammals

- 3.7.1 The survey included an assessment of the site to support riparian mammals such as otter (*Lutra lutra*) and water vole (*Arvicola amphibius*). This included an assessment of the riparian habitats on site or within the wider environment to support these species.

3.8 Bats

- 3.8.1 The methodology for the bat survey has been informed by the *Bat Surveys for Professional Ecologists Good Practice Guidelines 4th Edition* (Collins, 2023).
- 3.8.2 Targeted surveys for bats were undertaken as set out in Table 2, with further details of survey methodology provided in Appendix 2.

Table 2 Surveys undertaken for bats

Survey	Description	Date Undertaken
Assessment of habitat suitability	Habitats on site were assessed for their suitability to support foraging and commuting bats.	16 th July 2025
Ground Level Tree Assessment (GLTA)	Potential roosting features on trees were identified and classified in line with guidance (BCT, 2023).	16 th July 2025
Automated/ static surveys	4 static detectors deployed across the site monthly between July and October, in line with guidance for sites with Moderate suitability habitat for bats.	July – October 2025 And April – June 2026
Night-time Bat Walkover (NBW) surveys	Two NBWs undertaken across the bat active season following a defined transect route.	26 th August, 18 th September 2025 and 22 nd April 2026

3.9 Birds

- 3.9.1 The bird survey included an assessment of the habitats on site for their potential to support protected and notable species of bird as well as their potential to support breeding birds.

3.10 Reptiles

- 3.10.1 The potential presence of reptiles on site was assessed considering the habitats present (availability of refugia and basking areas) and suitability of surrounding environment. The assessment of habitats was informed by the *Herpetofauna Workers Manual* (Gent and Gibson, 2003). Where possible, attempts to confirm reptile presence on site were made following *Froglife Advice Sheet 10 – Surveying for Reptiles* through direct observation in reptile “hotspots” and checking of any existing refugia.

3.11 Amphibians

- 3.11.1 Surveys for GCN were informed by the *Great Crested Newt Conservation Handbook*, Froglife 2001.
- 3.11.2 The site was examined for suitable waterbodies and for breeding terrestrial habitat. Terrestrial habitats providing sufficiently structured vegetation in which amphibians may forage or hibernate over winter were also surveyed for.
- 3.11.3 In addition to the on-site assessment, *Great Crested Newt Mitigation Guidelines* (English Nature, 2001) recommend that a desktop analysis of ponds within 500m of the site be undertaken, to identify any potential breeding ponds which may require further survey. Ponds within 500m of the site were mapped on GIS with an OS OpenData base map at 1:10,000 resolution.

3.12 Invertebrates

- 3.12.1 Due to the many invertebrate taxonomic groups that exist, the often-large differences in invertebrate diversity between habitats and the many survey techniques available, invertebrate surveys are highly specific to individual sites. Therefore, an assessment of the site's potential for invertebrates was undertaken, including the need for targeted surveys, as recommended in *Considering Invertebrates in Preliminary Ecological Appraisals* (Jukes, 2021).

3.13 Limitations

- 3.13.1 The site was fully accessible for the survey and all surveys were undertaken in line with best practice. Therefore, there are considered to be no significant limitations to the assessment.

3.14 Evaluation of Ecological Features

- 3.14.1 In line with CIEEMs guidelines on EcIA, this assessment has focused on relevant Important Ecological Features. The scale of importance of these features has been determined based on available contextual information, which for this project are considered only to include:
- **International** – of international importance and protected through international legislation;
 - **National** – of importance in England and protected through national legislation;
 - **County** – of importance to the county (Wiltshire) but not sufficiently important to warrant 'National' scale of importance; and
 - **Local** – of importance to the local area (Great Somerford), but not sufficiently important to warrant County scale of importance.
- 3.14.2 Potential impacts on Important Ecological Features are identified and assessed; likely significant effects are those likely to result in a change to the conservation status of a habitat or species population or undermine/support nature conservation policy. Mitigation measures have been devised following the mitigation hierarchy; appropriate mechanisms for securing mitigation measures have been identified.

3.15 Personnel

- 3.15.1 The surveyors on site have been detailed in Appendix 2.

4 BASELINE ECOLOGICAL CONDITIONS

4.1 Designated Sites

Statutory designated sites

4.1.1 There are no statutory designated sites within 1km of the site boundary.

Non-statutory designated sites

4.1.2 The data search identified two Local Wildlife Sites within 1km of the site. The Bristol Avon River (ST96.043) located around 450m to the north of the site and is designated for its value as one of the main river systems draining northwest Wiltshire. The second LWS is the Great Somerford gravel pits (ST98.042), which are two small gravel pits which are now standing open water located around 300m east and 560m southeast of the site. Overall, it was assessed that the development proposals were unlikely to impact either of these LWS and therefore they have been scoped out of this report.

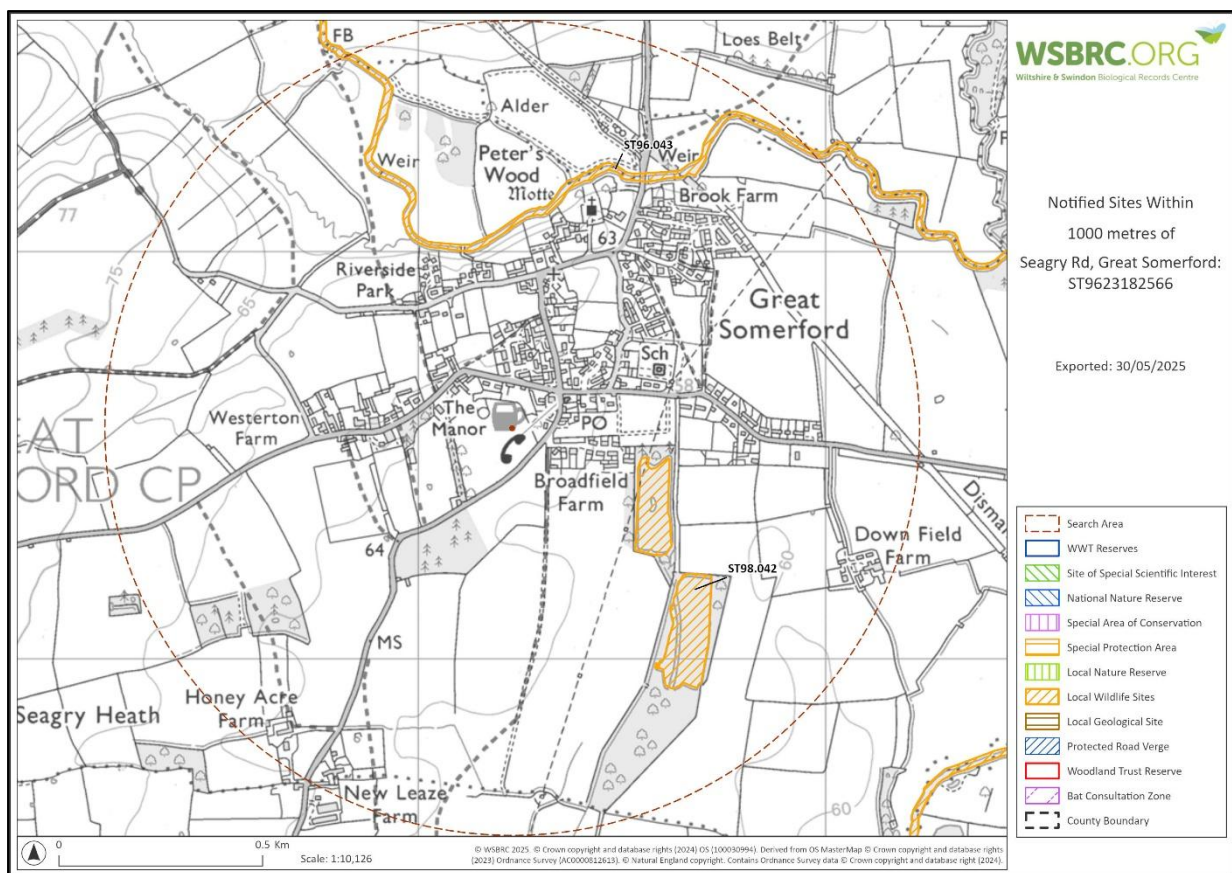


Figure 2: Non-Statutory Designated Sites within 1km

Priority habitats and Local Nature Recovery Strategy

- 4.1.3 The desktop search identified seven priority woodlands and four Coastal and floodplain grazing marshes within 1km of the site boundary. No priority habitats were identified on site and the habitats present within the redline boundary were not characteristic of these priority habitats. Overall, it was assessed that the proposals were unlikely to impact any of the priority habitats and therefore were scoped out of this assessment.
- 4.1.4 The site was not located within any Local Nature Recovery Strategies.

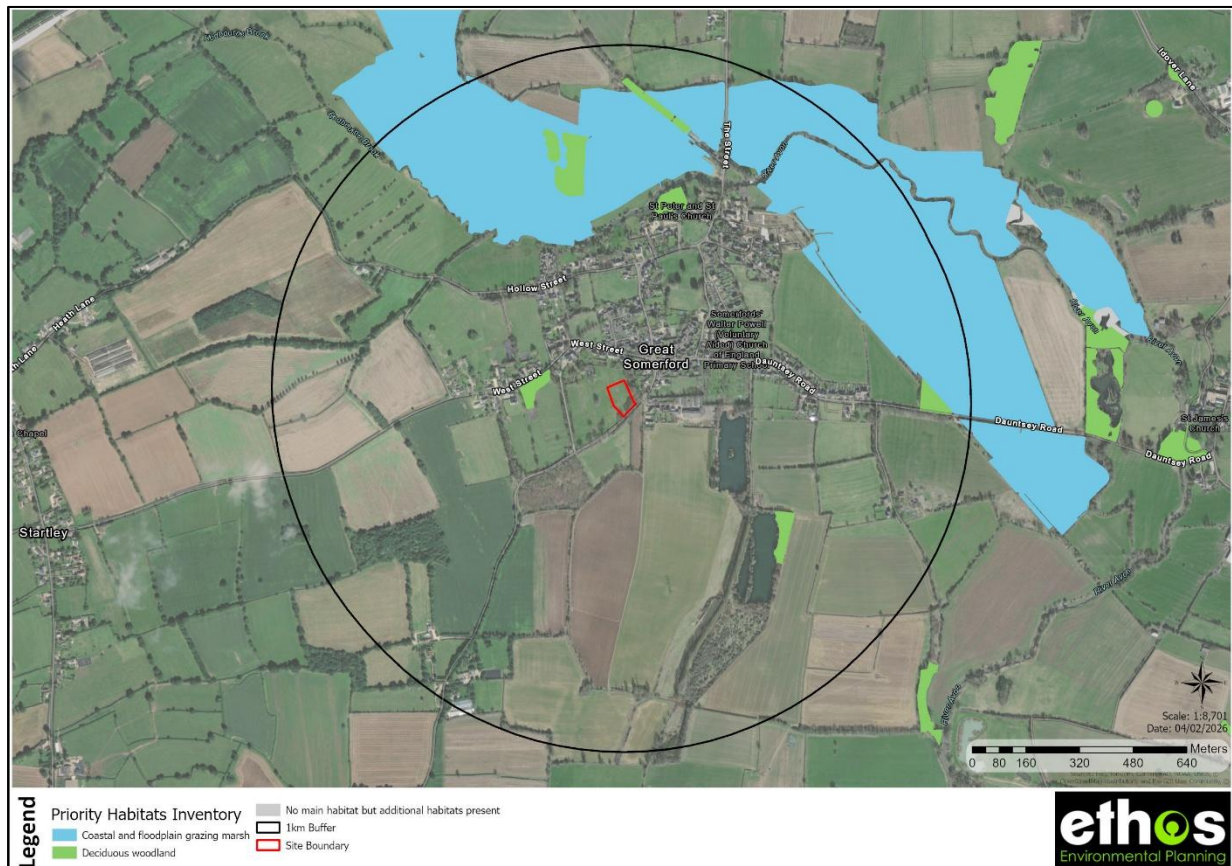


Figure 3: Priority habitats within 1km

4.2 Habitats

General site description

- 4.2.1 The site comprises a field of other neutral grassland which was cattle grazed field at the time of the assessment, with a small area of bramble scrub and a line of trees.
- 4.2.2 There are suburban, residential, woodland and arable field habitats adjacent to the site boundary.
- 4.2.3 The site is located in a rural setting on the periphery of Great Somerford village in Wiltshire. The site is located within an agricultural setting with a mosaic of cereal crops, woodland and grazed meadows located to the south and west of the site. Residential dwellings and urban infrastructure dominated the immediate area north and east of the site, with the River Avon located approximately 400 metres north.

UKHab survey

- 4.2.4 Figure 4 shows the key habitats using the UK habitat classifications. The key features described within this section are:
- Other neutral grassland; and,
 - Bramble scrub.
- 4.2.5 Hedgerows described within this section are:
- Line of trees (H1);



Figure 4: UKHab results

Other neutral grassland (A1)

- 4.2.6 The majority of the site comprises other neutral grassland which was cattle-grazed during the survey period, as shown in Photo 1 and 2. This grassland has an average of 9 species per quadrat and is dominated by Yorkshire fog (*Holcus lanatus*) with red fescue (*Festuca rubra*), meadow buttercup (*Ranunculus acris*), sweet vernal grass, meadow vetchling (*Lathyrus pratensis*), common mouse ear *Cerastium fontanum*, common sorrel (*Rumex acetosa*), perennial rye grass (*Lolium perenne*) and crested dog's tail *Cynosurus cristatus*. The grassland was assessed as being of low ecological value due to its management, however it does provide a variety of opportunities for protected species, most notably foraging bats. As a result, this habitat is not considered to be of particular importance for nature conservation and is only considered further in relation to its value for protected species.



Photo 1 Other neutral grassland (A1)



Photo 2 Other neutral grassland (A1)

Bramble scrub (A2)

- 4.2.7 The southern site boundary includes an area of bramble scrub within the understory of H1, as shown in Photo 3. The bramble scrub is not considered to be of particular importance for nature conservation and is only considered further in this assessment in relation to potential for protected species.



Photo 3 Bramble scrub (A2)

Line of trees (H1)

- 4.2.8 A line of trees is present at the southern boundary of the site. Line of trees are not a Habitat of Principal Importance in England and are not a priority habitat. The line of trees were assessed to be of **Local importance** for nature conservation and will be considered further in this assessment.
- 4.2.9 H1 is a line of trees found at the southern boundary of the site. The line of trees contains a range of native species, but with a low diversity which was limited to common lime (*Tilia × europaea*), poplar (*Populus*), cherry (*Prunus spp*), ash (*Fraxinus excelsior*) and beech (*Fagus sylvatica*).
- 4.2.10 Of relevance to the site is an offsite hedgerow, located immediately adjacent to the eastern boundary. This hedgerow comprised of beech and common lime and was

assessed to be of **local importance** due to its value for nature conservation and will be considered further within this assessment.



Photo 4 H1 Southern boundary

4.3 NERC S. 41 Mammals

- 4.3.1 The data search returned 252 records of hedgehog. These records included live sightings of animals and were recorded mostly in the last three years.
- 4.3.2 The site is located within a mosaic of habitats which are favourable to hedgehogs such as residential gardens and mature hedgerows connecting to the wider landscape. Within the site itself the hedgerows offer foraging and sheltering value for hedgehog, as well as a commuting corridor between residential gardens to the north of the site. Due to the presence of suitable habitat on site, location of the site within a residential area and presence of data search records, there is potential for hedgehog be present on or utilising the site. Therefore, hedgehog are considered further on a precautionary basis within the assessment.
- 4.3.3 Brown hare favour open grassland and arable habitats. Due to the lack in diversity of habitats onsite, with grassland limited to grazed grassland, the site offers limited foraging resources and habitat cover. However, the wider arable land has varied habitat suitability for brown hare and the species may therefore be occasionally present on site when dispersing across the landscape. Overall, it was assessed that the loss of habitats are unlikely to significantly impact brown hare (*Lepus europaeus*), and therefore the species is not considered further in this assessment.
- 4.3.4 There were no records of polecat returned in the data search. Polecat are found in a range of habitats including hedgerows, woodland, grassland and riverine habitats, often making use of farm buildings. The hedgerows and woodland located within the blue line boundary were assessed to provide suitable foraging habitat for polecat, with good connectivity to other suitable habitat within the wider area. The development proposals will result in the loss of majority of the grassland, a small patch of bramble scrub and the removal of two trees. Overall, it was assessed the loss of habitats on site are not likely to significantly impact polecat, and therefore the species is not considered further in this assessment.

- 4.3.5 There were no records of harvest mouse returned in the data search. Harvest mice are found within tall, tussocky grassland, and are unlikely to be present within grass that is intensely grazed by cattle. There is no suitable tussocky grassland present within the field margins on site and whilst the species can be present within hedgerows, this is typically where long tussocky grassland is associated with the hedgerow. The line of trees on site does not include a grassy field margin with suitable habitat for harvest mouse. Overall, it is assessed that harvest mice are unlikely to be present on site and therefore the species has been scoped out of this assessment.

4.4 Badger

- 4.4.1 The background data search returned one record of badger within the 1km search area. This record was in 2021 located 500 metre northwest of the redline boundary.
- 4.4.2 The site comprises a cattle-grazed field and a line of trees, which offer suitable foraging and commuting opportunities for badger. No evidence of badger was identified on site during the ecological surveys.
- 4.4.3 There are areas of agricultural land, woodland and a network of hedgerows located close to the site, which provide optimal habitat for badgers, such as the woodland south west of the site. Badger could therefore access the site on occasion for commuting and foraging.
- 4.4.4 Badgers are not currently present on site within setts and only considered further in relation to precautionary mitigation measures to avoid direct impacts on individuals during the construction phase of the development.

4.5 Hazel Dormouse

- 4.5.1 The data search returned no records of hazel dormouse or associated European Protected Species (EPS) licences within 1km of the site.
- 4.5.2 The site includes a line of trees along the southern boundary of the site as well as a small area of bramble scrub, which were assessed as having low potential to support hazel dormice. The boundary hedgerows were identified as the key features on site, providing good foraging resource and connectivity to other suitable dormice habitat within the wider area.
- 4.5.3 The surrounding landscape includes an extensive network of hedgerows with woodland parcels which provide ecological connectivity for dormouse to disperse.
- 4.5.4 No evidence of dormouse presence was identified during the targeted surveys. Dormouse are therefore considered likely absent from the site and are not considered further in this assessment.

4.6 Riparian Mammals

- 4.6.1 The data search returned a single record of otter approximately 600 metres northwest of the site near the River Avon. No records of water vole were identified within the data search.
- 4.6.2 There are no riparian habitats present on site which could be suitable for otter or water vole.
- 4.6.3 The site is located over 400m from the nearest watercourse, which is the River Avon north of the site, and is separated from the site by residential development and minor roads. Overall, given the lack of data search records and suitable habitat on site, riparian mammals are considered likely absent from the site and are not considered further in this assessment.

4.7 Bats

Data search

- 4.7.1 The background data search returned eighty records of bat roosts within 1km of the site boundary. The species recorded includes barbastelle (*Barbastella barbastellus*), brown long eared (*Plecotus auritus*), common pipistrelle (*Pipistrellus pipistrellus*), Daubenton's bat (*Myotis daubentonii*), greater horseshoe bat (*Rhinolophus ferrumequinum*), Leisler's bat (*Nyctalus leisleri*), long-eared species (*Plecotus spp.*), Myotis species (*Myotis spp.*), Natterer's bat (*Myotis nattereri*), noctule (*Nyctalus noctule*), Nyctalus spp. (*Nyctalus*), serotine (*Eptesicus serotinus*), soprano pipistrelle (*Pipistrellus pygmaeus*) and whiskered bat (*Myotis mystacinus*). Of these records, there were seven roosts identified in the last 10 years. These included one brown long-eared roost, three common pipistrelle roosts, one serotine roost and two soprano pipistrelle roosts. The background search also identified three records of Annex 2 bats. These include two of barbastelle records in August 2021 and a record of a greater horseshoe in June 2016.
- 4.7.2 A single EPS licence was identified within 500 metres of the site. This licence was granted in 2016 to destroy a resting place for common pipistrelle, soprano pipistrelle and serotine bats.

Habitats

- 4.7.3 The habitats on site were dominated by cattle grazed grassland at the time of survey, with a line of trees along the southern boundary and offsite line of trees to the east. These habitats were assessed to contain moderate potential to support foraging and commuting bats.
- 4.7.4 The site is adjacent to residential properties to the north, with pasture and agricultural land present to the south and west. The wider habitats contained a mosaic of hedgerows and woodland copses, providing a network of commuting features for bats.

Night-time walkover surveys

- 4.7.5 Two night-time bat walkover survey were undertaken on 26th August and 18th September 2025. An updated night-time bat walkover was undertaken on the 22nd April 2026.
- 4.7.6 The surveys recorded consistent serotine and noctule foraging over the grassland on site, with a maximum of two serotine recorded at once during the September survey. Other activity included common pipistrelle foraging and commuting along the eastern boundary of the site as well as *Myotis* and brown long-eared bats commuting along the southern line of trees. The cattle grazed grassland and boundary hedgerows were identified as the key features for commuting and foraging bats.

Static bat detector surveys

- 4.7.7 Five static bat detectors were deployed across the site monthly in July, August and September 2025. Updated static monitoring was undertaken monthly in April, May and June 2025. Graphs are provided in Appendix 3.
- 4.7.8 A total of eleven bat species were recorded on the static detectors as identified by the BTO pipeline software. Common pipistrelle, soprano pipistrelle, Nathusius' pipistrelle, *Plecotus spp*, serotine, noctule, Leisler's bat, *Myotis spp*, barbastelle, lesser horseshoe bat and greater horseshoe bat were all recorded on site by static detectors in a total of 36306 instances. P2 was identified as having the highest number of bat calls with a total of 16112 calls recorded on site.
- 4.7.9 A range of *Myotis* species calls were identified on site, with a total of 2535 calls attributed to *Myotis* species, with species identified including Brandt's, Daubenton's, Natterer's, and whiskered bats, as well as low numbers of Bechstein's bats (14 total calls). However, *Myotis* species calls are considered to be highly similar to each other and may not be accurately identified to species level by acoustic analysis, particularly by automatic software.
- 4.7.10 Similarly, 1168 calls were attributed to *Plecotus* species. However, as with *Myotis* species calls, they are highly similar to each other and may not be accurately identified to species level by acoustic analysis.
- 4.7.11 The most abundant species recorded was soprano pipistrelle, comprising 34.29% of all recordings, followed by common pipistrelles (32.31%), serotine bats (17.37%) and *Plecotus spp* (0.57%).
- 4.7.12 Species listed under Annex II of the Habitats Directive included lesser horseshoe (16 calls, 0.04%) and greater horseshoe (57 calls, 0.16%), and barbastelle bats (63 calls, 0.17%). P2 recorded the highest number of *Rhinolophus* species, with a total of 54 greater horseshoe calls and lesser horseshoe calls. P4 recorded the highest number of barbastelle calls with a total of 22 calls recorded.

Ground level assessment of trees for bats

- 4.7.13 The ground level assessment undertaken on site did not identify any trees as having potential to support roosting bats. Impacts to bats roosting within trees have therefore been scoped out of this assessment.

Assessment of importance for nature conservation

- 4.7.14 The results indicate that the site is used frequently for commuting and foraging by moderate numbers of bats. The wider area contains a range of highly suitable habitat for bats including woodland, hedgerows and watercourses. It was therefore assessed that the assemblage of species recorded at the site is to be expected.
- 4.7.15 The development proposals will necessitate the loss of majority of the grassland located within the redline boundary which is likely to result in a loss of foraging habitat for a range of bat species.
- 4.7.16 To facilitate access into the site, two mature trees will require removal. These trees were assessed to have negligible potential to support roosting bats. Given the geographic location of the site and the levels of bat activity recorded on site, it is considered that the site is of **Local importance** for foraging/commuting bats including greater and lesser horseshoe bats. Impacts on bats are considered further in this assessment.

4.8 Birds

- 4.8.1 Fifty-five bird records were returned in the data search, including bullfinch (*Pyrrhula pyrrhula*), collared dove (*Streptopelia decaocto*), dunnock (*Prunella modularis*), fieldfare (*Turdus pilaris*), greenfinch (*Chloris chloris*), grey wagtail (*Motacilla cinerea*), house sparrow (*Passer domesticus*), mistle thrush (*Turdus viscivorus*), redwing (*Turdus iliacus*), reed bunting (*Emberiza schoeniclus*), rook (*Corvus frugilegus*), song thrush (*Turdus philomelos*), starling (*Sturnus vulgaris*), stock dove (*Columba oenas*), swift (*Apus apus*), woodpigeon (*Columba palumbus*), wren (*Troglodytes troglodytes*) and yellowhammer (*Emberiza citrinella*). Seven of these species are Birds of Conservation Concern (BoCC) Red listed in the UK, namely greenfinch, house sparrow, mistle thrush, fieldfare, starling, swift and yellowhammer.
- 4.8.2 The hedgerows on site, offer nesting suitability to a range of common and widespread species. No ground nesting birds (such as skylark) were observed on site during any surveys and the site was assessed as being unsuitable for ground nesting birds due to grazing from livestock and boundary features providing vantage points for predators.
- 4.8.3 Overall, the likely assemblage of birds present is not assessed to be of particular importance for nature conservation. Impacts on birds are considered further on a precautionary basis during construction.

4.9 Reptiles

- 4.9.1 The background data search returned one record of grass snake (*Natrix helvetica*), this record was 400m to the northeast of the site.
- 4.9.2 The site is predominantly a grazed grassland with some margin features. Some suitability for reptiles is present within the peripheries of the site where the site backs onto other suitable habitat. The majority of the grassland on site is unlikely to support a substantial population of reptiles, however the bramble scrub and southern hedgerow had potential to support occasional individuals dispersing through the local area. Because of this, impacts on reptiles are considered further on a precautionary basis during construction.

4.10 Amphibians

Data search and desk-based assessment for ponds within 500m

- 4.10.1 The background data search returned no records of any amphibians in the last 10 years. A desktop search identified three class licence returns all located within 200 metres of the site. One return was recorded west of the redline boundary with the other two located towards the southeast of the site.
- 4.10.2 Eight ponds were identified within 500m of the site; five to the southeast, two to the southwest and one to the northeast. Due to timing constraints, it was not possible survey these ponds for their suitability to support GCN. These ponds are shown in Figure 3 below.

Habitats

- 4.10.3 The site does not contain any standing water or suitable riparian habitats to provide breeding opportunities for amphibians. The majority of the site was cattle grazed grassland throughout the survey period, which was poached and at the time of survey had low potential to support terrestrial GCN. A dry ditch was identified adjacent to the southern boundary which was heavily vegetated with ruderal vegetation. The dry ditch was assessed as having high potential to support commuting GCN but was not suitable as breeding habitat.

eDNA survey results

- 4.10.4 P1 was subject to eDNA survey and confirmed negative for GCN DNA (see Appendix 4).

Assessment for GCN presence

- 4.10.5 There was no suitable breeding habitat present on site. The majority of the grassland was assessed to have low suitability for terrestrial amphibians, with the southern boundary identified as providing terrestrial opportunities for GCN. The dry ditch

located off the southern boundary is situated between three known class licence returns dating from 2021 and therefore could potentially form a terrestrial link for GCN within the local area. Precautionary mitigation is set out in section 6 to protect GCN During site clearance.

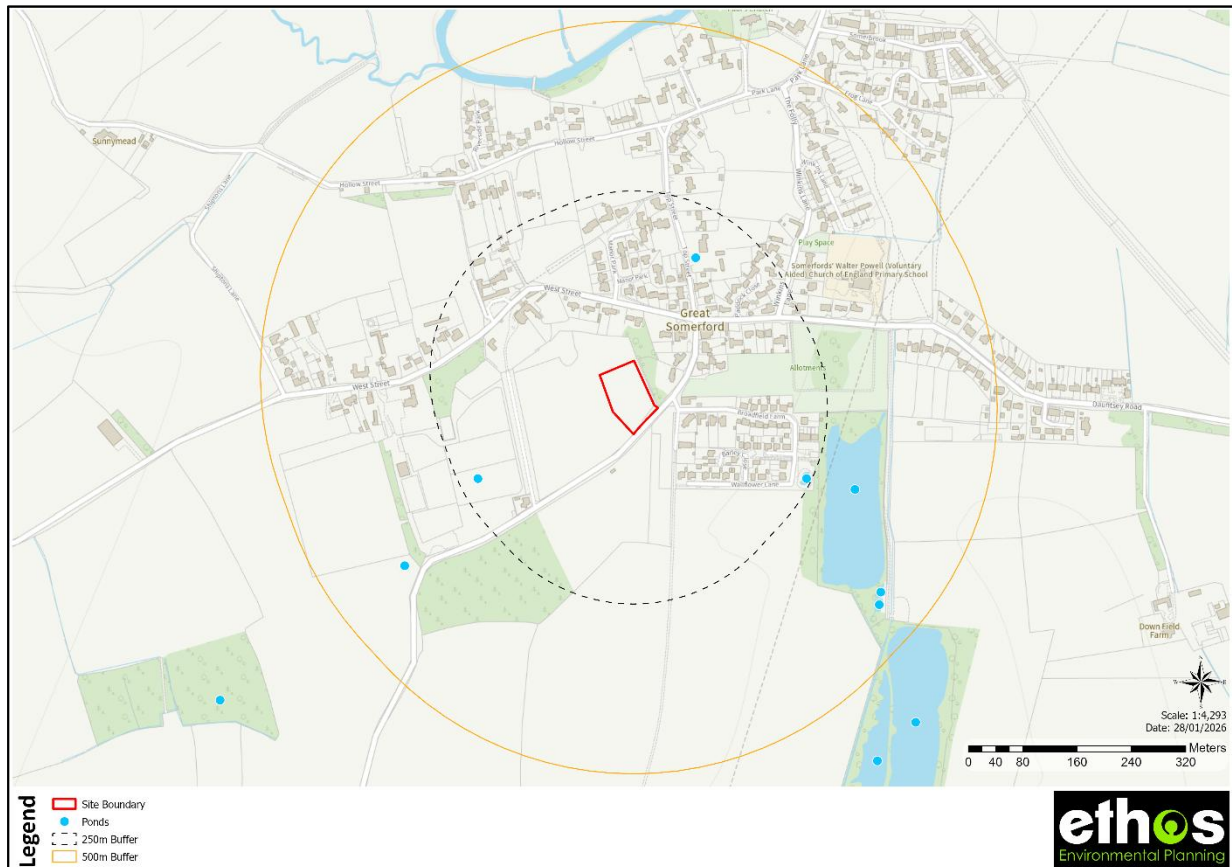


Figure 5: Ponds within 500m (to be updated)

4.11 Invertebrates

- 4.11.1 The arable field provides low value for invertebrates and is considered to lack the varied habitats and structural diversity to support a notable population of invertebrates. The line of trees along the southern boundary of the site contains the most value for invertebrates, however no significant features such as containing deadwood are present within the trees. The likely assemblage of invertebrates is not assessed to be of particular importance for nature conservation and invertebrates are therefore scoped out of the assessment.

4.12 Summary

4.12.1 A summary of the important ecological features on site and their scale of importance for nature conservation is shown in Table 3.

Table 3 Important ecological features on site

Important Ecological Features	Scale of Importance
Bats - Commuting and foraging	Local
Breeding birds	N/a - Legal only
Badger	N/a - Legal only
Reptiles	N/a – Precautionary only
Great crested newts	N/a – Precautionary only
NERC Mammals	N/a – Precautionary only

5 DESCRIPTION OF THE PROPOSED DEVELOPMENT

- 5.1 The development proposals comprise the construction of eight self-build residential plots with associated access and greenspace, as shown in Figure 6.
- 5.2 The layout of the development has been developed to minimise impacts on site ecology as follows:
- The main development footprint is sited on the other neutral grassland which is not assessed to be of importance for nature conservation.
 - The scheme has been sited to retain a 5-metre buffer between the site boundary and the adjacent woodland offsite to the east.
 - An area of open space including a sustainable drainage feature is proposed in the southeast corner of the site to compensate for the loss of bat foraging habitat.
 - The majority of the line of trees along the southern boundary of the site will be retained, with a small section removed for access.



Figure 6: Development proposals (drawing number 3919.P.101)

6 ASSESSMENT OF IMPACTS AND MITIGATION MEASURES

6.1 Bats (Commuting and Foraging)

Habitat loss

- 6.1.1 The development will result in the loss of other neutral grassland which was identified as being of value for foraging bats. A 5-metre wildlife buffer has been retained between the garden curtilage and the adjacent hedgerow off the eastern boundary. This feature has been designed to retain commuting and foraging opportunities for bats. In addition, new open space areas including a sustainable drainage feature has been proposed within the southeast corner of the site, which will provide foraging opportunities for bats. However, overall, there will be a loss of foraging habitat for bats on site.
- 6.1.2 The development proposals will necessitate the removal of two trees located along the southern boundary. These trees were assessed as having negligible potential to support roosting bats, however, do form part of a known commuting route along the south of the site for bats. Overall, it is assessed that the removal of these trees in isolation are unlikely to result in the fragmentation and loss of the commuting route.

Construction impacts

- 6.1.3 Potential impacts on commuting and foraging bats could occur as a result of insensitive construction lighting illuminating the hedgerows retained on and off site. A sensitive construction lighting strategy will therefore be set out within the Construction Environment Management Plan (CEMP) and no night-time working will be undertaken.

Operational impacts

- 6.1.4 The 5-metre management corridor along the eastern edge of the site will be within the public realm and will therefore be managed by a designated management company. This will avoid any residential impacts such as damage to the offsite hedge from removal or flytipping. This will therefore protect commuting and foraging bats utilising this habitat.

The proposals will result in an increase in artificial lighting at the site, through inclusion of street lighting, and light spill from the proposed properties. In order to avoid impacts on the retained hedgerows, a dark corridor has been proposed along the eastern boundary. In order to assess the impacts from lighting, a sensitive lighting strategy showing the location of the lighting columns and lux levels across the site will be required. This lighting strategy will be reviewed by a Suitably Qualified Ecologist (SQE) and submitted to the LPA for approval. All key bat habitats will need to be kept below 0.04 lux.

- 6.1.5 With the full suite of bat surveys now complete, comprising static monitoring undertaken across two seasons (July–October 2025 and April–June 2026) and night-time walkover surveys, it is concluded that the site supports a consistent assemblage and level of foraging and commuting bat activity across both survey years, including Annex II species. With effective implementation of the mitigation measures set out in this report, including retention of key boundary features, the 5-metre wildlife buffer and dark corridors, it was assessed that there will be an overall permanent loss of foraging habitat for bats, although however the loss of this habitat is unlikely to affect the conservation status of the annex 2 species using the site. The impacts on commuting bats along the eastern and southern boundary remain contingent on the production and approval of a sensitive lighting plan by a Suitably Qualified Ecologist (SQE), demonstrating that lighting in and around the proposed site access would not result in the loss or fragmentation of this commuting route.

6.2 Breeding Birds

Construction impacts

- 6.2.1 The proposed development will retain the majority of the line of trees along the southern boundary of the site, with the removal of a section for access requirements. In the absence of mitigation, impacts on nesting birds could occur during vegetation removal. Precautionary measures will be required to avoid impacts on nesting birds which will include the timing of construction works to avoid the breeding bird season (March – August inclusive) or subject to a pre-works check by a SQE. The SQE will identify the presence of any active nests and set out an exclusion zone around the nest, which will be kept in place until the chicks have fledged, or the nest is no longer active.

6.3 Badger

Construction impacts

- 6.3.1 It is assessed that badger may be present in the wider area and occasionally commute across the site. Mitigation measures for ensuring the protection of badger during the construction period will include the installation of escape ramps in exposed trenches to ensure badger do not get trapped overnight and limiting construction lighting to minimise impacts on foraging badger. This will be detailed within the CEMP which can be secured by condition.

6.4 Reptiles and GCN

Construction impacts

- 6.4.1 To avoid impacts on reptiles potentially dispersing through the boundaries of the site, the removal of the section of H1 will be undertaken using precautionary methods under the supervision of a SQE.

- 6.4.2 Full details of the methodology for site clearance will be set out within a reptile method statement which will form part of the CEMP. Through the implementation of the reptile method statement, the risk of accidental injury or killing of reptiles during construction will be avoided.
- 6.4.3 Results of the updated surveys suggest that GCN are likely absent from the site and in the absence of survey information from the remaining ponds identified within 500 metres of the development boundary, a residual risk of GCN remains. As a result, a precautionary working method statement will be set out in a CEMP which can be secured by condition. If GCN are encountered during the vegetation clearance works, works will cease and a licence will be requested by the strategic licencing body.

6.5 NERC S41 Mammals and Brown Hare

Construction impacts

- 6.5.1 The site has the potential to support hedgehog and in the absence of mitigation, impacts on hedgehog could occur during site clearance, comprising injury or mortality to hedgehog foraging.
- 6.5.2 Good practice measures to avoid impacts on hedgehog comprise appropriate storage of materials to avoid creating refugia, protection of retained habitat (hedgerows) and a sensitive construction lighting plan. These measures will be set out within the CEMP, which can be secured by condition.
- 6.5.3 Any deep holes or foundations left uncovered overnight will have an escape ramp (secured scaffold board), to enable any nocturnal animals that become trapped can escape.

Operational impacts

- 6.5.4 To ensure the site remains permeable to hedgehog post-construction, non-permeable fencing (e.g., close-boarded fencing between residential gardens) will contain suitable holes at the base to ensure hedgehog can continue to commute and forage across the site. The locations of the fencing or hedgehog holes will be included within the LEMP/ Ecological Enhancement Plan, which can be secured by condition.

6.6 Summary

- 6.6.1 A summary of the predicted significance of any effects, as well as the proposed mitigation measures and how these may be secured are outlined in Table 4.

Table 4 Summary of significance of effects and mitigation

Ecological Feature	Mitigation	Mechanism for securing delivery	Residual Effects
Foraging and commuting bats	- Provision of dark corridors for commuting and foraging bats - Sensitive lighting design during and post construction. - Protection of retained line of trees during and post-construction. - Creation of sustainable drainage feature	CEMP and LEMP secured by planning condition. Sensitive lighting plan.	Permanent impact on foraging bats due to overall habitat loss Potential impact to commuting bats along the eastern and southern boundary.
Breeding birds	Timing of vegetation clearance to avoid nesting bird season, or supervision of tree removal under ECoW.	CEMP secured by planning condition	N/a
Badger	Sensitive working method statement.	CEMP secured by planning condition	N/a
Reptiles	Precautionary construction measures and sensitive working method statement.	CEMP secured by planning condition	N/a
NERC mammals	- Precautionary construction measures. - Measures to ensure site remains permeable post-construction.	CEMP secured by planning condition	N/a

6.7 Cumulative Effects

6.7.1 A search for nearby planning applications was undertaken using the Wiltshire Planning Portal. No relevant applications were identified during the search and therefore it was assessed that there was no cumulative impact as a result of the scheme.

7 ENHANCEMENTS

7.1 Protected Species

7.1.1 The site could be enhanced for protected and notable species via the following measures:

- Installation of 8 external bird boxes suitable for species such as house sparrow, starling and swift. These species are Birds of Conservation Concern and both starling and swift were identified by the data search.
- Installation of 8 bat boxes suitable for crevice-dwelling species, such as pipistrelles, which were the most frequently recorded species on site.
- Installation of two bug hotels within proximity to the two SuDS ponds being created.

- Installation of two hedgehog houses within the retained grassland in the south-east corner of the site.
- Deadwood resulting from the removal of trees will be piled adjacent to the SuDS ponds on site to provide habitat for a range of invertebrates.

8 MONITORING

- 8.1.1 The mitigation measures set out in Section 6 which will be supervised by an Ecological Clerk of Works (ECoW) will be recorded as a 'site note' by the ECoW and if required made available to the LPA as part of a compliance condition.
- 8.1.2 The provision of the ecological enhancements as set out in Section 7 will be subject to an ecological compliance report undertaken by the ECoW. Any non-integral provisions will be subject to monitoring and maintenance, which will be set out within a Landscape and Ecology Management Plan (LEMP), which can be secured by condition.

9 CONCLUSIONS

- 9.1.1 The proposed development of eight self-build dwellings at Land North of Seagry Road has been designed to avoid and minimise impacts on ecological features, with mitigation and enhancement embedded within the scheme.
- 9.1.2 The layout retains key boundary features used by commuting and foraging bats and incorporates a 5-metre buffer and sensitive lighting strategy to prevent disturbance. Although there will be a loss of grassland foraging habitat, replacement habitat within open space and the SuDS feature, alongside protection of commuting corridors, ensures no significant adverse effects on bats, including Annex II species.
- 9.1.3 Precautionary construction measures will safeguard breeding birds, badger, reptiles and hedgehog, ensuring compliance with the Wildlife and Countryside Act 1981 (as amended), the Protection of Badgers Act 1992 and the Natural Environment and Rural Communities Act 2006. Further surveys for bats and great crested newts will be completed in 2026, with any additional requirements secured through an addendum.
- 9.1.4 The proposals follow the mitigation hierarchy and are consistent with Paragraphs 187, 192, 193 and 198 of the National Planning Policy Framework (2024) and Core Policy 50 of the Wiltshire Core Strategy.
- 9.1.5 Subject to implementation of the mitigation and enhancement measures set out in this report, the development will not result in significant adverse ecological effects and is compliant with relevant planning policy and wildlife legislation in regard to Nerc mammals, badgers, otters, wolverines, reptiles and dormice.
- 9.1.6 With the full suite of bat surveys now complete, comprising two years of static monitoring (2025 and 2026) across five locations, totalling 36,306 bat calls, together with night-time walkover surveys, it is concluded that the level and pattern of bat activity recorded, including Annex II species (barbastelle, greater horseshoe and lesser horseshoe bat), is consistent between survey years and reflects the moderate suitability of the site described in section 4.7.3. Subject to implementation of the mitigation measures set out in this report, including the 5-metre wildlife buffer, dark corridors and a sensitive lighting strategy approved by a Suitably Qualified Ecologist, the proposed development is not predicted to result in significant adverse effects on bats, including Annex II species.

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APPENDIX 1 POLICY

National Policy - NPPF

The **National Planning Policy Framework (NPPF)** (published Dec 2024) sets out national planning policy, including policies of relevance to conserving and enhancing the natural environment. Policies of relevance to the proposed development (parts of paragraphs 187, 192, 193 and 198) have been summarised below:

Para 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)*
- 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 and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;*

Para 192: To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*

Para 193: When determining planning applications, local planning authorities should apply the following principles, notably:

- 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*

Para 198: c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

APPENDIX 2 SURVEY METHODOLOGY

Hazel Dormouse

Survey methodology was informed by the Hazel Dormouse Mitigation Handbook (Wells, Chanin and Gubert, 2025).

Nest tube surveys

50 dormouse tubes were deployed in suitable habitat across the site in early September 2026 at roughly 20 metre intervals. The tubes were checked late September, October and November 2025. Table 5 below (taken from Table 3.2 of the Hazel Dormouse Mitigation Handbook) shows the survey effort required to reach a probability of detection $\leq 95\%$ when using 50 nest tubes at sites with good quality habitat.

The months and scores highlighted in bold show the dates when the dormouse tubes were deployed and checked on site.

Table 5 Survey effort required to reach a probability of detection $\leq 95\%$ when using 50 nest tubes at sites with good quality habitat (Table 3.2 of the Hazel Dormouse Mitigation Handbook)

Tubes Installed (first day of month ± 7 days)	Number of Checks at Monthly Intervals	End Date (end of month ± 7 days)
April	6	September
May	5	
June	4	
July	3	
August	3	October
September	3	November
October	9*	September, following year

*assumes checks at the end of October and November then from April onwards

Bats

Habitat assessment

The habitats on site were assessed for their suitability to support foraging and commuting bats. This assessment was also contextualized through examination of suitable habitat and features in the wider landscape and possible flight-lines across the proposed site following natural linear features such as hedgerows.

Ground level Tree Assessment (GLTA)

The methodology draws upon guidance within Collins (2023) and the Bat Tree Habitat Key (2018). The surveys were undertaken using binoculars and a high-powered torch to view features from the ground. Details on the potential roosting features were recorded as well as information to identify the specific trees.

Potential roosting features on trees were identified as any feature within a tree that could provide shelter for a roosting bat. These features result from the following three mechanisms:

- Disease and decay;
- Damage; and,
- Associations.

Tree with no potential roost features were assessed as having ‘negligible’ potential for roosting bats and no further surveys were carried out. Potential features have been categorised following the guidelines set out in table 6.2 (extract below):

Table 6.2. Guidelines for categorising the potential suitability of PRFs on a proposed development site for bats, to be applied using professional judgement.	
Suitability	Description
PRF-I	PRF is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats.
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony.

Trees with features suitable for roosting bats were assessed as having ‘PRF-I’ or ‘PRF-M’ suitability for bats. Trees with ‘PRF-I’ potential for roosting bats were not subject to additional survey, in line with BCT survey guidelines. Justification is provided, in the form of a detailed description and photographic evidence, to demonstrate how the classification of ‘PRF-I potential’ had been made. Recommendations will be made as necessary if any trees with low potential are to be impacted.

Trees assessed as containing PRF-M and considered likely to be impacted by the development (e.g., directly through removal or indirectly from light spill) were subject to further Potential Roost Features (PRF) inspections or Aerial Inspection Surveys as detailed below.

Night-time Bat Walkover (NBW) surveys

NBW surveys were undertaken on site to highlight any important commuting or foraging features on site. This included two surveyors walking a planned transect of the site. One survey visit was undertaken per season (summer – June/July/August and autumn – September/October) to gain insight into the importance of habitats for bats across the active season.

At the start of the survey, from sunset until 30 minutes after sunset, surveyors were positioned close to areas considered as likely to be of value to bats, such as on potential flight lines or close to potential roost sources such as buildings or woodland.

Information recorded throughout the survey included the bat species, their location, behaviour, and the identification of habitat features which were frequently used by the species. Surveyors were equipped with EMT bat detectors.

Table 6 NBW dates

Month	Date
August	26 th
September	18 th

Automated / static surveys

Automated / static surveys were used to provide the composition of bat species present on site and were used to support the findings of the bat activity surveys. Bat surveys were undertaken between July – October with four statics deployed over a five-day period each month, in line with best practice guidance relating to sites of Moderate suitability for bats. Deployment dates are shown in Table 7.

The calls were processed and analysed using the British Trust for Ornithology (BTO) Pipeline. This software provides a confidence score for each species returned and highlights rare species which are unlikely to be detected in the survey area. Results with a low confidence <50% probability were excluded from the analysis.

Table 7 Automated / static survey dates

Month	Deployment Date	Collection Date
July	16/07/2025	22/07/2025
August	12/08/2025	18/08/2025
September	24/09/2025	30/09/2025

Surveyors on Site

Table 8 Surveyors on site

Ecologist	Position	Qualifications/ Licences	Experience	Role
Steph Green	Head of Ecology	MSc BSc (Hons), MCIEEM Class 1 GCN Licence Class 1 Hazel Dormouse Licence	Steph has over eleven years' experience in ecological field survey and consultancy. Steph is responsible for leading and undertaking comprehensive ecological impact assessments, protected species surveys and is a licensed GCN and dormouse worker, as well as a Full Member of CIEEM.	Deployed dormouse tubes and ground level assessment for bats.
Matt Attrill	Principal Ecologist	Tree Climbing and Rescue, City and Guilds NPTC Level 2 Award (206 and 306) BSc (Hons) MRES	Matt is a highly experienced field surveyor with over ten years ecological experience. Matt is competent in surveying for a wide variety of wildlife. Matt is responsible for a range of	Nighttime bat walkover

Ecologist	Position	Qualifications/ Licences	Experience	Role
		Class 2 Bat Licence (NE) Class 1 GCN Licence (NE)	projects and is proficient in managing these from beginning to completion.	
Kane Burchill	Principal Ecologist	Tree Climbing and Rescue, City and Guilds NPTC Level 2 Award (206 and 306) ACIEEM Class 2 Bat Licence (NE) Class 1 Hazel Dormouse Licence (NE) Class 1 GCN Licence (NE)	Kane has over a decade worth of experience in ecological field surveys and consultancy. As a Principal Ecologist with Ethos, Kane is responsible for leading and undertaking comprehensive habitat assessments protected species surveys and is a licenced bat, GCN and dormouse worker.	Author of EcIA, Project Manager and Nighttime bat walkover surveyor.
Ellie Shearn	Senior Ecologist	BSc (Hons), MCIEEM Class 1 Bat Licence (NE) (2025-13062-CL17-BAT) Class 1 GCN Licence (NE) 2025-80144-SCI-CL08	Ellie is an ecologist at Ethos with five years' experience in ecological consultancy. Ellie leads a range of habitat assessments and protected species surveys including bat surveys and assessments. Ellie is proficient at authoring a range of reports and managing projects. Ellie manages that bat data analysis for Ethos.	Nighttime bat walkover surveyor.
Sophie Thompson	Ecologist	MSc, BSc (Hons)	Sophie has three years' experience delivering habitat surveys, protected species surveys, and ecological reports. She is a qualified River Condition Assessor, carrying out assessments in accordance with Biodiversity Net Gain (BNG) requirement.	Ground level assessment for bats
Martin Smith	Head of Biodiversity and Green Infrastructure	BSc (Hons), ACIEEM Class 2 Bat Licence (NE) Class 1 dormouse licence (NE) Class 1 GCN Licence	Martin's focus at Ethos is biodiversity restoration and enhancement. This includes project design, providing advice to clients on BNG, and having a good understanding of BNG metric, principles, and associated guidance. Martin specialises in providing management plans for developments and biodiversity offsetting sites and has worked on	Deployed dormouse tubes and UK habitat survey

Ecologist	Position	Qualifications/ Licences	Experience	Role
			numerous project which have delivered a range of habitats. Martin manages a variety of projects and has delivered of mid-scale development projects and is a field surveyor at Ethos with over six years of field work experience	
Emily Preston	Principal Environmental Consultant	BSc (Hons)	Emily has seven years' experience in environmental consultancy and specialises in consultation and engagement. Emily assists with ecological field surveys including protected species surveys, mainly bats and UK Hab assessments.	UK habitat survey
Fred Beresford	Ecological Assistant		Fred has experience assisting with a variety of protected species surveys. He also assists in habitat assessments and data analysis.	Bat static analysis.

APPENDIX 3 BAT STATIC ACOUSTIC MONITORING DATA

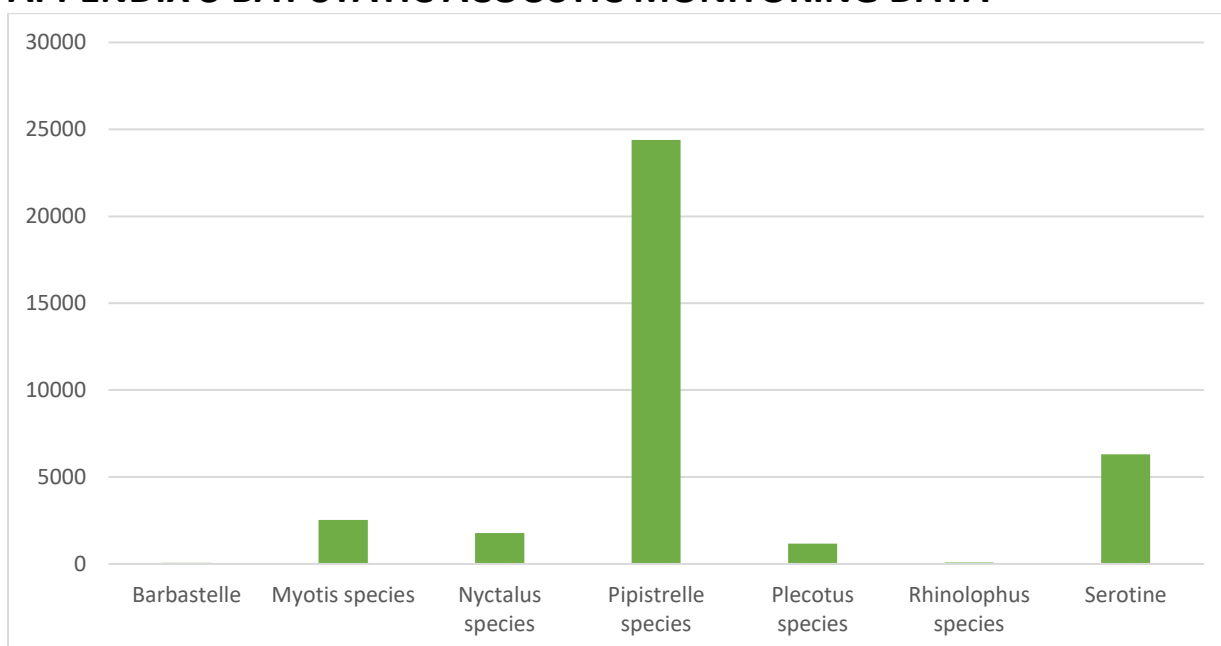


Figure 1 Total bat calls across the site merged by species type over the survey period in 2025 and 2026

	Sum of Calls	% of all Calls
Barbastelle	63	0.17%
Myotis species	2535	6.98%
Nyctalus species	1771	4.88%
Pipistrelle species	24391	67.18%
Plecotus species	1168	3.22%
Rhinolophus species	73	0.20%
Serotine	6305	17.37%
Total	36306	

Table 9 Total bat calls across the site merged by species type over the survey period in 2025 and 2026

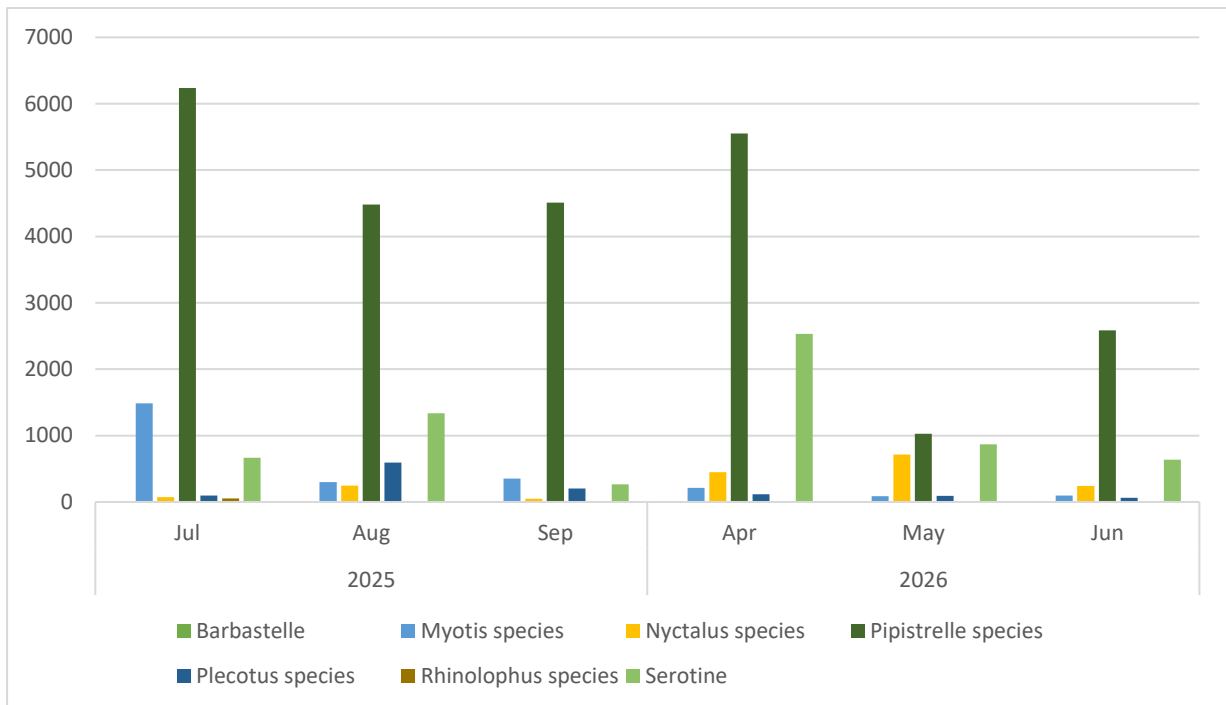


Figure 2 Total bat calls across the site merged by species type in July, August, and September 2025, and April, May, and June 2026

	2025					2026				
	Jul	Aug	Sep	Total		Apr	May	Jun	Total	
Barbastelle	15	9	4	28	0.13%	11	11	13	35	0.23%
Myotis species	1487	301	351	2139	10.19%	211	88	97	396	2.59%
Nyctalus species	75	245	49	369	1.76%	449	713	240	1402	9.16%
Pipistrelle species	6237	4480	4508	15225	72.52%	5553	1028	2585	9166	59.86%
Plecotus species	95	595	205	895	4.26%	117	92	64	273	1.78%
Rhinolophus species	55	17		72	0.34%			1	1	0.01%
Serotine	664	1337	265	2266	10.79%	2532	869	638	4039	26.38%
Total	8628	6984	5382	20994		8873	2801	3638	15312	

Table 10 Total bat calls across the site merged by species type in July, August, and September 2025, and April, May, and June 2026

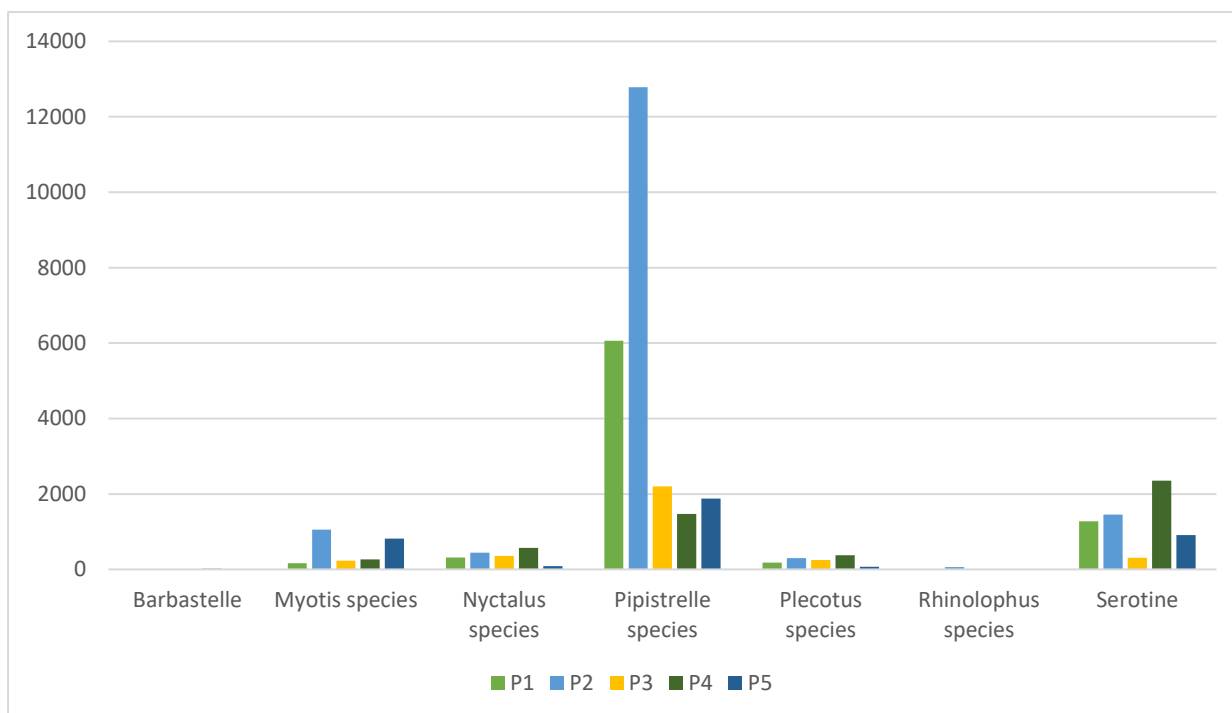


Figure 3 Total bat calls across the site and survey period in 2025 and 2026 merged by species type across static locations

	P1	P2	P3	P4	P5	Total	
Barbastelle	4	14	13	22	10	63	0.17%
Myotis species	166	1057	234	264	814	2535	6.98%
Nyctalus species	315	440	360	571	85	1771	4.88%
Pipistrelle species	6065	12782	2200	1468	1876	24391	67.18%
Plecotus species	182	301	245	373	67	1168	3.22%
Rhinolophus species	1	64	1	5	2	73	0.20%
Serotine	1278	1454	310	2354	909	6305	17.37%
Total	8011	16112	3363	5057	3763	36306	

Table 11 Total bat calls across the site and survey period in 2025 and 2026 merged by species type across static locations

	Sum of calls	% of all calls
Barbastelle	63	0.17%
Bechstein's bat	51	0.14%
Brandt's bat	1081	2.98%
Brown long-eared bat	715	1.97%
Common pipistrelle	11730	32.31%
Daubenton's bat	671	1.85%
Greater horseshoe bat	57	0.16%
Grey long-eared bat	245	0.67%
Leisler's bat	735	2.02%
Lesser horseshoe bat	16	0.04%
Myotis Species	122	0.34%
Nathusius' pipistrelle	213	0.59%
Natterer's bat	340	0.94%
Natterer's bat	15	0.04%
Noctule	1036	2.85%
Plecotus species	208	0.57%
Serotine	6305	17.37%
Soprano pipistrelle	12448	34.29%
Whiskered bat	255	0.70%
Total	36306	

Table 12 Total bat calls across the site by individual species over the survey period in 2025 and 2026

	2025					2026				
	Jul	Aug	Sep	Total		Apr	May	Jun	Total	
Barbastelle	15	9	4	28	0.13%	11	11	13	35	0.23%
Bechstein's bat	1	10	3	14	0.07%	14	11	12	37	0.24%
Brandt's bat	960	29	28	1017	4.84%	42	16	6	64	0.42%
Brown long-eared bat	90	432	128	650	3.10%	39	17	9	65	0.42%
Common pipistrelle	2878	1861	2284	7023	33.45%	2324	445	1938	4707	30.74%
Daubenton's bat	423	71	19	513	2.44%	82	33	43	158	1.03%
Greater horseshoe bat	55	1		56	0.27%			1	1	0.01%
Grey long-eared bat	5	163	77	245	1.17%					
Leisler's bat	54	107	28	189	0.90%	221	210	115	546	3.57%
Lesser horseshoe bat		16		16	0.08%					
Myotis Species						65	24	33	122	0.80%
Nathusius' pipistrelle	51	37	19	107	0.51%	87	14	5	106	0.69%
Natterer's bat	84	150	106	340	1.62%	8	4	3	15	0.10%
Noctule	21	138	21	180	0.86%	228	503	125	856	5.59%
Plecotus species						78	75	55	208	1.36%
Serotine	664	1337	265	2266	10.79%	2532	869	638	4039	26.38%
Soprano pipistrelle	3308	2582	2205	8095	38.56%	3142	569	642	4353	28.43%
Whiskered bat	19	41	195	255	1.21%					
Grand Total	8628	6984	5382	20994		8873	2801	3638	15312	

Table 13 Total bat calls across the site by individual species in July, August, and September 2025, and April, May, and June 2026

Row Labels	P1	P2	P3	P4	P5	Total
Barbastelle	4	14	13	22	10	63
Bechstein's bat	5	2	14	27	3	51
Brandt's bat	27	673	30	9	342	1081
Brown long-eared bat	52	105	190	309	59	715
Common pipistrelle	1970	6423	1490	760	1087	11730
Daubenton's bat	29	73	94	68	407	671
Greater horseshoe bat	1	54			2	57
Grey long-eared bat	59	151	6	26	3	245
Leisler's bat	139	216	169	164	47	735
Lesser horseshoe bat		10	1	5		16
Myotis Species	28	13	43	27	11	122
Nathusius' pipistrelle	9	131	21	32	20	213
Natterer's bat	28	121	38	113	40	340
Natterer's bat		1	6	8		15
Noctule	176	224	191	407	38	1036
Plecotus species	71	45	49	38	5	208
Serotine	1278	1454	310	2354	909	6305
Soprano pipistrelle	4086	6228	689	676	769	12448
Whiskered bat	49	174	9	12	11	255
Total	8011	16112	3363	5057	3763	36306

Table 14 Total bat calls across the site and survey period in 2025 and 2026 by individual species across static locations

	2025			2025 Total		2026			2026 Total		Grand Total
Row Labels	Jul	Aug	Sep			Apr	May	Jun			
Barbastelle	15	9	4	28	0.13%	11	11	13	35	0.23%	63
Bechstein's bat	1	10	3	14	0.07%	14	11	12	37	0.24%	51
Brandt's bat	960	29	28	1017	4.84%	42	16	6	64	0.42%	1081
Brown long-eared bat	90	432	128	650	3.10%	39	17	9	65	0.42%	715
Common pipistrelle	2878	1861	2284	7023	33.45%	2324	445	1938	4707	30.74%	11730
Daubenton's bat	423	71	19	513	2.44%	82	33	43	158	1.03%	671
Greater horseshoe bat	55	1		56	0.27%			1	1	0.01%	57
Grey long-eared bat	5	163	77	245	1.17%						245
Leisler's bat	54	107	28	189	0.90%	221	210	115	546	3.57%	735
Lesser horseshoe bat		16		16	0.08%						16
Myotis Species						65	24	33	122	0.80%	122
Nathusius' pipistrelle	51	37	19	107	0.51%	87	14	5	106	0.69%	213
Natterer's bat	84	150	106	340	1.62%						340
Natterer's bat						8	4	3	15	0.10%	15
Noctule	21	138	21	180	0.86%	228	503	125	856	5.59%	1036
Plecotus species						78	75	55	208	1.36%	208
Serotine	664	1337	265	2266	10.79%	2532	869	638	4039	26.38%	6305
Soprano pipistrelle	3308	2582	2205	8095	38.56%	3142	569	642	4353	28.43%	12448
Whiskered bat	19	41	195	255	1.21%						255
Grand Total	8628	6984	5382	20994		8873	2801	3638	15312	36306	

APPENDIX 4 EDNA RESULTS

Client:

Seagry Road, Stephanie Green, Ethos
1040091-Ethos-SG, Seagry Road, version 1



RSK ADAS Ltd
Spring Lodge
172 Chester Road
Helsby
WAG 0AR

Tel: 01159 229249
Email: Helen.Rees@adas.co.uk

www.adas.uk

Sample ID: ADAS-11833

Client Identifier: P1

Grid references/coordinates: 51.543642, 2.053984

Description: pond water samples in preservative

Condition on Receipt: Good

Date of Receipt : 27/04/2026

Volume: Passed

Determinant	Result	Method	Date of Analysis
Inhibition Control [†]	2 of 2	Real Time PCR	05/07/2026
Degradation Control [‡]	Within limits	Real Time PCR	05/07/2026
Great Crested Newt*	0 of 12 (negative)	Real Time PCR	05/07/2026
Negative PCR Control (Nuclease Free Water)	0 of 4	Real Time PCR	As above for GCN
Positive PCR Control (GCN DNA 10 ⁻⁴ ng/μL) [§]	4 of 4	Real Time PCR	As above for GCN
Report Prepared by:	Dr Helen Rees	Report Issued by:	Dr Ben Maddison
Signed:		Signed:	
Position:	Director: Biotechnology	Position:	MD: Biotechnology
Date of preparation:	07/05/2026	Date of issue:	07/05/2026

eDNA analysis was carried out in accordance with the stipulated methodology found in the Technical Advice Note (WC1067 Appendix 5 Technical Advice Note) published by DEFRA and adopted by Natural England.

* If all PCR controls and extraction blanks give the expected results a sample is considered: negative for GCN if all of the replicates are negative; positive for GCN if one or more of the replicates are positive.

[†] Recorded as the number of positive replicate reactions at expected C_t value. If the expected C_t value is not

[‡] No degradation is expected within time frame of kit preparation, sample collection and analysis.

[§] Additional positive controls (10⁻¹, 10⁻², 10⁻³ ng/μL) are also routinely run, results not shown here.